



Enhancing Community  
Resilience and Local  
Governance Project  
Phase II (ECRP II)

# **South Sudan Enhancing Community Resilience And Local Governance Project II (ECRP II)**

## **Grievance Redress Mechanism (GRM) Manual**

**AUGUST 2023**

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## Abbreviations

BDC	Boma Development Committee
CoC	Code of Conduct
CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESA	Environmental and Social Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GOSS	Government of South Sudan
IP	Implementing Partner
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
LMP	Labor Management Procedures
NGO	Non-Governmental Organization
OIG	Office of Inspector General
PAP	Project Affected Person
PMU	Project Management Unit
PDC	Payam Development Committee
ECRP II	Enhancing Community Resilience and Local Governance Project
SEP	Stakeholder Engagement Plan
SEAH	Sexual Exploitation, Abuse and Harassment
SOP	Standard Operating Procedure
WB	World Bank

## Definition of Terms

Term	Definition
Complainant	An affected individual or party that submit (s) a complaint
Complaint	A complaint is a statement (verbal or written) or expression of displeasure concerning an impact or effect arising from a sub-project as unsatisfactory or unacceptable to the complainant. For the purposes of the ECRP II, a complaint is a concern about a minor impact or effect that is short term, low in risk, often temporary, that typically does not require an investigation but does require a specific response to remove or remediate the unsatisfactory or unacceptable impact or effect. Unresolved complaints may become grievances if not dealt with appropriately and within a short timeframe (typically 2 days but a maximum of 14 days). Complaints that are dealt with on the spot or resolved immediately can be referred to as minor complaints.
Grievance	A grievance is statement about an action, impact or effect originating from a sub-project that adversely affects the rights, health and/or wellbeing of an affected person or group of people to the extent that it forms legitimate grounds for grievance and if upheld, may result in compensation, legal action or a change to the sub-project in order to resolve the grievance. For the purposes of the ECRP II, a grievance will require specific response and potentially a formal intervention by the PMU for resolution and such resolution must be formally agreed and recorded.
Grievance Log	A database for maintaining information about grievances received.
Project Affected Person (PAP)	A project affected person is a person that is adversely affected temporarily or permanently as a result of sub-project works under ECRP II
Severe Incident	A severe incident is an incident <i>that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g., fatality, forced or child labor or rape/sexual violence.</i>

## Introduction

The Enhancing Community Resilience and Local Governance Project Phase II (ECRP II) is funded by the World Bank and managed by the Ministry of Finance and Planning and the Local Government Board (LGB), with the International Organization for Migration (IOM) as the project's implementing partner in 17 countries. The project seeks to strengthen the capacity of local governance and community-level institutions and to build infrastructure to address gaps in basic services in 17 counties across six states in South Sudan. Since implementation began, IOM has engaged selected communities in participatory planning processes at the county, payam, and boma levels. These processes mobilize and empower communities to convey their needs, analyze challenges they are facing, propose creative solutions to those challenges, and vocalize their preferences to promote and shape community development. ECRP II works to operationalize South Sudan's Local Government Act by supporting the functioning of Boma Development Committees (BDCs) and Payam Development Committees (PDCs) as sustainable drivers of community development. The overall Project Development Objective (PDO) is to improve access to services, strengthen flood resilience, and enhance institutional capacity for local service delivery and integrated disaster risk management at the national and sub-national levels.

The project consists of the following components:

### **Component 1: Infrastructure and Services for Community Resilience**

The component supports eligible investments in community-level infrastructure and services as well as physical investments for flood risk reduction.

*Subcomponent 1.1: Community Infrastructure and Services.* This subcomponent supports eligible investments in community-level infrastructure and services in selected vulnerable areas, including additional support for refugee hosting counties, through a participatory planning process.

*Subcomponent 1.2: Flood Risk Reduction Investments:* This subcomponent will finance physical infrastructure for flood risk reduction and related technical assessments including feasibility studies, detailed engineering designs, and safeguards assessments. The appropriate solutions and physical investments for flood risk reduction will be determined on the basis of detailed studies considering the flood hazard, exposure of people, and assets, as well the vulnerabilities of at-risk communities in the target counties.

*Subcomponent 1.3: Operations and Maintenance (O&M).* The ECRP-II envisions implementing a variety of O&M approaches based on type of infrastructure, the socioeconomic character of project communities, and demographic features of locations.

### **Component 2. Institution Strengthening**

The component supports the participatory planning process for the identification of sub-projects to be financed under Component 1, monitoring of the construction of sub-projects, as well as capacity building of relevant national and local institutions.

*Subcomponent 2.1. Community Institution Strengthening.* This subcomponent will build on the activities undertaken under ECRP-I, albeit recalibrated based on lessons learned.

*Subcomponent 2.2. County Government Strengthening.* This subcomponent will support county governments to fulfil their responsibilities for local service delivery and disaster risk management.

*Subcomponent 2.3 National and State Government Strengthening.* This sub-component will support the capacity building of the PMU, the MoFP, and the LGB (based on an assessment of their technical competencies) in the areas of financial management (FM), procurement, project planning, monitoring and evaluation (M&E), O&M planning and execution community engagement methods, and environmental and social (E&S) standards.

### **Component 3: Project Management and Learning**

This component will support (a) project management including technical planning, Financial Management, procurement, E&S risk management, and communications; (b) project monitoring which includes a geo-enabled monitoring system and beneficiary feedback/grievance redress mechanism (GRM) which will be accessible by refugees, IDPs and host communities; (c) impact evaluation; (d) continuous conflict analysis; (e) just-in-time studies, as needs arise; (f) financing for a third-party monitoring agent (TPM); and (g) PMU operating costs.

### **Component 4: Contingency Emergency Response (US\$0)**

A contingency emergency response component (CERC), initially without a budget allocation, will allow for the rapid reallocation of project funds in the event of natural or man-made crisis and major disease outbreaks of public health importance during the implementation of the project, in accordance with the World Bank Investment Project Financing (IPF) Policy, paragraphs 12 (Projects in Situations of Urgent Need of Assistance or Capacity Constraints). Implementation modality and eligible activities to be financed under the CERC will be described in a separate CERC Project Implementation Manual.

The project has been assessed and classified as a high-risk project in terms of its environmental and social risk classification. As such, in a bid to provide for the sound management of environmental and social risks, the Grievance Redress Mechanism (GRM) guidelines have been developed for the management of complaints and grievances under the *Enhancing Community Resilience and Local Governance Project Phase II (ECRP II)* in South Sudan. The purpose is to provide a suitable, centralized GRM for the ECRP that can be applied to meet the World Bank's (WB) environmental and Social Standards (ESSs) and national requirements of the Republic of South Sudan.

Under the WB ESSs, supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances'<sup>1</sup>. The GRM will enable the ECRP II to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project.

As per the WB standards, this GRM makes the following distinctions:

- a) Project-related complaints and grievances: it focuses on **project-related complaints and grievances** and defines the different steps of handling such. Labor-related complaints

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<sup>1</sup>World Bank, Environmental and Social Framework, 2018, p. 131.

and grievances which are complaints from project workers raising workplace concerns, terms of employment and other related concerns will be registered through the workers' GRM, which is a separate GRM elaborated in this document;

- b) Sexual Exploitation and Abuse (SEA) Sexual Harassment (SH) related complaints and grievances: These will focus on complaints and grievances relating to SEA/SH. Given their sensitivities and considerations related to a survivor-centered approach, they will be referred to the SEA/SH referral pathways, which are laid out in the SEA/SH action plan. This counts for complaints and grievances from Project Affected Persons (PAPs), as well as workers deployed by the project;
- c) Second tier / escalated complaints and grievances: This concerns complaints and grievances that cannot be solved by the first tiers (Project-wide and workers' complaints and grievances) or have been escalated by users dissatisfied with the resolutions from the first tiers. This describes procedures regarding how these grievances shall be addressed through an appeals mechanism.

This manual is informed by the Project's Environmental and Social Management Framework (ESMF), the Project Appraisal Document (PAD) and the Project Implementation Manual (PIM). It contains clear processes and procedures (including resolution processes and timelines) for receiving and addressing grievances related to the project. It focuses on solving grievances at the community level where possible, and if necessary, escalating them to the appropriate higher levels.

## Objectives

The key objective of this manual is to establish a prompt, easy to understand, consistent and respectful mechanism that spells out the process of receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project team's ability to identify, track, resolve and refer eligible grievances; and to enhance the project's development results and outcomes. By addressing grievances, there will be continuous improvement in performance of the ECRP II through analysis of trends and lessons learned and integrating them into ongoing implementation. The presence of a GRM process does not substitute for, or prevent complainants to access judicial and administrative remedies if they so wish. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

## Core Principles

The GRM is based on six core principles:

1. **Fairness**: Grievances are treated confidentially, assessed impartially, and handled transparently.
2. **Objectivity**: The GRM incorporates all interested parties in order to guarantee an objective focused on the grievance and not the complainant. GRM officers who include the Safeguards Specialist, Social Mobilizer/Community Outreach Assistant and Health and Safety officers will

be trained by the Project and will have adequate means and mandate to document grievances (e.g. through interview of witnesses and access to records).

3. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that PAPs can easily understand them. PAPs have a range of contact options including, at a minimum, a hotline telephone number. The GRM is accessible to a wide range of stakeholders, irrespective of their level of education or income. The GRM processes have been made simple and user-friendly to avoid creating confusion or anxiety to potential users.
4. **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.
5. **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
6. **Participation and social inclusion:** A wide range of PAPs, including community members, members of vulnerable groups, project implementers, civil society, and the media, are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

## **GRM and Gender Mainstreaming in the ECRP II**

While any project stakeholder has prospects of being aggrieved as a result of the Project, we anticipate that the grievance will also have a gender dimension to it, and will affect men and women, and boys and girls differently. Particularly, it is anticipated that children and women will most likely be affected as a result of prevailing socio-cultural barriers. In particular women are likely to be exposed to gender-based violence (GBV), in particular SEA/SH. Under the project's operating context, there are varied gender discrimination and inequalities, such as exclusion of women from decision-making, unequal power, access and control over resources especially affecting women, low level of education among majority of the women which in turn limits their knowledge and practices. In addition, more women are vulnerable due to economic hardships and are mostly dependent on agriculture, with limited capacity for business management.

In light of the above, the redress mechanism will intentionally address the needs of men and women by ensuring that:

- 1) The SEA/SH referral systems in place will guarantee that survivors have access to necessary services they may need and wish to access, including medical, legal, counselling and that cases are reported to the police should the survivor choose to do so.
- 2) IOM will sensitize the public on SEA/SH, raise public awareness about the appropriate channels for filing such complaints, train stakeholders (contractors, communities), assist and refer survivors to appropriate service providers

3) Training is offered to all relevant staff of the PMU, Hotline Operators, ECRP II and Implementing Partners on GBV-related complaints and referral systems during the initiation phase of sub-projects and as part of the staff welcome package. Training will also be provided to contractors who will engage in the infrastructure projects.

4) Grievance uptake points manned by Social Mobilisers should have both a male and a female to give equal access to both male and females. Teams investigating grievances should also have adequate representation of female and male representatives

## Categorization of Grievances

Grievances have been categorized as summarized in table 1. **Grievances outside the ECRP II mandate will be referred to the appropriate statutory institution. Annex 8** provides a list of likely grievances related to the ECRP II.

*Table 1: Categories of grievances*

<b>Categories of Grievances</b>
<i>1. Access to Basic information</i>
- Limited access to basic information on the Project itself and the GRM processes
- Correction and deletion of untrue or misleading information that affects the PAP
<i>2. Ethics and conduct</i>
- Implementing Partner staff may not exercise appropriate work ethics, like taking bribes from any relevant stakeholders.
- Violation and breach of codes of ethics by staff of Implementing Partners and contractors
<i>3. Corruption and economic crimes</i>
- Unethical conduct
<i>4. Labor and working conditions</i>
- Termination/summary dismissal/wrongful termination
- Breach of employment contract terms
- Conflicts with trade unions
- Work injury
- Discrimination
- Remuneration

- Suspension
- Waiver of claims
<b>5. Land Use Related Grievances</b>
Physical and Economic displacement, Valuation, Entitlement and Eligibility, Compensation Payment, Relocation Assistance, Resettlement assistance etc.
<b>6. Occupational Health and Safety (OHS)</b>
Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
<b>7. Sexual Exploitation and Abuse (SEA/SH) / Sexual Harassment (SH)</b>
- Sexual exploitation and abuse committed by Project workers of an IP associated to the Project (including any worker employed by sub-contractors) against a project beneficiary.
- SH committed by any Project worker (including any worker employed by sub-contractors) against another Project worker
<b>8. Other</b>
- All other project related grievances that are not captured above but relate directly to the project for example land disputes in relation to the project.

## Grievance Handling Procedure

### Step 1: Grievance Uptake

Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the project, which 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. The project has established the hotline, suggestion boxes, BDC community volunteer, social mobilisers and the help desk as means upon which the aggrieved party may approach to lodge a complaint. The uptake source guarantees confidentiality of the aggrieved person as well as it has an equality dimension as it makes sure that everyone has equal access to the uptake source.

### Means of Filing Grievance

There are four distinct means that must be made available at the project locality for people to file a grievance:

1. **A toll-free phone number operated by a hotline operator:** The phone number of a grievance hotline operator is widely disseminated among project stakeholders and PAPs. The Hotline Operator is available 12 hours a day through a toll-free number and beyond the 12

hours there is a recording provision in the hotline system to record the caller information. The recording system shall not be limited just to recording the caller information, the information to be collected by the recording system shall be designed with further grievance inquiry procedure including those mentioned in the grievance logging table: Where did it happen, Parties involved, Time when it happened, Description of the case. The recording system also need to have language option features to access by the different language user. The hotline operator is set up and managed by the Project Management Unit (PMU). The Safeguard Specialist will oversee the hotline operators. Experienced personnel will be hired and the GRM hotline operators will be trained prior to deployment in the field. Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in English and/or local language (Local Arabic). The Hotline Operator will register the grievance (see also **Annex 2** for more detailed information) in the grievance log (see below).

The Hotline Operator will be initially trained by the IOM in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to SEA/SH related grievances; d) workers' GRM; and e) ECRP II project components After providing appropriate responses to the complainant, and registering the grievance, the Hotline Operator will transfer the grievance to the relevant IOM responsible for the grievance-related activity.

The Hotline Operator will deploy two male and female staff to maintain gender parity and to allow people of different sexes to report freely who will operate Monday to Friday from 8.00 4.30 between Monday to Friday and will be substituted by the system which records automatically in their absence. The hotline operators are trained enough to handle issues across both sexes and can speak local Arabic and other local languages. The hot line booth will be stationed in its own compartment at IOM Juba office to maintain confidentiality to those who will be logging grievances. In the event that the call goes on voicemail it will automatically give the caller a recording option and the message will be retrieved once the system is back online.

2. **A Help Desk:** This will be set up by IOM during the implementation of physical sub-project activities in an area and will be manned by a social mobilizer.<sup>2</sup> The help desk can be open at hours decided upon by the IP, with a minimum a half working day (4hrs) and the help desk must be set up at a public space easily accessible and in close proximity to the sub-project activities. It should be manned by IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the help desk. The staff manning the desk will register the grievance in a GRM log. The social mobilizers will undergo an intensive training program before being deployed to operate as desk minders.

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<sup>2</sup> The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

The staff will be trained in a) the registration of a grievance; b) the interaction with complainants; c) appropriate handling of SEA/SH related grievances; and d) workers' GRM.

3. **Community Focal Persons:** Each relevant boma will have a community selected focal person in the local community – for the GRM during project activities: the 'boma or payam GRM focal point'. Community Focal Persons (volunteers) elected by the community available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. This volunteer is elected by the Boma Development Committee (BDC) members. The first point of contact for all potential grievances from community members are these elected community focal persons. They will be required to accept formal grievances; or they can point out the Hotline Operator's number, the help desk (when relevant/operational) or suggestion boxes and the Social Mobiliser who will further accept and register the grievance in a log. Each relevant volunteer will be trained by the IP or PMU in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to SEA/SH related grievances; and d) workers' GRM. The volunteer will be trained by the PMU and will be in direct contact with the IP and Social Mobiliser for any assistance.
  
4. **A Suggestion Box:** This must be installed at the nearest Boma administrative office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing. Boxes are clearly marked as ***ERCP - related*** feedback and grievance mechanisms. They will also clearly indicate when the box will be opened and grievances addressed and recorded. A signature sheet for when this is done will also be at the box for accountability purposes. The Social Mobilizer for the respective county holds the key to the suggestion boxes who will be stationed one at the boma and the other one at Payam level. IOM will procure the suggestion boxes and IOM will be responsible for the set-up of the boxes in the counties where they have infrastructure projects. The contents of the boxes will be emptied on a weekly basis by the Social Mobilizer or assigned person, and then transferred to the Safeguards Specialist in charge of the GRM. However, use of suggestion box comes with challenges of ability to write either in local language or English; and centralizing the box at the County may disadvantage those people in Payams and Bomas. Therefore, this should be encouraged where it's practically possible.

**IOM GRM Focal Points Contact List**

S/No	Name	Title	Location	Phone/Email
1			Payam	
2			County	
3			State	
4	Brian Gada	Safeguards Specialist	Juba	0927928043 <a href="mailto:bgada@iom.int">bgada@iom.int</a>

### PMU GRM Focal Points Contact List

S/N	Name	Title	Location	Phone/Email
1	Charles Abugo	Social Development Specialist	PMU/Juba	<a href="mailto:abugocharles.ecrp2.pfm@gmail.com">abugocharles.ecrp2.pfm@gmail.com</a> 0926100618
2	Samuel Manyok	Senior Social Safeguards Specialist	PMU/Juba	<a href="mailto:smanyok.ecrp2sss@gmail.com">smanyok.ecrp2sss@gmail.com</a> 0924735914
3	Paul Ssegawa	Senior Environmental Specialist	PMU/Juba	<a href="mailto:paulssegawa.ecrp2.pfmis@gmail.com">paulssegawa.ecrp2.pfmis@gmail.com</a> 0929888810
4	Guyson Adikobaa	Project Manager	PMU/Juba	<a href="mailto:guyson.pmecrp2@gmail.com">guyson.pmecrp2@gmail.com</a> 0929711711

### Step 2: Sort and Process

ECRP II will appoint a 'GRM Focal Point' in each area of operation and in this case a Social Mobilizer and a Community Outreach Assistant at Payam and County levels, and the Environmental and Social Safeguards Specialist at national level. A detailed training programme for the GRM focal points has been outlined and shall be delivered upon finalization of the GRM manual. All registered grievances will be transferred to the GRM Focal Point - either by the Hotline Operator, the Help Desk Officer or directly through the contact list provided above. The GRM focal point will categorize the complaint according to the table above (section on 'Categorization of Grievance'). Worker-related grievances will be handed over to the workers' GRM (see below). Where grievances are of sensitive nature and can be categorized as SEA/SH/SH or child protection risk, the IP has to handle the case appropriately, and refer the case according to the SEA reporting protocols and referral systems in place, defined in the SEA/SH/SH and Child Protection Prevention and Response Plan (see ESMF). No details of such cases should be taken and they should not be recorded through the GRM.

Dedicated training on how to respond to and manage complaints related to SEA/SH will be required for all staff and volunteers involved in receiving complaints (see below). The Fulcrum online system will be checked weekly by the Social Development and Social Safeguards Specialists at the PMU. In addition, there will be regular checking of the grievances reported directly to ECRP II about the Project. The grievance forms will be picked regularly and fed into the system and once the grievance is logged into the system a unique number will be auto generated and allocated to the grievance for easy follow up. The use of generated numbers will help to keep confidentiality and anonymity of complainants.

For grievances handled under the general project GRM, the Social Development and Safeguards Specialists/ GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based

on the priority of the grievance and make a judgment and reassign the grievance to the appropriate staff or institution. Grievances that are handled elsewhere will be excluded (e.g. at the court) although they will still be captured on the grievance log and shared in the overall GRM updates (reports). The focal point should offer the complainant option/s for resolution of their grievance.

The Social Development Specialist, the Senior Social Safeguards Specialists and or the Senior Environmental Specialists/ GRM Focal Points at the PMU will also transfer the grievance information into a more comprehensive grievance register (see **Annex 2**). Both ECRP II GRM Focal Points (IP and PMU) must maintain a central grievance register. The format should be similar for ease of reporting to the PMU (see Step 5).

The report form and register of the GRM will be stored in an online software which is called Fulcrum that utilizes Smart Phones for collecting and processing data gathered from the project affected persons. Each social mobiliser will receive a smartphone or tablet installed with this software. The system is designed to work without internet connectivity allowing the social mobilisers to register grievances at all times. Once the person gets back online the system will automatically connect to the server based in Juba where the information will be updated. The system is protected with data protection mechanisms to avoid unauthorized access to information while the design is inclusive in nature to capture the needs of the most vulnerable groups in the community.

All grievance forms collected will be loaded on the platform and once categorized they will be assigned at different levels on how to deal with the received information. The system's function allows the creation of protected folders for sensitive information. A general geo-referenced map of grievances distribution can be generated from the system and other categories that includes age, sex and disability as social categorization tools. The system has a grievance tracking method to monitor the status of a grievance by indicating from the time the grievance is logged what stages it has gone through and where it is at any particular time. This feature helps in the timely delivery of an overall grievance status report focusing on the operations of the GRM at the end of each reporting period.

All synthesized grievance information will be reported to the PMU on a monthly basis. The PMU will maintain a central grievance register for the logging, management and monitoring of grievances. Where IPs wish for complainants to remain confidential, they only have to share the nature of the case and the outcome/resolution with the PMU.

It is likely that at the local level, IPs will use books to maintain a record of grievances. The information will then be migrated to a digital platform for data capturing at the PMU. The platform is designed in such a way that all cases are treated confidentially.

Grievances registered with the chief, BDC or Payam Development Committee (PDC) members will remain with the local authorities, where they will be logged and handled. This is to mean that grievances that fall within the mandate of the local authorities will remain there. Any complaints

related to SEA/SH should not be registered here, but reported through established PSEA channels, and referred according to set procedures and pathways. Where no resolution can be identified, or where the complainant is dissatisfied with the proposed resolution, the grievance will be handed to the IP GRM Focal Point for processing and an appeal process is in place to cater for dissatisfied complainants. Information of cases that are solved at this level will be synthesized and reported to the project GRM social mobiliser or community outreach assistant in the area.

Severe incidents (an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g. fatality, SEA/SH, forced or child labor) will be reported within 24 hours to the PMU, with the WB in copy (see **Annex 4** for guidance). All staff involved with IOM and their respective contractors will be trained on the detection of 'incidents' and on how to report an incident, including severe incidents (see **Annexes 4 and 5**).

The ECRP II is required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. The overall responsibility for the GRM will be with the Safeguards Specialist in the PMU, and it will cover all activities and sub-components of the Project.

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

### **Step 3: Acknowledgement and Follow-Up**

Through the toll-free hotline, help desks and suggestion boxes, the information or complaints are received by the Hotline Operator (for grievances received through the toll-free hotline) or the assigned GRM Focal points in the field. The GRM Focal Person at ECRP II reviews all information. All cases will be treated confidentially. Any issue that constitutes an emergency will follow emergency reporting guidelines.

Emergency reporting - For grievances related to environmental or social incidents, the contractor is obliged to submit a report within 48 hours and within 24 hours for serious cases (as attached in the incident classification guide) to the Safeguards Specialist in the PMU.

Where grievances are sensitive and can be categorized as SEA/SH or child protection risk, the staff receiving such a complaint (hotline operator, staff managing the helpdesks, opening the suggestion boxes, etc) has to handle the case appropriately, and refer the case as per the PSEA and GBV referral system. All cases relating to SEA/SH or child abuse have to be reported to PMU for monitoring purposes, to allow PMU/IOM to: a) report cases under the emergency reporting procedures to the WB, and b) ensure that all appropriate referral mechanisms are undertaken and respective services are provided to the survivor. The case should further be reported to the respective contractor, in case a worker of the contractor (direct worker or sub-contractor) is involved in the case.

**Table 2: Case Processing Schedule**

Type of Case	Actions Required	Response Required	No. of days for action
<b>GBV/SEA/SH</b>		Refer to step 4 and Annex 3	
<b>Straight-forward cases with little anticipated complications e.g (holding long meetings exceeding agreed times)</b>	Minimal checks and consultations	Acknowledge receipt of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if needs be, and communicate outcomes and next steps based on outcomes	1-2 days
<b>Cases that require some minimal processes e.g. (delayed payment of a contractor)</b>	Delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information	Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines	7-14 days
<b>Cases that require investigation (land ownership dispute)</b>	Access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	Acknowledge reception of the grievance, provide follow-up steps and outline steps that will be followed to provide a comprehensive response	1 - 2 months
<b>Cases that require escalation to higher ECRP II implementation level e.g (Fraud)</b>	Transfer case to relevant higher level (e.g. state-level or national IOM or to PMU)	Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response	1-4 Months

Type of Case	Actions Required	Response Required	No. of days for action
	Transfer case to relevant institution (National Police Service, WB)	Acknowledge reception of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress	6 months and more

Records of all feedback and grievances reported will be established by the GRM focal person. All feedback is documented and categorized for reporting and/or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback, village, boma, payam, county, cooperating partner, Programme, nature of feedback or complaint. The general case management process is presented in the figure below.

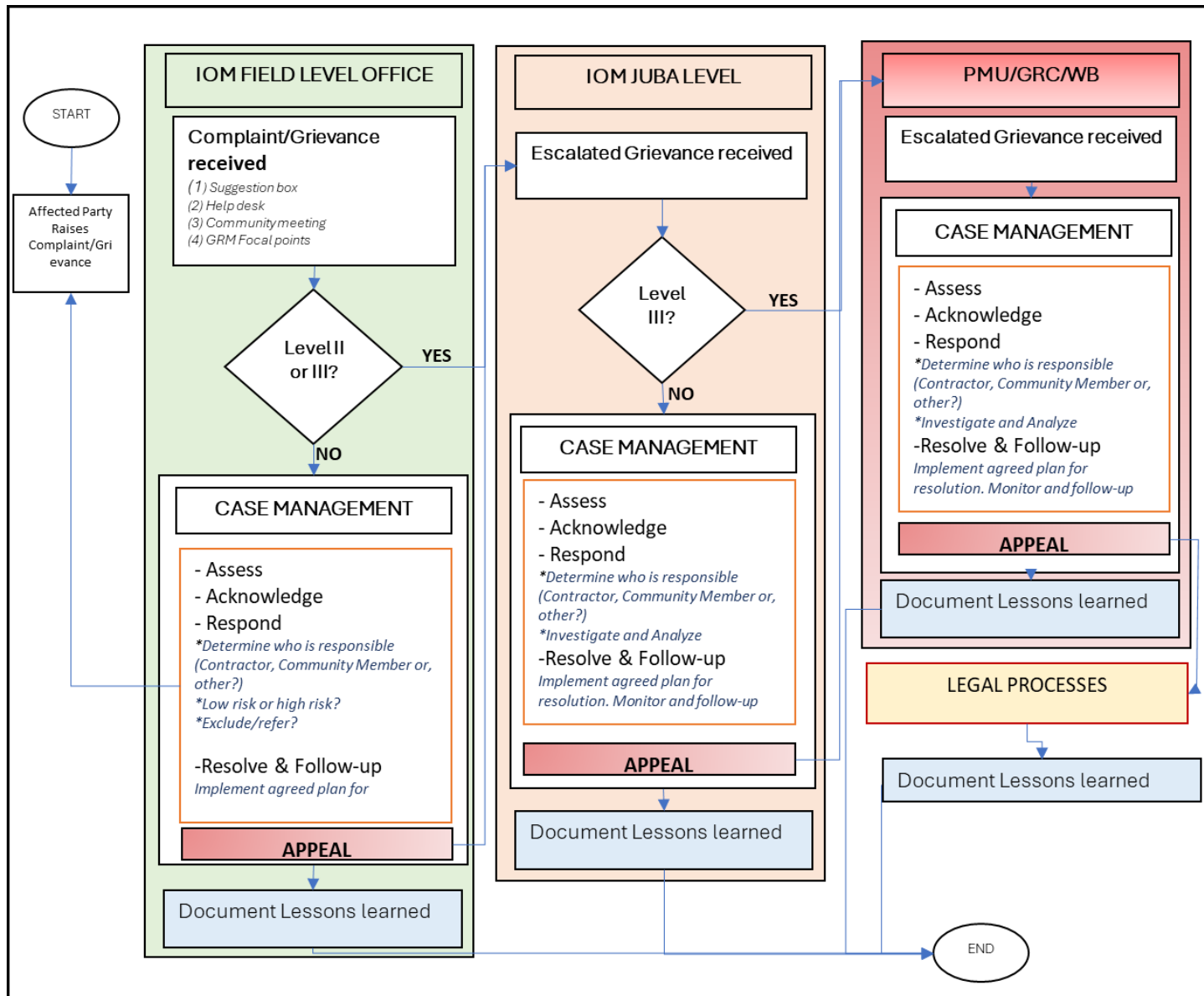


Figure 1: Overview of the case management process and escalation modalities

#### Step 4: Verify, Investigate and Act

The GRM Focal Point will then undertake activity-related steps in a timely manner. The activities will include verification, referral to investigations, redress action and plan.

##### Verification

- Check for eligibility and ineligibility (objectively based on set standards and criteria) of complaints in terms of relevance to the Project. Refer to the ECRP II PAD, PIM, EMSF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance;
- Escalate outright grievances that require high level interventions within IOM; and
- Refer outright grievances that are outside of IOM jurisdiction (e.g. refer to PMU or relevant external institution)

Once eligibility is determined, the GRM Focal Point will categorize the issues into one of categories spelt out in **Annex 8**.

##### Investigation

- GRM Focal Point to appoint an independent investigator (safeguards experts, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation.
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos).
- Collect and preserve evidence.
- Analyze to establish facts and compile a report.
- In serious cases, the Social Development and Safeguard Specialists will confidentially bring them to the attention of the IOM Office or to IOM Protection, Gender Equality and Inclusion Unit or the relevant ethics and conduct offices.
- The Social Development and safeguard Specialists will remain on standby to provide additional information to the investigators as needed;
- All cases of SEA/SH **must** be reported to IOM Protection, Gender Equality and Inclusion Unit through the corporate channels: Cases will be treated confidentially by IOM. The IOM Protection, Gender Equality and Inclusion Unit investigate all cases of SEA/SH that involve a member of IOM personnel. Allegations may need to be also reported to donors pursuant to the project agreement.
- The local PSEA Focal Points should also be contacted as soon as possible, as they are trained on what actions need to be taken and on how to contact IAIG.
- The project however establishes multiple channels for raising concerns and reporting misconduct. Even though all reported cases of SEA/SH will eventually be conveyed to IAIG, a multiplicity of reporting channels can better reach all project-affected people and increases the chance that they are used. Other reporting mechanisms can be other Agencies' or partners' reporting channels; United Nation Country Team common grievance mechanism (if in place); oral reports to members of IOM personnel; formally established project grievance mechanisms, or distinct SEA/SH grievance mechanisms.

### **Grievance Action Plan**

- 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 IOM have no jurisdiction;
- Undertake mutually agreed follow-up actions; and
- Provide project affected persons with a grievance redress status update and outcome at each stage of redress, (iii) update the IOM teams internally on grievance redress across the GRM value chain.

### **Step 5: Monitor, Evaluate and Provide Feedback**

The GRM Focal Point will provide feedback to GRM users and the public at large (if appropriate) about:

- Results of investigations (results on SEA/SH investigation touching on specific cases will not be shared to the public except with the complainant permission);
- Actions taken;
- Why GRM is important;
- Enhance the visibility of the GRM among beneficiaries; and
- Increase in users' trust in the GRM

GRM focal persons for IOM will report on the GRM cases to the PMU on a monthly basis and to the WB on quarterly basis. The ECRP II GRM Focal Person reports monthly to the Head of PMU providing information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

The PMU will undertake the following monitoring actions:

- Develop indicators for monitoring the steps of GRM value chain;
- Track grievances and assess the extent to which progress has been made to resolve them;
- Conduct a stakeholder satisfaction survey for the GRM services;
- Conduct a general and location specific analysis on the raw grievance data - average time to resolve grievances, types of grievances received, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact;
- Provide a report on grievance redress actions pertaining to the steps of GRM value chain, as part of the quarterly project report to the WB; and
- Improve awareness materials based on actual gaps in the GRM path, and also arrange necessary capacity building training.

The PMU will evaluate the GRM by:

- Analyzing grievance data to reveal trends and patterns;
- Sharing GRM analysis in management meetings and with IOM; and
- Taking corrective action on project implementation approaches to address the grievance.

### **Step 6: Close Complaint**

Once the complainant confirms that they are satisfied with the outcome, the grievance will be marked as 'closed' in the grievance register, and then archived. The Social Safeguards Specialist will also update the records in the data capturing system. If the complainant is not satisfied with the outcome, they may lodge an appeal with the structure they filed the complaint with. Appeals committees will be set at Boma level and if agreement fails to be reached then the issue is escalated to Payam level. If the complainant is not satisfied with the outcome, then recourse will be sought with the PMU.

The complainant shall lodge an appeal using the grievance report form to the secretary of the appeals committee who happens to be the Safeguards Specialist who will document the details of the matter and present it to members for consideration or where applicable forward it to the secretary of the committee to which the complaint was referred or escalated. The resolving structure shall re-evaluate the grievance and provide a resolution to the complainant. The secretary of the appeal committee shall document the outcome and notify the complainant. It should also be noted that the Senior Project Manager is the Chairperson of the appeals committee.

Where a matter is not resolved by the project structures, it shall be forwarded to the GRM focal person in the respective field office or the Safeguards Specialist for resolution.

### **Handling of SEA/SH and other Sensitive Grievances**

If the related grievance is SEA/SH, it shall be recorded in the SEA/SH incident report form by the SEA/SH focal person without divulging personal identification details about the survivor. The secretary of the appeals committee and the Gender Specialist shall ensure that all sensitive incidents are promptly reported to the PMU and that sensitive information is securely filed in folders until it is entered into the system. Access to the SEA/SH sub module in the system will be restricted to the Safeguards Specialist and the Project Manager.

The Gender Specialist shall obtain consent by completing a SEA/SH information sharing consent form before referring the survivor to the appropriate service referral where they shall receive further assistance and or treatment. If the SEA/SH incident is due to project activities, it will be followed up by the Social Mobilizer to ensure it is resolved and closed with survivor's consent, and that measures to prevent recurrence of the incident are established.

SEA/SH incidents involving committee members or project employees shall be reported to the Project Manager for investigation by relevant authorities and appropriate action in line with IOM and WB policies as well as other applicable legislation shall be taken against the perpetrator.

### **THE GRM STAKEHOLDERS**

The following are the main actors for the GRM:

- a) The ECRP II Project Director (PD): This is the Director General of Planning and Aid Coordination at the Ministry of Finance and Planning. The PD is the head of Project Management Unit (PMU) and the Chair of Grievance Redress Committee (GRC).
- b) Project Management Unit (PMU). PMU is the technical governing agency of the Government of South Sudan tasked with the project execution, including the fiduciary and safeguard aspects of the ECRP II.
- c) PMU Project Manager (PM): The PM is responsible for managing the Project's implementation. The PM will receive all complaints and provide the aggrieved with a registration number and the Safeguard Team's timeframe within which they would be contacted. The PM will avail resources needed and is responsible for the implementation of the GRM. The PM is the principal secretary to the GRC.
- d) Safeguards Team: This team comprises the Social Development Specialist, Senior Social Safeguards Specialist, Senior Environmental Specialist and E&S Safeguards Officer (SET Team) to provide communication and consultation to all beneficiaries during the implementation of the GRM.
- i) Senior Social Safeguards Specialist: The Senior Social Safeguard Specialist is responsible for monitoring, processing and evaluating all grievances. He acts as the principal technical advisor to the PMU and the PM on all GRM issues.
  - ii) Senior Environmental Specialist: The Senior Environmental Specialist is responsible for addressing concerns related to the Project's environmental impacts.
- e) A National Steering Committee (NSC) chaired by the Ministry of Finance and Planning is responsible for overall oversight and policy guidance for the ECRP II. NSC membership comprises undersecretaries from key government ministries and agencies involved in the implementation such as the Ministry of Finance and Planning, Ministry of Environment and Forestry, Ministry of Water Resources and Irrigation, Ministry of Humanitarian Affairs and Disaster Management, Ministry of Gender, Child and Social Welfare, Ministry of Labour, Ministry of Health, Ministry of Education, Commission for Refugees Affairs
- f) A National Technical Working Group (NTWG) comprising of MOFP and line ministries key technical staff representing front-line service delivery at the state and county levels. The NTWG will be responsible for providing technical guidance for meeting the project objectives and ensuring cohesion and coordination of the various project components by reviewing and endorsing annual work plans and budgets. This committee will also be chaired by the MOFP and will meet on a quarterly basis or more often as needed with the participation of the World Bank.
- g) **The Grievance Redress Committee:** to effectively facilitate and manage all the appeals, the GRC shall comprise the following persons:
- Director General of Macroeconomic Planning & Aid Coordination (MOFP) – Chair

- Project Manager (PMU) – Secretary
- Director General of Ministry of Environment
- Director General of Ministry of Labour
- Director General of Ministry of Gender, Child and Social Welfare
- Director General of Ministry of Humanitarian Affairs and Disaster Management
- Project Manager (IOM)
- Government Legal Counsel (MOFP)
- Senior Social & Environmental Safeguard Specialists – PMU and IOM

**Table 3: GRM Stakeholders**

STEP OF GRM	FUNCTION		ACTORS	ACTIONS
Assess and clarify	Mechanism available to help aggrieved person Assess if grievance is warranted.		ECRP II IPs and contractors	<ul style="list-style-type: none"> <li>Public disclosure of information if confidentiality is not mandatory (see SEP)</li> </ul>
			PAPs	<ul style="list-style-type: none"> <li>Assess and clarify feedback of grievance</li> </ul>
Report	Depending on the type of grievance and the person aggrieved – institutions receive reports of grievances.		GRM Focal person of contractors and IPs	<ul style="list-style-type: none"> <li>Set up and maintain suggestion boxes, hotline, help desks and contact list of focal points</li> </ul>
			Stakeholders	<ul style="list-style-type: none"> <li>Report feedback or grievance through help desks, suggestion boxes, hotline, IOM letter boxes and contact list of focal points</li> </ul>

STEP OF GRM	FUNCTION		ACTORS	ACTIONS
Acknowledge and follow-Up	Rapid acknowledgement and follow-up are important in order to prevent conflicts. The officer who receives the grievances has to decide where it should be handled. Some grievances should be solved locally, while others must not and should be transferred to various tiers/levels		GRM Focal Person	<ul style="list-style-type: none"> <li>• Receive feedback and grievances from suggestion boxes, help desks and hotline</li> <li>• Escalate serious issues to IOM, following emergency reporting guidelines</li> <li>• With permission of beneficiary, channel feedback or complaint to appropriate SEP feedback mechanism</li> <li>• Decide whether grievance can be solved locally.</li> <li>• Where grievances are of sexual nature, refer the case to the GBV referral system, defined in the ECRP II SEA/SH/SH and Child Abuse Action Plan and report to the PMU / and respective TA if necessary (reports can only be made if the complainant agrees)</li> <li>• Where investigations are required follow</li> <li>• Incident Management Protocol</li> <li>• Provide rapid feedback</li> </ul>

STEP OF GRM	FUNCTION		ACTORS	ACTIONS
				<ul style="list-style-type: none"> <li>• Document, categorize and report all feedback and grievances</li> <li>• Analyze data and share quarterly reports with ECRP II</li> </ul>
			ECRP II	<ul style="list-style-type: none"> <li>• Report serious issues to the WB within 24 hours, following emergency reporting guidelines</li> </ul>
			ECRP II	<ul style="list-style-type: none"> <li>• Receive grievance report where applicable</li> </ul>

STEP OF GRM	FUNCTION		ACTORS	ACTIONS
Verify, Investigate and Act	Once grievance reports have been forwarded to the appropriate address within project structures, grievances need to be verified, investigated and acted up		GRM Focal Person/ ERCP	<ul style="list-style-type: none"> <li>• Conduct investigations in 2-5 working days</li> <li>• If grievance resolution mechanism is necessary, invite representative from the respective TA and the aggrieved party (or representative)</li> <li>• Decide on a solution through grievance resolution mechanism</li> <li>• Provide appeals mechanism after decision on the case through ERCP</li> </ul>
			ECRP II	Provide appeals mechanism after decision on the case
Closing the case	<p>Grievance reports, case logs and investigation results are registered and filed by the respective Officers.</p> <p>Feedback is provided to the complainant and all aggrieved parties against every complaint received, in order to inform on the</p>		GRM Focal Person	<ul style="list-style-type: none"> <li>• Provide feedback on the grievance within week</li> <li>• Log and monitor the case</li> <li>• Analyze all cases and share synthesized analysis with ECRP II on a quarterly basis</li> </ul>

STEP OF GRM	FUNCTION		ACTORS	ACTIONS
	<p>results of the investigation and show that the grievances were handled.</p> <p>Data on grievances should be used to refine project / processes</p>		ECRP II	<ul style="list-style-type: none"> <li>Analyze all reports and provide reporting for bi-annual reports to the Bank</li> </ul>

## Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

Cases of SEA/SH (see **Annex 6**) for classification of SEA cases, can be reported through the general project GRM which include suggestion boxes, hotline, help desks and community GRM focal person. A GRM grievance recipient cannot reject a SEA/SH complaint. The above defined different grievance recipients (Hotline operators, help desks and community GRM focal persons) should include women where possible – to allow woman to woman reporting. However, the SEA/SH survivor has the freedom and right to report an incident to anyone: community members, project staff, or local authorities. All relevant staff of the PMU, Hotline Operator and IOM should receive training on receiving SEA/SH complaints and referral systems during the initiation phase of sub projects and as part of the staff welcome package. The GRM hotline operators will be trained on key protocols including confidentiality, referral, reporting and informed consent protocols to receive those cases according to the survivor-centered approach.

The PMU SEA/SH and Gender Specialist will be the key focal point for any such grievances and concerns and will work closely with respective SEA/SH Specialist counterparts at IOM in the follow-up on cases.

The Hotline Operator, and all other GRM case recipients (staff manning Help Desks, and local personnel) will ensure appropriate responses vis-à-vis the complainant/survivor by: 1) providing a safe and caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agrees, obtain informed consent and make appropriate referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of SEA/SH.

Beneficiaries and communities should generally be encouraged to report all SEA/SH cases. This will be made explicit in all community awareness sessions using appropriate Information Education Communication (IEC) in line with the survivor centered approach, as well as be part of the publicly disclosed information, including codes of conduct. The SEA/SH referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. No measures will be undertaken without the informed consent of the survivor.

If such cases are reported through the described GRM pathway, the GRM Hotline Operator needs to report the case within 24 hours to the PMU, as the PMU is obliged to report any cases of SEA/SH to the WB within 24 hours following informed agreement by the survivor. Priority should also be given to referring the survivors to medical care within 72 hours for sexual assault/rape cases, in order for the survivor to receive lifesaving medication e.g, Post Exposure Prophylaxis (PEP) for prevention of HIV, emergency contraception, etc.

Furthermore, all SEA/SH related cases that are related to any type of project workers (as defined in the IOM Labor Management Procedures) must be reported by the grievance recipient to the respective employer, so that internal PSEA procedures can be applied on IOM SEA mechanisms)

which imply dealing with the office of IAIG for investigations and the PSEA Task Force for SEA related issues.

All reporting of SEA/SH related cases will be limited to the survivors' wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution. The survivor will be made aware of their rights, options for action and providing informed consent.

In view of SEA cases, the GRM will:

- All GRM grievance recipients need to report the case within 24 hours to the PMU, as the PMU is obliged to report any cases of SEA to the WB within 24 hours following informed agreement by the survivor. The PMU will then refer the survivor to ensure the adequate provision of case management and referral pathways, ensuring survivor confidentiality;
- IOM will sensitize the public on SEA, raise public awareness about the appropriate channels for reporting such incidents, train stakeholders (contractors, communities), assist and refer survivors to appropriate service providers, and monitor implementation of the SEA risk mitigation measures. This includes the sensitization of affected populations to the risk and impact of SEA through awareness-raising sessions and the dissemination of information as well as through education and communication materials on SEA prevention and risk mitigation. All information should be made accessible to children so they are aware of how to report incidents from the project affecting them; IOM are responsible to monitor that the training for contractors regarding the CoC obligations and awareness-raising activities for the community are in place. The information gathered is monitored and reported to PMU;
- Community awareness on child protection concerns: Communities should be informed that in the event that project or partner staff abuse a child they should refer such complaints to organizations mandated on child protection issues.

## **GBV Response Measures**

### **Referral**

Any GRM grievance recipient has to instantly refer survivors to the existing GBV service providers. Existing knowledge on referral pathways for SEA survivors is currently limited in project counties. In order to complete existing information on referral pathways in project counties, a service mapping and coordination with the GBV Sub-Cluster within project areas will shed light on the functioning and effectiveness of referral pathways in place. Consultation will take place during the Project inception phase and will serve to update the GBV action plan.

Following a service mapping of existing referral services in each county, Victims and survivors will be referred to relevant health, psychosocial, case management and legal services to survivors of SEA/SH in all project areas including the areas which IOM is operating. In those counties where GBV services are very weak or non-existent, the project will establish mobile task forces (e.g. DRC integrated protection mobile teams) to provide services to SEA/SH/SH survivors at short notice.

## Monitoring of GRM system and Referral of SEA/SH/SH and Child Protection Cases

IOM will monitor all SEA/SH/SH and child protection cases reported through the various reporting mechanisms and report back to the PMU. New complaints and ongoing cases and complaints will be followed closely by the IOM Gender Specialist and the protection officer to ensure instant appropriate responses. In some instances, PMU & IOM will conduct joint field monitoring visits that will include supporting GBV/GRM/SEA/SH aspects.

Monitors will ensure that:

- Communities, including children, are aware of their rights, of the risks and threats to these, and the mechanisms available to them to report cases;
- Appropriate referral pathways are provided to survivors;
- Changes in the perception of gender inequality and women's rights among male community leaders and chiefs leading to more gender equal customary law resolutions;
- Facilitate survivors' access to essential services;
- All staff are trained on SEA/SH, CoC and their protocols. At IOM and PMU level a complaint is received and processed and the protocols are followed in a timely manner and complaints are referred to the SEA/SH resolution mechanism to be addressed;
- Where applicable, a response from the criminal justice system to investigate sexual violence/exploitation is provided;
- Where applicable, perpetrators are brought to justice and survivors are encouraged to report and engage with the criminal justice system;
- Services from the health system are provided, including for acute and long-term health implications of sexual violence; and
- A comprehensive response from social welfare services and community-based support services is provided.

Indicators for referral pathways<sup>3</sup>:

- SEA/SH Standard Operating Procedures (SOP) are in place at national and sub-national levels and project teams at national and sub-national levels are aware of SEA/SHA SOPs;
- Number of staff/GRM focal points and complaint responders oriented on the referral pathway; and
- GBV services mapped in project locations on a quarterly basis.

Quarterly monitoring of Action Plan. The PMU will monitor the implementation of the SEA/SH action plan on a quarterly basis. Quarterly reviews will focus on:

- Ensuring that all activities have been undertaken and/or are on track;
- Reviewing all referrals made in specific cases, and assess whether complaints have been handled and resolved appropriately;
- Monitoring and reporting on the effectiveness of the implementation of the SEA/SH, SHA and Child Protection Action Plan;

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<sup>3</sup> UNFPA GBVIE Minimum Standard.

- Reporting on progress on all activities and re-assessment of risks, monitoring and mitigation measures are put in place; and
- The Project team will update the PMU on a quarterly basis on the availability of GBV services for providing referral information for GBV, SEA/SH and SHA reporting survivors.

**Non-compliance:** Where quarterly reviews identify non-compliance, the matter will be reported to the PMU Project Manager. The PMU will then seek clarification from IOM and jointly develop plans on how to bring activities back on track. Serious cases of non-compliance will be reported to the WB by the PMU and may result in the closure of activities as per WB standard procedures for addressing non-compliance.

## **Workers' Grievance Redress Procedure**

### **Objective**

The objective of this procedure is to settle the grievance between employer and employee or between employees bilaterally before the intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

### **Procedure**

1. IOM only contract sub-contractors with registered CoC or who sign an undertaking to comply with the provisions of the Labor Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers;
2. Contractors induct the employee on the applicable workers' GRM, and on all relevant workers' rights. All records of induction shall be kept and made available for inspection by the PMU or the WB;
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest;
4. The supervisor will verify the details and seek to address the matter no later than 48 hours;
5. The supervisor will escalate the matter if not resolved within 48 hours until a resolution is arrived at;
6. Where no resolution is found, the employee can either escalate the matter to the 2nd tier / appeals mechanisms (see below), or to the sector specific institutions or courts to resolve the matter between employer and employee. The Supreme Court's decision is final which is the highest court of appeal;
7. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to the 2nd tier / appeals mechanism described below;
8. The Contractor shall keep records of all proceedings of grievance redress that are within its jurisdiction and furnish the PMU as part of the periodic progress reporting to the PMU;
9. All grievances of sexual nature (SEA/SH) experienced by a worker should follow the referral pathways and complaints resolution mechanism laid out in the SEA/SH action plan. A worker has the right to launch such complaints with any supervisor at any level, with IOM in the case of a subcontractor, or directly with the PMU. All personnel shall be trained appropriately in the reception of such cases and in providing appropriate referrals;

10. All SEA/SH cases must also be reported to the IOM Project Manager or the PMU Gender Specialist to allow for appropriate follow-up of organizational SEA mechanisms and for follow-up on the potential violation of the CoC; and
11. In case of risk of retribution, the employee may immediately escalate to the court system or to the PMU as noted under. If confidentiality is requested, the PMU will ensure such to avoid any risk of retribution, including in its follow-up actions.

## **Process for Escalation of Grievances / Appeals**

Where affected parties are dissatisfied with the outcomes of the grievance process handled by IOM, or where workers are dissatisfied with the solutions provided by the employer (IOM or sub-contractor), the parties have the right to escalate the matter directly to IOM (in the case of workers of sub-contractors) or to the PMU (in all other cases). For this purpose, all aggrieved persons shall contact PMU through contact list of PMU GRM focal points provided above in Annex 15. Alternatively, aggrieved parties that are dissatisfied with the grievance handling by IOM can contact the Hotline Operator and request to file the grievance directly and explicitly with the PMU, indicating its previous history.

Where a negotiated grievance solution is required, IOM or the PMU will form a 2nd Tier Grievance Redress Committee, which will consist of one neutral external individual that commands legitimacy for the resolution of conflicts.

The Committee will invite the aggrieved party (or a representative) and decide on a solution which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

Where a grievance is escalated to another institution, (including the court as a last resort), other than the processes within the Project's GRM, the complainant will be provided with the appropriate information, but will be responsible for following up their case.

Where aggrieved parties are dissatisfied with the response of the 2nd Tier / appeals mechanism, they can report cases directly to the World Bank (see below).

A grievance is considered closed after an amicable solution has been reached between the complainant and the responding party. However, in some situations the IP or the PMU may 'close' a grievance, even if the complainant is not satisfied with the result. This is the case, for example, where the aggrieved party cannot substantiate the grievance, or where an obvious speculative or fraudulent attempt has been undertaken. In such a circumstance, all steps laid out above will be undertaken before reaching a conclusion. All information will be documented and communicated to the complainant without putting the lives of those who provided information in danger.

IOM and the PMU should not dismiss any grievance based on a hasty review and closure of an investigation before the complainant has been notified and given an opportunity to provide additional information. The decision to close such grievances requires the endorsement of the GRM Focal Point in IOM, or the Social Development Specialist in the PMU.

## **World Bank Grievance Redress Service**

Communities and individuals who believe that they are adversely affected by a WB 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 WB's attention, and their management has been given an opportunity to respond. For information on how to submit complaints to the WB'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).

## **Institutional Arrangements**

The PMU is the main responsible body for the implementation of the GRM. The GRM team within the PMU consists of the Social Development Specialist (covering Gender issues), Senior Social Safeguards Specialist (all social risks including Labour and working conditions and Community health and safety), Senior Environmental Specialist (environmental risks), and the Project Manager (oversight).

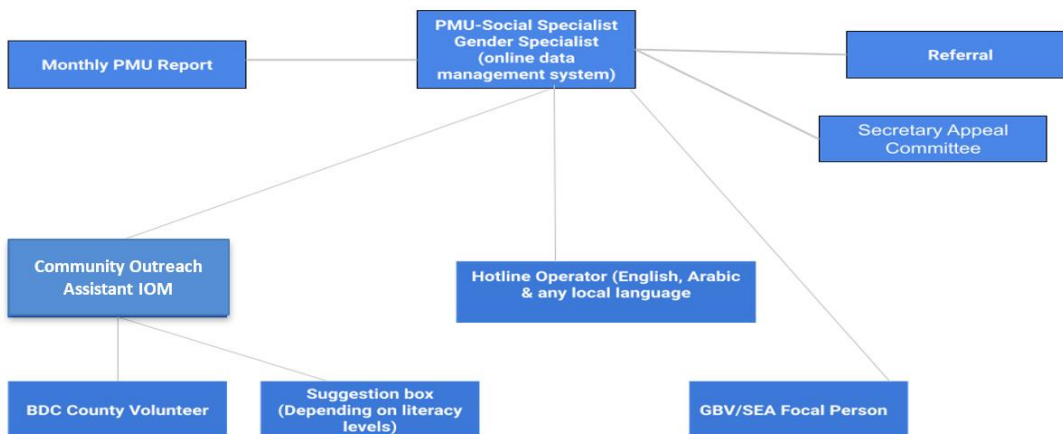
On the side of IOM, at the county level, the main responsibility for GRM related activities sits with the Community Outreach Officers (COAs). IOM has deployed a COAs for each county who will be assisted by a GRM community focal person elected by the community and assigned to each sub-project. When the Hotline is established, the operator will be stationed at IOM Juba Office in a lone office for privacy and the toll-free phone numbers will be displayed in visible and accessible points throughout the project sites. The COAs work as the Help Desk minders in selected places in the project area while community GRM focal persons selected by the community will be found at each project site. The overall GRM plan will be implemented and monitored by the Safeguards Specialist. The Specialist receives and processes grievances directed to the PMU, manage appeal mechanisms, monitors the implementation of the GRM through the Hotline Operator, manages the Hotline Operator, registers and file all GRM reports incoming from project sites, as well as compile all relevant GRM data and include reports on the GRM in the regular reports to the WB. Additionally, the Specialist is responsible for the monitoring of GRM implementation, and the identification of trends and analysis of the GRM reports in order to flag critical issues with the Project Management.

Each IOM Community Outreach Assistant is responsible for awareness creation on the GRM at its in the County he or she will be operating; roll-out information dissemination; prepare and man help desks at project sites; run a suggestion box at the project site (nearest office of administration); receive and handle grievances addressed at IOM (through help desks, suggestion boxes and directed by the Hotline Operator). The PMU's Social Management

Specialist will share all the necessary information with IOM GRM focal persons, and will monitor their awareness creation in the project of the GRM, the implementation of help desks at project sites and the handling of grievances by the Social Mobilisers.

The members of the Grievance Redress Committee have to be selected from the PMU and other project senior personnel from the relevant MDAs and IPs. They must be respectable and should have a positive influence in the project. The committee will ensure women representation ensuring that women are comfortable to raise their complaints. The GRC members must be willing to work without extra payment from the project but may be provided assistance and resources to facilitate their activities. A GBV focal person shall be appointed for each Appeals Committee and will be responsible for handling all GBV and SEA/SH incidents involving project affected persons or linked to the project.

The GRM system recognize the existence of the traditional grievance handling mechanisms. The presence and inclusion of the traditional or customary GRM system in the project site shall be identified and strengthened for the benefit of the project GRM system. The traditional leadership will be used to settle issues like communal land conflicts in order to benefit of the project GRM system as well as to ensure the sustainability of the GRM.



**Figure 2: Overview of the GRM System**

## Staffing Responsibilities

Monitoring and reporting of the GRM will be under the responsibility of PMU through the Risk Management Unit which comprises the Safeguards Specialists, Social Development Specialist and Environmental Specialists. The team will conduct regular monitoring of IOM field offices through spot checks, and receive all data from the Hot Line Operators and GRM Focal Points in the field. Quarterly reports will be submitted through the EMIS platform from the Safeguards Specialists to the M&E Unit of PMU to allow their integration into the Project's Quarterly and annual reporting to the WB. Furthermore, all monitoring data and analysis from the Hotline Operator and the Social Mobiliser/Community Outreach Assistant will be shared with the M&E Unit, to feed into the monitoring of Project indicators.

*Table 3: Responsibilities of project staff under this GRM System*

<b>Staff</b>	<b>Responsibility</b>
Safeguards Specialist	General oversight of GRM, monthly report writing, entering and consolidating data in the mobile platform
Community Outreach Assistant	Community GRM awareness, Grievance reception point, follow up on referrals and assisting with all grievance uptake points
BDC County Volunteer	community grievance focal point, assisting the social mobilizer/community outreach assistant with grievance uptake
<b>Secretary of GRC</b>	receives unresolved grievances and forward them to the Redress committee
Gender Specialist	Assists in handling of GBV/SH/SH issues
Internal PSEA focal person	focal person for community to report SEA/SH issues
Hotline Operator	Receive grievances channel them to the Safeguards Specialist for actioning
Grievance Redress Committee	Receives and reviews unclosed grievances

## Annexes

### Annex 1: Grievance Report Form

Reference No: \_\_\_\_\_

#### Details of Complainant:

Full name: \_\_\_\_\_

- I wish to raise my grievance anonymously  
 I request not to disclose my identity without my consent Contact

\_\_\_\_\_  
 **By Mail:** Please provide mailing address:

Gender of Complainant:

Age of Complainant:

By Telephone: \_\_\_\_\_

By Email \_\_\_\_\_

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**Preferred Communication:** , ,  English

- One time incident/grievance Date \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Happened more than once (how many times) \_\_\_\_\_  
 On-going (currently experiencing problem)

#### Description of Incident or Grievance:

Location of grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

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

## Annex 2: Grievance Register

The grievance register will contain the following information (ideally in an excel file, or if at local level in a book):

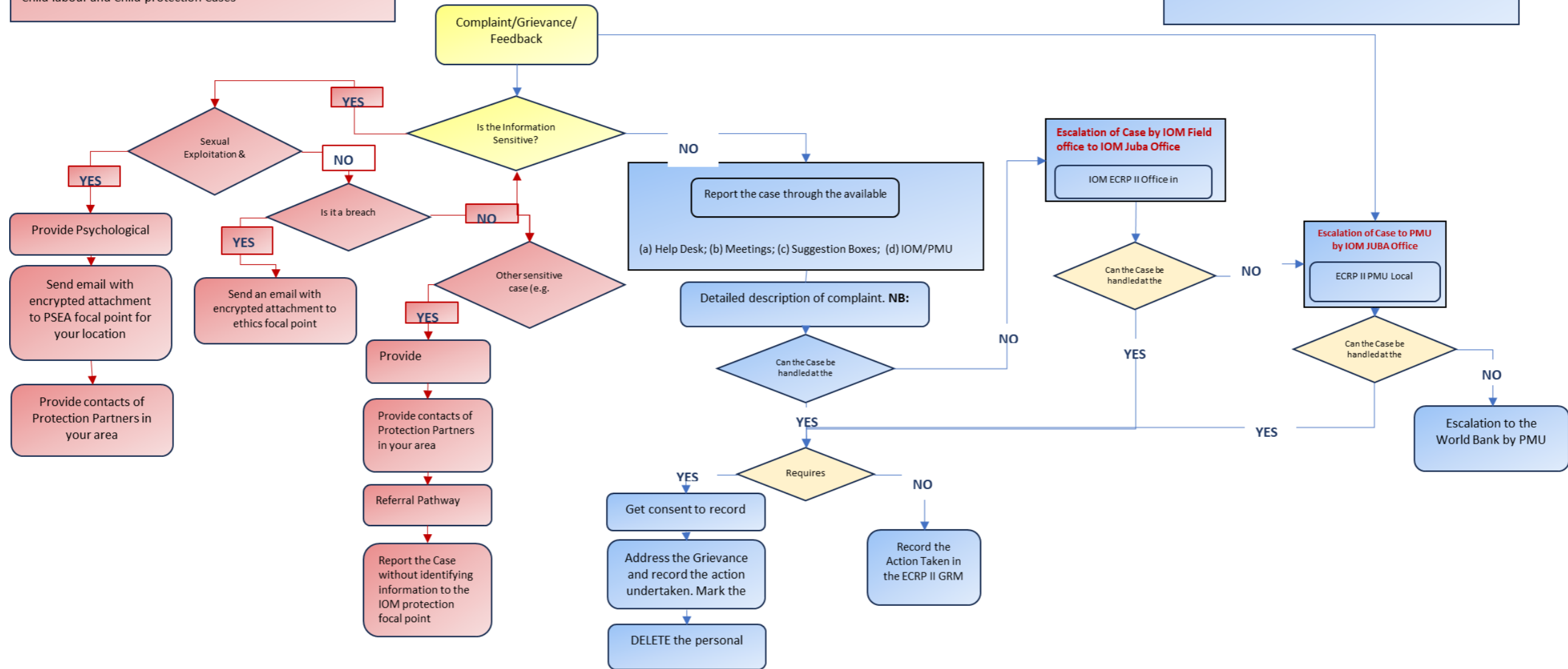
Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complaint name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (Unit/contractor/Agency etc)	
Nature of Complaint ["SEA/SH"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is SEA/SH immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	
Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	

Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date Resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

### Annex 3: ECRP II Grievance Redress Mechanisms Flowchart

**Definition of "Sensitive feedback":**  
 The complaint (Survivor) and other persons involved may be at further risk of harm if their identity is known. The case must be handled with confidentiality.  
**Examples include:**  
 (a) Forced recruitment by Project Staff sexual Exploitation and Abuse by project staff  
 (b) Sexual and Gender -based Violence  
 Child labour and Child protection Cases

**Definition of "Non-sensitive feedback":**  
 The case does not require confidentiality. Neither the complainant nor the project workers are at risk if the complaint is made public.  
**Examples include:**  
 A water point not working  
 Community members have to walk extra distance to access safe drinking water



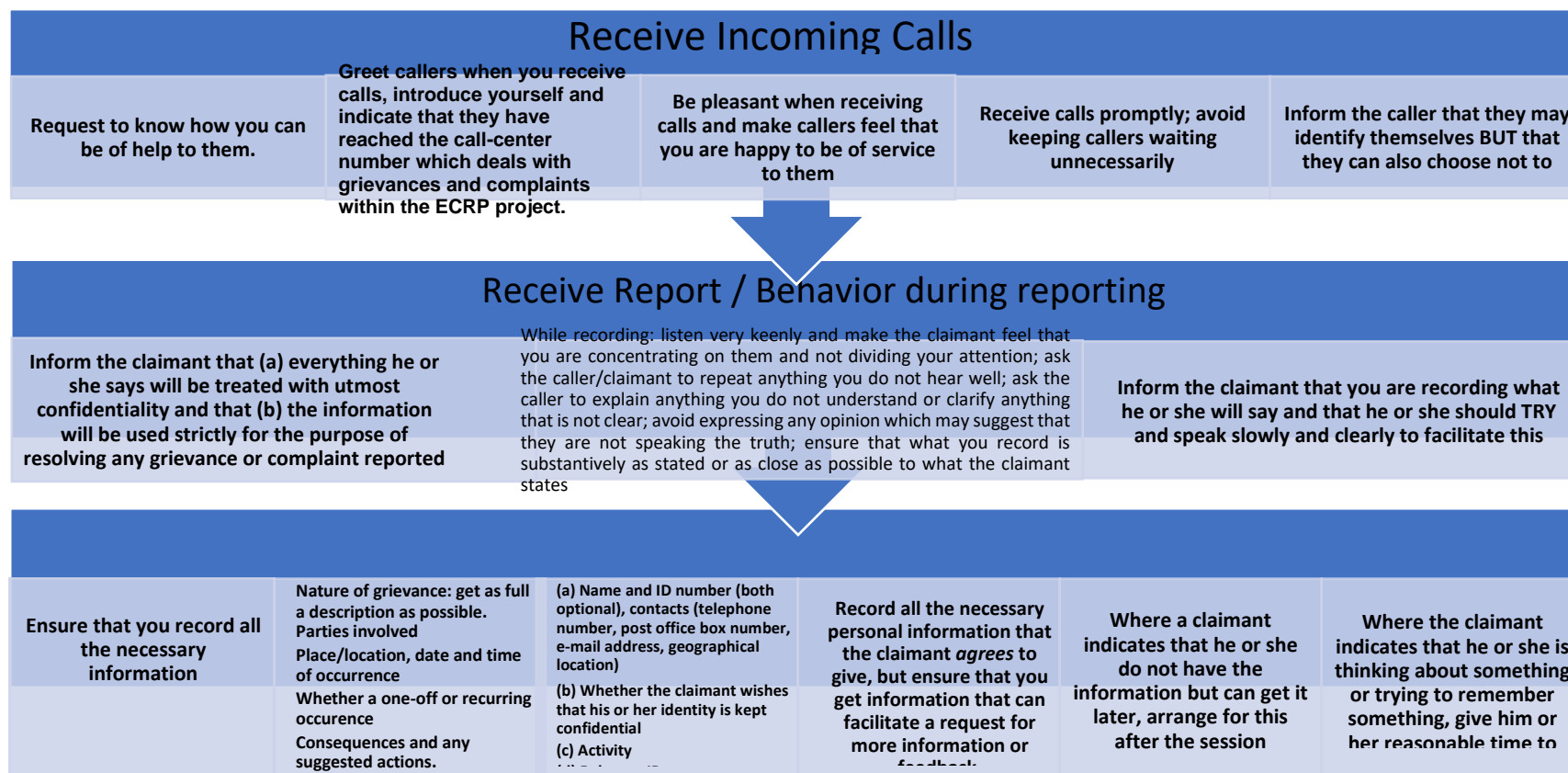
## Annex 4: GRM Incident Classification Guide and Management under ECRP II

GRIEVANCE LEVEL & CATEGORY	CATEGORY DESCRIPTION	EXAMPLES OF GRIEVANCES
<b>Level I:</b> <i>Indicative Cases</i>	<ul style="list-style-type: none"> <li>- Relatively minor, small scale localized cases that negatively impacts a small geographical area or involving a small group of people,</li> <li>- Do not result in significant or irreparable harm</li> </ul>	<ul style="list-style-type: none"> <li>- Failure to implement agreed requirements with limited immediate impacts.</li> <li>- Requests for project information and clarifications about the project</li> </ul>
<b>Level II:</b> <i>Serious Cases</i>	<ul style="list-style-type: none"> <li>- Complains and grivancies that caused or may potentially cause significant harm to the environment, workers, communities and/or natuarl or cultural resources.</li> <li>- Failure to impliment ES measures and other programatic measures with significant or repeated non compliance with project guidance documents</li> <li>- Failure to remedy indicative non-compliance that may cause significant impacts</li> <li>- Cases that are complex and/or costly ro reverse</li> <li>- May result in some level of lasting damage or injury</li> <li>- Requires urgent response</li> <li>- cause significant reputational damage to the project and the bank</li> </ul>	<ul style="list-style-type: none"> <li>- Delays in the payment of projects workers, and contractors</li> <li>- Failure to provide adequate PPE for employees.</li> <li>- Violation of critical ESS requirements</li> <li>- Violation of the CoC</li> </ul>
<b>Level III:</b> <i>Severe Cases</i>	<ul style="list-style-type: none"> <li>- Critical cases</li> <li>- Cases that caused or may cause great harm to the environment, workers, communities or natural or cultural resources</li> <li>- Failure to remedy serious non-compliance that may cause significant impacts that cannot be reversed.</li> <li>- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed.</li> <li>- Failure to remedy serious non compliance that may potentially cause severe impacts or is complex and/or costly to reverse</li> <li>- May result in high levels and immediate response</li> <li>- Poses a significant reputational risk to the project and the bank.</li> </ul>	<ul style="list-style-type: none"> <li>- Child labour cases</li> <li>- GBV/SEA/SH cases</li> <li>- Fraud cases</li> </ul>

GRIEVANCE LEVEL & CATEGORY	CATEGORY DESCRIPTION		EXAMPLES OF GRIEVANCES	
<b>NOTES ON GRIEVANCE MANAGEMENT LEVELS:</b>				
	<i>IOM Field Level Staff (ES Safeguarding Assistants, GRM Focal Points, COAs)</i>	<i>IOM Juba Office</i>	<i>PMU/GRC</i>	<i>WB</i>
<b>Level I: Indicative Cases</b>	<i>Receives, Records, Investigates, Resolve and Close such Complains and Grievances</i>	<i>Receives Reports, monitors the field offices. Reports to PMU and the WB</i>	<i>Receives reports from IOM and Monitors and review the GRM system for ECRP II</i>	<i>Receives reports from PMU and monitors and review the GRM System</i>
<b>Level II: Serious Cases</b>	<i>Receives, records, participates in the investigation <b>Escalate to IOM Juba Office</b></i>	<i>Receives, Investigates, Resolve and Close such Complains and Grievances. <b>May Escalate to PMU.</b> Reports to PMU and the WB</i>	<i>May receive escalated grievances from IOM Juba, Investigates, Resolve and Close such Complains and Grievances. Receives reports from IOM and Monitors and review the GRM system for ECRP II</i>	<i>Receives reports from PMU and monitors and review the GRM System for ECRP II</i>
<b>Level III: Severe Cases</b>	<i>Receives, records, <b>Escalate to IOM Juba Office</b></i>	<i>Receives, participates in Investigations, <b>escalates to IOM Regional Office &amp; HQ, Escalates to PMU &amp; the WB</b></i>	<i>Receives, participates in Investigations, <b>may escalates to the WB</b></i>	<i>May receive escalated cases. Participate in the management of severe cases.</i>

## Annex 5: Guidelines for Hotline Operators

The Hotline Operator has to be familiar with the ECRP II Project as a whole; with all partners implementing the ECRP II (including their key contact persons and contact details); the content of these GRM; and the SEA/SHA referral pathways and required responses for such cases. Furthermore, the Hotline Operators should understand that grievances relating to different risk levels may be treated differently; that SEA/SHA cases have special procedures for redress and require a high level of sensitivity and confidentiality.



Furthermore, Hotline Operators should be familiar with the incident reporting system laid out in the ESMF. A dedicated training will be provided initially to the Hotline Operators by the PMU. For more details see the 'GRM Value Chain' above

## **Annex 6: Classification of ECRP II Project GBV incidents**

**GBV:** According to the World Bank Guidance Note on GBV in civil works, 'GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences.'<sup>4</sup> It can therefore occur in a variety of different ways, including through the infliction of physical, mental and sexual harm, or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse or denial of resources, services and opportunities, trafficking and abduction for exploitation, Intimate Partner Violence (IPV) perpetrated by a former or current partner. Most importantly, the World Bank applies 'GBV' as an umbrella term that includes SEA/SH.

The Guidance Note defines four key areas of GBV risks:

1. SEA/SH - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion;
2. Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact;
3. Human trafficking - sexual slavery coerced transactional sex, illegal transnational movement of people;
4. Non-SEA/SH: Physical assault, psychological or physical abuse, denial of resources, opportunities or services, IPV.<sup>5</sup>

**SEA/SH:** The United Nations apply the term SEA/SH in regards to staff conduct. The United Nations Protocol on Allegations of Sexual Exploitation and Abuse involving implementing partners defines SEA/SH as 'Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another', and 'sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions'.

Sexual Harassment and Abuse (SHA) refers to unwelcome advance or conduct of a sexual nature to a colleague that creates an intimidating environment or is made a condition of employments. It could be repeated requests for a sexual or more personal relationship or inappropriately touching of another person's body.

For the ECRP II project, the broader definition of GBV will be applied to ensure that a broader set of acts are covered.

**Violence against Children:** The Convention on the Rights of the Child defines violence against children as: 'All forms of physical or mental violence, injury or abuse, neglect or negligent

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<sup>4</sup> World Bank, Good Practice Note. Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, September 2018, p.5.

<sup>5</sup> World Bank 2018, p. 3

treatment, maltreatment or exploitation, including sexual abuse. Child labor, however, is treated by UNICEF as a context of heightened risk of violence rather than violence itself.<sup>6</sup>

The ECRP II sub-components and activities do not rely on major civil works, and the anticipated social impacts are mainly positive and are not expected to have irreversible social impacts related to land acquisition, community health and safety and cultural heritage. The potential adverse risks and impacts include gender-based violence (GBV) and sexual exploitation and abuse (SEA/SH)

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<sup>6</sup> UNICEF, Preventing and Responding to Violence against Children and Adolescents. Theory of Change 2017

## **Annex 7: IOM Preventing Sexual Exploitation and Abuse and Sexual Harassment and Abuse Mechanisms**

### IOM SEA/SH Mechanisms

SEA/SH Commitments: IOM abides by the Secretary-General's Bulletin ST/SGB/2003/13 on "Special Measures for Protection from Sexual Exploitation and Sexual Abuse". IOM has a mandatory Instruction, entitled: Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse, IN/234, which binds staff members to standards of behavior at all times and especially when working with beneficiaries of assistance, including during emergency response. Sexual exploitation and abuse of affected populations constitutes gross misconduct and is grounds for disciplinary action, including summary dismissal and referral for criminal prosecution, where appropriate. In addition to IOM's SEA/SH Instruction and the Standards of Conduct, IOM has also made SEA/SH commitments that include inter-agency coordination to prevent and address SEA incidents, including active participation in in-country SEA/SH Networks.<sup>7</sup>

Inter-Agency Community-Based Complaint Mechanisms (CBCMs): IOM establishes and participates in CBCMs. A CBCM is a mechanism for receiving complaints from beneficiaries that is designed based on the input of the affected community and allows reports (including SEA/SH) to be made safely and confidentially. An inter-agency CBCM links the various complaint mechanisms of agencies working in a response to ensure that complaints are safely and efficiently referred to the appropriate agency for follow-up and potential investigation, regardless of who receives the complaint.

IOM has worked in close collaboration with humanitarian agencies to develop tools on inter-agency complaint mechanisms (see Guidance Documents and Tools for SEA/SH) and plays an active role in the Task Team on Accountability to Affected Populations and PSEA, and its technical assistance helpdesk for in-country SEA/SH networks. Since 2016, the inter-agency PSEA capacity-building team has provided technical assistance to Humanitarian Country Teams and PSEA Networks on setting up or strengthening joint SEA/SH initiatives, including joint CBCMs.

IOM South Sudan Gender Based Violence in Crisis (GBViC) Action Plan 2019-2021 has an overall priority of strengthening internal collective practices to support GBV programming, enhance IOM staff capacity and reinforce accountability mechanisms on GBV.

SEA/SH Misconduct: The Office of the Inspector General (OIG) receives reports of incidents regarding SEA-related misconducts by IOM personnel and prohibited practices by IOM contractors, vendors and third parties. It is responsible for investigating alleged misconduct across a number of areas, e.g., fraud, abuse of authority, SEA and SH. OIG has an online platform – [wearellin.iom.int](http://wearellin.iom.int) where parties can report cases directly on the platform. The IOM Ethics and

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<sup>7</sup> IOM, Emergency Manual, Protection from Sexual Exploitation and Abuse (PSEA). Accessed January 2019 <https://emergencymanual.iom.int/entry/21309/protection-from-sexual-exploitation-and-abuse-psea>

Conduct Office as well as PSEA Focal Points in the country conducts training of personnel, contractors, vendors etc on Code of Conduct, including on SEA and SH.

Community awareness: IOM has developed materials for community awareness on SEA/SH and it is mandatory that all beneficiaries are engaged on awareness raising efforts on SEA/SH in areas of operation including provision of information on how to report cases of SEA/SH either directly or through community-based complaints mechanisms set up in various field offices.

## **Annex 8: Likely grievances that might occur within the ECRP II**

### **1) Labour and working conditions.**

- Pay and benefits this may include situations where workers' wages are not fair and do not meet standards of minimum wages set by authorities or there are disparities among individuals carrying out similar work.
- Bullying which may include behaving aggressively towards an employee, teasing or making jokes, pressuring someone to behave inappropriately, excluding someone from work-related events or making unreasonable work demands.
- Poor working conditions due to lack of sanitation facilities in the workplace that exposes workers to health and safety hazards.
- Workload that involves disproportionate amount of work on one or few individuals that may force someone to accomplish additional tasks without additional compensation.
- Lack of appropriate safety gears to protect workers from risks of physical injury.
- Work related injuries and temporary or permanent disability caused at the place of work.
- Gender, age and other related biases in recruitment and remuneration of workers

### **2) Sexual exploitation and abuse**

Unwelcome sexual advances, requests for sexual favors that are verbal and physical, conduct of sexual nature. The Project GRM system considers it work related if:

- a. Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of a person's job, pay or career.
- b. Submission to or rejection of such conduct by a person is used as a basis for career employment decisions affecting that person.
- c. Such conduct interferes with an individual's performance or creates an intimidating, hostile, or offensive environment.

### **3) Occupational safety and health**

It is the responsibility of every employer to make sure that the health and safety of all employees is maintained and therefore a worker is likely to find grievances of this nature:

- lack of or absence of personal protective equipment which is directly related to the job task at hand.
- Lack of information in relation to the risks and impacts as a result of the work assignment.
- assigning unqualified personnel to carry out tasks that might endanger them to health and life risks.
- Poor workplace ergonomics

#### **4) Environmental and Social Compliance**

The project should offer a clean and safe environment for its workers and the community at large. Under this section the following grievances may be found:

- Lack of stakeholder engagement
- Poor implementation of the Environment and Social Management plan,
- Lack of proper waste management,
- Lack of respect for local cultures and traditions
- Disturbance of archaeological sites
- Lack of proper dust suppression measures
- Poor disposal of hazardous waste

#### **5) Corruption and economic crimes**

Corruption is a cancer in most projects and as a result grievance may arise in the following areas:

- Floating of tender procedures
- Awarding tenders to undeserving suppliers
- Accepting sub-standard jobs from contractors in exchange of favours

#### **6) Violation of human rights and fundamental freedoms**

Human beings are endowed with fundamental human rights and freedom of association among others. If these are not respected and upheld, they may lead to the following grievances:

- Denial of right to workplace related labour unions
- Denial of access to healthcare at a place of choice if ever a worker feels that his/her health is compromised.
- Forcing an employee to work in areas or conditions in which he or she feels that this right may be compromised without his or her consent.
- denying an employee, the right to improve his or her education even if it does not interfere with the work schedule.

#### **7) Ethics and Conduct**

- Grievances related to receiving or giving bribes in contradiction to organizational codes of conduct and ethics.
- Violation and breach of codes of ethics by staff of IOM Contractors and their workers and/or subcontractors

#### **8) Access to basic information**

Information about the project, its duration, finances, recruitment policies, procurement policies, environment and social impacts of the project - if not availed to the Project Affected Persons this may be a source of grievances.

#### **9) Others**

This section includes all other project grievances not captured in the above categories but are related to the project that can still be reported. These may include issues related to unprocedural change of project location or dispute over project land ownership.

## Annex 9: ECRP II Environmental and Social Safeguarding Code of Conduct

The rules and guidelines contained in this CoC form an integral part of your employment contract. IOM expects that every individual worker employed on its project site behaves with respect for human rights and dignity, for the equal rights of men and women, and for the values of the United Nations.

No worker present at the site is exempt from this CoC. Its violation may result in disciplinary action by IOM including, in serious cases, in your immediate removal from the project site and dismissal.<sup>8</sup> Breaches will lead to criminal prosecution when the violation of the CoC is also a violation of national laws.

\*\*\*\*\*

As a worker of IOM ECRP II:

- I will adhere to the instructions and guidance of the designated site supervisor and of any IOM personnel at the workplace.  
  
I will protect the natural environment and work in a sustainable manner. I will follow the instructions on waste management, prevention of spills, and on any other activity designed to protect the environment.
- I will avoid any unsafe acts and I will take extra care in ensuring that the way I perform my duties does not cause harm to myself or others.  
  
I will follow the health and safety procedures and use plant, equipment and personal protective equipment (PPE) according to manuals and instructions, to ensure my safety and that of my co-workers.
- I will not have sexual relations with children (under 18 years).  
  
I will not engage in any form of sexual abuse or exploitation of any person of any age, including exchanging sex for money, goods, services or other things of value.  
  
I will treat everyone with respect and dignity at all times, and challenge all forms of harassment, discrimination, intimidation, exploitation, abuse and threat of violence.  
  
I will report any such behaviors or malpractice to IOM through the toll-free line, suggestion box, dedicated email, or speak up IOM staff.

- I will uphold the integrity and reputation of IOM by ensuring that my conduct is consistent with IOM values.

I will not work under the influence of alcohol or drugs, nor will I be in possession of illegal substances on IOM work sites.

I will not engage in any violent confrontation or conflict with my fellow workers on-site or off-site.

- I have received induction or training by IOM or by its representatives on the content of this CoC, and I understand the standards of conduct that I commit to follow by signing this CoC.

I understand that I have a responsibility to speak up and report possible or actual violations of this CoC to IOM through the toll-free line, suggestion box, dedicated email or IOM staff.

I understand that failure to respect the terms of this CoC may result in my immediate removal from the project site and in the termination of my contract.

Name (in block letters)	Signature	Place, date

**Annex 10: Code Grievance Referral Form**

**Enhancing Community Resilience and Local Governance Project**

**Grievances Referral form**

*(Fill and attach a copy of register form & minutes of Appeal Committee)*

**Payam/Boma council:** \_\_\_\_\_ **Complaint referred to:** \_\_\_\_\_

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

**Reasons for referral:** \_\_\_\_\_

\_\_\_\_\_

<b>Complainant details (Name, ID/Tell. No.)</b>	<b>Details of the accused:(Name, ID/Tell. No.)</b>	<b>Resolution 1:-</b>	<b>Resolution 2:- By Authority where complaint referred to</b>	<b>Feedback to/from complainant</b>

Complaint referred by: \_\_\_\_\_

Signature: \_\_\_\_\_

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

Complaint finally resolved by: \_\_\_\_\_

Signature: \_\_\_\_\_

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

**Annex 11: Minutes of Appeals Committee Sitting**

**Enhancing Community Resilience and Local Governance Project**  
Minutes of the Appeals Committee sitting  
*(Grievances register form to be attached)*

Quarter council: \_\_\_\_\_

Date of meeting: \_\_\_\_\_ Time: \_\_\_\_\_

Case number	Agenda of discussion ( <i>Name of complainant and the accused</i> )	Main issues discussed	Action points/ Resolutions of the complaint reported	Feedback to/from complainant

Secretary Appeal committee: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Chairperson Appeal committee: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Annex 12: Consent of release of information form**

**CONFIDENTIAL**

**Consent for release of Information**

*(This form should be read and clearly explained to the complainant that he/she can choose from the listed options)*

I, \_\_\_\_\_, give  
*(Indicate full names)*

my permission for \_\_\_\_\_  
*(Indicate names and position of project representative)*

to share information about the incident I have reported to them as explained below:

- I understand that by giving my permission I am agreeing to the sharing of the specific case information from my incident report with the appropriate service providers so that I can receive medical, safety, psychosocial and/ or legal assistance;
- I understand that the information shared will be treated with utmost confidentiality and respect and shared only as needed for reporting and to provide the assistance I request;
- I understand that releasing this information means that the service provider may come and talk to me;
- I understand that I have the right to change my mind about sharing information with the designated focal points or service providers listed below at any point in time.

I would like information released to the following service providers:

Yes	No	<i>(Tick all that apply and specify name, service provider and/ or agency as applicable)</i>
<input type="checkbox"/>	<input type="checkbox"/>	Protection Services:
<input type="checkbox"/>	<input type="checkbox"/>	Medical services:
<input type="checkbox"/>	<input type="checkbox"/>	Psychosocial services:
<input type="checkbox"/>	<input type="checkbox"/>	Legal assistance:
<input type="checkbox"/>	<input type="checkbox"/>	Safe Space:
<input type="checkbox"/>	<input type="checkbox"/>	Other(specify):

**Signature or Thumbprint of Complainant** \_\_\_\_\_ **Date:** \_\_\_\_\_

Contact

Number: \_\_\_\_\_

Address: \_\_\_\_\_

—

## **Annex 13: GBV Incident Report Form**

### **South Sudan Enhancing Community Resilience And Local Governance Project (ECRP II)**

#### **Instructions:**

This form should be filled out by a GBV focal point, grievance mechanism operator or other authorized project personnel responsible for reporting of GBV incidents.

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 questions. This includes telling the person that their information will be safely stored, who at minimum will know about the case, and any limits there may be to confidentiality. The survivor must agree to providing information by signing the Consent form.

Remember, only seek the minimum details required for filling the form. Receiving a complaint is not the same as investigating it. It is not your role to investigate the case.

React calmly and listen carefully to what is being said.

Reassure the complainant that he or she has a right to raise any concern.

Ask only relevant questions required to gain a clear understanding of the complaint so that it can be passed through the relevant reporting procedures.

Ensure that the survivor/complainant's safety is not at risk.

Prioritise the survivor's need for services including medical attention and use the available GBV referral pathway if available, or seek advice from the assigned GBV / HSSE specialist.

Allow the complainant to read what you have written. If the complainant is illiterate, read out the text to ensure that what you have written is what he or she meant. Ask the person if he or she is satisfied with what you have written. If they are not, correct the text with them.

Inform the complainant of the next steps in the procedures.

All information shared by the client should be kept **strictly confidential** and shared only with the relevant persons involved in/responsible for managing such cases and providing further assistance as required. A consent form, duly completed and signed by the survivor must be attached to this form.

<b>Full name of the complainant:</b> <i>(Optional)</i>	
<b>Age:</b> <i>(Approximate if necessary)</i>	
<b>Gender:</b>	<input type="checkbox"/> Male <input type="checkbox"/> Female
<b>Incident reported by:</b>	<input type="checkbox"/> Survivor <input type="checkbox"/> Family member <input type="checkbox"/> Friend <input type="checkbox"/> Caregiver/Guardian <input type="checkbox"/> Other (specify)
<b>Date of interview:</b> <i>(day/month/year)</i>	Date: _____ Location: _____ Time: _____
<b>Date of incident:</b> <i>(day/month/year)</i>	Date: _____ Location: _____ Time: _____
<b>Is the survivor a minor:</b> <i>(aged below 18 years)</i>	<input type="checkbox"/> No <input type="checkbox"/> Yes
<b>If a minor, was the complainant accompanied by an adult?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes
<b>Description of the incident</b> <i>(summarize the details of the incident in client's words)</i>	

<b>Is the perpetrator known:</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes
<b>If known, is the perpetrator associated with the project?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Don't know
<b>Is the client at risk of retaliation by the perpetrator:</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes
<b>How would you like the issue to be resolved? What actions would you like to take?</b> <i>When asking this question, make sure you don't discourage anyone from making complaints and do <b>NOT</b> suggest a course of action on their behalf nor suggest any informal mediation.</i>	
<b>Would the complainant like to be referred to available assistance (medical, counseling, GBV case management, etc.?)</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes
<b>Type of Referral Provided</b> <i>(tick all that apply)</i>	<input type="checkbox"/> GBV Case Management <input type="checkbox"/> Medical/Health Care <input type="checkbox"/> Safety and Security <input type="checkbox"/> Legal and Justice <input type="checkbox"/> Mental Health and Psychosocial Support <input type="checkbox"/> Protection and Shelter <input type="checkbox"/> Other e.g. NFI/Food/Cash (specify)
<b>Is the client willing to provide a contact number/ person for follow up?</b>	<input type="checkbox"/> Yes <i>(Enter detail)</i> <input type="checkbox"/> No
<b>Incident Recorded by:</b>	Name:  Position:  Contact No:  Date and Signature:

## Annex 14: Referral Centers

Region	Activity	Actor
<b>Bahr el Ghazal</b>		
<b>Northern Bahr el Ghazal</b>	<ul style="list-style-type: none"> <li>- Family protection centers (Maluaklon)</li> <li>- One stop center (expanding to Aweil<sup>9</sup>)</li> <li>- Aweil Civil Hospital/American Refugee Committee</li> </ul>	<b>UNFPA</b>
<b>Western Bahr el Ghazal</b>	<ul style="list-style-type: none"> <li>- <u>Humanitarian hubs with prepositioned supplies (Wau)</u></li> <li>- <u>One stop center (Wau)</u></li> <li>- Psychosocial support for survivors of sexual violence</li> </ul>	<b>UNFPA</b> <b>UNFPA</b> <b>DRC</b>
<b>Lakes</b>	<ul style="list-style-type: none"> <li>- Family protection centers (Rumbek)</li> <li>- One stop center</li> <li>- Psychosocial support for survivors of sexual violence</li> </ul>	<b>UNFPA</b> <b>UNFPA</b> <b>ICRC</b>
<b>Warrap</b>	<ul style="list-style-type: none"> <li>- Transforming lives and preventing violence programme</li> <li>- <u>Capacity building on GBV basis and response to GBV, update of referral pathways. A GBV assessment (Twic)</u></li> </ul>	<b>UNICEF</b> <b>DRC</b> <b>GBV WG</b>
<b>Equatoria</b>		
<b>Western Equatoria</b>		
<b>Central Equatoria</b>	<ul style="list-style-type: none"> <li>- Campaign to address harmful social norms at the root of GBV through individual behavior change and community awareness approaches.<sup>10</sup> (Juba)</li> <li>- Family protection centers (Juba), <u>humanitarian hubs with prepositioned supplies</u></li> <li>- Transforming lives and preventing violence programme (Juba)</li> <li>- Legal aid clinics for IDPs on land and housing.</li> <li>- Dignity kits (200) and counseling and referrals for women (Lobonok)</li> <li>- Juba Teaching Hospital</li> </ul>	<b>Active Youth Agency and IOM</b> <b>UNFPA</b> <b>UNICEF</b> <b>UNHCR</b> <b>AYA, IOM</b>
<b>Jonglei</b>	<ul style="list-style-type: none"> <li>- Transforming lives and preventing violence programme.</li> <li>- Integrated protection Mobile Teams</li> </ul>	<b>UNICEF</b> <b>DRC</b>
<b>Unity</b>		
<b>Upper Nile</b>	<ul style="list-style-type: none"> <li>- <u>Humanitarian hubs with prepositioned supplies</u></li> <li>- <u>One stop Center (Malakal)</u></li> <li>- Psychosocial support for survivors of sexual violence (Malakal)</li> </ul>	<b>UNFPA</b> <b>UNFPA</b> <b>ICRC,</b> <b>International Medical Corps</b>

<sup>9</sup> Information from the SSSP meeting with GBV sub cluster members held on 11th February.

<sup>10</sup> IOM (2019), GBV Report, Quarter 2

## Annex 15: GRM Focal Points Contact List

ID	Name	Title	Location	Phone/Email
1.	TBA	Environmental and Social Safeguarding Assistant	Upper Nile State	TBA
2.	TBA	Environmental and Social Safeguarding Assistant	Greater Unity State	TBA
3.	TBA	Environmental and Social Safeguarding Assistant	Western Bahr el Ghazal	TBA
4.	TBA	Environmental and Social Safeguarding Assistant	Juba, Roving	TBA
5.	Brian Gada	Environmental and Social Safeguarding Officer	Juba	<a href="mailto:bgada@iom.int">bgada@iom.int</a> +211927928043
6.	Samuel Manyok	Senior Social Safeguards Specialist	PMU/Juba	<a href="mailto:smanyok.ecrp2sss@gmail.com">smanyok.ecrp2sss@gmail.com</a> +211924735914
7.	Guyson Adikobaa	Project Manager	PMU/Juba	<a href="mailto:guyson.pmecrp2@gmail.com">guyson.pmecrp2@gmail.com</a> +211929711711