



SOUTHERN AFRICA TRADE AND CONNECTIVITY PROJECT (SATCP)

GRIEVANCE REDRESS MECHANISM MANUAL

Roads Authority

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Abbreviations

SATCP	Southern African Trade and Connectivity Project
AIDS	Acquired Immune Deficiency Syndrome
CGRC	Community Grievance Redress Committee
DGRC	District Grievance Redress Committee
ESHS	Environment, Social, Health and Safety
GBV	Gender Based Violence
GBV SP	Gender Based Violence Service Provider
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV	Human Immune Virus
ICT	Information and Communication Technology
LMP	Labour Management Procedure
NGO	Non-Governmental Organization
PAPs	Project Affected Persons
PGRC	Project Level Grievance Redress Mechanism
PPE	Personal Protective Equipment
RA	Roads Authority
RCC	Resettlement Compensations Committee
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SH	Sexual Harassment
WB	World Bank
WGRC	Workers Grievance Redress Mechanism
VAC	Violence Against Children

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1.0 INTRODUCTION

1.1 Background

The Government of Malawi through the Ministry of Transport and Public Works and Roads Authority is implementing the World Bank (WB) financed Southern African Trade and Connectivity Project (SATCP). The project is expected to run for 6 years from 2021 to 2027. The objective of the project is to reduce trade and transport costs and increase value chain development in the region, thus improving regional integration. The project includes an infrastructure-plus approach in design, combining the upgrade of border posts, Information Communication and Technology (ICT) investments, roads rehabilitation, as well as broader trade-related reforms and value chain development to advance regional integration. Ultimately, the project investments and activities are expected to lead to considerable economic benefits including increased regional trade, income growth, job creation, and resilience, as well as economic spillovers to other countries in the sub-region.

The objective of the project is *to support Malawi and Mozambique in increasing regional trade coordination, reducing trade costs and time, developing regional value chains, and improving access to infrastructure*. It has four components, namely:

- a) **Reduce Trade Costs**, with three sub-components- Enabling digital trade: Development of trade ICT systems, Improving borders and their management, Strengthening trade and connectivity institutional capacity;
- b) Enabling digital trade;**
- c) **Strengthen Value Chains for Regional Integration;** and
- d) **Strengthen transport infrastructure** to improve market access, which has two sub-components- Roads and improvement of road safety.

In order to mitigate the adverse social and environmental impacts of the project, various Environmental and Social instruments were developed and among them are the Stakeholders Engagement Plan (SEP), Labour Management Procedure(LMP) and Resettlement Policy Framework which provides for the establishment of the Grievance Redress Mechanism(GRM). The objective of the GRM is to provide a platform by

which stakeholders can raise concerns, provide feedback, or make complaints about the SATCP and any activities related to the project.

1.2 Purpose of this Document

This document describes the procedures that will be followed on SATCP to address grievances/ complaints submitted by the persons who may be impacted by the project. It intends to provide clarity and predictability on how grievances/complaints will be received, assessed, sorted and resolved as well as how the mechanism will be monitored. Specific activities for each of these steps are described in Chapter 2.

1.3 Rationale of the Grievance Redress Mechanism

The main rationale of a GRM is to assist in resolving complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved through a transparent and credible process for fair, effective, and lasting outcomes. The GRM as an integral component of broader community consultation that facilitates corrective actions:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of the project;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Avoids the need to resort to judicial proceedings; and
- Builds trust and cooperation.

The implementation of SATCP is mostly expected to have positive impacts in the surrounding communities and the country at large. While considerable effort and forethought has been made to include safeguards in the design and implementation of the project in order to minimize and prevent potential adverse impacts from the project, there is always a possibility that interests of some individuals, agents, and the public may still be negatively affected by the activities of the project. It is therefore expected that such instances may generate complaints or grievances that will need to be addressed. As such, provision of a mechanism for receiving, recording and resolving potential concerns and complaints that may arise from the project affected persons is necessary. Such a mechanism would assist to provide remedies to grievances early enough so as to avoid unnecessary project implementation delays and obstructions.

1.4 Objectives of the Grievance Redress Mechanism

The specific objectives of this GRM are as follows:

- i. To create accessible, responsive and demonstrably fair channels to resolve communities' and workers' grievances and complaints in a mutually acceptable process;
- ii. To implement effective dialogue and open lines of communication with the public;
- iii. To establish a system of investigation, response and quick grievance resolution;
- iv. To create an extra channel for receiving information about community and worker grievances and complaints with the project;
- v. To serve as a release valve for community and worker grievances and complaints stemming from a project and provides early warning of potential problems that are developing;
- vi. To prevent unrealistic expectations or negative perceptions from the local population towards the Project;
- vii. To prevent grievances and complaints from accumulating and escalating to conflicts such as protests, sabotage or strikes that can be very costly to the project in terms of its reputation and in terms of work time, land access or additional demands;
- viii. To allow the project team to understand the project risks associated with a grievance. Protests, campaigns and strikes can arise from 'unfounded' grievances or misunderstandings as well. The grievance mechanism provides one channel that a project can use to rectify these sorts of misunderstandings or explain why a grievance is unfounded or is not within the project's jurisdiction;
- ix. To ensure that the rights of affected parties are respected;
- x. To increase stakeholder involvement in the project;
- xi. To manage negative publicity and activist campaigns. Projects that operate responsibly and have effective grievance management channels can actively manage strike threats and hence reduce opportunities for activists to influence aggrieved workers.
- xii. To improve the Project social performance through the analysis of grievances and complaints.

2.0 GRIEVANCE REDRESS MECHANISM

The GRM provides a platform for stakeholder engagement and involvement in management of grievances. In addition, the GRM helps to improve the Project social performance since the number and nature of the received grievances and complaints is an indicator of the manner in which the project is conducted and the behavior of employees and contractor. Additionally, effective implementation of a GRM helps to establish and sustain good relations between the project and the local community.

2.1 Grievance Types

The Project will receive any kind of grievances and complaints such as those about local hiring, unfulfilled agreements, unplanned impacts and infrastructure damage, grievances and complaints about the public consultation process, land negotiation, or construction impacts, grievances about social and environmental performance, economic conditions, cultural contexts, child labor, Gender Based Violence, sexual harassment, Sexual Exploitation and Abuse, Violence Against Children, discrimination etc. Table 1 below summarized anticipated types and sources of grievances and complaints for the project.

Table 1: Expected Community and Work Grievances

Community issues	Workers issues
<ul style="list-style-type: none"> i. Regarding environmental issue, dust for passengers and community residing along the road especially those located at diversions, competition for water; ii. Social issues – land acquisition, infrastructure/ property damage, security concerns; iii. Gender based violence, sexual exploitation and Abuse, Violence Against Children, child labour, etc.; iv. Employment for local community (Village around the project area); v. Unfulfilled development commitments to communities; 	<ul style="list-style-type: none"> i. Workers whose contracts are not renewed frequently complain; ii. Workers without contracts; iii. Lack of clarification on overtime payment; iv. Worker dismissal without been given a chance to be heard; v. Sexual Harassment vi. Criminal cases; vii. Grievances about lack of PPE viii. Over time payments

- | | |
|---|--|
| <ul style="list-style-type: none"> • Resettlement related grievances such as delayed compensations, unfair compensations, objections to use of someone’s land, encroachment on private land, property damage by the project, missing or wrongly registered names on compensation schedule e.t.c; | |
|---|--|

2.2 Implementation of the Grievance Redress Mechanism

2.2.1 Grievance Redress Committees

The GRM will be implemented at three levels namely: Site Level Grievance Redress Committees District level and National level respectively. At site level there will be three committees, firstly there will be a Resettlement Compensation Committees which will be functional during preparatory phase and it will be replaced by Community Grievance Redress Committee (CGRC) during construction phase. At the same level, the contractor shall establish a Workers’ Grievance Redress Committee for the employees. At the districts level, the committee is referred to as the District Grievance Redress Committee (DGRC) and at national level the GRM will be spearheaded by the Project Implementation Unit (PIU) with the Social Safeguards Specialist as the focal point. Committee members in all GRCs will be working on voluntary basis. Table 2 below presents the composition of the various GRM Committees at Community, District and National level.

Table 2: Composition of the GRM Communities

Resettlement and Compensation Committee	Community Level	Contractor (Workers GRM)	District Level	National Level
<p>The composition of Resettlement and Compensation Committee will be:</p> <ul style="list-style-type: none"> • District Councils • Ministry of Lands, Housing and Urban Development • Social Safeguards Specialist from Roads Authority • Gendered representation of the PAPs. 	<p>The composition of GRC with a representation of at least 40% of either sex</p> <ul style="list-style-type: none"> • Social Expert from Consultants • Youth Representative • Women Representative • Local NGO/CBO representative • Community member • Member from community policing • Social welfare Officer • Community Development Officer • Child Protection Officer • GBV SP • HIV and AIDS SP 	<p>A total of 6 to 10 workers with a representation of not less than 40% of either sex.</p> <ul style="list-style-type: none"> • Workers Representatives • Contractor Representative (ESHS Personnel) • Consultants Representative • Service providers (Including GBV SP) • District Labour Officer 	<ul style="list-style-type: none"> • District Environmental Officer • Director of Public Works, District Gender Officer • Social Welfare Coordinator/Officer, • District Lands Officer, • District Labour Officers, • HIV and AIDS Officer • NGO Representative and • Police Officer (from Victim Support Unit) • Police Officer (From Community policing department) • Magistrate • District Education Officer • Social Safeguards Specialist 	<ul style="list-style-type: none"> • PGRC • RA • Ministry of labour • Ministry of Transport • Ministry of Justice and constitutional affairs • Ministry of Lands and urban development

Roles and Responsibilities of Grievance Redress Committees

a. Resettlement Compensation Committee (RCC)

This committee will help to ensure that all legal processes involving valuation and compensation are followed in a just and transparent manner and will be responsible for handling resettlement related grievances during preparatory phase of individual subprojects. The committee is proposed to ensure participation and inclusion of stakeholders. The RCC will ensure effective communication among affected persons, Ministry of Lands, Housing and Urban Development, District Councils and implementing entities. The RCC will include representative of District Councils, Ministry of Lands, Housing and Urban Development, Social Safeguards Specialist from Roads Authority and gendered representation of the PAPs.

b. Community Level Grievance Redress Committee

The Community level GRM committee's roles and responsibilities include but are not limited to;

- i. Recording all grievances as submitted to them by complainant;
- ii. Vetting all received grievances and consider their appropriateness for resolution under this GRM. If the grievance is not within jurisdiction of the committee, it shall be referred to the appropriate authority;
- iii. Summoning all concerned parties for hearing;
- iv. Considering and investigate the issue, facilitate and mediate resolution of grievance;
- v. Documenting status of the complaint and its resolution;
- vi. Referring the grievance to the District Level GRM Committee for resolution with appropriate documentation and justification for reference if the case is unresolved;
- vii. Providing feedback to the complainant and ensure reporting; and
- viii. Sensitizing communities on GRM.

c. Contractor/Workers Level Grievance Redress Committee

The Contractor level Grievance Redress Management Committee (CGRC) roles and responsibilities include but are not limited to:

- i. Recording all grievances as submitted to them by complainants;

- ii. Vetting all received grievances and consider their appropriateness for resolution under this GRM. If the grievance is not within jurisdiction of the committee, it shall be referred to the appropriate authority;
- iii. Summoning all concerned parties for hearing;
- iv. Considering and investigate the issue, facilitate and mediate resolution of grievance;
- v. Documenting status of the complaint and its resolution;
- vi. Referring the grievance to the District Level GRM for resolution with appropriate documentation and justification for reference if the case is unresolved;
- vii. Considering and investigating the issue, facilitate and mediate resolution of grievance;
- viii. Providing feedback to the complaining party and ensure reporting; and
- ix. Sensitizing workers on GRM.

d. District Level Grievance Redress Committee

- i. Resolving and addressing grievances which have been referred from CGRC and WGRC;
- ii. Referring to Project level GRC unresolved grievances at community and District level;
- iii. Building capacity of CGRC and WGRC on GRM;
- iv. Investigating the grievance, facilitate and mediate resolution of grievance;
- v. Reporting to the project level GRC all complainants handled at community and district level; and
- vi. Documenting status of the complaint and its resolution.

e. National/Project Level Grievance Redress Committee

- i. Reviewing grievance details and appropriate background information, including notes/ minutes of meeting of DGRC with respect to the specific grievance case;
- ii. Documenting status and resolution of the grievance;
- iii. Providing feedback to complainants; and
- iv. Directing grievant with unresolved grievances to the Ministry of Justice.

2.2.2 Roles and Responsibilities of the Project Implementation Unit

The Project Implementation Unit at Roads Authority, as the project implementing agency, in collaboration with the SATCP PIU will be responsible for implementation and monitoring of the GRM. Therefore professionals in the PIU will be of paramount importance in the functionality of the GRM. Table 3, below presents roles and responsibilities of the responsible personnel for operationalization and functionality of the GRM.

Table 3: Roles and responsibilities of PIU Personnel

Position	Key Roles and Responsibilities
Project Manager	<ul style="list-style-type: none"> • Ensure project compliance with this GRM Procedures and provisions; • Ensure the GRM Manual is operationalized and its operations are adequately financed; • Assigns responsibility to Social Safeguards Specialist to ensure grievances are resolved as per the Procedure; • Facilitate collaboration of the Safeguards Team with other Stakeholders
Project Coordinator	<ul style="list-style-type: none"> • Establishing a project grievance mechanism, and document a project-level grievance management procedure, based on the World Bank Grievance Redress Mechanism standards; • In coordination with the Social Safeguards Specialist to determine the scope or mandate for the consultant’s Social Expert to resolve grievances based on first assessment; • Ensuring external stakeholders are involved in the design and development of the project grievance mechanism.
Social Safeguards Specialist (SSP)	<ul style="list-style-type: none"> • Primary responsibility is to manage the implementation and management of the community grievance mechanism and resolution procedure; • Playing a governance role to ensure that the grievances on project are resolved according to this manual; • Ensuring that parties implicated in the complaint/grievance provide a review/investigation report into any grievance;

	<ul style="list-style-type: none"> • Supporting the project manager in the development of a project grievance mechanism based on this manual; • Facilitate trainings, workshops and sensitizations for the Grievance Redress Mechanism; • In collaboration with Consultant’s Social Expert, manage the Grievance Redress Mechanism and tasks include: <ul style="list-style-type: none"> - Informing communities how to access the mechanism; - Conducting first level review; - Keeping complainants informed of the status of any lodged complaints; - Tracking and reporting on grievances; - Management of grievance process including: collation of all grievances from various registration channels; - Investigation of grievances as required, engaging other functional staff; - Report on status of grievances and performance of the GRM
M & E Specialist	<ul style="list-style-type: none"> • Assist in tracking performance of the Grievance Redress Mechanism based on the indicators provided

2.2.3 Grievance Redress Procedures

2.2.3.1 Stages for Grievance Redress

The GRM structure has 5 stages from when a grievance is first reported to when it is resolved. The flow chart below illustrates the 5 stages.

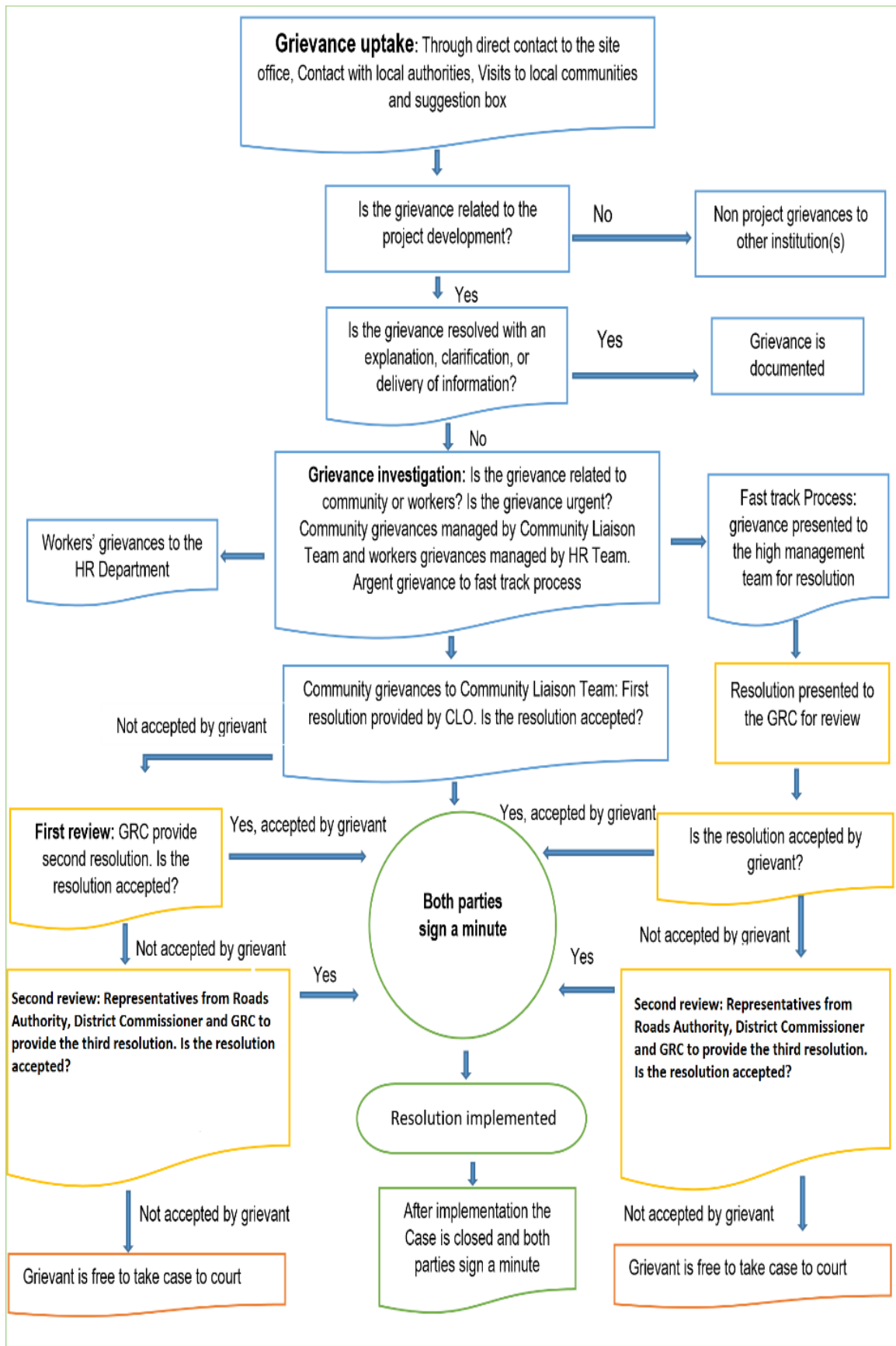


Figure 1 :Stages in GRM structure

* All workers grievance relating Sexual Harassment, will be managed by GBV Service Provider and provide updates to HR

Stage 1: Grievance Uptake

Community grievances may be received from a variety of sources, among them being individuals, communities, civic or other non-governmental organizations (NGOs), government officials and others. All grievances will be received by Grievance Redress Committees (GRC) through mechanisms of identifying and receiving grievances presented in Table 2 below. Information on these various channels to submit grievance or complaint will be displayed on the notice board on sites and local government offices around the project area and the public will also be informed of these channels during public sensitizations. Complaints are also channeled directly to the following address in writing or telephone:

*The Project Coordinator
Southern Africa Trade and Connectivity Project
Roads Authority
Private Bag B346
Lilongwe 3
Tel: +2651759156
Email: satcp@ra.org.mw*

Table 4: Mechanisms to Identify and Receive Grievances

	Mechanism	Description
1.	Direct contact to site office	Through phone, letter, email and social media such as WhatsApp or physically meeting the GRC or by visiting the site.
2.	Contact with local Authorities	The GRC will be in constant contact with the local authorities, so that local leaders may articulate any type of grievance.
3.	Visits to local communities	Grievances are received through the Social Specialist (SS)/Community Liaison Officer (CLO) and the GBV service providers who periodically visit the communities to hold meetings with the community members, local authorities, community leaders, etc. The SP/CLO also holds informative workshops periodically. Local workers are also able to express grievances and complaints to their SP/CLO, or in their place of work.

4.	Grievance Boxes	Suggestion boxes will be available on site and at public offices, strategic work sites and with GRM committees set in the communities around the project area. This is potential channel for anonymous grievances for workers and community.
5.	Exit Interviews	GRM should consider introducing exit interviews as a way to gather feedback from employees on issues that they may not have been willing to raise while they were still working on the project.
6.	Information table	Having an information table at the work site on a regular day each week, where workers can ask questions or express concerns, is also a simple and effective way to encourage two-way communication.

The CGRC records all received complaints or grievances in a Community Grievance Log and Resolution Form. The case shall only be referred to District Grievance Redress Committee if it has not been resolved at the CGRC. Otherwise, the preferred scenario is to have grievances resolved at lowest levels possible. Criminal cases will not be handled through the respective CGRC, such cases will be reported directly to the police.

Stage 2: GRM Registry

All grievances received are publicly entered into an accessible entering recording system as the GRM registry shall be maintained at both community and district levels. The community log and resolution form shall be in triplicate. For any case heard, closed or referred, a copy of this case is sent to the DGRC. This shall enable the district to keep a register (Annex 1), of all cases recorded and handled by any GRM committee in their district. Using this information, councils generate a matrix of cases and agreed resolutions and be able to follow up if the resolutions are being implemented. The generated matrix of cases and agreed resolution shall be cascaded to the PGRC for recording and following purposes.

Stage 3: Acknowledgement and Response

Once the grievance is received, the GRC will determine if it is related to the project development. All grievances related to the project development will be responded on the spot and offered immediate resolution while those non-project grievances will be submitted into different body/institution or advise the grievant where to direct the grievance. After receiving and document the grievance, the GRCs will proceed in the following manner:

- i. Speak with the person who lodged the grievance to learn as much as possible about the case. What exactly happened? When? Who were the people involved? It is important to listen attentively to the person while he/she expresses his/her grievance;
- ii. Determine whether the grievance is a grievance, complaint, suggestion or request and assign it to the appropriate process;
- iii. Determine whether the grievance can be managed by GRM, under its accountability;
- iv. Determine whether the grievance is a community issue or workers issue. Grievance investigations will be managed in two streams: community grievances will be handled by the CGRC and workers' grievances will be handled by WGRC except Sexual Harassment grievance which will be managed by GBV SP. For most grievances it will be clear which team should manage it. Grievances by local workers that link to the selection process for hiring may need to be managed by a combination of the CGRC and the WGRC. These should be managed through the community process to enable the broadest involvement in the investigation and resolution;
- v. Determine the possible corrective action(s) or mitigation of the grievance. The nature of the corrective action, the time in which it must be implemented.

An appropriate acknowledgement should be delivered to the grievant explaining the timeframes and the process. This will include providing information to people who have submitted a grievance outside the purview of GRM and who need to submit their grievance to a different body. The grievance timeframe should be entered into the grievance log. Other key information to be documented at this stage include: grievance

status and whether it will be managed through the GRM process; name of the GRC (CGRC or WGRC) responsible for handling the grievance.

Stage 4: Investigation of the Grievance

Grievances may be founded on fact or on perception, or in some cases may be opportunistic or misplaced. When a complaint is received by GRC, the GRM provides that a resolution be provided within 15 working days. This is so to make sure that grievances/complaints are resolved as early as possible and that feedback is provided to the complainant. The investigation process serves to ascertain the facts of the case and use these facts to propose suitable resolutions to the grievance and once complaints are received, the CGRC shall assess whether the complaint/grievance is related to the project or not. In case, complaints are not related to the project, the grievant shall be advised to channel their complaints to the right institutions.

Investigations will be coordinated by the CGRCs in the case of community grievances and by the WGRC in the case of worker grievances. Typically, many grievances need collaboration between project team (including GRCs) in order to reach effective resolution. The investigation should also try to identify any misunderstandings and perceptions that contribute to the grievance. These facts should be logged in the grievance log along with the identities of those involved in the investigation.

In case of resettlement related grievances, the Resettlement and Compensation Committee (RCC), consisting of PAPs representatives, District Lands Officer, Ministry of Lands, Housing and Urban Development representative and RA's Safeguards Specialist, will handle such issues until Community Grievance Redress Committees are established and such responsibility will to the Community GRCs. Thus during construction phase, the Community GRCs will receive, investigate and refer resettlement related issues to the District Lands Officer and in some case Land Board who will investigate the matter further and liaise with RA's Safeguards Specialist and Regional Lands Officers.

Stage 5: Grievance Resolution

The resolution must meet certain criteria in order to be considered adequate, in that case when resolving a grievance, GRC aims to achieve the following:

- i. Remedy problems instead of paying compensation or providing additional benefits. This means that the best resolution for damage to property caused by

the project is to restore the damage, rather than to pay compensation for the damage;

- ii. Remedies should address root causes, where possible, rather than only addressing symptoms. For instance, grievances about lack of PPE should include a process for distributing and keeping PPE rather than simply replacing or buying more PPE without addressing the root cause of the problem. They should also address developing a stronger safety culture on the project;
- iii. Remedies should rest on existing standards and criteria to the extent possible. E.g., remedies for damage should refer national standards for compensation, although they should not necessarily be limited to recognized amounts if these are inadequate to replace or repair damage; and
- iv. Remedies should seek to provide fair compensation for losses. Compensation should aim to return to a level equal to the situation prior to the grievance. Providing generous compensation tends to encourage opportunistic grievances, whereas providing inadequate compensation can damage relationships and reputation among stakeholders.

Stage 6: Grievance Closure and Appeal

Where a resolution has been arrived at and the grievant accepts the resolution, the grievant is required to sign the resolution and closure section in the Grievance Community Log and Resolution Form as attached. Two members of the CGRC (Chairperson and Secretary) are also required to counter sign. In the event that the grievance has not been resolved at CGRC, it will be referred to District GRC then eventually to NGRC and if the resolution is not reached at this level, the grievant has the option of seeking legal redress from civil courts.

Anonymous grievances will usually be regarded as closed once a resolution is proposed.

2.2.3.2 Handling GBV/SH/SEA/VAC

All GBV/SEA/SH/VAC grievances will be referred to and handled by the GBV services who will be working with Technical Working Groups under the Ministry of Gender, Community Development and Social welfare. Where the grievance is Sexual Harassment related, the GBV Service Provider will still manage the grievance and provide updates to Human Resource. Nevertheless, such cases are sensitive and

unfortunately, victims of GBV/SEA/SH/VAC face challenges in coping due to stigma and discrimination from the society. Most survivors in school end up dropping and this has adverse effects and leaves girls and women in a vicious cycle of poverty thus while providing avenues of launching grievances is important, careful handling of GBV/SEA/SH/VAC matter is equally important. The GRM will ensure victims are guaranteed confidentiality, safety, dignity and non-discrimination.

In the event the GRC has been approached by a community member or colleague with information regarding an incident of GBV/SEA/SH/VAC, attention will be paid to the following while receiving the complaint:

- i. React calmly and listen carefully to what is being said;
- ii. Reassure the complainant/witness that s/he has right to raise the concern;
- iii. Reassure the complainant/witness that information will be kept confidential and only shared with their consent to third party as the service provider. Ask only relevant questions required to gain a clear understanding of the complaint so that it can be passed on via GBV Service Provider's reporting procedures;
- iv. Ensure that the survivor/complainant's safety is not at risk;
- v. Consider (prioritize) the survivor's need for services including medical attention and use the available GBV referral pathway if available or seek advice from a GBV specialist;
- vi. Recording of information, suspicions or concerns needs to be as clear as possible, as it may be used in subsequent disciplinary or legal action. i.e. Correct names of all involved, identity numbers of witnesses, victims, and if possible photo records of the subject;
- vii. The nature of the complaint. An accurate account of what was said by the complainant in her/his own words. A description of any visible sign of abuse or other injuries including a body map, maybe helpful;
- viii. Key observations while receiving the complaint: Times, locations, dates given, whether anyone else knows or has been given information, whether survivor has accessed services;
- ix. Inform the complainant of the next steps in the procedure;
- x. Report the complaint (using the form below), as per the agency reporting procedure, at the earliest opportunity.

The survivors will be informed of their rights as by the GRM focal point person receiving their case:

- i. The right to request that her story, or any part of her story, not be documented on case forms.
- ii. The right to refuse to answer any question they prefer not to.
- iii. The right to tell the caseworker when she needs to take a break or slow down.
- iv. The right to ask questions or ask for explanations at any time.
- v. The right to request that a different caseworker be assigned to her case.
- vi. The right to refuse referrals, without affecting our willingness to continue working with her.
- vii. The right to access their personal information and request deletion.

General data protection requirements when dealing with GBV/SEA-SH cases brought to the project level grievance:

- i. All staff in contact with the data have a strong understanding of the sensitive nature of the data, the importance of data confidentiality and security.
- ii. Clients and/or their caregivers are giving their informed consent for the Grievance Officer and/or service provider to gather and store their data before any information is recorded. Staff are aware that when obtaining informed consent, clients may highlight particular information that they do not want shared with certain people, and that this must be recorded and respected. Signed paper consent forms are being kept in a locked filing cabinet.
- iii. Information is not being passed to a third party without the informed consent of clients and/or their caregivers and following the data sharing protocols of the GBV/SEA-SH Action Plan.
- iv. All staff working with data sign the data protection checklist/agreement as part of their hiring process.
- v. Paper documentation for each incident is stored in its own individual file, clearly labeled with the incident number. Names of clients are NOT on the outside of the paper files.
- vi. Paper files are being kept in a locked cabinet / drawer, accessible only to responsible individuals

vii. All computers being used for data storage are protected with strong case sensitive and special character-included passwords.

2.2.3.3 Grievance Management Timeframe

Reliable and realistic timeframes are a key part of a grievance management process since they add an element of certainty to the grievance management process and increase trust in the process when they are followed. In adherence to that, project grievance management process will follow grievance management time frame presented in Table 3 below.

Table 5: Grievance Management Timeframe

	Process	Time frame
1.	Acknowledge all grievances	Within one week of receiving the grievance
2.	Endeavour to have an initial resolution for a grievance	Within two weeks of receiving the grievance
3.	For grievances where the investigation is more time consuming, the grievant should be informed of the situation and the timeframe to be followed	Within three weeks
4.	First review should aim to be completed	Within two weeks of receiving the grievance
5.	Second review	Within four weeks of receiving the grievance

2.2.4 Internal and External Communication

Grievance Redress Mechanism need to be accessible to all members of society and all members of the workforce (including employees working for contractor). A first step in achieving accessibility is to ensure that all community members are aware of and understand the grievance management procedure. Publication of the GRM should consider both community and worker audiences and should involve a range of different communication channels including public meetings, village council meetings, notice boards, morning meetings and informal engagement.

Successful implementation of the GRM will rest on effective internal communication about the process to create buy-in from the managers, and a practical understanding of grievance flow, roles and responsibilities, documentation and monitoring from supervisors and community development staff, who will play key implementation roles.

2.2.5 Grievance Record Management

In order to ensure effectiveness of the GRM, RA shall keep records of all grievances arising from the project. A log book will be used to record and track grievances for every GRC and a database will be created for the project updated and managed by the consultant's Social Expert at subproject level and RA's Social Safeguards Specialist at project level. The record will contain the name of the grievant; the date when the matter occurred and reporting; nature and description of the complaint; immediate action and any follow-up actions taken; the final resolution; and how and when this decision was communicated to the complainant (See Annex 4). Personal data shall be kept confidential unless required to disclose to authorities. Periodically RA will be reporting to the communities and other interested stakeholders on how it responded to certain grievances of interest if such need arises. All the records will be made available to the Third Party Monitoring team for Audit.

Grievances Records Storage

Documentation and storage of all recorded grievances is important as it helps keep track of the progress in implementation and operation of the GRM. The following are the recommended procedures for keeping all grievances records safe;

a) Paper copies

The project will use grievance recording booklets that will contain forms in annex 1 or 2 and 3. The booklet will be designed in such a way that it replicates copies upon recording a grievance by using self-carbon copied papers. The original form will be kept in the booklet and stored at the grievance intake GRC while the other one will be provided to the grievant when the matter is closed or upon referral and a third copy will either be collected by the PIU Social Safeguards during site visits or be forwarded to top tier GRC in case of referral.

- Register each copy by applying serial number for easy tracking;

- Limit number of people with access to the documents;
- Store the copies in a locked file cabinet and limit access to the keys.

Responsibility for keeping and storing the log books will be designated to various individuals on various GRCs for safe keeping and easy accessibility and case tracking. At Site level, the secretary for the Community and Contractor GRCs will be custodians of the log books and at District level the District Lands Officer or Social Welfare Officer will be ideal to be tasked with storage of the log book as most grievances will touch on their duties. At PIU Level, the Social Safeguards Specialist will be responsible for keeping the log books.

b), Electronic copies

The consultant's Social Expert will keep and maintain scanned copies of all forms and update a computerized database for recording and tracking grievances (Annex 4). Access to the data will be limited and will only be made available to stakeholder on need to know basis unless otherwise.

2.3 Schedule, Budget, Monitoring and Reporting

2.3.1 Schedule

The GRM will be functional throughout project implementation period. All necessary activities for the establishment of the GRM, including establishment of the National Level GRC, will be carried out prior to commencement of civil works. Upon identification of site and during site preparatory phase, each site where construction activities will affect people's properties and land will necessitate establishment of a RCC. During construction, the sites will establish Community and Contractor's Grievance Redress Committees at the lower level and will adopt/establish breakout Grievance Redress Committees from existing District Grievance Redress Committees. A detailed mini-plan will be developed for the roll-out, including information on the following:

- i. Any consultation prior to the implementation;
- ii. Internal trainings on the GRM procedures for focal persons from project stakeholders and all implementing teams;
- iii. Key messages to accompany consultations and internal communications procedure;

- iv. Development of any communications materials to support implementation;
- v. Schedule of meetings to communicate the implementation with both workers and communities;
- vi. Follow-up informal meetings in communities to check understanding and to collect grievances more broadly;
- vii. Follow-up process with workers to ensure understanding and to encourage use of the GRM;
- viii. Monthly assessment of use of the process and associated analysis at least quarterly to review performance and suggest ways to address challenges.

2.3.2 Training

Training will be provided to staffs drawn from various direct implementers and counterparts particularly on national environmental policies and World Bank Group environmental and social safeguard policies and standards and use of the screening and other pertinent checklists. Furthermore, public sensitizations and recurring message delivery strategies will be used for the community awareness. Specific training on Grievance Redress Mechanism will be arranged for the GRCs and safeguards team (both from consultant and contractor) their handling and monitoring of the GRM system. The workshops will focus on grievances related to environmental and social issues (Occupation and Community Health and Safety, Sexual Harassment, Sexual Exploitation and Abuse, Gender-based Violence (GBV), Abuse of child labor and issues linked with labor influx), resettlement related grievances and possible grievances that might arise from implementation of the project. Furthermore, the workshop will focus on Grievance Redress Mechanism (GRM) process, roles and responsibilities of the committees, how to run an effective and efficient mechanism as well as how to handle sensitive matter. Each workshop will have no more than thirty participants. In case of extra participants, extra workshops will be conducted.

The proposed training plan will focus on:

- Objectives, purpose and limitation of the GRM;
- Project impacts and possible issues upon which people can complain on;
- GRM procedures and how to handle GBV/SH/SEA/VAC issues;
- Efficient and effective GRC; and

- Trainings on how to use GRM tools e.g Grievance uptake forms, Resolution form, Grievance Register form etc.

Table 6: Awareness, Capacity Building and Training Plan

No.	Description of Training	Training Module	Location	Frequency	Participation
1	1 day GRC orientation meeting	<ul style="list-style-type: none"> • Objectives, purpose and limitation of the GRM; • Project impacts and possible issues upon which people can complain on 	RA	Prior to launch of project	Community GRC, District GRC
2	2 days training	<ul style="list-style-type: none"> • GRM procedures and how to handle GBV/SH/SEA/VAC issues; • Efficient and effective GRC. 	RA, GBV Service Provider	Launch workshop at the start of the project	Community GRC, District GRC, Workers GRC
3	1 day	<ul style="list-style-type: none"> • Objectives, purpose and limitation of the GRM; • Project impacts and possible issues upon which people can complain on • Efficient and effective GRC (importance of autonomy of GRCs). 	RA, District GRC	Launch workshop at the start of the project	Project Staff including Project Manager, Environment and Social Safeguards Specialists
2	One day awareness workshop	<ul style="list-style-type: none"> • Project impacts and possible issues upon which people can complain on • Efficient and effective GRC (importance of autonomy of GRCs). 	RA, District Council	Twice year	Relevant staffs from RA and other institutions, Project E&S safeguards specialists, Contractors, subcontractors, consultant, etc.
3.	One day community	<ul style="list-style-type: none"> • Grievance Redress Mechanism (GRM), 	Project Area	Every 3 months	Community members,

No.	Description of Training	Training Module	Location	Frequency	Participation
	sensitization meeting	Gender based Violence (GBV), Abuse of child labor and issues linked with labor influx. Roles and responsibilities of the Community, contractor, RA and other stakeholders			traditional leaders and other local stakeholders

2.3.3 Budget

The project will provide funds to the Community, District and National Grievance Redress Committees in order to facilitate their operations while the Workers Grievance Redress Committee will be funded by the contractor through the ESMP implementation budget. The budget for the operationalization of the Grievance Redress Manual, which include funds for the Community, District and National GRCs, is presented below in table 7:

Table 7: Budget for the GRM implementation and operations

Item	MK
Trainings	30,000,000
Annual Operational Budget	16,000,000
Workshop	10,000,000
Sensitization (Whole Project)	40,000,000
Printing Logbooks	13,000,000
Total	109,000,000

2.3.4 Monitoring, Reporting and Continuous Improvement

The GRM evaluation can be undertaken alongside any other evaluation exercises for the project. This is possible using copies of registers that Councils and RA keeps. The monitoring assists to track whether the GRM system is working efficiently and effectively and informs the project to make any necessary adjustments. The evaluation helps to assess the impact of GRM in response to people's complaints and whether the

GRM principles were met or not during the project implementation. The following are the useful monitoring indicators:

- i. Number and type of grievance received (divided into community/worker grievances, if useful divided into grievance sub type (e.g., environmental issue, worker transport issue, commitment delay, etc.) ;
- ii. Distribution of community grievances by community and of worker grievance. (NB: High numbers of grievances in one area may be a sign that the process is trusted in this area and not in others and, as such, is not necessarily an indicator of poor performance.);
- iii. Written comments analyzing the trends in distribution of grievances;
- iv. Grievance resolution: percentage (%) of grievances responded and/or resolved within the stipulated service standards;
- v. Written comments analyzing the resolution of grievances: e.g., explain which grievances are tardy, why, and what, if anything, can be done to improve resolution and implementation of remedies.

The key indicators are the number of grievances received and the number of grievances resolved to the satisfaction of all parties within the proposed time. Above indicators and other indicators relating to Community Health and Safety as well as Environmental and Social Management will be reflected in quarterly progress reports. It is important to note that the aim of a GRM is NOT to achieve a zero grievance level. An effective GRM receives grievances, investigates and manages them in an efficient manner and generally achieves resolution of grievances within the expected time frame. Zero grievances is an indicator that the process is not effective, suggesting it is not known, not accessible or not trusted.

2.3.5 Grievance Profile

As shown in the figure below, typically when an effective grievance management is launched it receives a wave of grievances, complaints, disputes, suggestions and requests. As the project demonstrates fair and strict management of grievances workers and community members learn which issues can be raised effectively through the grievance process and which cannot. After this, so long as the process continues to be known and accessible, the grievance process serves to identify and remedy issues effectively.

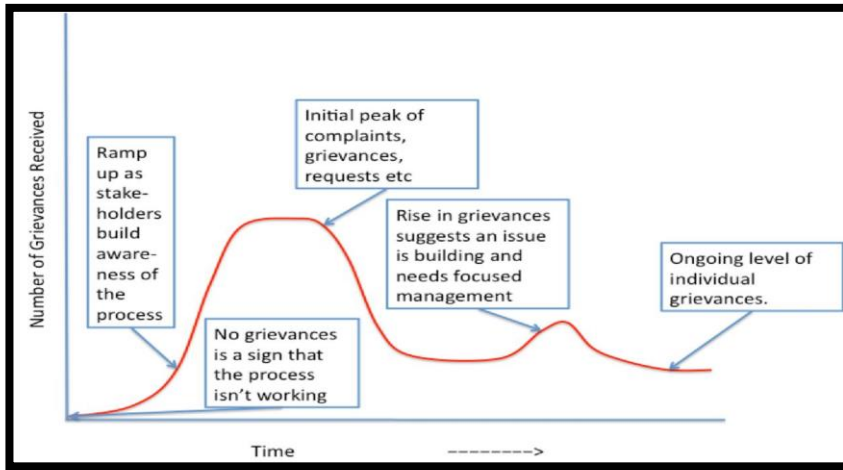


Figure 2: *Typical Grievance Profile When Setting Up a Successful Process*

REFERENCE

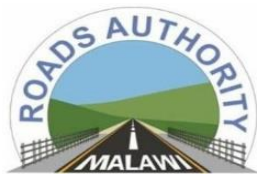
Roads Authority (2022), Southern African Trade and Connectivity Project: Stakeholders Engagement Plan

Roads Authority (2022), Southern African Trade and Connectivity Project: Labour Management Procedures

World Bank. 2014. The World Bank's Approach to Grievance Redress in Projects. Washington, DC. © World Bank.
<https://openknowledge.worldbank.org/handle/10986/20119> License: CC BY 3.0 IG

ANNEXES

Annex 1: Community Grievance Uptake Form



FOMU YOLEMBA MADANDAULO NDI NDEMANGA ZA ANTHU AKUMUDZI MU PULOJEKITI YA SATCP

Dzina la Chitukuko:

Malo omwe polejekiti ikuchikira		Dzina la Boma	Keyala:	Tsiku:			
Dzina (Dr./Mr./Ms/Mrs.)		Mfumu Yayikulu ndi Mudzi			Nambala ya foni		
Nambala ya chidziwitso	Tsiku loperekera dadandaulo:	Mlembi/M unthu olemba dandaulo	Dandaulo	Kutsatira/kufufuza		Chigamulo Choperedwa	Kutumizidwa kwa
				Tsiku:	Munthu yemwe watumidwa		

Ngati mulandu watha, ma membala a komiti yokumva madandaulo ndi odandaula adzasaina apa:

Mkulu wa komiti yokumva madandaulo.....

Dzina komanso kusainila kwa opereka chidandaulo.....

Mlembi wa komiti yakunva madandaulo.....

Tsiku.....Kutumizidwa ku

Nambala ya chidziwitso	Tsiku lomwe watumizidwa	Kutumiza kwa umboni	Dzina la odandaulo

Annex 2: Workers GRM Forms

Southern African Trade and Connectivity Project

Workers Grievance Log & Resolution Form

District Name:

Name of Catchment:		Sub-Project Name			Dates:		
Names Dr/Mr/Ms/Mrs)		Address/Contact	TA& VGE	Contacts/Email			
Ref No.	Date of Grievance	Official Recording	Grievance/Complaint	Follow-up/Investigation		Resolution Made	Referred to
				Date	Person Assigned		
G1							

If case is closed, GRM Committee members & complainant to sign below

GRM Committee Chair _____

Name & Signature of Grievant _____

GRM Committee Secretary _____

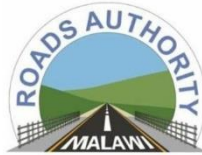
Date: _____

Referred to District

Ref No.	Date of Referral	Official Referring:	Name of Complainant:

Annex 3: Grievance Redress Mechanism Register

Grievance Redress Mechanism Register



GRIEVANCE REGISTER

GRM...../..... District Reference No.

Name of the District:

Ref #	Date Grievance Reported	Name of the House hold	Household Identification	TA	Type of Grievance/C omplaint:	Resolution Made:	Project	Status (Open, Referred, Closed)	Date Grievance Referred or Closed
G 1									
G 2									
G 3									
G 4									
..									
..									
...									
..									
Gx									

Annex 5: Project Environmental and Social Management Framework Matrix

a) Matrix for potential Positive environmental and social impacts from the construction of roads, Inland Examination centres and Value Chain Infrastructure

Potential Positive impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
Facilitation of trade and the movement of agricultural commodities along the corridor	The construction of a selected road, inland exam center and last mile infrastructure	<ul style="list-style-type: none"> • Regular maintenance of the infrastructure • Supervision and monitoring works • Agricultural diversification 	MRA, Ministry of Trade, Roads Authority
Facilitate faster clearance of cargo	Construction of inland exam centres	<ul style="list-style-type: none"> • Regular maintenance of the infrastructure • Training of staff 	MRA
Reduce the average price of transport services	Rehabilitation of a selected road within the corridor	<ul style="list-style-type: none"> • Regular maintenance of the road infrastructure • 	Roads Authority
Improved connectivity and access to markets within the corridor	Rehabilitation of a selected road within the corridor	<ul style="list-style-type: none"> • Regular maintenance of the road infrastructure • Supervision and monitoring works • Agricultural diversification 	Roads Authority
Improved Road Safety	improved in terms of flow of traffic, management of speed, signage, post-accident	<ul style="list-style-type: none"> • Regular maintenance of the road infrastructure • Sensitize communities to care for road signs 	Roads Authority, Road Traffic Directorate

Potential Positive impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
	care, emergency services and the development of rest stops	<ul style="list-style-type: none"> • Replacement of signage once vandalized 	
Improved food security, nutrition and household incomes	The development of value chain infrastructure, improvement of trade and access to market and reduction of transportation costs	<ul style="list-style-type: none"> • Provide training to farmers; and • Promote agricultural diversification. 	Contractors
Increase in employment opportunities	The project construction activities will create job opportunities for people from surrounding project areas	<ul style="list-style-type: none"> • Employ people from surrounding communities; and • Provide equal employment opportunities for both men and women including the youth 	Contractors
Increased business opportunities for local suppliers of goods and services	The construction works shall increase business opportunities for the local suppliers of goods and services	<ul style="list-style-type: none"> • Purchase goods and services from the local communities 	Contractors

b) Matrix for potential negative environmental and social impacts from the construction of roads, Inland Examination centres and Value Chain Infrastructure

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
1	Increased risk of loss of land and Property	Construction of road infrastructure, inland exam centres and last mile infrastructure may affect some peoples land and property	<ul style="list-style-type: none"> • Develop a Resettlement Plan for the PAPs with GRM and ensure its implementation; • Carry out sensitization meetings on planned project activities and likely impacts including loss of land/property; • Develop and implement livelihoods restoration plans 	Roads Authority
2	Loss of vegetative	Clearance of land for road, inland examination centres and infrastructure for value chain construction activities	<ul style="list-style-type: none"> • Promotion of afforestation; • Limiting the clearance of vegetation to land that will be affected by the project activities 	Contractor
3	Loss of habitat for wildlife	Clearance of land for road, inland examination centres and infrastructure	<ul style="list-style-type: none"> • Limiting the clearance of vegetation to land that will be affected by the project activities 	Contractor

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
		for value chain construction activities		
4	Creation of borrow pits and quarries	Top soil stripping; excavation of construction soil and road gravel	<ul style="list-style-type: none"> • Develop and implement borrow pit and quarry management plans • Obtain materials from licensed borrow pits and quarries • Rehabilitate borrow pits after excavation activities prior to completion of contracts; • Fence of quarries and pits to restrict access 	Contractor
5	Increase in surface runoff and soil erosion.	Clearance of vegetation and poor compaction of roads and on other project infrastructure	<ul style="list-style-type: none"> • Limit the clearance of vegetation to land that will be affected by the project activities; • Promote afforestation. 	Contractor
6	Increased risk of labour influx leading to GBV and SEA	labour influx and increase in disposable income resulting into interactions between migrant	<ul style="list-style-type: none"> • GBV/SEA sanitizations by GBV service provider; • Signing and adherence to Workers' Code of Conduct; • Establish and operationalize GRM whose approach is 	Contractor

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
		workers and surrounding community or amongst workers themselves leading to GBV/SEA	<p>sensitive to issues of GBV and SEA; and</p> <ul style="list-style-type: none"> • Map out GBV/SEA service providers in the project areas; • Community engagement and consultation to include GBV/SEA sensitization; 	
7	Increased Risks of HIV/AIDS and other STIs	labour influx and increase in disposable income resulting into interactions between migrant workers and surrounding community or amongst workers themselves;	<ul style="list-style-type: none"> • Source much of the labor force from surrounding communities as this may decrease influx of migrant workers; • Develop a Work place HIV/AIDS policy and enforce its implementation; • Conduct sensitization meetings on the dangers of contracting HIV and AIDS and other STIs to workers and communities; • Provision of HTC Services; and • Provision of free condoms to workers. 	Contractor
8	Occupational Safety and Health Risks	Construction activities may bring along occupational safety and health risks to workers	<ul style="list-style-type: none"> • Develop an Occupational Safety and Health Plan and enforce its use to reduce or avoid occupational health and risks; • Provide appropriate personal protective equipment (PPE) to 	Contractor, PMSU

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
			people working in high-risk sub projects and enforce its use; <ul style="list-style-type: none"> • Provide first aid kits and ensure they are fully stocked at all times; and • Provide adequate warning sign in all areas where safety risks are high. • Report any accidents or incidents to the World Bank within 24 hours of accident occurrence. 	
9	Public Safety Risks	The construction site could be dangerous to surrounding communities and stray animals that might walk across the site	<ul style="list-style-type: none"> • Cordon off working areas; • Conduct sensitization meetings to communities; and • Level the borrow pits after construction works 	Contractor
10	Disturbance of public utilities	Removal or movement of existing public utilities such as water and electricity	<ul style="list-style-type: none"> • . Replace all public utilities disturbed • Sensitize communities before movement of public utilities 	Contractors

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
		supplies		
11	Pollution from spillage of petroleum products	Leakages or spillage of diesels and oils from storages and maintenance workshops on the construction sites.	<ul style="list-style-type: none"> • Develop and implement waste management plan that would promote; • Provide waste receptacles such as bins and toilets; • Collect and dispose of used oil at sites designated by respective municipal/district councils; • Bund all areas (with concrete) used for maintenance works and storage of oils and fuel. 	Contractor
12	Dust emissions from construction works during construction phase	Project construction activities on roads, inland exam centres and infrastructure for value chain addition	<ul style="list-style-type: none"> • Sprinkle water to minimize dust 	Contractor
13	Noise and vibrations from construction equipment and trucks	Project civil and earthworks during construction phase.	<ul style="list-style-type: none"> • Use well serviced machinery; • Limit the use of heavy machinery; • Fit silencers to all machinery with exhaust pipes. 	Contractor
14	Increased risk of disturbance to flow of traffic	The construction activities for roads and other infrastructure in the project will result in affecting movement of traffic	<ul style="list-style-type: none"> • Develop and implement traffic management plan; • Install road signs include speed limit signs; and 	Contractor

NO	Potential Negative impacts	Source of impacts	Proposed Mitigation Measures	Responsibility for implementation of mitigation Measures
			<ul style="list-style-type: none"> • Provide detours for vehicles and pedestrians 	
15	Risks of child labour in some activities at road rehabilitation/upgrading activities	Recruitment of under aged persons and within senior staff quarters may encourage local children to drop out of school	<ul style="list-style-type: none"> • Recruit people who are aged 18 and above 	Contractor
16	Increased Generation of liquid and solid waste	Poor management of liquid and solid waste on construction sites and campsites	<ul style="list-style-type: none"> • Develop and implement waste management plan; • Provide waste receptacles such as bins and toilets. ; <ul style="list-style-type: none"> • Dispose-off collected waste in the manner agreed with respective local councils 	Contractors

Annex 6: Common Grievances and their solutions in Construction

Common Grievances	Description	Solution
Bullying or Harassment Grievances including Supervisory Practices	It's inevitable that members of staff in your workplace just won't get on. But that doesn't mean you should allow bullying or harassment. Abuse of authority intimidation or coercion over-supervision (snooping) inadequate supervision (failure to instruct properly) supervisor working on bargaining unit jobs discrimination favoritism	Ensure all workers know the anti-harassment policy with disciplinary procedure to be followed if somebody lodges a grievance for bullying or harassment
Workload grievances	Unreasonable Rate of Production or Workload (Speedup) violation of time or production standard can be approached from the standpoint of a physical working condition or violation of principle of "fair day's work for fair day's pay." It can also occur when another employee leaves or are laid off due to redundancy	Extra work and hours should be accompanied by extra benefits and this should be explained to workers

Physical Working Condition Grievances	Unsafe or unhealthy working conditions (could be a violation of provincial, state or federal safety laws or workplace rules) - cleanliness, toilet conditions, temperatures and Health and Safety Hazards	Conduct workplace risk assessment regularly, have first aid & firefighting equipment and trained personnel, waste bins and cleaning material and clean toilets with toiletries
Pay and benefits grievances e.g. wage inequalities	Workers unhappy with salaries because they either want a higher salary or think they should be earning as much as somebody who does a similar job in the organization or might be trying to receive expenses—such as for their commute. This can also take form of failure to pay agreed rating including for overtime work	Make sure that you have a pay and benefits policy that outlines how often you will conduct salary and benefits reviews with your staff, and ensure that any documents your employees receive are in line with this policy.
Disciplinary Action	Unreasonable rule penalties without just cause employees not properly notified of rule or penalties reprimand (recording warning) disciplinary layoffs discharge	Provide Code of Conduct and expected behaviors of works with attached consequences of not adhering to that behaviour. All workers to sign the Code of Conduct and contracts with expected behaviours
Compensations	This arise from unpaid or delayed compensations and perceived or actual undervalued properties	Clearly inform communities of compensations criteria and pay compensations on time
Spread of sexually transmitted diseases and increase in illicit behaviour by contractor's workers	Often as a result of labour influx	Reduce the number of migrant workers employed on the project and enforce signing and adherence to code of conduct. If complaints arise handle them with impartiality and make sure appropriate measure are followed

GBV/SEA/SH/VAC	Often as a result of labour influx	Reduce the number of migrant workers employed on the project, sensitize the communities, provide for availability of GBV Service Provider and enforce signing and adherence to code of conduct. If complaints arise handle them appropriately
Waste Management	Poor waste storage, handling and disposal results in bad odour, eye sour and spills that contaminate water quality and ultimately cause diseases	Ensure there is a waste management plan that is followed and when complaints arise act promptly to address the complaints
Damaged properties	This arise from poor management of storm water (flooding and sedimentation), vehicle accidents, cracking of structures due to compaction, removal of trees and unauthorized entry on private land to extract material	Follow the following hierarchy of mitigation on community property: avoid damage, replace or compensate. However, respond promptly and keep them informed of your progress on the matter
Traffic Management	This is caused by production of dust, over-speeding of vehicles, disturbed traffic flow, blocked passage, unmaintained diversions and lack or poor signage on the road	Have a traffic Management Plan in place and implement it wholly. Ensure that drivers are well trained, diversions and signage are maintained, conduct frequent inspections of road sections (including at night) and when complaints arise act with prompt