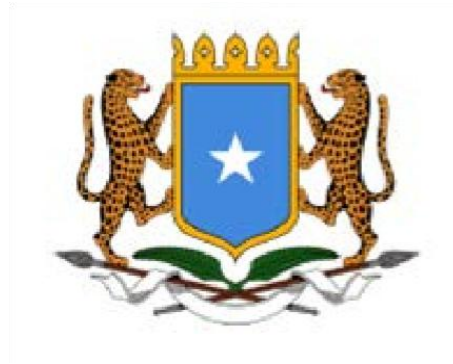


# Federal Republic of Somalia



## Ministry Of Public Works, Reconstruction and Housing **Grievance Redress Mechanism (GRM)**

### *Somalia - Horn of Africa Infrastructure Integration Project (P173119)*

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SECOND DRAFT

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**Abbreviations and Acronyms.**

<b>Acronym</b>	<b>Full Meaning</b>
CBO	Community-Based Organization
CoC	Code of Conduct
EHS	Environmental, Health, and Safety
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMPs	Environmental and Social Management Plans
ESIA	Environmental and Social Impact Assessment
ESIAs	Environmental and Social Impact Assessments
ESS	Environmental and Social Standard
ESS2	Labor and Working Conditions
ESS10	Stakeholder Engagement and Information Disclosure
FG	Federal Government
FGS	Federal Government of Somalia
FHWs	Frontline Health Workers
FMS	Federal Member States
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
HR	Human Resources
IP	Implementing Partner
LMP	Labour Management Procedures
MoECC	Ministry of Environment and Climate Change
MoPWR&H	Ministry of Public Works, Reconstruction and Housing
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PAP	Project-Affected Person
PCU	Project Coordination Unit
POM	Project Operations Manual
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SHIIP	Somalia Horn of Africa Infrastructure Integration Project
WB	World Bank

## 1. Executive Summary

This Grievance Redress Mechanism (GRM) Manual outlines the processes for receiving, evaluating, and addressing grievances that may arise during the implementation of Somali Horn of Africa Infrastructure Integration Project (SHIIP). Given the project's national scale and the involvement of multiple stakeholders—including affected communities, contractors, consultants, and government institutions—a comprehensive and transparent GRM is essential.

The GRM provides a structured, accessible, and inclusive process for individuals or groups to raise concerns related to the project, including environmental and social risks, land acquisition, resettlement, labor conditions, gender-based violence (GBV), or any other issues.

The mechanism is designed to:

- Ensure that complaints are addressed promptly, fairly, and transparently.
- Provide multiple channels (e.g., verbal, written, SMS, anonymous) for submitting grievances.
- Resolve complaints through community-level resolution, escalation to the PIU and PCU, and linkage to formal legal systems if necessary.
- Promote continuous learning and feedback loops for improving project performance and accountability.

### Feedback Resolution Process:

The GRM follows a tiered resolution process that begins at the community or contractor level. If grievance cannot be resolved locally, it is escalated to the PIU and then to the PCU. Each complaint is logged, acknowledged within a specified timeframe, assessed for eligibility, and investigated as appropriate. Resolutions are communicated in writing or through preferred communication channels, and the complainant is given the opportunity to confirm satisfaction or request further action. Regular monitoring and reporting are conducted to track the status and outcomes of all grievances, ensuring transparency and learning.

The GRM will be implemented at all levels of the project and maintained throughout its lifecycle.

## 2. INTRODUCTION

The Grievance Mechanism (GM) is an integral component of the comprehensive stakeholder engagement and information disclosure process. It serves as a venue for stakeholders to express their concerns, ensuring that they are reported and addressed in a fair and timely manner. For the Somali Horn of Africa Infrastructure Integration Project,' the responsibility for resolving any issues pertaining to the project lies with the Implementing Agency, the Ministry of Public Works, Reconstruction and Housing (MoPWR&H) of the Federal Government (FG) of Somalia. The ministry undertakes this task in accordance with the laws of the Federal Government and the Environmental and Social Standards (ESSs) set forth by the World Bank.

MOPWR&H will have the responsibility for overseeing the resolution of all grievances related to the project activities in accordance with the laws of Federal Government of Somalia (FGS), Federal Member States (FMS), and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the social/Community Development Specialist at the FGS and FMS levels, who will receive grievances by phone, text, or email to publicize free toll-free mobile phone lines and email addresses at both FMS and FGS levels. Based on learning from NGOs, the toll-free lines are not often used to report serious cases for fear of retribution or the assumption that there will be no proper follow-up.

Limited awareness is also a concern; therefore, efforts are ongoing to raise widespread awareness on the GM to promote an understanding and trust in the system. The social specialists will acknowledge, log, forward, follow up on grievance resolution, and inform the complainant of the outcome. The complainant has the right to remain anonymous. Thus, their name and contacts will not be logged, and Protections will be in place for whistle-blowers who submit complaints in good faith. The FGS social specialist will carry out training of all the MOPWR&H staff, including the SHIIP project team and contractors, on receiving complaints, referrals, complaints handling, and reporting, and will oversee awareness raising on the GM at the national level.

### Objective Of the Grievance Mechanism

The primary objective of the Grievance Mechanism (GM) under the SHIIP Project is to provide a transparent, accessible, culturally appropriate, and timely system through which project-affected persons and stakeholders can raise concerns, seek clarification, and receive redress related to project activities. The GM is intended to complement—but not replace—judicial or administrative remedies available in Somalia.

The mechanism will support effective management of feedback and complaints, strengthen the project's accountability, and improve implementation performance. It also contributes to broader social outcomes by promoting dialogue and resolving disputes early.

In line with ESS10, the specific requirements of the GM are as follows:

1. **Accountability:** Ensure project implementation aligns with World Bank policies, the Environmental and Social Framework (ESF), and national laws, promoting responsible behavior by implementers.
2. **Participation:** Provide a platform for project-affected persons (PAPs), local communities, and other stakeholders to voice their concerns, offer feedback, and influence project outcomes.
3. **Conflict Resolution:** Establish a clear and responsive mechanism for resolving grievances at the community, PIU, and PCU levels—thereby preventing escalation or delays.
4. **Transparency:** Foster openness and trust by documenting, tracking, and disclosing grievances and their resolution status.
5. **Continuous Improvement:** Analyze trends in grievances to strengthen project implementation, service delivery, and stakeholder engagement.
6. **Protection of Rights:** Safeguard the rights and dignity of all individuals—especially vulnerable groups—ensuring concerns are addressed fairly and without fear of retaliation.

The GRM also promotes a mutually constructive relationship between PAPs, communities, the FGS and FMS Ministries of Public Works and Housing, implementing partners, and the World Bank.

## Core Principles

The GM is based on the following principles:

1. **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently. The GM ensures that all complaints are addressed with fairness and without bias, ensuring a just and equitable process.
2. **Objectivity and Independence:** The GM operates independently of all interested parties to guarantee fair, objective, and impartial treatment in each case. GM officials have the necessary authority and resources to thoroughly investigate grievances, while upholding principles of fairness, confidentiality, and whistle-blower protection.
3. **Simplicity and Accessibility:** Procedures to file grievances and seek action are designed to be simple and easily understandable for Project Affected Persons (PAPs). Multiple contact options, such as a telephone number, email/letter, and in-person meetings with

project staff, are provided. The GM ensures accessibility for all stakeholders, regardless of their location, level of education, or income. Complex processes that create confusion or anxiety are avoided.

4. **Responsiveness and Efficiency:** The GM is designed to be responsive to the needs of all complainants. Staff members handling grievances are trained to take effective action and respond promptly to grievances and suggestions.
5. **Speed and Proportionality:** All grievances, whether simple or complex, are addressed and resolved as quickly as possible. GM ensures swift, decisive, fair, and constructive action in response to the grievances.
6. **Participation and Social Inclusion:** GM encourages a wide range of PAPs, including community members, vulnerable groups, project implementers, civil society, and the media, to bring grievances and comments to the attention of the Project staff. Special attention is given to ensuring that marginalized or vulnerable groups, including those with special needs, can access GM and have their concerns addressed.

In addition to the six general principles, the following four guiding principles are specifically applied to adequately respond to sexual exploitation and abuse/sexual harassment (SEA/SH) cases:

- i. **Confidentiality:** The SHIIP project Grievance mechanisms put in place channels for registering, recording, and handling SEA/SH cases in a safe and confidential manner, with the informed consent of the survivor. Reporting mechanisms enable complainants to report SEA/SH cases without being publicly identified, using secure online encryption mechanisms or discrete uptake points like hotlines or dedicated email addresses.
- ii. **Survivor-Centricity:** The focus of the process is on the short-term and long-term best interests of the survivor, with the survivor at the center of the reporting and referral mechanism. The GM creates a supportive, dignified, and protective environment for survivors, respecting their rights, wishes, and choices. Training is provided to GM officials to ensure respectful, culturally sensitive, non-judgmental approaches and empathetic listening. Survivors have the opportunity to share their stories in their own words, with the choice to disclose or not remain solely with them. Multiple retelling of the story is avoided to prevent revictimization.
- iii. **Survivor Safety:** Because some survivors may be at risk of further harm, it is essential to take measures to ensure the physical and psycho-social safety of survivors and their families. Potential risks are carefully assessed throughout the support provision process, and safety plans are created with the survivor's consent. This could include reasonable adjustments are made to work schedules and environments, preferably by moving the alleged perpetrator rather than the survivor, as deemed necessary. Survivor files will not be discussed with anyone unrelated to the case and are kept confidential



(in locked cabinets) and securely stored (electronic GM files encrypted with passwords). Maintaining the confidentiality of a grievance is essential to ensuring the safety of a survivor from retaliation, especially if the allegations may lead to disciplinary measures.

- iv. **Non-Discrimination:** Survivors of violence receive equal and fair treatment, regardless of age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristic. GM operators refrain from making assumptions about the survivor's history or background and remain aware of their own prejudices and opinions about gender-based violence, ensuring they do not influence their treatment of survivors.

### 3. Legal Framework

#### 3.1 Somalia Legal Framework

##### **Provisional Constitution of the Federal Republic of Somalia.**

Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose. Article 20 of the Constitution of Somaliland: Work, Trade, and the Welfare of Employees with the following provisions:

1. All able citizens have a right and a duty to work.
2. The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.
3. All employees have a right to payment appropriate to the work they undertake and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited.

Provisional Constitution of the Federal Republic of Somalia Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. Every labor law and practice shall comply with gender equality in the workplace.

##### **Somalia Labour Code of 1972**

Somalia Labour Code of 1972 stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval. Somalia Labour Code of 1972. The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances.

Somalia Labour Code of 1972. Workers have the right to submit complaints, and the employer must give the complaints due consideration. Somalia Labour Code of 1972. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regard to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.

Somalia Labour Code of 1972. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

Somalia Labour Code of 1972. The Labor Code forbids work for children below the age of 12 but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.

### **The Puntland Sexual Offences Act 2016 prohibits sexual harassment**

The Puntland Sexual Offences Act 2016 prohibits sexual harassment Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.

### **3.2 World Bank Environment and Social Standard 2**

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Somalia will uphold and promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. All project workers (direct and contracted) will be required to abide and meet the objectives of ESS2 including but not limited to:

- To promote safety and health at work.
- To promote the fair treatment, non-discrimination, and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

#### 4. Categorization and Types of Grievances

Grievances under the SHIP Project may arise from project-affected persons (PAPs), workers, implementing partners, contractors, consultants, or members of the public. Grievances will be categorized and addressed through the GM in accordance with project scope, World Bank Environmental and Social Standards (ESS), and national regulations.

*Table 1: Grievance Categories and Example*

Category	Description / Example Types
Access to Information	Requests for access, correction or deletion of misleading or untrue project-related information.
Ethics and Conduct	Violations of codes of conduct or ethics by government officers, project staff, or contractors.
Human Rights and Equality	Discrimination, inequality in access, or exclusion of vulnerable or marginalized groups.
Corruption and Economic Crimes	Fraud, embezzlement, bribery, or misuse of public or project funds.
Labor and Working Conditions	Unfair dismissal, contract violations, delayed wages, poor working conditions, or harassment.
Occupational Health and Safety (OHS)	Unsafe working environments or violations of ESMP/ESMF OHS measures.
Environmental compliance	Breaches of ESIA/ESMP/ESMF requirements or harm to the environment caused by project activities.
Procurement and contracting	Perceived unfairness in bidding, award, or execution of contracts.
Land Acquisition and Resettlement	Disputes over land ownership, access restrictions, delayed or inadequate compensation, relocation, or legacy land issues.
Livelihood and Economic Impacts	Disruption to business operations, markets, agriculture, or access to income-generating activities.
Social and Community Impacts	Displacement, loss of community assets or infrastructure, or adverse effects on vulnerable populations.

Gender-Based Violence (GBV), SEA/SH	GBV, sexual exploitation and abuse, or harassment by any project-affiliated personnel.
Forced or Child Labor	Use of child labor, coercive labor, or exploitative practices by contractors.
Payment-Related Complaints	Non-payment or delayed payment to workers, suppliers, or service providers.
Quality of Service	Delivery of substandard or incomplete works or services.
Threats to Safety	Risks or threats to individual or community safety due to project activities or personnel.
Other	Any complaint that does not fall within the predefined categories.

### Grievance Origin and Stakeholder Classification:

To ensure proper handling and referral, grievances may also be classified by origin:

- **Workplace-Related Grievances:** Raised by project or contractor staff regarding labor rights, SEA/SH, discrimination, or other employment-related issues (see Labor Management Procedures).
- **Direct Project Beneficiary Grievances:** Raised by local community members or PAPs, related to exclusion, safety risks, GBV, or service access.
- **Grievances from Other Stakeholders:** Raised by external or indirect actors such as local authorities, subcontractors, or civil society, typically regarding consultations, payments, or project impacts.

## 5. Institutional Arrangements for the Grievance Mechanism

### Roles and Responsibilities

#### At FGS level

**Social/ Community Development Specialists at the FGS level will have the following responsibilities:**

1. **Designing** the system and tools for the mechanism, receiving reports, and monitoring its functionality at the FGS level and with contractors.
2. **Conducting** training sessions for all staff and contractors on the Grievance Mechanism (GM) process, their roles, and responsibilities. This includes providing guidance on how to respond if a complaint is raised to them and where to refer it.
3. **Receive** and resolve complaints at the FGS level and report them to the FGS Grievance Redressed Committee (GRC). This requires close collaboration with the GBV specialist on SEA/SH complaints. The Social Specialist will regularly check the grievance email, Toll-free channel, and other sources at least once a day.
4. **Acting** as the secretary to the FGS GRC, which involves arranging meetings, taking minutes, and following up on actions and resolutions. These activities will be documented for future reference.
5. **Receiving** reports and grievance logs from the Federal Member State (FMS) and contractors. The Social Specialist will summarize the progress and recommendations and provide updates to the Project Coordinator. This information will be included in project quarterly reports and shared with World Bank Missions through reports and presentations.
6. **Facilitating Grievance Resolution**, identifying the appropriate channels for resolving each grievance, such as mediation, negotiation, or formal investigation. Liaising with relevant stakeholders, departments, or external parties to address the grievances effectively. Providing guidance and support to grievance parties throughout the resolution process.

#### At FMS level

The Social Safeguard focal point at FMS level will have the responsibility for:

1. Receiving reports from implementing partners and monitoring its functionality, including at health facility level
2. Training all staff and contractors at the FMS level on the grievance mechanism process and their roles and responsibilities, including how to respond if a complaint is raised to them and where to refer it
3. Receiving complaints at the FMS level through the focal point and forwarding them to the PCU Grievance Redress Committee (GRC).
4. Acting as the secretary to the FMS GRC, which involves calling for meetings, taking minutes, and following up on actions and resolutions, while also documenting them.

5. Receiving reports and grievance logs from implementing partners and contractors, and summarizing progress and recommendations to the Project Manager. This includes providing reports and presentations for inclusion in the project quarterly reports and World Bank Missions.

**The Social Safeguard focal point at FMS level shall undertake the following responsibilities:**

1. Conduct ongoing sensitization at the community level about the project's risks, including GBV/SEA/SH and the grievance mechanism. This includes explaining the procedures and mechanisms for reporting allegations of SEA, targeting health facility Grievance Focal Persons and recipients of assistance, as well as local communities.
2. Ensure that incident report forms are continuously available at the office and work area.
3. Establish direct communication with the GBV Specialist at the FGS in cases of GBV/SEAH incidents as soon as the incident is shared or known.
4. Urgently refer GBV complaints to relevant service providers using the appropriate referral systems when necessary. The focal persons at worksites should always act promptly on GBV/SEA/SH cases and closely follow up with the relevant agencies to ensure they are addressed.
5. In locations where survivor assistance services are limited or unavailable, districts should develop and strengthen referral pathways for survivor assistance services in coordination with other government actors.
6. Continuously raise awareness within the community about the channels for reporting grievances, including for GBV/SEA, and share the appropriate channels to report incidents.

**GBV Specialist**

**The responsibilities of the GBV Specialist at the FGS level include:**

1. Ensure that all staff within the project have read, understood, acknowledged, and adhered to internal SEA/SH complaints handling procedures included.
  - a) the individual Code of Conduct,
  - b) internal reporting mechanism,
  - c) survivors' assistance and support policy and procedures,
  - d) complaint management for staff and community.
  - e) Staff involved in the prevention of and response to SEA should understand and sign a Code of Conduct.
2. Raise SEA/SH awareness among staff through induction, sensitization, training for new personnel and refresher training for current staff on SEA/SH, the Code of Conduct, the importance and procedures of reporting incidents.

3. Provide mentorship support (trainings, sensitization as well as development of IEC materials) to GM focal points at different entry level and ensure they have direct access to the GBV GM operator to execute their functions.
4. Coordinate with other IPs to ensure that serious complaints are resolved in a timely fashion.
5. Ensure that the designated focal points are actively engaged in understanding the importance of their role and their action in supporting survivors.
6. Receive GBV/SEAH complaints at FGS level, and guide FMS focal point as social/GBV specialists on handling of complaints.
7. Promptly notify and provide information about an incident (GBV) to the Project Coordinator and the WB GBV advisor, as well as further details as they become available as needed (as per the incident classification guide in the ESIRT)
8. Ensure proper feedback is provided to complainants and monitor no adverse impact as a result of the decision for 3 months after resolution.
9. Promote adherence to the SEA/SH prevention and response action plan, by the implementing agency.

### **Grievance Redress Committee (GRC)**

The Project Coordinator will appoint and oversee the proper functioning of a grievance redress committee and ensure that the Project Managers institute similar structures at the FMS level.

The grievance committee will consist of relevant project staff who have been trained and involved in complaints handling and agreed to confidentiality and whistle-blower protection principles.

The grievance committee will meet regularly every 2 months to monitor, review, and agree on action for the resolution of non-urgent complaints and outstanding actions on other complaints; advise on any adjustments in the project to prevent common or serious complaints; review the functioning of the grievance mechanism among all implementing agencies and identify actions for strengthening. All meetings will be minute, and actions followed closely by the Project Coordinators.

In the case of serious or urgent complaints, the project coordinator will report within 24 hours of learning of the complaint to the World Bank Task team leaders, and ad hoc emergency meetings may be called as necessary.

**A Terms of Reference (TOR) has been developed to guide the scope and functions of the Grievance Redress Committee – which is attached as annex.1**



## 6. GRM Value Chain

### Step 1: Grievance Uptake

Multiple channels must be available for aggrieved parties to file their complaints, grievances, or feedback. The aggrieved party must be able to select the most efficient institution and the most accessible means of filing a grievance. He or she must also be able to circumvent partial stakeholders in the project who may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

#### Means of Filing a Grievance: -

There are four distinct means for submitting grievances, at least two of which must be made available at each project locality to ensure accessibility for all stakeholders, including survivors of GBV/SEA/SH: A phone number for a hotline operator should be established in SHIIP Project: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders.

- The Hotline Operator (2628) is available from 8.00 am to 5.00 pm every day via toll-free number. The National Project Coordination Unit (PCU) sets up and manages the hotline operator. Any party concerned can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English. The PCU and designated focal points will provide initial training to the Hotline Operator on grievance registration procedures.
- **Email Address for Communication:**  
In addition to the hotline, we completed setting up an official email address ([cabasho.shiip@gmail.com](mailto:cabasho.shiip@gmail.com)) for stakeholders to file grievances or share feedback. This email will be monitored regularly, and responses will be provided in a timely manner. The email will serve as an additional channel for stakeholders who may prefer to submit their concerns electronically.

#### Applicability to GBV/SEA/SH Grievances:

The above channels — toll-free hotline (2628) and official grievance email ([cabasho.shiip@gmail.com](mailto:cabasho.shiip@gmail.com)) — are also fully applicable and safe for reporting Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) cases. These channels are managed by personnel trained in survivor-centered approaches and confidentiality protocols. All GBV/SEA/SH-related complaints received through these means are treated with the highest level of sensitivity, confidentiality, and urgency.

In addition to the hotline and email, survivors may also report cases through designated focal points (e.g., GBV Specialists, Health Facility Focal Persons, or Case Managers) as part of the SHIIP Project's survivor-centered grievance mechanism.

## Anonymous Complaints

The SHIIP Project GRM allows for the submission of anonymous complaints to ensure accessibility for all stakeholders, including those who may fear retaliation or stigmatization.

Anonymous complaints can be submitted through:

- Locked suggestion boxes at project sites and community centers.
- SMS platforms or dedicated phone hotlines (where applicable);
- Community-based focal points or third-party representatives who can report on behalf of complainants.

While anonymous submissions may limit the ability to provide direct feedback or request further details, they will be logged, assessed, and addressed through the same grievance resolution process as other complaints.

All grievance data will be documented and treated with strict confidentiality, and project staff will take all necessary measures to prevent any form of retaliation or disclosure of sensitive information.

### Step:2 Sorting and Processing Grievances

The GM focal point will categorize the complaint according to the table above (section on ‘Categorization of Grievance’). Worker-related grievances will be handed over to a workers’ GM (see below).

Where grievances are of sexual nature and can be categorized as GBV/SEA/SH or child protection risk, the IP has to handle the case appropriately and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEA/SH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEA/SH will be required for all GM operators and relevant project staff.

Regarding grievances addressed within the overall SHIIP Project, the GM the Social Safeguard/GM Focal Point will assess the most suitable and efficient level for resolving grievance, along with the most effective approach for redress. The focal point will also establish timelines for subsequent actions based on the grievance's priority, exercise judgment, and reassign the grievance to the relevant staff member or institution. Grievances that are already being handled elsewhere, such as in court, will be excluded from the focal point's purview. Additionally, the focal point should provide the complainant with options for resolving the grievance.

In cases where Implementing Partners (IPs) already have a Grievance Mechanism (GM) in operation, the PCU will evaluate the GM's compliance with the SHIP project's GM and streamline it as necessary. The PCU will keep a centralized grievance register for recording, handling, and overseeing complaints. If IPs prefer to maintain complainants' confidentiality, they need only disclose the case's nature and outcome/resolution to the PCU.

### Incident Reporting

In the event of severe incidents that cause a significant adverse impact on the environment, affected communities, public, or workers, such as fatalities, gender-based violence, forced or child labor, the focal points and IPs will immediately report to the PCU. The PC will inform the World Bank/TTL within 48 hours of learning of such incidents, or within 24 hours in the case of SEAH due to time sensitivity.

All staff and IPs will be trained in detecting and reporting incidents, including severe ones. The reporting process ensures that information is limited according to the survivor's wishes for confidentiality. If the survivor agrees, information will be shared only on a need-to-know basis and without any details that may lead to their identification or risk of retribution.

### Step 3: Acknowledgement And Follow-Up

When a grievance is received, the IP will determine whether it can be resolved at the local level, involving local authorities, NGOs, CSOs, or contractors, or if it requires further investigation. The initial contact points will have a deep understanding of the social and political structures of the community, allowing them to recommend the appropriate individuals to address the case if it can be resolved locally. For SEAH related incidents, the survivor consent must be documented at all times.

The IP's GM Focal Point is responsible for promptly providing feedback to the aggrieved party (unless the complaint was submitted anonymously) within 5 working days after the grievance is filed. Feedback can be provided via phone, in writing, or through the community facilitators. Additionally, feedback is communicated through stakeholder meetings and beneficiary meetings during Project activities. In the case of sensitive issues, feedback is provided to the concerned parties on a bilateral basis.

### Step 4: Verify, Investigate and Act

The IP, the GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include verifying, investigating, redressing action and planning.

## Verification

➤ Check for eligibility (objectively based on set standards and criteria) of complaints in terms of relevance to the project. Refer to the SHIIP PAD, POM, ESMF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance

- Escalate outright grievances that require high-level interventions within the IP
- Refer to outright grievances that are outside the IP jurisdiction (e.g., refer to PCU or relevant external institution)

## Grievance Action Plan and Resolution Timelines

Based on the findings, determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction

- undertake mutually agreed follow-actions
- Provide users with a grievance redress status update and outcome at each stage of redress; (iii) update the IP team on grievance redress across the GRM value chain.

### Note on GBV/SEA/SH Cases:

This timeline applies to all general project-related grievances. However, for GBV/SEA/SH-related complaints, the project follows a shortened timeline in line with the World Bank SEA/SH Good Practice Note and the SHIIP SEA/SH Action Plan.

Specifically:

- SEAH (Sexual Exploitation, Abuse, and Harassment) cases must be reported to the World Bank within 24 hours of being received.
- All steps involving SEA/SH must be handled with urgency, confidentiality, and survivor consent — and resolved as quickly as possible, ideally within 7 to 10 days.
- Survivor safety and service referral take precedence over investigation or resolution timelines.

The following table outlines the standard grievance resolution steps and timelines for SHIP project-related complaints:

*Table 2: Grievance resolution timelines*

Steps to address the grievance	Indicative timeline	Responsibility
Receive, register and acknowledge complaint in writing. Serious complaints are immediately reported to the social specialist, who will report to the PC immediately. The PC will then report to the World Bank within 48 hours of learning of the incident in the case of general complaints or in the case of the SEAH within 24 hours.	Within three days	Social specialist /GBV Officer at FGS level supported by PCU.
Screen and establish the basis of the grievance. Where the complaint cannot be accepted (for example, complaints that are not related to the project), the reason for the rejection should be clearly explained to the complainant and where possible directed to the relevant department.	Within seven working days	Social specialist /GBV Officer at FGS supported by NPCU.
Project Coordinator and social specialist to consider ways to address the complaint if required in consultation with the GRC and where appropriate the complainant.	Within ten days	Project Coordinator supported by Social Safeguard focal point.
Implement the case resolution and feedback to the complainant.	One Month	Project coordinator with support from GC.
Document the grievance and actions taken and submit the report to PMT.	One Month	SS specialist and GC supported by PCU

**IP will categorize the complaint into the following categories:**

Grievance Category	Required Action
Queries, comments, and suggestions	Acknowledgment / Clarification

Complaints and concerns which do not require formal investigation	<p>Grievances should be handled and resolved by the immediate manager within the GM structure, e.g. the social Safeguard/GM Focal Point.</p> <p>The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally, the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.</p>
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	<p>As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc....</p> <p>The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.</p>

### Step 5: Monitoring, Evaluation (M&E), and Feedback Mechanisms

Effective monitoring and evaluation (M&E) of the Grievance Mechanism (GM) is critical to ensuring that complaints are resolved promptly, transparently, and in a manner that builds trust with project stakeholders. This section outlines how grievance-related data will be collected, reviewed, reported, and used to improve the effectiveness of GM.

The table below summarizes the key M&E responsibilities at different levels — including Implementing Partners (IPs), the Grievance Mechanism (GM) Focal Points, and the Project Coordination Unit (PCU) and how their actions contribute to tracking and improving grievance resolution processes.

*Table 3: key M&E responsibilities at different levels*

Entity Responsible	M&E and Feedback Activities
Implementing Partner (IP) / GM Focal Point	<p>Provide regular feedback to GM users and the public on:</p> <ul style="list-style-type: none"> <li>Results of investigations</li> <li>Actions taken</li> </ul>

		<ul style="list-style-type: none"> <li>● Importance and functioning of the GM</li> <li>● Visibility of the GM among beneficiaries</li> <li>● Building user trust in the mechanism</li> </ul>
Implementing Partner (IP)		Submit monthly GM reports to the PCU, including: <ul style="list-style-type: none"> <li>● Summary of grievances received and resolved</li> <li>● Actions taken and outcomes</li> <li>● Entries from the grievance register (excluding personal identifiers if confidentiality is required)</li> </ul>
Project Coordination Unit (PCU)		Lead overall monitoring and reporting by: <ul style="list-style-type: none"> <li>● Developing GM performance indicators</li> <li>● Tracking resolution progress and average response times</li> <li>● Conducting stakeholder satisfaction surveys</li> <li>● Analyzing grievance trends and patterns</li> <li>● Producing regular GM performance reports for internal use and World Bank review</li> </ul>

## 7. WORKERS GRIEVANCES AND PROCEDURES

A workplace grievance refers to a concern, complaint, or problem that an employee has regarding their work, the workplace environment, or individuals they interact with, including management. It arises when employees feel dissatisfied with a particular situation and perceive it as unfair or unjust.

### 5.1 Common Types of Workplace Grievances:

1. **Pay and Benefits:** Employees may raise grievances about salary, wages, overtime pay, bonuses, or discrepancies in benefits packages.
2. **Bullying:** Grievances may arise when employees experience bullying behavior, including verbal abuse, intimidation, or harassment from colleagues or superiors.
3. **Workloads:** Grievances can emerge when employees feel overwhelmed by excessive workloads, unrealistic expectations, or unfair distribution of tasks.
4. **Working Conditions:** Concerns about unsafe or unhealthy working conditions, lack of necessary equipment or resources, or inadequate workplace facilities may be raised.

5. **Sexual Harassment:** Grievances may involve instances of unwelcome sexual advances, requests for sexual favors, or other forms of unwanted behavior that create a hostile work environment.

## 5.2 Steps Of Grievance Handling Procedures

### Informal approach

Wherever possible, the MOPWR&H member, whether senior project coordinator or Grievance committee member, should make an initial attempt to resolve a grievance informally. This can include speaking to the employee who has made the complaint to understand how they would like the matter resolved. The informal approach aims to try to prevent the matter from escalating and settle the problem early on. During this stage, it is important to listen and consider what the employee has to say to reassure them that the complaint is being taken seriously and will be addressed. If an informal approach is not appropriate or does not address the grievance, then the employer will revert to the formal process.

In handling workplace grievances, the following step-by-step guidance applies:

- The employee should first approach their line manager to raise the concern.
- If they do not feel comfortable doing so, they may approach another trusted individual such as the GBV Specialist, Director General, Grievance Committee, or HR lead.
- For non-urgent grievances, the employee should submit a written complaint via email including any supporting evidence (e.g., texts, voice mail, contracts, pay slips) to the most appropriate recipient listed above.
- For urgent grievances — such as SEA/SH, fraud, or corruption — the complainant or survivor should immediately contact the GBV Specialist and Social Safeguard Specialist for immediate support, guidance, and referral.

### A formal meeting with the complainant.

This process entails conducting a grievance hearing with the employee, allowing them an opportunity to present their grievance, provide relevant details, information, or evidence to support their complaint. The employer's objective is to ascertain the facts surrounding the issue, including the individuals involved, the nature of the issue, the location, the timeline, and the underlying



reasons or causes. Once the employee has fully articulated their grievance, it may be possible, depending on the nature of the complaint, to address and resolve it at this stage.

### **Grievance investigation**

It is important to assess the validity of the grievance before proceeding. This involves gathering information and inquiring about the incidents or situations related to the complaint. If the matter involves other staff members, it may be necessary to notify them and provide an opportunity for them to share their perspectives and present any supporting evidence they may have.

### **Grievance outcome**

Once the investigation is complete and all the relevant facts have been examined and taken into account, a determination will be made regarding the validity of the grievance. This decision can involve either upholding the grievance in whole or in part or rejecting it outright. The decision should be effectively communicated to the employee. If the grievance is upheld, it may be resolved at this stage. However, if the grievance is partially upheld or rejected, or if the employee remains dissatisfied, the process may proceed to the next stage.

### **Grievance appeal**

If the employee does not accept the decision and wishes to exercise their right to appeal, they should initiate the process by submitting an appeal letter to the relevant authority, clearly stating the reasons for seeking reconsideration of the decision. To ensure fairness and impartiality, the appeal should be heard by a manager or supervisor who was not involved in the initial meeting.

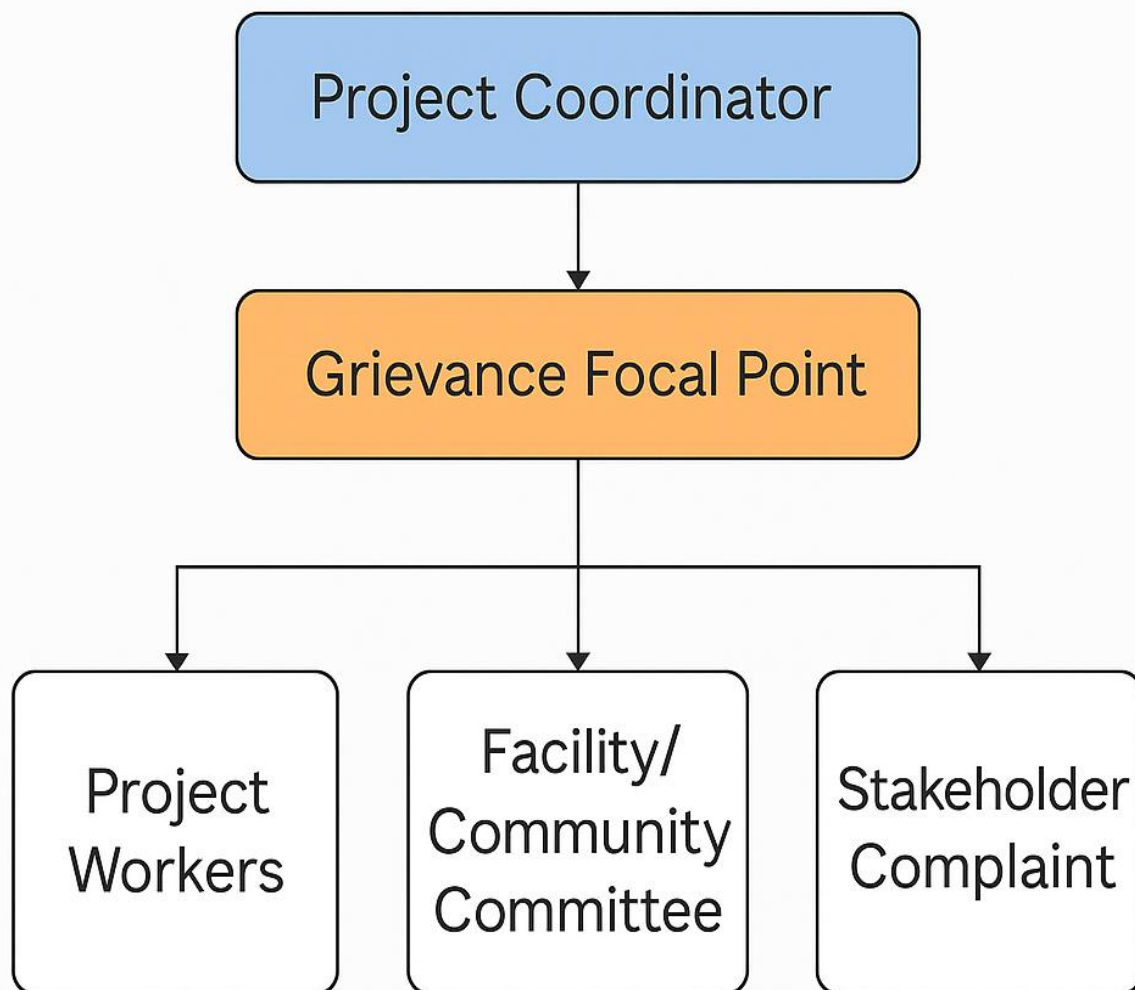
Following the submission of the appeal, an appeal hearing will be conducted, during which the employee can present any new evidence or information to support their case. The outcome of the appeal hearing will be communicated to the employee in writing. If the employee remains dissatisfied with the outcome, two additional options are available: mediation or escalation to the employment tribunal.

### 5.3 World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS).

The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org)

# Project Grievance Mechanism



*Figure 1:Project Grievance Mechanism*

## 8. GBV/SEA/SH-related Grievance

Given the sensitive nature of GBV complaints, the GM provides different ways to submit grievances. All grievance uptake channels (email, toll free lines) can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all project staff will be trained in handling and processing them.

- The GBV survivor has the freedom and right to report an incident to any individual **who is part of the SHIIP GBV/SEA/SH grievance mechanism**, including trained Health Facility Focal Points, Social/GBV Specialists, Implementing Partner (IP) Focal Points, Frontline Health Workers (FHWs), GBV Case Managers, and designated local authorities. All recipients of such reports must, with the survivor's **informed consent**, refer the case to a SHIIP Project Social or GBV Specialist in accordance with survivor-centered protocols. Survivors may also designate another trusted person to act as their advocate and report the case on their behalf, provided that person is familiar with and trained in the grievance mechanism procedures.
- The grievance recipient will be responsible for recording and registering the complaint. A GM operator cannot reject a GBV/SEA/SH complaint. At the same time, however, the project can only respond to a GBV/SEA/SH complaint if it is directed into the designated GM channels.
- Once a case has been taken in by a GM recipient and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the SHIIP GBV Specialist.

The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services and that the survivor is safe.

1. **Confidentiality:** All grievance recipients and anyone handling the GBV/SEA/SH-related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example:
  - a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to life-saving services should be sought.
  - b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.
2. **Informed Consent:** The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up.

3. Asking for Consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs), and/or to undertake any action (for instance investigation of the case).
4. Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent.
5. Where possible, the consent form can be used (in cases of direct person-to-person reporting/online). By signing this form survivor can formally agree (or disagree) with the further processing of the case. The form will clearly state how information will be used, stored and disseminated.
6. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on.
7. In the case of children, informed consent is normally requested from a parent or legal guardian of the children.
8. **Severe Incident:** If severe incidents are reported through the described GM pathway, the GM focal points need to report the case immediately to the PCU following an informed agreement by the survivor.
9. **Third-party reports:** In case of any reports from third parties on GBV/SEA/SH—related grievances to the Somali Horn of Africa Infrastructure Integration Project GM, the grievance recipient will register the case. The case will then be passed to the GM focal point, who will make contact with the survivor or an advocate that was appointed by the survivor and will a) request informed consent from the survivor to follow up on the case and b) offer any available referral services.

### GRM Budget and Sustainability

The implementation and operation of the Grievance Redress Mechanism (GRM) for the SHIIP Project are funded under the Stakeholder Engagement Plan (SEP) and the broader Environmental and Social (E&S) management budget allocated through the SHIIP project.

Specific budget lines are included at both the federal level (PCU) and state levels (PIUs) to ensure the GRM remains fully functional, staffed, and responsive throughout the project lifecycle. These funds will cover:

- Recruitment and training of GRM focal points at community, PIU, and PCU levels.
- Establishment and operation of GRM channels (e.g., hotlines, suggestion boxes, GRM registers);
- Awareness campaigns and community sensitization.
- Periodic reporting, documentation, and grievance database management.
- Transportation and logistics for grievance investigation and resolution activities.

Contractors will also be required, through contractual obligations, to support GRM dissemination and to resolve any grievances directly linked to their workforce or activities.

The PCU will oversee the GRM implementation and monitor its effectiveness as part of the project's overall E&S performance framework.

## ANNEX

### Annex 1: TOR Of Grievance Redress Committees

#### 1. Introduction

The Federal Government (FG) Ministry of Public Works, Reconstruction and Housing (MOPWRH) is committed to ensuring that all project stakeholders, including communities and civil servants, have a voice when it comes to addressing grievances related to the Somali Horn of Africa Infrastructure Integration Project (SHIIP). To achieve this, the Project Coordination Unit (PCU) has developed a Grievance Mechanism (GM) that will provide confidential and appropriate channels for individuals to raise concerns related to the Project, including environmental and social risks, land acquisition, resettlement, labor conditions, gender-based violence (GBV), or any other issues.

At the PCU – MOPWRH level, a Grievance Redress Committee (GRC) will be established. This committee will be chaired by the SHIIP Project Coordinator and the Social Specialist as the secretary, who will be responsible for taking minutes and following up on the grievance resolution process. The Social, Environment, and M&E specialists will also be members of this committee.

In order to ensure that states are also equipped to resolve grievances effectively, a GRC will also be established at each of the FMS levels. These committees will operate under common guidelines, protocols, and procedures and will coordinate with and share information between the states and the GRC at the FGS level.

#### 2. Objective of Grievance Mechanism

MOPWRH, consider the following improvements:

1. **Strengthening Stakeholder Engagement:** Emphasize the importance of active participation and engagement of all stakeholders, including community members, project-affected persons (PAPs), and relevant government agencies. Encourage regular dialogue, consultations, and involvement in decision-making processes related to health sector activities.
2. **Proactive measures to reach out to the community and create awareness about the GM.** Conduct sensitization programs, workshops, and awareness campaigns to educate

community members about their rights, the grievance process, and the available avenues for seeking redress.

3. Highlight the significance of mediation and conflict resolution as key components of the GM. Promote the use of mediation techniques to facilitate constructive dialogue, foster understanding, and resolve issues in a mutually agreeable manner. This approach can help prevent disputes from escalating and maintain positive relationships.
4. Capacity Building and Training for GM stakeholders, including GM officials, SHIIP project personnel, and community representatives. Provide training on effective communication, conflict resolution, mediation techniques, and cultural sensitivity to ensure that all parties involved have the necessary skills to address grievances efficiently and with empathy.
5. Establish a feedback loop that encourages continuous learning and improvement of the GM. Use the feedback received to identify areas for improvement, rectify shortcomings, and implement necessary changes to enhance the overall effectiveness of the GM.
6. Ensure transparency by providing regular updates on the status of grievances, actions taken, and resolutions achieved.
7. Foster an environment of empathy and empowerment within the GM. Demonstrate a genuine commitment to addressing grievances and creating positive social change. Ensure that aggrieved persons/entities are treated with dignity and respect throughout the grievance process, and that their concerns are given due consideration.

### **3. Responsibilities of Safeguard Specialists or Focal Points in GM**

The above objectives of Grievance Mechanism will be implemented by the respective Focal Points or Specialists at FGS, FMS to SHIIP.

The Safeguard specialists and Focal Points at FGS, FMS of SHIIP will deal with grievances or complaints reported through multiple sources, such as in person, messages sent to dedicated emails, and telephone calls/WhatsApp to call centres among others. Grievances can also include concerns raised by partners, consultants, contractors, beneficiaries - members of the community where the project is operating or members of the general public about any of the following matters:

- Fairness of contracting;
- Fraud or corruption issues;



- Inclusion/exclusion;
- Inadequate consultation;
- Social and environmental impacts;
- Payment-related complaints;
- Quality of service issues;
- Poor use of funds;
- Workers' rights;
- Forced or child labour; and
- Threats to personal or communal safety.
- Grievance related to sexual harassment, Sexual exploitation abuse and any gender domestic violence will be handled in confidential manner – by the GBV Specialist.

#### **4. Scope and Function of Grievance Committee**

The GRC is to effectively monitor the implementation process and functions of the Grievance Mechanism, overseen by the Safeguard specialists. The committee serves as a platform to address technical issues and challenges related to the established Grievance Mechanism. The following functions and responsibilities are assigned to the GRC:

- I. Ensure management and the implementation of grievance mechanism for concerned projects are effectively managed.
- II. Review the technical documents to guide the implementation of grievance mechanism
- III. Ensure the committee to act as platform to technically discuss safeguard arrangements and jointly address implementation challenges.
- IV. The committee is to identify and jointly review non-urgent appeals that requires the attention beyond a specific focal point or safeguard specialist.
- V. The committee jointly identifies and notes critical trends of emerging grievances such as an increase or decrease of grievance types and identifying mechanism in place to address those emerging grievances.
- VI. The committee also jointly tracks and investigates complaints specific to the project or those related concerns posted on the social media.

- VII. Review and consolidate the GM reports on (once every two months) generated and submitted by the safeguard specialists concerned and other project staff.
- VIII. Monitor if the grievances are responded on time – such as if sexual harassment, exploitation and abuses are resolved within 48 hours while other cases at maximum on 21 days (3 weeks).
- IX. Cases reporting to the committee will be on anonymous basis – not disclosing the names of cases received and responded to – but presenting and reporting on aggregated number of cases recorded and how it was responded – to ensure confidentiality of clients.
- X. The Grievance Committee at the FGS level will oversee and technically support the functions of the Grievance Committee to be established at Federal Member State levels.
- XI. The Grievance Committee at the Federal Level will report to the Director General of the Federal Ministry of public works, while those at FMS will report to the Director Generals of their respective Ministries of public works. The Director Generals at the Federal and State levels will provide strategic guidance to their committees. They will report to the Project Steering Committee and the Leadership Committees, who will further provide strategic and policy guidance consistent with the national laws and the agreed protocols of the Grievance mechanism of the Ministry of public works. The PCU will include information on this aspect of the program as part of the project progress implementation update.
- XII. Raise SEA awareness among staff through induction training for new personnel and refresher training for current staff on SEA/SH, the Code of Conduct, the importance of complying with SEA policies, and procedures to report incidents
- XIII. The committees will also promote, advice, and facilitate the interactions and coordination among grievances mechanisms of other ministries– to promote a wider government approach to the grievance mechanisms.
- XIV. The committees will also guide and help with the planning and implementation of the communication outreaches and stakeholder engagement process – as a critical component of the Grievance Mechanism.
- XV. Other technical experts of the FG Ministry or FMS might be invited to contribute to the discussions and guidance on the resolutions.

## 5. Functions of the GRM Committee Chair

The roles and responsibilities of the GRM Committee Chair are as follows:

### GRM Committee Chair:

- The GRM Committee will be chaired by the SHIIP Project. PCU Project Coordinator
- The Chairperson is responsible for convening and leading GRM Committee meetings.
- They are responsible for sending notices and agendas for all committee meetings to the committee members.
- The Chairperson ensures that the minutes of each committee meeting are reviewed and approved within ten (10) calendar days of the meeting's adjournment.
- They play a vital role in facilitating effective communication and collaboration within the committee and with relevant stakeholders.
- The Chairperson oversees the overall functioning of the GRM Committee and ensures that its objectives and goals are met.

## 6. Functions of the Secretariat.

- The Social Safeguards Specialists at the Federal and State level will act as the secretariat for their respective GRC
- The secretariat will support the Projects of the GRC meetings, which will be held once every two months.
- The secretariat will assist in taking meeting minutes of the meeting and follow up on the resolutions and agreed action points.
- The secretariat will also assist the GRC in consolidating the documentation and the reports needed, in collaboration with all safeguard teams, to be submitted to the Director Generals at the Federal level to the Steering and the leadership committees, and to the World Bank.

## 7. Summary Grievance Redress Procedures / protocol

To ensure effective grievance resolution, it is crucial to establish localized mechanisms that consider the unique issues, cultural context, local customs, traditions, and project conditions and scale. These mechanisms shall be designed and implemented in accordance with the World Bank Environmental and Social Framework (ESF), specifically Environmental and Social Standard 10

(ESS10), which emphasizes the need for accessible, inclusive, and responsive grievance mechanisms for both project-affected persons and other stakeholders.

The following outlines the grievance process that will be followed by the safeguard specialists or focal points who report to the GRC:

- Receive, register and acknowledge complaint form (see Annex 4 for a Grievance Registration Form Template.
- Screen and establish the basis of the grievance (e.g., a nuisance complaint may be rejected, but the reason for the rejection should be clearly explained to the complainant);
- Implement the case resolution, including the complainant can seek or be referred to redress at a formal court of justice;
- Reporting the resolved and unresolved grievances to the Grievance Committee for review, guidance and assist where/when necessary; and
- Document the experience for future reference.

**Table: Members of Grievance Redress Committee (GRM) at the Federal Ministry Public Works**

S/N	NAME	TITLE	POSITION
1	Ahmed Dualeh	SHIIP Project Coordinator	Chairperson
2	Yahya Ali	SHIIP Environment Specialist	Member
3	Sadia Ali	SHIIP M&E Specialist	Member
4	Fartun Umar	SHIIP GBV Specialist	Member
5	Khadra Abdirahman	SHIIP Communication Specialist	Member
6	Bashir Mahamed	SHIIP Social Specialist	Secretary

**ANNEX: 2 Confidential Consent for Release of Information**

**CONFIDENTIAL**

**Consent for Release of Information**

**This form should be read to the survivor or guardian in her / his first language. It should be clearly explained to the survivor that she / he can choose any or none of the options listed.**

I, (Survivors Code) \_\_\_\_\_, give my permission for the SHIIP Project for resilience **project** to share information about the incident I have reported to them as explained below:

1. I understand that in giving my authorization below, I am giving **SHIIP** project permission to share the specific case information from my incident report with the service provider(s) I have indicated, so that I can receive help with safety, health, psychosocial, and/or legal needs.

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the assistance I request.

I understand that releasing this information means that a person from an agency or service may come to talk to me. At any point, I have the right to change my mind about sharing information with the designated agency / project grievance redress mechanism.

2. I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify with me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

**Signature/Thumbprint of**

**survivor:**

**(or parent/guardian if survivor is under 18)**

\_\_\_\_\_ If consent has not been signed (especially if disclosure has been made through the hotline/phone call or visiting SHIIP, has the survivor been explained the process and has verbally consented to release information for referrals and further support?

**GM Code:** \_\_\_\_\_

**Date:** \_\_\_\_\_

CONFIDENTIAL INFORMATION (for follow up and further support if necessary)

Survivor's

Name:

---

Name of Caregiver (if survivor is minor):

---

Contact

Number:

---

Address:

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SURVIVOR CODE

INCIDENT ID\*

## ANNEX 3: STANDARD GBV/SEA/SH INTAKE &amp; ASSESSMENT FORM

**CONFIDENTIAL**

Before beginning the interview, please be sure to remind the survivor that all information given will be kept confidential, and that they may choose to decline to answer any of the following questions.

**1 ADMINISTRATIVE INFORMATION:**

<b>Report Date*</b>	<b>Incident Date*</b>	<b>GM Code*</b>	<b>Report by Survivor**?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
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**2 SURVIVOR INFORMATION:**

<b>Age of survivor*</b>	<b>Sex of survivor*</b> <input type="checkbox"/> Female <input type="checkbox"/> Male	<b>Type of alleged incident*</b> <input type="checkbox"/> Sexual Exploitation and Abuse SEA <input type="checkbox"/> Workplace Sexual Harassment <input type="checkbox"/> Human Trafficking <input type="checkbox"/> Rape (includes gang rape, marital rape)	<b>Alleged Perpetrator*</b> Employee of Project Other staff including government staff <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
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		<p><input type="checkbox"/> <b>Sexual Assault</b></p> <p>(includes attempted rape and all sexual violence/abuse without penetration, and female genital mutilation)</p> <p><input type="checkbox"/> <b>Physical Assault</b></p> <p>(includes hitting, slapping, kicking, shoving, etc. that are not sexual in nature)</p> <p><input type="checkbox"/> <b>Forced Marriage</b></p> <p>(includes early marriage)</p> <p><input type="checkbox"/> <b>Denial of resources, opportunities or services</b></p> <p>(includes denial of inheritance, earnings, access to school or contraceptives, etc)</p> <p><input type="checkbox"/> <b>Psychological / Emotional Abuse</b></p> <p>(Includes threats of violence, forced isolation, harassment / intimidation, gestures, etc)</p>	
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### 3 DETAILS OF THE INCIDENT:

Description of the Incident (summarise in the words of the survivor)

### 4 PLANNED ACTION / ACTION TAKEN:

Was the survivor referred to service provision? \*

☐ Yes

☐ No

☐ Psychosocial Services

☐ Health/Medical Services

☐ Livelihood Services

☐ Safe House/shelter

☐ Legal Assistance

☐ Other (Specify type of service and agency)

	<b>Referral Details:</b> (specify name, facility and agency/organization as applicable)
<b>If the survivor was not referred to any of the services listed above why not?</b>	<input type="checkbox"/> Service received prior to this call/visit <input type="checkbox"/> Service not applicable <input type="checkbox"/> Referral declined by survivor <input type="checkbox"/> Service unavailable
<p>Did the survivor give their consent to share her/his non-identifiable data in your reports? *</p> <p><input type="checkbox"/> Yes   <input type="checkbox"/> No</p> <p>Is the survivor willing to file a formal complaint?</p> <p><input type="checkbox"/> Yes   <input type="checkbox"/> No   if not, why?</p> <p>Has the survivor consented to provide contact information to be contacted in the future (for future help or to pursue the complaint)?</p> <p><input type="checkbox"/> Yes   <input type="checkbox"/> No</p>	

**ANNEX 4: Example of general COMPLAINTS FORM (to be translated into Somali)****1. Complaints' Details**

Full name or Reference number (if confidentiality requested):

Male/Female

Mobile \_\_\_\_\_

Email \_\_\_\_\_

District \_\_\_\_\_

Relationship to the project

Age (in years): \_\_\_\_\_

**2. Which institution or officer/person are you complaining about?  
Ministry/department/agency/company/group/person**


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**3. Have you reported this matter to any other public institution/ public official?**
☐ Yes
                 
 ☐ No
**4. If yes, which one?**


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**5. Has this matter been the subject of court proceedings?**
☐ YES
         
 ☐ NO

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

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7. What action would you want to be taken?

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Signature \_\_\_\_\_

Date \_\_\_\_\_

## Annex 5: World Bank Incident Classification Guide

### Indicative

- Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people
- Does not result in significant or irreparable harm
- Failure to implement agreed E&S measures with limited immediate impacts

### Serious

- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources
- Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents
- Failure to remedy Indicative non-compliance that may potentially cause significant impacts
- Is complex and/or costly to reverse
- May result in some level of lasting damage or injury
- Requires an urgent response
- Could pose a significant reputational risk for the Bank.

### Severe

- Any fatality
- Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources
- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed
- Failure to remedy Serious non-compliance that may potentially cause severe impacts Is complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.

***Annex 6: Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint***

<b>Call Answering Protocol for GBV/SEA/SH Cases</b>	
<b>1.</b>	Answer call according to standard script
<b>2.</b>	Ensure confidentiality
<b>3.</b>	Collect intake information
<b>4.</b>	Provide emotional and psychological support
<b>5.</b>	Detect if there is immediate danger for the survivor
<b>6.</b>	Explain informed consent, obtain if survivor agrees
<b>7.</b>	Provide contacts for referral services and assistance to access them where required

**Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint**

➤ <b>Listen, inquire, validate enhance safety and support</b>
➤ <b>Be patient and give compassionate responses to the caller, particularly because the caller is likely to be upset and in distress</b>
➤ <b>Responses should be dealt with in a calm way</b>
➤ <b>Do not make judgements or ask inappropriate questions</b>
➤ <b>Being sensitive to cues survivors may give</b>

## Annex 7. INFORMATION SHARING PROTOCOL

The Information Sharing Protocol (ISP) sets out the guiding principles and describes procedures and creates an opportunity to discuss information sharing among the GM operator, GBV focal points, GBV specialists, social safeguards specialist. This discussion promotes the need for ethical data sharing and ensures that the risks around information sharing are identified and mitigated. This ISP will also promote accountability for violations of the relevant Code of Conduct(s) for project workers by holding the perpetrator/project staff accountable.

When collecting, storing, sharing, and processing personal data, there are inherent risks such as unsecured data storage, accidental or unauthorized loss or disclosure. This information sharing protocol sets out procedures for sharing anonymous data on reported incidents of GBV/SEA/SH. Overall, this ISP will ensure that information related to GBV, including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), is protected in a way that ensures that no harm comes to the survivor and their family or the community from information sharing.

### Guiding Principles for Data Sharing

Information will be grounded in the following Guiding Principles:

- **Safety & Well-Being:** The safety of the survivor shall be ensured at all times including during reporting, investigation and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint and the organizations involved) and streamline ways to prevent additional harm in all the complaint handling process.

The survivor is never to blame for reporting an act of GBV and should never be made to feel investigated. On the contrary, it is important that she/he feels that her story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights and the dignity of the survivor. Furthermore, while pending investigation, the project should make efforts to ensure that the subject of the complaint does not have further contact with the survivor, such as by preventively suspending employment.

- **Confidentiality/Anonymity:** The confidentiality and anonymity of complainants, survivors and other relevant parties must be respected at all times. All GBV-related information must be kept confidential; identities must be protected and the personal information on survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.
- **Survivor-Centered Approach:** All prevention and responses actions will need to balance respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety and wellbeing remain at the center in all matters and

procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

- **Considerations regarding children:** All the guiding principles listed above apply to children, including the right to participate in decisions that will affect them. If a decision is taken on behalf of a child, the best interests of the child shall be the overriding guide and children's legal guardian should be associated with this decision whenever possible without exposing a child to further risks.

### REGISTERING A COMPLAINT:

<i>Level</i>	<i>How to raise</i>	<i>Resolution</i>	<i>Type of complaints that can deal with</i>	<i>Awareness raising?</i>
<b>Village level:</b> GRM focal person in Village Development Committee	Phone or in person	Resolve (in conjunction with VDC) or refer to FMS safeguards officer	Minor complaints that can be easily resolved, especially information or adjustments by contractor	Verbally at community meetings Poster (with toll free number) on community centre or central point
<b>Contractor:</b> site supervisor or designate	Phone or in person	Resolve or refer to FMS safeguards officer	Minor issues, adjustments in line with ESMP, dust, traffic etc.	Site handover and community meetings Overview in office and poster at site
<b>FMS implementing agencies/contractors:</b> E&S focal point	Phone or in person			
<b>FMS level: social specialist</b> (in conjunction with PM and GRC), GBV focal point for complaints related to GBV	Phone or email or toll-free hotline number in Puntland	Resolve (with PM/GRC) or refer to FGS	All complaints should be logged into GEMS and the information downloaded every month to produce a register which is sent to the	Overview in FMS offices and poster in public place and on FMS website including of implementing agencies.



			FGS social specialist and FMS PM	
<b><i>FGS level social specialist</i></b> (in conjunction with PM and GRC), GBV focal point for complaints related to GBV	Phone or email	Resolve (with PM and GRC) and inform WB (immediately or in quarterly report)		Overview in FGS offices and poster in public place and on FGS website.