



**WEST AFRICAN POWER POOL**  
**SYSTÈME D'ÉCHANGES D'ÉNERGIE**  
**ÉLECTRIQUE OUEST AFRICAIN**

**Regional Emergency Solar Power Intervention Project;  
(RESPITE) P179267**

# **GRIEVANCE MECHANISM (GM)**

*(Final)*

**November 2024**

# SUMMARY

|   |    |
|---|----|
| LIST OF ABBREVIATIONS AND ACRONYMS .....  | 5  |
| DEFINITION OF CONCEPTS .....  | 6  |
| INTRODUCTION.....   | 9  |
| 1. RESPITE PROJECT DESCRIPTION .....  | 10 |
| 1.1. Description of the RESPITE project.....                                      | 10 |
| 1.1.1. Project objectives .....   | 10 |
| 1.1.2. Specific objectives .....  | 10 |
| 1.2. Description of project sub-components .....                                  | 10 |
| 1.3. Description of the sub-componente 4A Regional.....                           | 10 |
| integration and technical assistance (RITA to be<br>implemented by WAPP .....     | 10 |
| 2. BASIS AND TYPOLOGY OF COMPLAINTS .....   | 11 |
| 2.1. Fundamental principles.....  | 11 |
| 2.2. Causes and grounds for complaints .....                                      | 13 |
| 2.3. Types of complaint.....  | 13 |
| 3. PROCEDURES FOR IMPLEMENTING THE GRIEVANCE .....                                | 16 |
| MECHANISM .....   | 16 |
| 3.1. Step in the process for handling non-sensitive<br>complaints.....            | 16 |
| 3.2. Actions prior to the implementation of the grievance.....<br>mechanism ..... | 16 |
| 3.2.1. Public information on the mechanism .....                                  | 16 |
| 3.2.2. Establishment of complaints bodies.....                                    | 16 |
| 3.3. Complaints management bodies.....  | 16 |
| 3.3.1. The Village Complaints Management Committee (VCMC) .....                   | 16 |
| 3.3.2. The Municipal Complaints Management Committee (MCMC).....                  | 17 |
| 3.3.3. The National Complaints Management Committee (NCMC).....                   | 18 |
| 4. RESOURCES NEEDED FOR COMPLAINTS MANAGEMENT .....                               | 18 |
| 5. STEPS IN THE COMPLAINTS MANAGEMENT PROCESS.....                                | 18 |
| AND PLACES FOR COMPLAINTS.....  | 18 |
| 5.1. Steps in the complaints management process.....                              | 18 |
| 5.2. Places for filing complaints .....   | 19 |
| 5.3. Monitoring and evaluation of the GM.....                                     | 19 |
| 6. MANAGEMENT OF COMPLAINTS SPECIFIC TO GBV/ SEA/ .....                           | 23 |
| SH AND VAC .....  | 23 |
| ANNEX 1 GM Management Action Plan   | 61 |
| ANNEX 2a Complaints Registration Form   | 64 |
| ANNEX 2b Verbal Complaints Registration Form                                      | 65 |
| ANNEX 2c Template: Minutes of Complaints Management at the Local Level            | 66 |
| ANNEX 3 GM Monitoring and Recording Log (for non-SEA/SH complaints)               | 67 |
| ANNEX 4 Complaints Response Sheet   | 68 |
| ANNEX 5 Quarterly Summary Table on Complaints Handling                            | 69 |
| ANNEX 6 Template Meeting Report   | 70 |
| ANNEX 7 Template Complaints Form  | 71 |
| ANNEX 8 Complaints Acknowledgment Form  | 72 |
| ANNEX 9 Form for Official Response to a Complaint                                 | 73 |
| ANNEX 10 Complaints Closure Form  | 74 |
| ANNEX 11 Survivor consent Form  | 75 |
| ANNEX 12 Intake Form  | 76 |
| ANNEX 13 SEA/SH complaint verification Form                                       | 77 |

|          |  |    |
|----------|--|----|
| ANNEX 14 | Code of Conduct for Implementing ESHS and Standard Preventing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) and Violence Against Children (VAC) | 80 |
| ANNEX 15 | Response Protocol for SEA/SH complaints  | 82 |

# LIST OF TABLES

Table 1: Table of operational indicators of fundamental principles ..... 11

Table 2: Non-exhaustive typology of non-gender-related complaints..... 14

Table 3: Non-exhaustive complaints about GBV, SEA/SH and VAC ..... 15

Table 4: Summary of CDM implementation stages and responsibilities ..... 18

Table 5: Indicators for monitoring the implementation of the GM ..... 21

## LIST OF ABBREVIATIONS AND ACRONYMS

|                |  |
|----------------|--|
| <b>ERERA</b>   | ECOWAS Regional Electricity Regulatory Authority   |
| <b>ECOWAS</b>  | Economic Community of West African States  |
| <b>ESF</b>     | Environmental and Social Framework   |
| <b>ECREEE</b>  | ECOWAS Centre for Renewable Energy and Energy Efficiency                                     |
| <b>ESCP</b>    | Environmental and Social Commitment Plan   |
| <b>ESF</b>     | Environment and Social Framework   |
| <b>ESIA</b>    | Environmental and social Impact Assessment   |
| <b>IPP</b>     | Independent Power Producer   |
| <b>ESMF</b>    | Environment and Social Management Framework  |
| <b>ESMP</b>    | Environment and Social Management Plan   |
| <b>IDA</b>     | International Development Association  |
| <b>IPP</b>     | Independent Power Producer   |
| <b>LEC</b>     | Liberia Electricity Company  |
| <b>PAD</b>     | Project Appraisal Document   |
| <b>WMP</b>     | Workforce Management Plan  |
| <b>PIM</b>     | Project Implementation Manual  |
| <b>SEA :</b>   | Sexual Exploitation and Abuse  |
| <b>SEP</b>     | Stakeholder Mobilization Plan  |
| <b>PoE</b>     | Panel of Experts   |
| <b>RESPITE</b> | Regional Emergency Solar Power Intervention Project  |
| <b>RITA</b>    | Regional Integration and Technical Assistance / Intégration régionale et Assistancetechnique |
| <b>WAPP</b>    | West African Power Pool  |

## DEFINITION OF CONCEPTS

When it comes to complaint management or resolution mechanisms, the terminology used can be a source of confusion for many companies. In some cases, words like problem, concern, complaint, grievance and feedback may be used interchangeably. In other circumstances, however, these terms can have very different meanings, depending **on the culture of the company or community concerned**.

- **Actor:** Any individual or group of people directly or indirectly involved in project activities, or with an interest in the project context, or with the ability to influence outcomes.
- **Conflict:** This is the observation of opposition between two or more people or entities who come up against divergent ideas or opinions, and where the expectations of some are often in contradiction with the expectations of others. Conflict is charged with emotions such as anger, frustration, fear, sadness, resentment and disgust. At times, it can also involve aggression and violence.
- **Confidentiality:** An ethical principle that service providers must protect information gathered from survivors and only share case information with their explicit permission (Comité Interagence, 2015).
- **Consent:** Refers to approval or assent given voluntarily and freely, after careful consideration. To give consent, individuals must have access to all relevant information at the time they give consent, and they must be able to assess and understand the consequences of any action. They must be aware of and have the power to exercise their right to refuse to engage in any action, and they must not feel constrained by financial considerations, force or threats. A minor (person under the age of 18) is considered to be unable to provide informed consent. Therefore, for the purposes of this project, any agreement to sexual activity by a person under the age of 18 will be considered as non-consensual, even in countries where national legislation allows sexual relations at an age below 18. In cases of sexual exploitation and abuse (SEA) and sexual harassment (HS), obtaining consent means getting permission from survivors before sharing information about them with others, such as care services.
- **Fraud:** Deliberate action consisting of falsification, deception, artifice and perversion of the truth or breach of confidentiality in relation to an organization's financial, material or human resources, its capital, the services it provides and/or transactions, generally for personal profit or gain.
- **Vulnerable groups:** Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend.
- **Grievance mechanism:** Organized and institutionalized process by which project stakeholders can submit their requests, complaints as defined above in connection with the project. It is also a method for preventing, collecting and processing requests and complaints, enabling conflicts to be anticipated or responded to systematically. It includes survey techniques and tools, actors and their roles in the collection and processing of queries and complaints, as well as rules and procedures adapted to the context.
- **Concern:** Concerns are questions, requests for information or general perceptions uncorrelated with a particular impact or incident. If these concerns are not satisfactorily addressed, they may develop into complaints.

- **Complaint:** A complaint is a written or oral expression of a concern, dissatisfaction, claim, need or aspiration relating to the project, its impacts or related corrective measures, formulated by beneficiaries and/or any stakeholder or person expressing an interest in the project.

Complaints may concern any type of subject relating to project interventions, such as concerns about administrative procedures, non-compliance with laws and regulations, quality and access to services, and complaints about environmental and social management.

Complaints about the implementation of Project interventions may involve sensitive issues that must be handled confidentially, respecting the wishes of the potential complainants. This includes abuse of power, human rights abuses (working standards and conditions, sexual harassment, etc.).

Complaints or grievances are expressions of dissatisfaction generally related to the actual or perceived impact of a company's activities. Complaints range from frequent, relatively minor problems to more serious, deeper issues likely to generate significant resentment. Grievances are expressions of dissatisfaction usually related to the actual or perceived impact of a company's activities. Complaints range from frequent, relatively minor problems, to more serious, deeper issues likely to generate significant resentment. When people file a complaint with the company, they generally expect to receive a specific response, or to have the possibility of recourse.

The terms "complaint" and "grievance" are used interchangeably in this document, without presuming any difference in scope, complexity or seriousness.

- **Complainant(s):** Any individual, group of individuals or structure affected directly or indirectly by the project's activities, as well as those who may have an interest in the project or its impact or development results.
- **Legal proceedings:** Complaints received in the context of legal proceedings cannot be processed, as the legal process cannot be interrupted. Citizens must assert their rights before a judge.
- **Request:** need for information, wish, apprehension, concern expressed in relation to the project. If the request is not answered satisfactorily, it may turn into a complaint.
- **Feedback:** Feedback is a comment or concern that can be positive or negative, but does not require a formal response. It provides useful insights into how the PGM is perceived by stakeholders, or how it is implemented. Comments of this nature can be dealt with informally during program monitoring visits.
- People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project
- **Contracted workers :** people employed or engaged through third parties<sup>3</sup> to perform work related to core functions<sup>4</sup> of the project, regardless of location.
- **Physical assault:** an act of physical violence that is not sexual in nature. Examples: hitting, slapping, strangling, wounding, shoving, burning, shooting a person or using a weapon, attacking with acid or any other act that causes pain, physical discomfort or injury.
- **Sexual exploitation and abuse (SEA) :**
- **Sexual exploitation:** 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 (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).
- **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse is a broad term, which includes a number of acts including rape and sexual assault, among others. (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).

- **Sexual harassment (SH)** : Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person.
- **Forced marriage:** the marriage of an individual against his or her will.
- **Survivor:** The term "survivor", refers to a person who has been subjected to sexual exploitation or abuse.
- **Witness:** A person who has first-hand knowledge of a crime or event through having seen it, and who can help attest to important considerations relating to the crime or event.

**Rape:** Rape is the act by which a person is forced to perform a sexual act (usually intercourse) by force, surprise or threat. According to the penal code, rape consists in forcing sexual relations on another person against their will, by fraud or violence. Rape, according to the penal code in many countries, consists of forcing another person to have sexual relations against their will, by fraud or violence. The World Bank's good practice note entitled "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works" (see note 1 below) defines rape as physically forced or otherwise coerced penetration - however slight - of the vagina, anus or mouth by a penis or other part of the body. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is called attempted rape. The rape of one person by two or more perpetrators is called gang rape (See UN Glossary on Sexual Exploitation and Abuse 2017).

- **Gender-based violence:** This is any act of a nature to cause physical, sexual or psychological harm or suffering to women and/or men, including threats through such acts, coercion or arbitrary deprivation of liberty.
- **Violence against children** (penal code): Violence against children is any form of violence suffered by people up to the age of 18, whether committed by parents, carers, romantic partners or strangers. This violence has a lifelong impact on health and well-being. Violence against children includes abuse, exploitation, trafficking and all forms of violence and torture to which children are subjected.
- **Survivor-centered approach:** The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect (The World Bank Note on best practices).



## INTRODUCTION

This complaint management mechanism has been developed for the RESPITE project. During the preparatory studies for energy infrastructure projects, disputes and disagreements may arise between project stakeholders, i.e. the promoter, consultants, experts, subcontractors, suppliers, community members or other stakeholders. A Complaints Management and Resolution Mechanism (CMRM) is an essential element of an environmental management system, enabling project stakeholders to voice their concerns about environmental and socio-economic issues affecting them, and, where appropriate, to take timely corrective action.

The introduction of a grievance resolution mechanism in project management:

- Illustrates the project's willingness to take community concerns into account, thus helping to strengthen its relations with stakeholders;
- Promotes early identification and resolution of concerns, leading to better management of operational impacts while preventing possible harm;
- Rectifies unintentional errors,
- Reduces the likelihood of complaints escalating into litigation, disputes, safety incidents or regulatory issues that could lead to project delays or work stoppages;
- ✓ Improves compliance with international standards and external expectations
- ✓ Ensures accountability to stakeholders and justification of compliance with grant agreement commitments and policies,
- ✓ Facilitates the acquisition of a learning culture that enables the analysis of trends and patterns, with a view to continuously improving performance.
- ✓ Creates a trusting, abuse-free environment.
- ✓ Creates a trusting environment, free from abuse.

# 1. RESPITE PROJECT DESCRIPTION

## 1.1. Description of the RESPITE project

The Regional Solar Emergency Response Project is the World Bank's response to the region's energy crisis. It aims to complement existing regional integration efforts by helping the WAPP promote an efficient regional electricity market and supporting investment in transmission and generation infrastructure to physically integrate markets.

### 1.1.1. Project objectives

The main development objective of the project is to rapidly increase grid-connected renewable energy capacity and strengthen integration between participating countries.

### 1.1.2. Specific objectives

The project will finance i) the construction of a solar and hydropower generation and battery storage plant with short-term (approx. 3 years) operation and maintenance contracts for the supply of solar energy; ii) as required, the necessary grid connection infrastructure; iii) the modernization and upgrading of the grid to ensure efficient penetration of variable solar generation and iv) the expansion of distribution, v) capacity building of implementing agencies and technical assistance for greater regional integration..

## 1.2. Description of project sub-components

The RESPITE project is made up of several components and sub-components:

**Component 1:** Construction of solar photovoltaic power plants with battery storage (SSEB) and grid connections (IDA \$184 million equivalent).

**Component 2:** Expansion of the Mt Coffee hydropower plant and improvement of dam safety (\$61 million IDA equivalent).

**Component 3:** Distribution expansion and transmission optimization (\$15.5 million IDA equivalent)

**Component 4:** Regional coordination, institutional capacity building, implementation support and technical assistance (\$50.5 million IDA equivalent).

## 1.3. Description of the sub-componente 4A Regional integration and technical assistance (RITA to be implemented by WAPP

This sub-component will continue to support the activities begun under Component 2 of the WAPP APL4 Phase 1 Power Grid Rehabilitation Project - Côte d'Ivoire, Sierra Leone, Liberia and Guinea (WAPP-CLSG Project, P113266), when the financing of this project is completed, namely i) the finalization and operationalization of the legal, regulatory and technical frameworks to enable efficient regional trade between the WAPP countries, notably for the CLSG interconnection and the North Core interconnection ; ii) technical integration of the WAPP network by improving the synchronous operation and reliability of interconnections; iii) preparation of regional priority projects in line with the WAPP Master Plan 2018-28 , including preparatory studies for the Mt Coffee Island solar photovoltaic project (sub-component 1A) and the Mt Coffee hydropower plant expansion (component 2), the Saint Paul 2 hydropower plant, the WAPP Ghana-Burkina-Mali interconnector and the WAPP Mid Interconnector ; and iv) strengthening the institutional and technical capacity of the WAPP Secretariat to fulfil its regional mandate. Further regional integration of the WAPP power systems will increase the integration of renewable energies,

reduce greenhouse gas emissions and provide more climate-proof decision-making options. This activity will be separated from the other project components, as it has its own implementing entity.

WAPP is responsible for implementing RESPITE's 4A subcomponents. The World Bank and other donors are financing the construction of sections of the regional infrastructure of transmission lines and substations completed or under construction in the WAPP region. It is preparing further investments in high-voltage transmission lines. Support is also being provided to establish the institutional, operational and commercial frameworks needed to enable regional trade and thus capitalize on the significant investments in physical infrastructure. The RESPITE project will support activities through :

- the finalization and operationalization of the legal, regulatory and technical frameworks to enable efficient regional trade between the countries of the WAPP system, including the countries involved in the CLSG interconnection and the North Core interconnection.
- technical integration of the WAPP network by improving the synchronous operation and reliability of interconnections.
- preparation of regional priority generation and transmission projects in line with the WAPP System Master Plan 2018; including preparatory studies for the Mt Coffee Island solar photovoltaic project (sub-component 1A) and the Mt Coffee hydropower plant expansion (component 2), the Saint Paul 2 hydropower plant, the WAPP Ghana-Burkina-Mali interconnector and the WAPP Mid Interconnector.
- and strengthening the institutional and technical capacity of the WAPP Secretariat General (SG) to fulfil its regional mandate.

## 2. BASIS AND TYPOLOGY OF COMPLAINTS

### 2.1. Fundamental principles

Fundamentals principles

Effective complaints handling is based on a set of fundamental principles designed to ensure fairness in the process and its results. The effectiveness criteria stipulate that the grievance mechanism at the operational level must be legitimate, accessible, predictable, equitable, transparent, rights-compliant, based on dialogue and constitute a source of learning.

The eight effectiveness criteria are summarized below:

**Table 1: Table of operational indicators of fundamental principles**

| Fundamental principles          | Implementation measures   | Indicators   |
|---------------------------------|---|--|
| Participation                   | <ul style="list-style-type: none"> <li>• Develop the GM with strong participation from representatives of all stakeholders;</li> <li>• Integrate the GM fully into project activities,</li> <li>• Involve populations or user groups in every stage of the process, from design to implementation to monitoring and evaluation;</li> </ul>  | % of stakeholders involved in the entire process   |
| Contextualization and relevance | <ul style="list-style-type: none"> <li>• Adapt the GM to the local context, so that it complies with local governance structures and fits within the specific framework of the program being implemented,</li> <li>• Design the mechanism in a participatory manner, in consultation with potential users and other stakeholders</li> </ul> | at least 50% of potential users and other stakeholders are satisfied with the GM as a mechanism at local level |

| Fundamental principles                       | Implementation measures   | Indicators   |
|--|---|--|
| Security/<br>confidentiality                 | <ul style="list-style-type: none"> <li>• Protect complainants' anonymity where necessary,</li> <li>• Ensure confidentiality of sensitive complaints,</li> <li>• Limit the number of people with access to sensitive information.</li> </ul>   | zero retaliation for whistleblowing  |
| Accessibility/<br>Variety<br>of entry points | <ul style="list-style-type: none"> <li>• Widely disseminate the mechanism to target groups, overcoming language, geographical, intellectual, financial barriers, etc.</li> <li>• Clearly explain complaint filing procedures;</li> <li>• Diversify the possibilities or channels for filing complaints;</li> <li>• Assist people with particular access problems, those who are excluded or who are the most marginalized or vulnerable.</li> </ul>   | <ul style="list-style-type: none"> <li>• Several channels are offered to users for filing their complaints,</li> <li>• Proportion of complaints submitted by disadvantaged or vulnerable groups</li> <li>• Types / nature of complaints;</li> <li>• Rate of eligible complaints</li> </ul> |
| Impartiality,<br>objectivity/<br>Neutrality  | <ul style="list-style-type: none"> <li>• Ensure the impartiality of those involved in investigations,</li> <li>• Ensure that no one with a vested interest in the outcome of the investigation is involved in the handling of the complaint concerned</li> </ul>  | Zero (0) members of the complaints management team disqualified  |
| Fairness                                     | <ul style="list-style-type: none"> <li>• Benefit from equal access to the information, advice and expertise required to resolve the complaint;</li> <li>• Participate in the complaint's resolution process in a fair and equitable manner;</li> <li>• To deal with each complaint by the various bodies provided for in a consistent manner and with respect for the complainant, and without prejudging whether or not the complaint is well-founded.</li> </ul>  | <ul style="list-style-type: none"> <li>• Number of information, advice and expert opinions received</li> <li>• Number of complainants involved in complaint resolution</li> <li>• number of complaints handled by complaints management committees</li> </ul>                              |
| Transparency                                 | <ul style="list-style-type: none"> <li>• Clearly inform stakeholders of how to access the GM and the various procedures that will follow once they have done so.</li> <li>• Communicate the purpose and function of the mechanism transparently. This can be done by using the media to pass on information to as many people as possible,</li> <li>• Inform the parties concerned about the progress and results of complaints and processing.</li> <li>• Clearly disclose the different levels of complaints management, including recourse to the Tribunal de Grande Instance (TGI) of the complainant's territorial jurisdiction, where applicable</li> </ul> | <ul style="list-style-type: none"> <li>• number of awareness sessions organized on the GM</li> <li>• Number of beneficiaries and other stakeholders informed about the GM</li> <li>• number of cases resolved.</li> </ul>  |
| Predictability                               | <ul style="list-style-type: none"> <li>• Provide a rapid and appropriate response to all complainants.</li> <li>• Present a clear handling process, with response times for each stage.</li> </ul>  | <ul style="list-style-type: none"> <li>• % of complaints handled on time and appropriately</li> <li>• Degree of ownership of handling process by stakeholders</li> <li>• Average processing time,</li> <li>• Response rate (upheld and not upheld)</li> <li>• Response rate</li> </ul>     |

## 2.2. Causes and grounds for complaints

The RESPITE program supports preparatory studies for power generation and transmission infrastructure projects. This preparation phase can generate complaints, the causes of which can come from a variety of sources. It is important to detect them accurately in order to identify the real problem and envisage appropriate solutions. A complaint may therefore concern problems indirectly linked to the project (such as a local or national political problem):

- problems inherited from a previous situation (such as a conflict between communities and/or with the State, a land liability) or genuine problems concerning the project;
- non-compliance with procedures and measures recommended in environmental and social assessments;
- issues relating to gender-based violence (GBV), in particular sexual exploitation and abuse, sexual harassment, rape and assault, etc.
- issues relating to violence against children (VAC) and child labor;
- disagreement over resettlement measures (location of resettlement site, type of habitat proposed), conflict over ownership of property, land or an artisanal/commercial activity (the owner of the land and the operator are different, hence conflicts over the sharing of compensation) ;
- breaches of the activity selection and approval process (procedural violations, acts of corruption, etc.);
- inappropriate behavior by project staff, executing agencies, partner structures or any other actor involved in project management (injustice, discrimination, infringement of the rights of vulnerable people, theft, rape or sexual abuse, inappropriate comments and suggestions).

## 2.3. Types of complaint

All complaints relating to the activities of RESPITE subcomponent 4A can be submitted to the complaints management mechanism.

However, the management of complaints will follow different paths depending on the type of complaint. There are two categories of complaint: sensitive and non-sensitive.

Sensitive complaints relate to sexual exploitation and abuse (SEA/SH), sexual violence and violence against children (VAC), and so on. For this category of complaints, users need to be assured that they will be handled confidentially and without risk to themselves. In these cases, a special handling procedure is reserved to preserve the confidentiality of data processing.

Non-sensitive complaints: Non-sensitive complaints refer to all other forms of complaint or grievance relating to the implementation of measures to mitigate the environmental and social risks and impacts of RESPITE's activities, unfulfilled promises, the choice of infrastructure locations, failure to recruit local labor (e.g. impact assessment, payment of compensation, grievances for specific satisfaction). Complainants may be individuals or NGOs, associations, organizations or companies.

**Table 2: Non-exhaustive typology of non-gender-related complaints**

| Complaints   | Sources/causes  |
|--|---|
| Complaints about participation in capacity-building training courses   | <ul style="list-style-type: none"> <li>- non-compliance with selection procedures and criteria for participants in the various training courses related to project implementation;</li> <li>- favouritism;</li> <li>- Gender discrimination (gender inequality, sex, vulnerability, poor, etc)</li> <li>- No taking into account women's constraints on the venue and the time of conducting such trainings</li> <li>- poor quality of services</li> <li>- non-payment of daily allowances;</li> <li>- poor practical organization of training sessions;</li> <li>- failure of the organizing committee (logistics);</li> <li>- Late payment of consultants' fees.</li> </ul>   |
| Procurement complaints (The World Bank's new procurement regulations highlight problems that may give rise to complaints). | <ul style="list-style-type: none"> <li>- Irregularities in the choice and selection of service providers;</li> <li>- Quality of services provided to customers, payment of formal contracts;</li> <li>- Conduct and management of worksites or behavior of company workers and subcontractors,</li> <li>- Actions of companies in charge of works vis-à-vis communities;</li> <li>- Irregularities, fraud and corruption in the governance of procurement activities;</li> <li>- Poor preparation of selection files (pre-qualification files, initial selection files for invitations to tender, calls for proposals, etc.),</li> <li>- Favoritism, nepotism and exclusion of candidates, bidders, proposers and consultants prior to contract award.</li> <li>- Gender discrimination, sexual harassment in the awarding of contracts.</li> </ul> |
| Other complaints   | <ul style="list-style-type: none"> <li>- Gender-based violence and sexual harassment;</li> <li>- issues relating to violence against children (VAC) and child labor;</li> <li>- night work and non-compliance with working hours</li> <li>- speeding;</li> <li>- restrictions on land use, resettlement of affected populations and compensation for damages</li> <li>- individual or community property damaged or destroyed (school, health centre, house, etc.);</li> <li>- conflicts caused by the non-fulfilment of commitments made by stakeholders;</li> <li>- conflicts between site workers and local populations over - nuisance caused by the work;</li> <li>- failures in the selection and approval process (procedural violations, acts of corruption, etc.).</li> </ul>  |

**Table 3: non-exhaustive complaints about GBV, SEA/SH and VAC**

| <b>Complaint categories</b>        | <b>Descriptions and events</b>  |
|------------------------------------|---|
| <b>Gender-based violence (GBV)</b> | <ul style="list-style-type: none"> <li>- A harmful act perpetrated against a person's will, based on socially established differences between men and women;</li> <li>- Gender-based violence, since victims are often abused because of their vulnerable status as women, girls, boys or men;</li> <li>- Attempted rape</li> <li>- Rape</li> <li>- Restriction of access to opportunities and services</li> <li>- Rape;</li> <li>- Rape culture (voyeurism is the furtive observation of a person without their consent in a context where the person can reasonably expect intimacy. Acts defined as voyeurism include direct observation or observation by mechanical, electronic or video-recording means.</li> <li>- Any sexual violation committed with force, coercion or the unequal threat of such violation.</li> <li>- Sexual assault</li> <li>- Incest</li> </ul> |
| <b>Sexual exploitation</b>         | <ul style="list-style-type: none"> <li>- Sexual exploitation occurs when one person takes advantage of another through non-consensual sexuality or abusive sexual control. This can include the broadcasting and distribution of digital or electronic recordings or photographs of sexual activity without the consent of those involved.</li> </ul>   |
| <b>Sexual abuse</b>                | <ul style="list-style-type: none"> <li>- Unwanted touching of the breasts, vagina, penis, anus or other areas constitutes sexual abuse.</li> <li>- Exhibition,</li> <li>- Child pornography</li> <li>- Acts causing physical, sexual or psychological harm or suffering;</li> <li>- Threat of sexual acts under duress or arbitrary deprivation of liberty.</li> </ul>  |
| <b>Sexual harassment</b>           | <ul style="list-style-type: none"> <li>- Moral harassment</li> <li>- Sexual harassment</li> <li>- Attempted rape</li> <li>- Sexual advances or unwanted sexual interest from a person who knows or ought reasonably to know that such interest is unwanted;</li> <li>- Any unwelcome sexual advances or verbal or physical conduct of a sexual nature without consent.</li> <li>- An explicit or explicit promise of reprisals or the actual existence of reprisals following a refusal of a request of a sexual nature;</li> <li>- A sexual relationship that constitutes an abuse of power in a relationship of authority;</li> <li>- A remark or behavior of a sexual nature that could reasonably be perceived as psychologically or emotionally harmful to work or studies;</li> <li>- Indecent gestures.</li> </ul>   |
| <b>Violence against children</b>   | <ul style="list-style-type: none"> <li>- Violence against children</li> <li>- Clandestine child labor</li> <li>- Child apprenticeships</li> </ul>   |

## **3. PROCEDURES FOR IMPLEMENTING THE GRIEVANCE MECHANISM**

### **3.1. Step in the process for handling non-sensitive complaints**

In accordance with the World Bank's guidelines, the following steps are required to deal with types of complaint:

- informing the public about the implementation of the mechanism and procedures;
- registration,
- processing,
- follow-up,
- closure,
- archiving

The various stages in the complaints management process are: receiving complaints, issuing an acknowledgement of receipt, checking the eligibility of a complaint, processing the complaint, notifying complainants of the resolution and decisions taken, resolving and implementing the proposed measures, closing the procedure; monitoring and documenting the complaints management process.

### **3.2. Actions prior to the implementation of the grievance mechanism**

#### **3.2.1. Public information on the mechanism**

For the GM to be efficient and effective, public information activities on the mechanism must be carried out. Once established, the mechanism must also be disseminated to stakeholders. To make this clear to all stakeholders, the WAPP should organize periodic awareness-raising and capacity-building meetings, covering the mechanism, its roles and responsibilities, its importance, its composition, etc.

#### **3.2.2. Establishment of complaints bodies**

Complaint management structures will be set up in the project intervention areas on a more territorial basis, following the political-administrative hierarchy. WAPP will ensure that all complaints management bodies include people who know how to read and write in the official working language of the country. Other criteria may also be involved in the choice of committee members, namely: being of good moral character, honest, impartial, available, discreet, patient, critical mind, etc.

The GM of subcomponent 4A of RESPITE in its preparation phase takes into account three complaint management bodies, namely: i) local complaint management structures (village/neighborhood/canton); ii) structures (municipal, cantonal, prefectural, regional, departmental, etc.) and iii) a national complaints management structure.

### **3.3. Complaints management bodies**

#### **3.3.1. The Village Complaints Management Committee (VCMC)**

This committee is set up with the support of the RESPITE project before the start of field activities in each village in the project's intervention regions. To be effective, the committee must be of medium size.



Composition: The committee will include the village chief, an advisor to the chief, a representative of the project beneficiaries, a village representative and the representative of the women's organization. Making a total of five (05) members, the committee can always call on other resource people if necessary. The VCMC office is made up of a president, a secretary and a rapporteur. The election of committee members takes place during a general meeting in the presence of a representative of the RESPITE Project Management Unit.

Role of the committee: This is a community structure set up with the support of RESPITE to ensure the functioning of the GM as defined. It serves as an interface between the communities and the Project. It allows communities to express their concerns regarding certain aspects of the implementation of RESPITE. As such, it constitutes a structure for receiving and managing complaints either by processing them locally, or by transmitting them in the event of incapacity to the higher authority: the Municipal Complaints Management Committee (MCMC) which will rule on the subject. Its functions, among other things, are to:

- receive and record complaints;
- analyse complaints (study their admissibility, give feedback to the complainant(s),
- help the RESPITE project manage, and correct inclusion and exclusion errors observed in the implementation of its actions;
- act as an interface between the RESPITE project and the intervention communities in matters of complaint management;
- work in close collaboration with the project's safeguards specialists;
- monitor and evaluate mitigation actions;
- archive files relating to the processing of complaints;
- transmit complaints not covered by the VCMC to higher authorities: the MCMC or the NCMC;
- prepare periodic reports on complaints management activities.

The members of the Complaints Management Committee work voluntarily and meet systematically after each complaint is filed.

Furthermore, once a month, they organize a review meeting allowing them to evaluate themselves and capitalize on the lessons learned in the form of a brief half-yearly and annual summary report. This report will include statistics on complaints (received, processed, comments) and suggestions for improvement.

### 3.3.2. The Municipal Complaints Management Committee (MCMC)

Like the VCMC, the Municipal Complaints Management Committee (MCMC) is also set up with the support of the RESPITE PIU and has the same composition. The difference is that the members of the MCMC are appointed by the Mayor of the municipality. This committee is made up of the mayor or his representative, a municipal councillor, a representative of the social promotion centre, the project's social safeguards specialist or a project focal point and an NGO active in the municipality.

In addition to the role of the VCMC, the MCMC is responsible for:

- Manage complaints that may arise between villages in the event of shared resources, or complaints related to properties directly involving the municipality, such as the opening of quarries;
- Receive complaints that come under the VCMC if the complainant decides to contact it directly;
- Transmit complaints not covered by the VCMC to the competent authority;
- Archive all GM documentation and prepare periodic reports on complaints management activities.

In principle, the municipal committee has seven (7) days to rule on the complaint/complaint.

### 3.3.3. The National Complaints Management Committee (NMC)

A National Complaints Management Committee (NMC) will be set up by the General Secretariat of the Ministry in charge of energy in each of the countries involved in the RESPITE project under the responsibility of the coordinator. The NMC will be composed of representatives of the Ministry in charge of the Environment, the Minister of Labor and Social Affairs, and with as members all the project specialists, including in particular those of Communication and Social Protection of the RESPITE project.

On a half-yearly basis (or shorter, depending on actual needs), the social expert, with the contribution of other experts, presents the status of management decisions taken by the NMC. This allows it to update the project complaints database, which is used to produce the GM implementation report. This report must highlight the risk level of the claim (high, medium or low). It must also provide relevant analyses, particularly on the reasons for the recurrence of certain categories of complaints.

## 4. RESOURCES NEEDED FOR COMPLAINTS MANAGEMENT

The complaints management bodies must be equipped with office supplies, a complaints management register (complaints register, complaints transmission register, filing model, report model). These will be made available to each structure. Training will be organized for committees on how to take appropriate notes, maintain records etc.

## 5. STEPS IN THE COMPLAINTS MANAGEMENT PROCESS AND PLACES FOR COMPLAINTS

### 5.1. Steps in the complaints management process

The different stages of the complaints management process are: receipt of complaints, issuance of an acknowledgment of receipt, verification of the eligibility of a complaint, processing of the complaint, notification to complainants of the resolution and decisions taken, the resolution and implementation of the proposed measures, the closure of the procedure; monitoring the implementation of recommendations and archiving the complaints management process.

**Table 4: Summary of CDM implementation stages and responsibilities**

| N° | Steps / activities  | Responsibility                                 | Support / Collaboration  |
|----|---|--|--|
| 1  | Managing the Complaints Mechanism (GM)  | Complaints Management Committees,              | Social expert, PIU--RESPITE Coordinator, Gender Based Violence (GBV) Expert,<br>PIU-RESPITE Coordinator, |
| 2  | Taking GM into account in project documents and in the implementation of activities | PIU, Consultants, Operators/ Companies, Donors | Local authorities<br>Village Development Committee<br>Women's committee, etc.                            |
| 3  | Raising community and stakeholder awareness of the GM, conflict prevention          | PIU, Operators/ Companies, Donors              | Traditional chiefs, local authorities<br>Village Development Committee                                   |

| N° | Steps / activities    | Responsibility   | Support / Collaboration  |
|----|-----------------------|--|--|
| 4  | Receipt of complaints | Complaints management committees, village development committee, consultants, social expert, PIU-RESPITE, Operators Companies, Donors,                               |  |
| 5  | Complaints handling   | Complaints management committees<br>PIU-RESPITE<br>National Complaints Management Committee (NCMC)<br>Consultants, companies, operators,                             | local authorities, Traditional chiefs,                             |
| 6  | Processing appeals    | Communal or prefectural Complaint of Management Committee<br>National Complaints Management Committee (NCMC)<br>Ministries concerned, PIU-RESPITE Local authorities, | local authorities, Traditional chiefs,<br>VDC, CCMC                |
|    | Compensation          | Ministries of Finance  | Ministries of the Environment, PIU-RESPITE, consultants, companies |
| 8  | Monitoring Evaluation | PIU-RESPITE, Social expert,  | Operators, companies   |

## 5.2. Places for filing complaints

The GM uses various channels for receiving complaints. These channels are adapted to the socio-cultural realities of the Project implementation areas. These include complaint boxes, telephone, referral by an intermediary (parent, relative, local authorities, human rights association, etc.) and any other means deemed effective. Complaints will be made orally or in writing. Any oral complaint is transcribed into writing by the agent responsible for maintaining the tools. If the complaint is filed anonymously, investigations, if necessary, can confirm the allegations and facilitate the treatment of victims on the one hand and facilitate the deterrence of the perpetrators or their prosecution on the other hand.

The GM must therefore be accessible to all through a variety of places and method of making complaints (complaint forms submitted to the project, in person, by telephone or by email) or through the contractor or the Committee Villagers for Development (VDC). Complaint forms should be available at these locations. Complaints can be filed at the level of complaints management committees. The seats of these committees will be communicated to stakeholders during the various awareness campaigns that the PIU will organize.

When indigenous groups or vulnerable people are present, specific processes will need to be in place to ensure the mechanism works equally well for them. For example, it may be necessary to have a grievance officer from a local indigenous group or to ensure female representatives are available to discuss and receive complaints in places where women do not customarily express concerns publicly. In addition, it is imperative that communications be in the local or indigenous language, to facilitate accessibility and understanding.

## 5.3. Monitoring and evaluation of the GM

The aim of the evaluation is to check whether the principles and values conveyed by the mechanism are respected, namely: participation and inclusion, contextualization and relevance, security, confidentiality and respect, transparency, and accessibility. The assessment also aims to ensure that the information associated with complaints is used to provide solutions to actual or potential problems encountered during the process. Using the data collected in the complaints register, monitoring sheets and closing sheets will be used to draw up periodic monitoring reports.

These should highlight the types of complaint that recur regularly, the location of the greatest number of complaints, and the lessons to be learned from the complaints received. Generally speaking, the GM relies on a system for recording and categorizing complaints. The basic principle is that no complaint should go unanswered. Appropriate solutions will be communicated to complainants by means of a reply signed by the head of the complaints management committee, via the most appropriate channel. The operation and relevance of the mechanism will be monitored through regular contact with stakeholders at all levels, and exchanges with beneficiaries in order to develop quality and transparency throughout the implementation of project activities.

This evaluation will make it possible to check whether the committee's expected results have been achieved, i.e. the way in which the committee has conducted its activities, the difficulties encountered, the community's satisfaction with the committee's work, etc. ... The monitoring and evaluation of the mechanism also includes a detailed examination of the handling of complaints and claims already settled, in order to draw lessons from them.

This capitalization exercise is essential, so that all the mistakes and successes recorded can be used to improve the mechanism. Lessons learned in the application of this claims management mechanism must also be capitalized on. The following table summarizes the verification indicators.

**Table 5: Indicators for monitoring the implementation of the GM**

| <b>Indicators</b>  | <b>Units</b>    | <b>Verification sources</b>   | <b>Collection frequencies</b> |
|--|-----------------|---|-------------------------------|
| Number of awareness campaigns on PGM in project areas  | Number          | Meeting minutes / meeting reports, activity report                              | Half-yearly                   |
| Number of people trained (disaggregated by   | Number          | Meeting reports   | Half-yearly                   |
| Types of complaints recorded   | Number          | Complaints management registers   | Monthly                       |
| Time taken to process complaints, including SEA/SH the type of registered complaints                       | Day             | Minutes of receipt, settlement and register of complaints management committees | Quarterly                     |
| Number and percentage of claims/complaints received, including from vulnerable and disaggregated by gender | Number and rate | Minutes of receipt, settlement and register of complaints management committees | Monthly                       |
| Number and percentage of claims/complaints   | Number and rate | Minutes of receipt, settlement and register of complaints management committees | Quarterly                     |
| Number and percentage of unresolved  | Number          | Minutes of receipt, settlement and register of complaints management committees | Quarterly                     |
| Number and percentage of complaints that were submitted to mediation                                       | Number and rate | Minutes and activity reports  | Monthly                       |
| Number of complaints settled out of court  | Number          | Minutes and activity reports  | Quarterly                     |

|   |                 |  |             |
|---|-----------------|--|-------------|
| Number of complaints brought before   | Number          | Reports, NGO focal points and facilitators, complaint management committee registers | Quarterly   |
| Number and percentage of SEA/SH complaints referred to care services within proposed timeframes | Number and rate | Minutes and activity reports of the NGO providing GBV services                       | Half-yearly |
| Number of complaints about the confidentiality of the mechanism                                 | Number          | Minutes and activity reports of the NGO GBV providers                                | Quarterly   |
| Rate of SEA/SH complaints referred to management services                                       | Rate            | Minutes and activity reports of complaints management committees                     | Quarterly   |

## 6. MANAGEMENT OF COMPLAINTS SPECIFIC TO GBV/ SEA/ SH AND VAC

Due to the sensitivity of issues related to GBV/ SEA/SH and VAC, it is essential to limit the number of people who will have to work on this category of complaint.

At the local level (village and municipality) the representatives of the Social Promotion Centers of the Municipality will be responsible for specifically dealing with these categories of complaints.

At the national level, a GBV Committee composed of the PIU, the representative of the national structure responsible for the fight against GBV, the Ministry in charge of social affairs and gender will be responsible for verifying the merits of the allegations and their link with the activities of the project. This GBV committee is responsible for exclusively managing sensitive complaints based on guiding principles of SEA. The latter therefore escape the village, commune and national level and fall under the responsibility of the GBV Committee.

The PMU will provide information through appropriate channels to employees/workers of selected companies and populations in the project intervention area on how to report cases of GBV/ SEA/SH and VAC violations through the project complaints management mechanism.

As soon as sensitive complaints are received, they are immediately recorded in a register available at the registration center. This information will be notified to potential complainants during the dissemination activities of the complaints management mechanism. The complainant will be given an acknowledgment of receipt within 48 hours of filing the complaint. The information messages on the GM will specify all the places for filing complaints and/or grievances as well as the different channels for reporting a case of GBV/SEA/SH. All actors identified in the complaint reception and processing channel will benefit from capacity building. These complaints must be managed with the support of specialized services in charge of social protection.

All stakeholders must preserve the confidentiality of employees who report acts of violence or threats of violence as well as the confidentiality of any employee alleged to have committed acts of violence or uttered threats of violence (unless a breach of confidentiality is necessary to protect people or property from serious harm or when required by law).

To ensure that survivors feel comfortable sharing their experiences of GBV/SEA/SH and VAC, they can report cases of GBV and VAC through various means: (i) by telephone (call or SMS); (ii) in person or (iii) by mail (letter, email, etc.). To maintain confidentiality, only the service provider will have access to information about the survivor. The GBV Committee will be the main focal point regarding information and monitoring of the perpetrator of violence.

All prevention and response actions must take into account Survivor-centred approach, balancing the respect for due process with the requirements of a survivor-centred approach under which the survivor's safety, confidentiality, choices, needs, and well-being remain central. The SEA/SH GM should also include processes that protect the rights of the alleged perpetrator, including confidentiality.

The procedure for handling sensitive complaints is based on principles that must be strictly adhered to.

Thus, all complaints and denunciations of cases of gender-based violence or sexual abuse recorded within the framework of the project will be directly transferred and processed by the specialized entities working in close collaboration with the Project. The project's focal points in each country will contact the Legal Advice and Listening Units at the Ministry for the Family and Social Protection, associations or NGOs, platforms and the police. These entities will be trained in how to manage such complaints, and in the technical tools available (complaints management register, complaints management procedure, etc.).

The procedure for managing sensitive complaints under RESPITE will consist of:

- receiving and registering the complaint with minimum information that respects the survivor-centered approach: the case as reported by the complainant, gender and age (if available), whether the case is related to the project or not;
- ensure that complainants have been referred to the appropriate care services;
- refer the case for processing to the appropriate bodies mentioned above (employers and specialized organizations) and follow up the processing of the complaint with a view to closing the file.
- The GM will not initiate any investigation, as it has no powers to do so. Nevertheless, the Project will inform the Bank within 24 hours of learning of any case of sexual exploitation, abuse or harassment linked to the Project.

**Table 7: Estimated budget**

| N°        | Activities   | Total cost (\$)  |
|-----------|--|------------------|
| <b>1.</b> | <b>Finalization of the GM</b>  | <b>3 000 \$</b>  |
|           | Consideration of the GM in RESPITE component preparation documents   | For Memory       |
|           | Recruitment of a social safeguard expert (full-time)   | For Memory       |
|           | Recruitment of a GBV expert (not exclusively female), but a female facilitator is needed for consultations | For Memory       |
|           | Production of posters, leaflets and flyers   | For Memory       |
|           | Creation and implementation of complaints management committees  | 3 000 \$         |
| <b>2.</b> | <b>Implementation of the GM</b>  | <b>8 000 \$</b>  |
|           | Setting up complaints management committees  | 1000 \$          |
|           | Launch activities for complaints management structures   | 1000 \$          |
|           | Capacity-building for complaints management structures   | 5 000 \$         |
|           | Costs of community meetings and other activities related to SEA/SH and GBV                                 | 1 000 \$         |
| <b>3.</b> | <b>Operation of complaint management committees</b>  | <b>7 000 \$</b>  |
|           | Dissemination of GMs   | 2 000 \$         |
|           | Equipping complaints management structures with equipment and supplies                                     | 3 000 \$         |
|           | Receiving and processing complaints  | For Memory       |
|           | Processing appeals   | For Memory       |
|           | Additional investigations and audits   | 2 000\$          |
|           | Administrative costs and expenses  | For Memory       |
| <b>4.</b> | <b>Communication activities</b>  | <b>4500 \$</b>   |
|           | Telephone communications   | 1 500 \$         |
|           | TV, radio, newspapers, publications, press releases, brochures and more                                    | 1 500 \$         |
|           | Creation of suggestion boxes   | 1 500 \$         |
| <b>5.</b> | <b>Monitoring and evaluation</b>   | <b>2 000 \$</b>  |
|           | <b>Total</b>   | <b>24.500 \$</b> |



## CONCLUSION

In accordance with the requirements of the World Bank's Environmental and Social Framework, the GM is an anticipation and planning document which details the process and operation of the WAPP complaints management mechanism. It is therefore to take into account the different forms of complaints, exchange with stakeholders affected by the project activities and satisfy certain requests linked to the implementation of WAPP activities respectful of environmental and social measures that the GM was carried out.

However, it proceeds to define a certain number of actions, measures and procedures that will be implemented by the project to facilitate potential complainants in submitting their complaints. It will thus make it possible to respond to the various concerns and expectations of citizens and to rectify, if necessary, project activities likely to cause serious harm, thus generating negative environmental or social impacts on stakeholders, their goods and services.

## BIBLIOGRAPHICAL REFERENCES

1. Regional Emergency Solar Power Intervention Project; RESPITE: Project Implementation Manual (PIM), November 2022
2. Regional Emergency Solar Power Intervention Project; RESPITE: Project Appraisal Document, November 2022
3. Regional Emergency Solar Power Intervention Project; Stakeholders Engagement Plan (SEP), November 2022
4. Regional Emergency Solar Power Intervention Project (RESPITE); Environmental and Social Commitment Plan (ESCP) November 2022
5. Regional Emergency Solar Power Intervention Project; ProJet Regional d 'Intervention d'Urgence dans le Secteur de l'Energie Solaire (RESPITE ; simplified Environmental and Social Management Plan

# APPENDIX

## ANNEX 1: GM Management Action Plan

### 1. Guidelines for Implementing the Grievance Mechanism

The local populations and other interested stakeholders may not be satisfied with a decision taken by the project, the impacts and risks of a project and how they are addressed, lack of benefits, the governance of the project or their representation within the Grievance Mechanism. Regardless of the nature of the grievance, the Regional Solar parks Project (RSP) Coordinator shall ensure that a transparent and fair process is put in place in a timely manner to deal with each complaint.

### 2. Types of Complaints and Conflicts/Disputes to be resolved

In practice, complaints and conflicts stemming from local populations and interested stakeholders may appear at different stages of the Project:

- during the preparation of sub-projects
- during the implementation of the project
- after the closure of the project

During the preparation of the project, complaints and disputes may relate to:

- the non-involvement of local riparian populations within the project area of influence
- disagreement over the choice of governing bodies
- disagreement over the types of projects to be funded
- disagreement over the choice of the project site
- conflicts of interest stemming from the project stakeholders

During the implementation of the project, complaints and disputes may relate to :

- the choice of beneficiaries: individuals, organizations, communities
- allocation of activity funds, geographic entity
- delay in the implementation or provision of funds
- the feeling of having been wronged in the implementation of the project
- external interference in the award and management of contracts
- cases of conflicts of interest
- fund management
- communication deficit
- political interference
- Lack of timely implementation of all mitigation measures. -

At the end of project implementation, complaints and disputes may relate to, among others:

- non-compliance with contractual clauses in financing
- promises not kept by the implementing agency
- management of project gains/assets
- contradictory perception of the results
- sustainability of results.

To facilitate the key stages of complaint management, the RSP shall perform the following tasks:

- a) produce a written record of all complaints received
- b) encourage immediate and on-site resolution of problems
- c) publicly report on complaints received and action taken in response to each complaint

### **3. Communication and Access to Information**

The RSP project shall ensure easy and culturally appropriate access to information about the project and the use of the mechanism to potential users. This information shall be disseminated on the project website and information channels. Likewise, public meetings, radio medium, posters on project sites and other culturally appropriate means of communication shall be used. The documents and reports shall be produced in French or English depending on the official language of the country and if necessary, translated into the local languages of each territorial entity concerned.

### **4. Complaint Handling Process**

Complaints, which may be of very different nature, should be submitted to a specific body called the Complaints Management Structure at three levels (local, municipal and national).

The processing procedure must be transparent in its claims settlement operations. It shall be implemented in a manner that responds effectively and timely to concerns raised by complainants.

### **5. Organization and Responsibilities /Complaint management committees and level of prioritization**

#### **Local and municipal complaints management structures (at the level of intervention sites):**

These structures shall constitute local levels of complaint management for people who do not have the means to draft or send their complaints or grievances and shall work in close collaboration with the populations in the project intervention areas. These structures shall be set up on the implementation sites of the sub-projects or on sites likely to be impacted by the project.

#### **Municipal Complaints Management Committee at (MCMC) prefectorial or regional level**

The communal committee is responsible for receiving unresolved complaints at the local level. It must provide appropriate solutions within ten (10) days from the date of receipt for those within its reach. It shall escalate to the national level those that cannot be resolved locally within three (3) days of attempts to resolve them. The committee shall report quarterly to the SP-IDPU on complaints received and addressed.

When the resolution of the complaint goes beyond the local level, it is referred to the Communal Complaints Management Committee which is composed of the Mayor of the commune and his deputies, the councilors in addition to the resource persons that the Mayor alone can call upon depending on the complaint received for its resolution.

#### **National Complaints Management Committee (NCMC) at the national level**

When the resolution of the complaint goes beyond the communal, prefectural or regional level, the national complaints management committee is called upon. The national committee is responsible for receiving complaints from the communal level. It must provide appropriate solutions within ten (10) days from the date of receipt. The committee must produce quarterly reports on the management of complaints. The committee will be provided with a complainant's logbook and a complaints transmission logbook.

### **6. Communication about GM**

The names and contact details of members of the complaints structure shall appear on the website and in the printed brochures of the mechanism. They shall acknowledge receipt of the complaints by sending a written response to the complainant, in which they shall detail the next steps they will take, including the possible transmission of the case file.

To those who can't read/write the information will be communicated by using of town criers, village chiefs, women's groups, elder's and youth groups, etc.

With regard to responsibilities, the complaints management structure at each level shall ensure the coordination of the complaints handling procedure, collect and examine the available information on the subject of the complaint, draft the responses intended for the complainants, endeavor to resolve the issues that give rise to complaints, centralize and objectively deal with all complaints lodged.

At the project site level, the responsibilities are summarized as follows: receive handwritten complaints, enter complaints in the register if the complaint is verbal, send these complaints every week to the complaints management structure for processing, receive solutions found to the complaints and disseminate them to the complainants (see annex 3 for GM monitoring table)

If the complaint can be resolved at the level of the local structure, the latter shall simply inform the Local Complaints Management Structure. Otherwise, the responsibility for handling the complaint shall be transferred to the municipal and then national Complaints Management Structures (CMS).

## **7. Reporting**

Each Complaints Management Structure shall register all complaints received at its level in an online system accessible to the public, which will allow complaints to be followed up. The system shall track and report (see Annex 3):

- the number of complaints received by types of complaints;
- the number and percentage of complaints that resulted in an agreement;
- the number and percentage of complaints that were resolved;
- the number and percentage of complaints that have gone to mediation;
- the number and percentage of complaints that did not result in an agreement;
- the number and percentage of complaints that did not result in a settlement;
- type and category of complaints received (i.e., relocation related);
- type and category of complaints related to the contractor; i
- type and category of environmental/social impact complaints, etc.

The database shall also flag the most common issues and the geographic areas with the most complaints. The information provided by the database should help the Complaints Management Structure to improve the mechanism and to better understand and deal with the social and environmental impacts of the projects.

## **8. Assessment, Assignment, Recognition**

If the complaint does not fall within the scope of the operational responsibilities of the RSP, but relates to the general policies of the country, under its governance the Complaints Management Structure shall guide the complainant by indicating to the latter the competent bodies that can resolve his/her complaint. If it relates to World Bank policies, the RSP project coordinator at the Bank may be invited by the Complaints Management Structure to attend its meeting to interpret the policy concerned.

## **9. Resolution and Closure**

It must be clear that there is a grievance operator and/or social safeguard focal point for the project who will collect grievances every time. The resolution and closure of the case must take place within 10 days of receipt of the initial complaint by a member of staff. The Complaints Management Structure shall in all cases offer the possibility of resorting to independent mediation or finding another means of resolving the dispute.

Whatever the outcome, all supporting documents for the meetings that will have been necessary to reach the resolution must be recorded in the complaints case file.

## ANNEX 2a: Complaints Registration Form

|  |  |
|--|--|
| <b>Complaint No:</b>   |  |
| <b>Date of issue:</b>  |  |
| <b>Last name and first name of the author of the complaint:</b>                    |  |
| <b>Address (Phone number, E-mail):</b>   |  |
| <b>Place of residence of the complainant:</b>                                      |  |
| <b>Component of the project and subject of the complaint:</b>                      |  |
| <b>Name of the beneficiary municipality of the project:</b>                        |  |
| <b>Location of the complaint:</b>  |  |
| <b>Category of complaint:</b>  | <input type="checkbox"/> A: Request for information or clarification<br><input type="checkbox"/> B: Outside the scope of the project<br><input type="checkbox"/> C: Selection/exclusion of a person or community<br><input type="checkbox"/> D: Allegations of corruption, misappropriation, or bias in public procurement.<br><input type="checkbox"/> E: Environmental and social issues<br><input type="checkbox"/> F: Other deviation from procedures or incorrect behavior of staff |
| <b>Full description of the complaint:</b>  |  |
| <b>Name of the accused in the complaint:</b>                                       |  |
| <b>Complaint handling:</b>   |  |
| <b>Observations:</b>   |  |
| <b>Has the complainant received an acknowledgment of receipt of his complaint?</b> | <input type="checkbox"/> Yes<br><input type="checkbox"/> No<br>If so, at what date and time?   |
| <b>Complaint received by (name, signature, date):</b>                              |  |

## ANNEX 2b: Verbal Complaints Registration Form

Verbal complaint registration form; this form can be used by a project coordinator to collect complaints made verbally by stakeholders, communities during field visits.

| <b>Part 1: to be completed with the complainant</b>   |  |
|---|--|
| <b>Date:</b><br>Date the complaint was made   |  |
| <b>Personal details:</b> <ul style="list-style-type: none"> <li>• Name and contact details of the complainant</li> <li>• Age - adult or child</li> <li>• Gender - male or female</li> </ul> |  |
| <b>Project details:</b><br>Project or program name / reference number   |  |
| <b>Nature of the complaint:</b><br>Brief summary of the complaint   |  |
| <b>Complaint Details:</b><br>Detailed description of the complaint made by the complainant  |  |
| <b>Person who failed to receive the complaint:</b><br>Name and contact details  |  |
| <b>Part 2: reserved for the administration / measures taken if necessary</b>  |  |
| <b>Outcome following a complaint:</b><br>Summary of actions taken and results   |  |
| <b>Additional comments:</b><br>For example, monitoring of actions taken to change the policy and procedures used, if any.   |  |

**ANNEX 2c: Template: Minutes of Complaints Management at the Local Level**

Date: \_\_\_\_\_  
Traditional chiefdom of \_\_\_\_\_  
Municipality of \_\_\_\_\_ Prefecture of \_\_\_\_\_  
Case File N ° \_\_\_\_\_

**COMPLAINT**

Name of complainant: \_\_\_\_\_  
Address: \_\_\_\_\_  
District: \_\_\_\_\_  
Nature of the complaint: \_\_\_\_\_

**DESCRIPTION OF THE COMPLAINT:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Information received at (location) \_\_\_\_\_ date \_\_\_\_\_

Signature of complainant

**CHIEF'S OBSERVATIONS:**

\_\_\_\_\_  
\_\_\_\_\_

At (location) \_\_\_\_\_ date \_\_\_\_\_

(Signature of the district Chief or the Mayor)

**COMPLAINANT'S RESPONSE:**

\_\_\_\_\_  
\_\_\_\_\_

At (location) \_\_\_\_\_ date \_\_\_\_\_

Signature of complainant

**RESOLUTION**

\_\_\_\_\_  
\_\_\_\_\_

At (location) \_\_\_\_\_ date \_\_\_\_\_

(Signature of the district Chief or the Mayor)

(Signature of complainant)



**ANNEX 3: Grievance Monitoring and Tracking Log (for non-SEA/SH Complaints)**

| Case no. | Date Claim Received | Name of Person Receiving Complaint | Where/how the complaint was received | Name & contact details of complainant (if known) | Type of Claim<br><br>Add content of the claim (include all grievances, suggestions, inquiries)<br><br>*Please note if the complaint was related to the project. If not, note it here and refer complainant to PIU for further | Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication & by whom) | Expected Decision Date | Decision Outcome (include names of participants and date of decision) | Was Decision communicated to complainant? Y/N<br>If yes, state when, by whom and via what method of communication | Was the complainant satisfied with the decision? Y/N<br><br>State the decision.<br><br>If no, explain why and if known, will pursue appeals procedure | Any follow up action (and by whom, by what date)? |
|----------|---------------------|------------------------------------|--------------------------------------|--|---|---|------------------------|---|---|---|---|
|          |                     |                                    |                                      |  |   |   |                        |   |   |   |   |
|          |                     |                                    |                                      |  |   |   |                        |   |   |   |   |
|          |                     |                                    |                                      |  |   |   |                        |   |   |   |   |
|          |                     |                                    |                                      |  |   |   |                        |   |   |   |   |

#### ANNEX 4: Complaints Response Sheet

|   |   |
|---|---|
| <b>Complaint No.:</b>   |   |
| <b>Institution or person concerned by the complaint:</b>  |   |
| <b>Date of receipt of the complaint by the Complaints Management Structure concerned:</b>   |   |
| <b>Information about the nature of the complaint:</b>   |   |
| <b>Action (s) needed to resolve the complaint?</b>  | <input type="checkbox"/> No action required<br><input type="checkbox"/> Action (s) required |
| <b>Details on the proposed actions<br/>(Give an explanation if no action is proposed)</b>   |   |
| <b>Date response given to complainant and response of complainant if resolution is acceptable (if not acceptable, indicate if the escalation procedures have been communicated to complainant and record any follow up action required by project team and by when)</b> |   |
| <b>Signature of the representative of the structure or of the person:</b>   |   |
| <b>Last name:</b><br><br><b>Title:</b><br><br><b>Phone:</b><br><br><b>Date of Signature:</b>  |   |

**ANNEX 5: Quarterly Summary Table on Complaints Handling**

|   |  |
|---|--|
| Name of commune:<br>Name of focal point:<br>Quarter:            |  |
| Number of complaints registered during the period:              |  |
| Synthetic summary of the type of complaints:                    |  |
| Number of complaints handled by the quarter (explanations):     |  |
| Number of complaints not handled by the quarter (explanations): |  |

**ANNEX 6: Template-Meeting Report**

**\*Ask permission if photos can be taken and record response. Do not take photos of women-only focused groups.**

**Date:**

**Venue:**

**Participants: (can attach list separately)**

**Other participants: (Last name, first name, function)**

**Total number (breakdown by gender)**

**Objectives and agenda of the meeting:**

**Item topics and issues raised by the Project:**

**Item topics, concerns and issues raised by participants (identify if there are new risks raised by participants):**

**Actions to be taken from the outcome of the meeting and follow up/feedback to be provided to stakeholders and by when and in which format:**

**Prepared by:** \_\_\_\_\_

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

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

## ANNEX 7: Template-Complaints Form

**Date:**

**Prepared by:**

**Complainant**

**Last name and first name(s):**

**Place of residence:**

**N° of household:**

**Reason for the complaint (detailed description of the version presented by the complainant):**

**Complaint follow-up (detailed description of the version presented by the complainant)**

**Prepared by:**

**Date:**

**ANNEX 8: Complaints Acknowledgment Form**

Country .....

National electricity company

Project title: Regional Emergency Solar Power Intervention Project; (RESPITE).

|   |                                     |   |
|---|-------------------------------------|---|
| <b>Name of the Complaints Management Structure:</b> | <b>Complaint handling structure</b> |   |
| <b>Locality:</b>                                    | <b>Date of receipt of complaint</b> | <b>DD / MM / YYYY and (time of receipt)</b> |

|                                 |  |                            |                  |
|---------------------------------|--|----------------------------|------------------|
| <b>Registration No.:</b>        |  |                            |                  |
| <b>Identity of complainant:</b> | <b>Last name and First name: Mr. / Mrs. ....</b> | <b>Place of residence:</b> |                  |
|                                 | <b>Ref. ID :</b>                                 | <b>Unique ID number:</b>   | <b>Contacts:</b> |

**SUBJECT: Acknowledgment of receipt**

Madam/Sir

Further to your formal complaint registered with our services under number No. .... dated DD / MM / YYYY at (time) and relating to the following subject (Omission of census, dispute of property rights with a neighbor, improper recording of assets characteristics, assets valuation claim, etc.)

|   |
|---|
| Description: of the motive for the complaint for a better understanding |
|---|

We acknowledge receipt of your complaint, and we will keep you informed of any action taken.

(Possible additional remarks - All useful information).

Yours Sincerely,

For the utility

For reception

Last name and First name of the representative

Last and first name

Signature

Signature

**ANNEX 9: Form for Official Response to a Complaint**

Country .....

National electricity company

|   |                                     |   |
|---|-------------------------------------|---|
| <b>Name of the Complaints Management Structure:</b> | <b>Complaint handling structure</b> |   |
| <b>Locality:</b>                                    | <b>Date of receipt of complaint</b> | <b>DD / MM / YYYY and (time of receipt)</b> |

|                                 |  |                            |                  |
|---------------------------------|--|----------------------------|------------------|
| <b>Registration No.:</b>        |  |                            |                  |
| <b>Identity of complainant:</b> | <b>Last name and First name: Mr. / Mrs. ....</b> | <b>Place of residence:</b> |                  |
|                                 | <b>Ref. ID :</b>                                 | <b>Unique ID number:</b>   | <b>Contacts:</b> |

**SUBJECT: Official Response**

Madam/Sir

Following your formal complaint registered with our services under number No. .... dated DD / MM / YYYY at (time) and relating to the following subject

|   |
|---|
| Description: of the reason for the complaint for a better understanding |
|---|

We hereby inform you that after an investigation encompassing the persons and services concerned by the complaint, the Project Management Unit has reached the following decision:

The complaints management committee proposes the following solution:

|   |
|---|
| Presentation of the solution to the complaint |
|---|

This decision is final for the complaints management committee but does not deprive you of your right to any action before the competent courts.

Sincerely Yours.

For the utility

For reception

Last name and First name of the representative  
Signature

Last and first name  
Signature

**ANNEX 10: Complaints Closure Form**

Country (\_\_\_\_\_)

**Project title:** \_\_\_\_\_ Regional Emergency Solar Power Intervention Project; (RESPITE) \_\_\_\_\_

|   |                                     |   |
|---|-------------------------------------|---|
| <b>Name of the Complaints Management Structure:</b> | <b>Complaint handling structure</b> |   |
| <b>Locality:</b>                                    | <b>Date of receipt of complaint</b> | <b>DD / MM / YYYY and (time of receipt)</b> |

|                                 |  |                            |                  |
|---------------------------------|--|----------------------------|------------------|
| <b>Registration No.:</b>        |  |                            |                  |
| <b>Identity of complainant:</b> | <b>Last name and First name: Mr. / Mrs. ....</b> | <b>Place of residence:</b> |                  |
|                                 | <b>Ref. ID :</b>                                 | <b>Unique ID number:</b>   | <b>Contacts:</b> |

**Subject:           Complaints Closure**

Madam/Sir

Further to your formal complaint registered with our services under number No. .... dated DD / MM / YYYY at (time) and relating to the following subject at (time) and relating to the following subject

Description of the reason for the complaint for a better understanding

You have been informed that the Complaints Management Committee has made the following decision:

Response to the complaint

**Attestation:**

I, the undersigned, bearing the above-described identification, certify that following the implementation of the corrective measures described in response to my request, I consider that the complaint is definitively closed.

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

Venue: \_\_\_\_\_ on \_\_\_\_\_ DD / MM / YYYY



**ANNEX 11: SURVIVOR CONSENT FORM**

We invite you to be interviewed about a case reported to our office concerning you. We assured you that strict confidentiality is essential and MUST be maintained at all times, except when you as the (survivor) or the (caseworker) faces imminent risk to your well-being, safety and security. You are also assured that your anonymity would be maintained wherever possible. All written information about you the (survivor) would be kept locked and secure from others. Safety and Security At all times, your safety as a survivor must remain paramount into our work.

For confidentiality, your answers will not be associated with your name. Rather, you will be given an identification number on the interviewer’s sheet. We will make sure all risk associated to your safety is eliminated or minimize at all costs. You may opt to answer questions that you wish to answer. If you have any concerns or you are dissatisfied with any aspect of this interview you may report the grievances anonymously if desired to the Grievance Mechanism Committee.

If you think you are not comfortable with the location where the interview is proposed to be conducted, please you are free to ask for change of location as we want to ensure that you the (survivor) is not placed at risk of further harm by the aggressor, in all cases.

Freedom to Withdraw or Refuse Participation: I understand I has the right to stop the interview at any time, or to refuse to answer any of the interviewer’s questions without prejudice from the interviewer.

Please feel free to ask the interviewer any questions before signing the consent form or at any time during or after the interview.

I understand that in giving my authorization below, I am giving (*Maimuna A. M. Sallah*) permission to share the specific case information from my incident report for the only purpose of accessing the GM

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the service I request. I understand that releasing this information means that a person from the verification committee may come to talk to me.

At any point, I have the right to change my mind about sharing information with the designated agency/focal point listed below.

Name: \_\_\_\_\_

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

Tel: \_\_\_\_\_

Signature \_\_\_\_\_

Signature of parent or guardian if the survivor is below 18 \_\_\_\_\_

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

Name: \_\_\_\_\_

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

Tel: \_\_\_\_\_

Signature \_\_\_\_\_

Signature of parent or guardian if the survivor is below 18: \_\_\_\_\_

**ANNEX 12: Intake Form**

SURVIVOR  
CODE

**STANDARD GBV INTAKE-REGISTRATION FORM**

**INSTRUCTIONS**

1- This form must be filled out by the person providing services to the survivor  
2- Remind the that all information will be kept confidential, and that they may choose not to answer any of the following questions.

|                     |                       |                                  |   |
|---------------------|-----------------------|----------------------------------|---|
| <b>Report Date*</b> | <b>Incident Date*</b> | <b>Staff Code (if available)</b> | <b>Report by Survivor*?</b><br><input type="checkbox"/> Yes <input type="checkbox"/> No |
|---------------------|-----------------------|----------------------------------|---|

| Survivor Information   |   |  |
|------------------------|---|--|
| <b>Survivor's Age*</b> | <b>Sex of survivor*</b><br><input type="checkbox"/> Female<br><input type="checkbox"/> Male | <b>Specific Needs / Vulnerabilities*</b> (check <u>all</u> that apply)<br><input type="checkbox"/> No<br><input type="checkbox"/> Physical Disability<br><input type="checkbox"/> Mental Disability<br><input type="checkbox"/> Unaccompanied Minor<br><input type="checkbox"/> Separated Child<br><input type="checkbox"/> Other Vulnerable Child |

| Details of the Incident  |                              |                       |
|--------------------------|------------------------------|-----------------------|
| <b>Area*<sup>o</sup></b> | <b>Sub-Area*<sup>o</sup></b> | <b>Village / Town</b> |

|   |   |
|---|---|
| <p><b>Type of incident/violence*</b><br/>(Please select <u>only ONE</u> of the below. Refer to the GBVIMS GBV Classification Tool for further clarification.)</p> <p><input type="checkbox"/> <b>Rape</b><br/>(includes gang rape, marital rape)</p> <p><input type="checkbox"/> <b>Sexual Assault</b><br/>(includes attempted rape and all sexual violence/abuse without penetration, and female genital mutilation)</p> <p><input type="checkbox"/> <b>Physical Assault</b><br/>(includes hitting, slapping, kicking, shoving, etc. that are not sexual in nature)</p> <p><input type="checkbox"/> <b>Forced Marriage</b><br/>(includes early marriage)</p> <p><input type="checkbox"/> <b>Denial of resources, opportunities or services</b><br/>(includes denial of inheritance, earnings, access to school or contraceptives, etc. Reports of general poverty should not be recorded.)</p> <p><input type="checkbox"/> <b>Psychological / Emotional Abuse</b><br/>(includes: threats of physical or sexual violence, forced isolation, harassment /intimidation, gestures or written words of a sexual/menacing nature, etc.)</p> <p><input type="checkbox"/> <b>Non-GBV</b> (specify) _____</p> | <ol style="list-style-type: none"> <li>1. <b>Did the reported incident involve penetration?</b><br/>If yes → classify the incident as "<u>Rape</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>2. <b>Did the reported incident involve unwanted sexual contact?</b><br/>If yes → classify the incident as "<u>Sexual Assault</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>3. <b>Did the reported incident involve physical assault?</b><br/>If yes → classify the incident as "<u>Physical Assault</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>4. <b>Was the incident an act of forced marriage?</b><br/>If yes → classify the incident as "<u>Forced Marriage</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>5. <b>Did the reported incident involve the denial of resources, opportunities or services?</b><br/>If yes → classify the incident as "<u>Denial of Resources, Opportunities or Services</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>6. <b>Did the reported incident involve psychological/emotional abuse?</b><br/>If yes → classify the incident as "<u>Psychological / Emotional Abuse</u>".<br/>If no → proceed to the next incident type on the list.</li> <li>7. <b>Is the reported incident a case of GBV?</b><br/>If yes → Start over at number 1 and try again to reclassify the incident (<i>If you have tried to classify the incident multiple times, ask your supervisor to help you classify this incident.</i>)<br/>If no → classify the incident as "<u>Non-GBV</u>"</li> </ol> |
|---|---|

**Were money, goods, benefits, and / or services exchanged in relation to this incident\*?**  No  Yes

**Has the survivor reported this incident anywhere else\*?** (If yes, select the type of service provider and write the name of the provider where the client reported).  
 No  Yes (specify) :

| Alleged Perpetrator Information  |  |   |
|--|--|---|
| <b>Number of alleged perpetrator(s)*</b><br><input type="checkbox"/> 1<br><input type="checkbox"/> 2<br><input type="checkbox"/> 3<br><input type="checkbox"/> More than 3 | <b>Alleged perpetrator sex*</b><br><input type="checkbox"/> Male<br><input type="checkbox"/> Female<br><input type="checkbox"/> Both<br><b>Age*</b><br><input type="checkbox"/> Adult <input type="checkbox"/> Minor<br><input type="checkbox"/> Adult & Minor | <b>Main occupation of alleged perpetrator (if known)</b><br><input type="checkbox"/> Farmer <input type="checkbox"/> Police <input type="checkbox"/> Soldier <input type="checkbox"/> Security Official<br><input type="checkbox"/> Teacher <input type="checkbox"/> Parent<br><input type="checkbox"/> NGO Staff <input type="checkbox"/> Religious / Community Leader <input type="checkbox"/> Other / Unknown<br><input type="checkbox"/> Unemployed <input type="checkbox"/> Any other individual associated with the project |

## ANNEX 13. SEA/SH complaint verification Form

### Introduction:

*This form should guide the verification process by the verification structure/committee. The verification structure will be in the form of a committee, with five members, recruited. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.*

*The verification committee is tasked to review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions.*

*It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the verification committee can make only its recommendations.*

### Section A:

Has the survivor provided his/her informed consent to access the grievance mechanism?

Yes  No

**IF YES**, please complete the form in its entirety.

**IF NO**, please seek the consent of the survivor only to anonymously share 1) the survivor code, 2) the type of incident reported and the date and area of the incident, 3) the alleged perpetrator's connection to the project (if known), and 4) the age and gender of the survivor.

Explain that this information will only be used by the project for the purpose of gathering information on the risks created by the project to the safety and well-being of women and girls in their communities and to take steps to mitigate these risks. No data specific to the incident in question, including the identity of the victim, specific location, etc., will be shared outside the provider.

Has the survivor provided his/her informed consent to share the abovementioned information?

Yes  No

**IF YES**, please fill out below only Section B.2; B.2; B.3

**IF NO**, please do not fill out the rest of the form.

### Section B :

#### 1. INFORMATION RELATED TO THE Complainant/GBV SURVIVOR

Survivor Code:

Age and sex of the GBV survivor:

Girl (<18)

Woman (>=18)

Boy (<18)

Man (>=18)

## 2. INFORMATION RELATED TO THE SEA/SH ALLEGATION:

Time, area and date of incident reported by the survivor:

GBV Type (classification GBVIMS) :

- Rape
- Sexual aggression
- If relevant, please specify:*
- Sexual exploitation and abuse
- Sexual harassment
- Physical aggression
- Emotional and psychological violence
- Forced marriage
- Denial of resources and opportunities

Has the survivor received any services? Yes  No

**If yes**, please specify:

- Medical
- Psychosocial
- Legal
- Security/protection:
- Other  please specify :

## 3. INFORMATION REGARDING THE LINK TO THE PROJECT:

*This session aims to determine whether the incident is linked to the project and if the alleged perpetrator is hired or is associated to the project*

Is the alleged perpetrator linked to the project?

- Ye
- Non
- Do not know

Name of the alleged perpetrator ( if known):

Role of the alleged perpetrator ( if known):

- Farmer
- Teacher
- NGO staff
- Parent
- Police
- Soldier
- Security official
- Religious/community leader
- Any other individual associated with the project
- Not known

Has the incident been confirmed as credible after verification?

- Yes  No  Verification ongoing

End date of the verification process:

Decision taken:

- No action/sanction
- Informal warning
- Formal warning
- Additional training

- Loss of salary
- Suspension of employment
- Layoff with notice
- Layoff without notice
- Report to the police if warranted
- Fines
- Other actions  Please specify:

Date of notification to the perpetrator's employer/contractor:

Date of notification to the GBV survivor:

Notification of the implementation of the decisions/sanctions:      yes       No

Notification to the PIU PCU yes       No

Notification to the World bank (*the verification structure needs only share the nature of the case, the age and sex of the complainant -if known-, whether there is a link with the project, and whether the survivor has been referred for services*)

yes       No

Note below any follow-up communication with the survivor:

*For example: When/if a verification has begun, or the allegation has been determined to have an insufficient basis to continue. It may also include concerns raised by the victim through the verification process.*

Last name and First name of the representative and signature

---

# ANNEX 14: Code of Conduct for Implementing ESHS and OHS Standards Preventing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and Violence Against Children (VAC)

## IMPLEMENTING ESHS AND OHS STANDARDS PREVENTING SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT, AND VIOLENCE AGAINST CHILDREN

### Individual Code of Conduct

I, \_\_\_\_\_, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) is important.

The company considers that failure to follow ESHS and OHS standards, or to commit acts of SEA/SH or VAC—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment. Prosecution by the Police of those who commit SEA/SH or VAC may be pursued if appropriate, and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH and VAC as requested by my employer.
2. Will always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
3. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can always impair faculties.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual exploitation, which is defined as any actual or attempted abuse of 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.
10. Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.
12. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
13. I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
14. Consider reporting through the GM or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

#### • **With regards to children:**

1. Wherever possible, ensure that another adult is present when working in the proximity of children.
2. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
3. Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
4. Refrain from physical punishment or discipline of children.
5. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
6. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age.
7. Take appropriate caution when photographing or filming children (See Annex 2 for details).

#### • **Use of children's images for work related purposes**

When photographing or filming a child for work related purposes, I must:

1. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
2. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

3. Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
4. Ensure images are honest representations of the context and the facts.
5. Ensure file labels do not reveal identifying information about a child when sending images electronically.

• **Sanctions**

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training (increase dialogue and awareness training).
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of six months.
6. Termination of employment.
7. Report to the Police if warranted.
8. Fines (involve crime and serious human rights violations).
9. Suspended while investigations take place (to have clear evidence against the alleged perpetrator).

**Reporting mechanism:**

If I see and/or witness a case of SEA/SH misconduct as described in this Code of Conduct, or I am a victim of any prohibited behaviors, I can call the toll-free number, 1212) or contact any SEA/SH focal points among the service providers, community-based structure, Community-based focal points or Regional SEA/SH Monitors listed in Annex. I can always contact the Social Safeguard specialist for guidance and information.

*I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.*

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

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

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

Witness Name: \_\_\_\_\_

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

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

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

## ANNEX 15 RESPONSE PROTOCOL FOR SEA/SH COMPLAINTS Response Protocol for SEA/SH Complaints

This annex provides standard operating procedures to follow for service referrals when a complaint related to SEA/SH is received through the project's grievance mechanism. This protocol should be adapted for each project intervention zone as needed in order to incorporate information about relevant and available local service providers.

### A. Protocol objectives

This protocol outlines the procedures to follow when a case of SEA/SH is reported and identifies the principal response actors that provide survivor support, normally health, psychosocial (which can include social reinsertion), and legal services. This protocol also outlines the roles, responsibilities, and guiding principles regarding **SEA/SH response and survivor care**.

### B. Key terms and concepts

- **Aggressor:** The person, group, or institution that inflicts directly, or supports by any other means, violence or abuse inflicted on another against his or her will.
- **Consent:** Consent must be informed, based on a clear appreciation, and understanding of the facts, implications, and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force, or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities. Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. **The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.**<sup>1</sup> Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.<sup>2</sup>
- **Gender-based violence (GBV):** Umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.
- **Sexual exploitation:** Any actual or attempted abuse of 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.
- **Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment:** Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.
- **Survivor or victim:** An individual who has experienced an incident of GBV, including SEA/SH. The terms "victim" and "survivor" are used interchangeably. The term "victim" is most often used in the medical and legal fields, and the term "survivor" is used more often in the field of psychosocial support to denote internal individual resilience.
- **Survivor-centered approach:** The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence or abuse. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

### C. GBVIMS classifications

The Gender-Based Violence Information Management System (GBVIMS) offers six principal and systematic classifications for GBV, as listed below. Intake forms may use these classifications to identify a particular type of GBV incident. Cases of SEA and SH, apart from rape, would be classified under sexual assault.

---

<sup>1</sup> Articles 1 of the UN "Convention on the Rights of the Child" defines children as those under the age of 18. The UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b).

<sup>2</sup> The age of consent has important implications for workers employed on World Bank-financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.



1. **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis or other body part. Also includes penetration of the vagina or anus with an object.
2. **Sexual assault:** any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks. Female genital mutilation/cutting (FGM/C) is an act of violence that affects sexual organs, and as such, should be classified as sexual assault. *This incident type does not include rape, i.e., where penetration has occurred.*
3. **Physical assault:** an act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that results in pain, discomfort, or injury. *This incident type does not include FGM/C.*
4. **Forced or early marriage:** the marriage of an individual against her or his will.
5. **Denial of resources, opportunities, or services:** denial of rightful access to economic resources/assets or livelihood opportunities, education, health, or other social services. Examples include a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.
6. **Psychological or emotional harm:** infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, verbal harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

#### D. Guiding principles for survivor care

- **Confidentiality:** always Respect the confidentiality of the survivor and his/her family. If the survivor gives her/his informed consent, share only relevant information with others for the purpose of helping the survivor, such as referring for services. Confidentiality and anonymity of the alleged aggressor's identity must also be respected. All identifying personal information (name, address, etc.) must be withheld in the reporting, compilation and sharing of data.
- **Exceptions to confidentiality** occur only when an adult survivor is threatening her or his own life or the life of another person and when the survivor is a child.
- **Non-discrimination:** Any adult or child, regardless of sex, has the right to receive care and support under the same conditions. SEA/SH survivors must receive equal and impartial treatment, regardless of their race, ethnicity, religion, nationality, sexual orientation, or gender identity.
- **Respect:** All actions taken will be guided by respect for the wishes, choices, rights, and dignity of the survivor.
- **Security:** Always ensure the safety of the survivor. Remember that s/he may be frightened and need assurance that s/he is safe. In all types of cases, ensure that s/he is not placed at risk of further harm by the alleged aggressor. If necessary and with survivor informed consent, ask for assistance from police, elders, community leaders or others who can provide security. Maintain awareness of safety and security of people who are helping the survivor, such as family, friends, counselors and health care workers.

#### E. Types of survivor support services

Actors that receive specialized training or have considerable programming experience in relation to service provision for GBV survivors are considered **specialized providers**, such as for health and psychosocial support services and case managers.

Actors that work in sectors outside of the GBV prevention and response arena are considered **non-specialized providers** though they may still be actors that offer other support services or additional entry points for orienting survivors towards assistance.

- **Health:** A survivor, especially following an incident of rape, may need medical care to treat injuries or to receive sexual or reproductive health care services, such as prevention of STIs, screening for and prophylactic treatment of HIV/AIDS, emergency contraception, and other common treatments for the physical consequences of GBV. Medical care can also encompass medico legal evidence collection.
- **Legal assistance:** These services offer legal counsel to survivors who wish to report or file a complaint in court against the alleged aggressor. Legal assistance also encompasses proper representation for the survivor before the court system and proper support throughout the legal process. Legal interventions in some project areas can be very limited and weak; therefore, it is important for the survivor to understand all of the advantages and disadvantages of pursuing a legal remedy in order to ensure an informed decision.
- **Psychosocial:** These services aim to offer a response to the harmful emotional, psychosocial, and social effects of GBV. Psychosocial support seeks to improve the survivor's well-being in aiding her/him to heal, re-establishing a normal life, protecting the survivor from an accumulation of troubling events, and encouraging the survivor and her/his family

to rebuild their lives and envision a positive future. These services can encompass individual case management as well as group activities that target emotional support and social reintegration.

- **Security:** All service providers must prioritize and reflect upon the safety and security of the survivor and her/his family, as well as that of their provider colleagues offering support. Security services may encompass support from law enforcement or the court system, but this will depend upon the project context and whether these agents have been properly trained and equipped.
- **Additional survivor support options:** For survivors or complainants who are project personnel or workers, and with the survivor's full participation and consent, the project may also be in a position to undertake further survivor support measures to ensure the survivor's safety, such as adapting personnel duties, location, or hours; facilitating safe transportation options; ensuring adequate leave for needed appointments, safe accommodation, or caregiver duties; and adopting other measures to ensure family-friendly or flexible work arrangements.

## F. Procedure for referrals or requests for assistance

### 1. Reporting an incident

A survivor has the right to report an incident of SEA/SH to any actor or individual that s/he wishes and whom she trusts, such as a family member, a friend, another member of the community, a service provider, or community or religious leader. A survivor may choose to receive or not to receive support or be referred for services, such as health or psychosocial care. Any actor or individual in whom a survivor confides should give the survivor all possible information about her/his options and available services, if the survivor consents. Service providers often provide helpful entry points, but any entry point into the grievance redress system must be accessible, secure, reliable, and confidential.

### 2. Referring for services

- a. Service referrals can happen in multiple directions:
  - Referrals from individuals or actors who are not specialized GBV service providers;
  - Referrals among specialized GBV service providers (e.g., between a medical and psychosocial support provider); and
  - Referrals from specialized GBV providers to non-specialized providers, who may offer services in other areas not directly linked to GBV services.
- b. When a non-specialized provider receives a report of SEA/SH, this actor's principal priority is to provide basic emotional support as well as offer information to the survivor as to locally available services for referral, with the survivor's consent. Immediate actions for this individual would be to:
  - Offer active listening;
  - Provide basic information about locally available services;
  - Ask for the survivor's informed consent for referral; and
  - Refer to other services in a timely manner.

The non-specialized actor should ensure that the suggested service provider can in fact provide assistance to the survivor, and once the survivor is referred for other services, the direct assistance from the non-specialized provider ends there.
- c. Specialized providers that receive a report of SEA/SH must provide care to the survivor in accordance with international best practices and guiding principles for survivor care.<sup>3</sup> Holistic support from specialized providers includes case management, medical care, psychosocial support and mental health interventions, security options, and legal assistance. These actors must likewise be active listeners and provide all information about a survivor's available options, obtaining the survivor's informed consent first before proceeding. Specialized providers should also provide survivors, and/or their caregivers where needed, information about any mandatory reporting laws, if relevant in a particular context, before proceeding.
- d. **Consent form:** Both non-specialized and specialized actors must obtain informed consent from the survivor before proceeding with service referrals or information. Ideally, the survivor should read and sign a document that gives her or his consent to be referred for or to proceed with services as well as regarding sharing of limited case information. If the survivor is unable to read or write, the individual or provider can read the consent form

---

<sup>3</sup> See Clinical Management of Rape (World Health Organization, 2009); Caring for Child Survivors of Sexual Abuse: Guidelines for health and psychosocial service providers in humanitarian settings (UNICEF and IRC, 2012); Interagency Gender-Based Violence Case Management Guidelines (IASC, 2017); and Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies (UNFPA, 2015).

aloud and the survivor can use a thumbprint to sign the document. Any such documentation must be maintained separately in a secure and locked area with strictly limited access.

- e. **Intake form:** Specialized service providers that receive a case must fill out an intake form after obtaining survivor consent, which will assign an anonymous code to the survivor. During the interview, the provider should inform the survivor of the type of help that the provider can offer, including the advantages and disadvantages of receiving different services. Any intake and other case documentation must also be maintained separately in a secure and locked area with strictly limited access.
3. **What to do when services are not available:** If complete services are not available in a particular intervention zone, the survivor should still be informed of what services are or are not available and how remote support might be offered if that is an option. It is important that a survivor's expectations in relation to service availability be managed realistically.

**Working with child survivors:** In cases involving minors, actors specialized in child protection should be involved and integrated into the referral pathway. Children have the right to be consulted directly about their case as well as to receive all available information that is necessary to help them decide upon a particular course of action, in accordance with their age and stage of maturity and cognitive development. Wherever appropriate, parents or caregivers should also be involved in the case management process, and children have the right to let a service provider know the adult in whom the child places the most trust and confidence. If the alleged aggressor is a member of the family, it is extremely important that any interview with the child take place outside of the family unit and in the presence of an adult whom the child trusts. A child's capacity to provide consent with regard to services or information-sharing will depend upon the child's age, level of maturity, and ability to express him or herself freely; the best interest of the child should also be taken into account.

Everyone has a duty to report to either the Police or Department of Social Welfare, any case of child abuse or the violation of the right of any Child that he or she knows about. It is against the law to sexually abuse or exploit a Child in any form or even encourage it, to keep a brothel or allow a child to be in your brothel, (The children's Act 2005). For the benefit of PSVR projects, there are SEA/SH Focal Points identified within project sites who will work directly with the PSVR Safeguard Team. In addition, they are trained on how to handle and report SEA/SH cases especially when it involves a child survivor. All referrals are done by using the numbers of contacts indicated in the GM referral pathways and that of the GM Operator's number (for the most up-to-date information, please consult the Safeguard Team at PIU).

4. **Payment for survivor services:** The GM operator will arrange for payment of survivor support costs for project-related claims that are not otherwise covered through public services, such as government health or social service centers, including transport costs to ensure access to needed services. In order to facilitate this coverage, the project may need to enter into partnership arrangements with certain service providers for the life of the project.
5. **Information and data management:** With regards to management of SEA/SH-related data, all documentation related to any SEA/SH case must be filed and maintained separately, in a lockable space, with access that is strictly limited. All guiding principles regarding confidentiality and the secure and ethical collection of data must be respected,<sup>4</sup> and any identifying information about a survivor or the alleged aggressor must never be included in any reports regarding SEA/SH cases for the project. Any project personnel responsible for collecting data related to SEA/SH cases must be trained on proper data collection methods and relevant guiding principles, especially surrounding survivor confidentiality and safety.

The project may need to enter into information-sharing agreements with certain service providers in order to ensure the ethical and confidential reporting and sharing of case data. Generally speaking, any data-sharing should be limited to information regarding the nature of the incident, whether the alleged aggressor is linked to the project, the age and sex of the survivor (if known), and whether the survivor was referred for services, and only with the informed consent of the survivor.

## G. Community Sensitization

Information regarding the management procedures for SEA/SH claims and available services must be disseminated regularly within project-affected communities (service-mapping information must therefore be available prior to organizing community awareness-raising sessions or consultations). Community members should be informed about the following:

1. Entry points to seek help safely and confidentially, whether for services and/or to file a complaint;
2. Available services in the community and how to access them;
3. What to expect from service providers, including counter-referrals, as well as the roles and responsibilities of different actors; and
4. The existence of any mandatory reporting laws, especially in the case of SEA/SH or VAC, so that any survivors or their caregivers are aware of these regulations before deciding whether to seek support from a service provider that may be required to report.

---

<sup>4</sup> World Health Organization, Ethical and safety recommendations for researching, documenting, and monitoring sexual violence in emergencies, 2007; Best Practices, Gender-Based Violence Information Management System, [www.gbvims.com](http://www.gbvims.com).