
GOVERNMENT OF SOMALILAND

MINISTRY OF INFORMATION AND COMMUNICATION TECHNOLOGY

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT –
SOMALILAND**

GRIEVANCE REDRESS MECHANISM (GRM) MANUAL

September 2025

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ABBREVIATIONS & ACRONYMS

ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRS	Grievance Redress Service
IDPs	Internally Displaced Persons
IP	Implementing Partner
LMP	Labor Management Procedure
MICT	Ministry of Information and Communication Technology
PAD	Project Appraisal Manual
PAPs	Project-Affected Persons
PIU	Project Implementation Unit
POM	Project Operation Manual
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment

DEFINITIONS

Term	Definition
Complaint	A complaint is a statement (verbal or written) or expression of displeasure concerning an impact or effect arising from a sub-project as unsatisfactory or unacceptable to the complainant.
Complainant	An individual, group or organization that submits a complaint
Grievance	A grievance is a statement about an action, impact or effect originating from a sub-project that adversely affects the rights, health and/or wellbeing of an affected person or group of people to the extent that it forms legitimate grounds for grievance and if upheld, may result in compensation, legal action, or a change to the sub-project in order to resolve the grievance.
Grievance Log	A database for maintaining information about complaints received.
Severe Incident	An incident <i>that caused significant adverse effect on the environment, the affected communities, the public or workers</i> , e.g. fatality, GBV, forced or child labor.
Gender-Based Violence (GBV):	An umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (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 private life.
Sexual Exploitation and Abuse (SEA)	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes.
Sexual Harassment (SH):	Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature in the workplace.

INTRODUCTION

This manual outlines the procedures for handling complaints, disputes, and concerns related to the Eastern Africa Regional Digital Integration Project (EA-RDIP) in Somaliland, ensuring ensuring fair, transparent, and **timely** resolution in line with local norms and international standards. EA-RDIP aims to enhance digital connectivity, expand broadband infrastructure, improve digital literacy, and support e-governance initiatives across Somaliland. Given the importance of stakeholder trust and social acceptance, this GRM provides accessible and culturally appropriate channels for affected communities, government agencies, private sector partners, and civil society to voice concerns.

The GRM is designed to address issues such as land acquisition, labor conditions, environmental impacts, and cultural sensitivities arising from project activities. It complies with Somaliland's national laws, including the Telecommunications Act 2011 and The Somaliland Labour Code No 31/2014, as well as the World Bank's Environmental and Social Standards on Stakeholder Engagement and Information Disclosure (ESS10) . To ensure inclusivity, grievances can be submitted through multiple channels, including local GRM offices in all Regions, a toll-free hotline, mobile SMS/WhatsApp for remote communities, community liaison officers, and an online portal where feasible, where anonymous complaints can be submitted.

Upon submission, grievances are registered within 48 hours, acknowledged with a reference number, and assessed by a GRM committee comprising government representatives, technical experts, and local elders to ensure culturally appropriate mediation. Resolution is targeted within 15–30 days, with unresolved cases escalated to the Somaliland Ministry of Telecommunications or the World Bank's Accountability Mechanism. The Project Implementation Unit (PIU) oversees GRM compliance, while independent monitors, including local NGOs, ensure fairness and transparency.

Monthly reports on grievance resolution are shared with the World Bank and Somaliland **Ministry of Information and Communication Technology (MICT)** , with anonymized summaries made publicly available **through the MICT official website and database** where appropriate. The GRM also incorporates safeguards such as gender-sensitive approaches, respect for clan-based dispute resolution mechanisms, and measures to minimize disruptions to pastoralist communities.

Objectives of the GRM

The objectives EA-RDIP Grievance Mechanism provides a fair, accessible and timely process for resolving project-related concerns, ensuring transparency and accountability while complying with Somaliland's laws and World Bank standards (**ESS1-10**). ~~It offers~~ ^{It offers} multiple reporting channels and timely resolutions (15-30 days), with special protections for sensitive GBV/SEA cases and worker complaints. The system respects local traditions through elder-involved mediation while maintaining escalation options to authorities, all

monitored for effectiveness through regular reporting.

Specifically, the objectives of this GRM Manual are to:

1. Accountability: Ensure that project implementation aligns with World Bank policies and standards.
2. Participation: Facilitate stakeholder engagement, allowing communities to voice their concerns and influence project outcomes.
3. Conflict Resolution: Provide a structured process for resolving disputes and grievances, promoting dialogue between affected parties and project implementers.
4. Transparency: Enhance openness in project operations by documenting grievances and responses, fostering trust among stakeholders.
5. Continuous Improvement: Gather feedback to improve project design and implementation, ensuring better outcomes for communities.
6. Protection of Rights: Safeguard the rights of individuals and communities affected by projects, ensuring their concerns are heard and addressed

Legal and Institutional Alignment in Somaliland

The Grievance Redress Mechanism (GRM) for the Eastern Africa Regional Digital Integration Project (EA-RDIP) is designed to align with both international safeguard requirements and Somaliland’s national legal and institutional frameworks. It operates in full compliance with the Telecommunications Act (2011), which provides a foundation for citizen protection and equitable access to ICT services. The GRM also adheres to the Labour Code of Somaliland (2014), particularly in its approach to worker-related grievances, ensuring fair treatment, occupational safety, and non-discrimination. For grievances involving environmental or resettlement impacts, the GRM reflects the principles set out in Somaliland Environmental Management Act” (Law No.../2014) (2018) as well as the Project ESMF, SEP and the RPF.

In addition, it upholds the commitments of the Gender Policy of Somaliland (2018) by incorporating survivor-centered protocols for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). Strategically, the GRM supports the broader objectives of the Somaliland National Development Plan III (2023–2027) which prioritize good governance, transparency, and inclusive service delivery.

Importantly, the GRM complements existing grievance handling structures within Somaliland. Local councils and district administrations—often the first line of response in rural communities—are integrated into local-level grievance redress committees to enhance cultural legitimacy and effectiveness. The Ministry of Information and Communication Technology (MICT), which leads EA-RDIP implementation, houses the Project Implementation Unit (PIU) and provides overarching policy oversight and coordination. Traditional clan-based dispute resolution mechanisms are respected and, where appropriate, incorporated into the grievance resolution process, provided they align with human rights principles and ESS10. For complex or specialized cases, such as labor violations or environmental disputes, the GRM includes referral pathways to sector-specific institutions like the Ministry of Labour and the Ministry of Environment. Legal grievances that cannot be resolved administratively may be referred to Somaliland’s formal judiciary system.

To ensure coherence and effectiveness, all EA-RDIP implementing partners, contractors, and grievance focal points are required to coordinate with government entities, respect local mandates, and document all grievances in a centralized register managed by the PIU. By embedding the GRM within Somaliland’s legal, policy, and governance architecture, the mechanism not only ensures compliance and accessibility but also strengthens the project’s legitimacy, accountability, and responsiveness to community needs.

CORE PRINCIPLES

The GRM will adhere to the following core principles:

- **Fairness:** All grievances will be treated equitably and without bias, ensuring that all parties have an equal opportunity to present their case.
 - **Confidentiality:** Sensitive information, especially in GBV/SEA/SH cases, will be handled with utmost discretion and respect for the privacy of individuals involved. Confidentiality protocols will be clearly outlined and strictly enforced.
 - **Transparency:** Information about the GRM process, including submission channels, timelines, and contact details, will be readily available to all stakeholders in accessible formats (e.g., posters, radio broadcasts, community meetings).
 - **Accessibility:** Grievance submission channels will be diverse and easily accessible to all stakeholders, including those with limited literacy, language barriers, or disabilities. Multiple channels (hotline, email, help desks, suggestion boxes) will be provided, and community outreach programs will be conducted to raise awareness about the GRM.
 - **Timeliness:** Defined timelines will be established for each stage of the grievance handling process, ensuring that grievances are addressed promptly and without undue delay. The timelines will be monitored and enforced to maintain efficiency.
 - **Cultural Appropriateness:** The GRM will be implemented in a manner that is sensitive to the cultural context of Somaliland, respecting local customs, traditions, and social norms. Grievance resolution mechanisms will be tailored to local circumstances to ensure effective and sustainable outcomes.
 - **Accountability:** Clear roles and responsibilities will be assigned to individuals and committees involved in the GRM, ensuring that there is accountability for the effective implementation of the process.
- Non-Retribution:** Complainants will be protected from any form of retaliation or intimidation for raising their concerns. Measures will be put in place to ensure **that** individuals feel safe and secure in using the GRM.

Grievance Redress System for Somaliland's EA-RDIP Project

In Somaliland's digital expansion project (EA-RDIP), we handle complaints with care and respect for our local context. Here's how we manage different types of concerns:

I. Regular Project Complaints

- (For issues like land use, community impacts, or project activities)
- **How to report:** Secure suggestion boxes will be available at all PIU and local offices, and community liaison officers can facilitate anonymous submissions upon request also, other means are available for anonymous cases such as suggestion boxes, and online platforms (WhatsApp/Email). The toll-free hotline is 9088 and SMS/WhatsApp channels also support anonymous reporting where callers/texters choose not to identify themselves."

Process:

- Acknowledged within 48 hours
- Reviewed by a team including elders and technical experts
- Resolved within 2-4 weeks, where possible. If a resolution is not feasible within this timeframe, the complainant will be advised of the delay and provided with an update on

the ongoing investigation.

II. GBV/SEA/SH Complaints (Most Sensitive Cases)

(Gender-Based Violence / Sexual Exploitation & Abuse / Sexual Harassment)

Special Protection: These cases follow a confidential, survivor-centered approach

How to report:

- Dedicated female staff available at all GRM offices
- Secure hotline with trained responders
- Local women's organizations can assist in reporting

Process:

- Immediate protection measures if needed
- Investigations handled by specialists, not regular GRM staff
- Support services provided through partner organizations **such as the Ministry of Employment, Social Affairs and Family (MESAF) and recognized GBV service providers.**

III. Worker Complaints (Labor Issues)

- (For project employees & contractors - pay, safety, unfair treatment)
- Separate Process: Workers use a dedicated Workers' GRM

How to report:

- Site supervisors must display hotline numbers
- Anonymous reporting options available

Process:

- Labor specialists investigate (not community elders)
- Strict 14-day resolution timeline for urgent safety issues. If the 14-day resolution timeline is not met for urgent safety issues, the case is automatically escalated to the PIU Project Manager for immediate action.

IV. Unresolved Complaints (Escalation Process)

- (When people aren't satisfied with initial solutions)

Appeals Process:

- First escalation: Regional EAR-DIP office
- Final appeal: Somaliland Ministry of Telecommunication and World Bank
- **Timeline:** Escalated cases get final decision within 30 days

Why This Matters for Somaliland

- Respects our traditional conflict resolution while meeting World Bank standards
- Women & vulnerable groups get safe ways to report
- Workers' rights protected without causing public shame
- No complaint "falls through the cracks" - tracking from start to finish

Institutional Arrangements for the Grievance Redress Mechanism (GRM)

Effective implementation of the EA-RDIP Grievance Redress Mechanism relies on clear institutional arrangements and defined roles and responsibilities across various levels. This ensures that grievances are received, processed, investigated, and resolved efficiently and equitably, adhering to both national regulations and World Bank standards.

Ministry of Information and Communication Technology (MICT) / Project Implementation Unit (PIU):

- **Overall Oversight:** Provides strategic guidance and ultimate oversight for the entire GRM framework, ensuring alignment with project objectives and national policies.
- **Policy Coordination:** Integrates GRM activities with broader project implementation and governance structures.
- **Centralized Register:** Maintains a centralized grievance register and Project Management Information System (MIS) for comprehensive tracking, monitoring, and reporting of all grievances, including those from implementing partners and contractors.
- **Appeals Mechanism:** Serves as the first escalation point for unresolved grievances from the local GRCs and provides the final appeal mechanism within Somaliland before World Bank intervention.
- **Reporting:** Prepares and submits periodic reports on grievance handling to the World Bank and relevant Somaliland authorities such as **the Somaliland Ministry of Planning and National Development**.
- **Resource Allocation:** Ensures adequate human and financial resources are allocated for effective GRM operation, including training and support for GRM personnel.

PIU Project Manager:

- **Leadership & Coordination:** Leads the PIU's GRM efforts, coordinates with all implementing partners, and ensures timely and appropriate responses to grievances.
- **Oversight of Investigations:** Reviews investigation reports and approves proposed actions for grievances escalated to the PIU level.
- **Appeals Chair:** Chairs the 2nd Tier Grievance Redress Committee for escalated cases, facilitating resolution meetings.

PIU Social Specialist (or Safeguard Expert):

- **GRM Coordinator:** Acts as the primary coordinator for the GRM, managing the centralized grievance register and overseeing the entire grievance handling process.
- **Capacity Building:** Provides training and guidance to GRM Focal Points, GRC members, and other project personnel on GRM procedures, stakeholder engagement, and cultural sensitivity.
- **Monitoring & Evaluation:** Monitors GRM performance, conducts stakeholder

satisfaction surveys, analyzes grievance trends, and recommends improvements.

- **Complex Case Review:** Reviews and provides expert input on social and resettlement-related grievances, ensuring compliance with ESF/ESS requirements.
- **Independent Investigator:** May act as an independent investigator for complex or sensitive cases that require external expertise, ensuring impartiality.

PIU GBV and Gender Specialist:

- **Primary Focal Point for GBV/SEA/SH:** Manages all GBV/SEA/SH-related grievances, ensuring a survivor-centered approach, strict confidentiality, and adherence to specific protocols.
- **Referral Management:** Ensures immediate access to appropriate referral services (medical, psychosocial, legal, protection) for survivors and maintains a comprehensive, updated list of service providers.
- **Coordination with Employers:** Coordinates with employing agencies (implementing partners, contractors) to ensure appropriate disciplinary action is taken against perpetrators when a Code of Conduct violation is confirmed.
- **Training:** Delivers specialized training on GBV/SEA/SH complaint handling, survivor-centered approaches, and referral systems to all relevant project personnel, including hotline operators.
- **Monitoring GBV Cases:** Monitors the resolution and follow-up of GBV/SEA/SH cases, ensuring the survivor's well-being and informed consent are paramount.

Grievance Redress Committee (GRC) – Local/Site Level:

- **First Line of Response:** Receives, registers, and conducts initial assessments of grievances at the local or site level.
- **Community Representation:** Composed of relevant personnel from the PIU, contractor representatives, and importantly, respected community stakeholders and local elders, ensuring cultural legitimacy.
- **Dialogue Facilitation:** Facilitates dialogue and mediation between involved parties to achieve local resolutions.
- **Gender Balance:** Strives for an equal number of men and women members to promote equitable representation and inclusive grievance resolution.
- **Referral & Escalation:** Refers complex cases to the PIU or specialized institutions (e.g., GBV Specialist) and escalates unresolved grievances to the PIU Appeals Mechanism.
- **Reporting:** Submits monthly reports on grievance handling to the PIU.
- **Gender Balance & Inclusivity:** To promote equitable representation and inclusivity, the GRC should be composed of an equal number of men and women and ensure fair grievance resolution.

GRM Focal Point (within Implementing Partners/Contractors):

- **Direct Engagement:** Acts as the first point of contact for receiving grievances from project-affected persons and workers at the respective implementing partner or contractor level.

- **Registration & Categorization:** Ensures all received grievances are accurately documented in a standardized register, assigned a unique tracking number, and categorized.
- **Initial Verification & Resolution:** Conducts initial verification and, for straightforward cases, takes immediate steps to resolve the issue and communicate with the complainant.
- **Referral & Escalation:** Refers cases requiring higher-level intervention or specialization (e.g., GBV/SEA/SH, severe environmental impacts) to the PIU, relevant government agencies, or the PIU GBV Specialist.
- **Reporting:** Provides regular updates to GRM users and the public and submits detailed grievance reports to the PIU.

Hotline Operators:

- **Frontline Support:** Staffs the dedicated toll-free hotline, receiving verbal grievances in local languages (Somali, English).
- **Initial Information Gathering:** Collects essential grievance details while ensuring empathetic, non-judgmental listening.
- **GBV/SEA/SH Protocol:** Immediately identifies and forwards GBV/SEA/SH cases to the specialized referral system/PIU GBV Specialist, following strict confidentiality and survivor-centered protocols.
- **Documentation:** Accurately documents all received calls and grievances in the register.
- **Training:** Receives specialized training on GRM procedures, communication skills, and GBV/SEA/SH protocols.

Community Liaison Officers (CLOs):

- **Community Interface:** Serves as a direct point of contact between the project and local communities, building trust and facilitating communication.
- **Grievance Uptake:** Assists community members, especially those with limited literacy or language barriers, in submitting grievances through various channels.
- **Awareness Raising:** Conducts community outreach programs to raise awareness about the GRM and available reporting channels.

CATEGORIZATION OF GRIEVANCES

Grievances will be classified into the following categories to facilitate efficient processing and appropriate response:

Table 1 Categorization of Grievances and Examples

Category of Grievance	Examples
Environmental Impacts	Noise or dust pollution from construction activities; Impact on water resources or biodiversity; Improper waste disposal; Chemical/oil spills; Damage to ecosystems (flora/fauna); Odor/air emissions.

Social Impacts	Damage to crops or property; Inadequate consultation with affected communities; Damage to cultural heritage; Negative changes in social dynamics; Exclusion of vulnerable or marginalized groups.
Land Acquisition & Resettlement	Disputes over land ownership; Access restrictions to land or resources; Delayed or inadequate compensation for land or assets; Issues related to involuntary resettlement.
Labor and Workplace Issues	Unfair dismissal or disciplinary action; Wage disputes or non-payment of wages; Unsafe working conditions; Discrimination or harassment in the workplace (non-sexual); Lack of adequate protective equipment; Occupational health and safety concerns.
Gender-Based Violence (GBV), Sexual Exploitation (SE), and Sexual Harassment (SH)	Sexual harassment of female workers or community members by project staff; Sexual exploitation or abuse of vulnerable individuals in connection with project activities; GBV related to changes in social dynamics resulting from the project. Note: These cases require specialized handling, strict confidentiality, and survivor-centered approaches.
Corruption and Financial Mismanagement	Bribery or extortion; Misuse of project funds or assets; Fraudulent procurement practices; Conflicts of interest.
Service Delivery Complaints	Delays in providing internet access or digital training; Poor quality of digital services; Lack of access to information about project benefits; Ineffective community outreach programs.
Human Rights and Equality	Discrimination (e.g., based on gender, ethnicity, religion); Inequality in access to project benefits; Exclusion of vulnerable or marginalized groups (beyond land/resettlement); Infringement of labor rights (covered above but could be broader human rights).
Other	Any other concerns or complaints related to project activities that do not fit into the above categories.

The GRM process consists of the following steps:

Step 1: Grievance Uptake

- **Multiple Channels:**

- **Toll-Free Hotline:** A dedicated toll-free number will be established and widely publicized for 8 hour per day in 6 days per week. The hotline will be staffed by trained operators who can communicate in Somali and English.
- **Email Submissions:** A dedicated email address will be created for receiving written grievances. The email address will be monitored regularly. The email account will be monitored daily by the **Social Development Specialist**.
- **Help Desks at Project Sites:** Physical help desks will be established at all project sites, staffed by trained personnel who can assist individuals in submitting grievances.
- **Suggestion Boxes:** Secure suggestion boxes will be placed in accessible locations at project sites for anonymous submissions.
- **Direct Reporting to PIU Officers:** Contact information for key PIU officers will be publicly available, allowing individuals to submit grievances directly.
- **Accessibility:** All grievance submission channels will be made accessible to all stakeholders, regardless of their location, literacy level, or physical abilities.
- **Documentation:** All grievances received through any channel will be documented in a standardized grievance register.

Step 2: Sorting and Processing

- **Registration:** Upon receipt, the Grievance Redress Committee (GRC) at the local level will register the grievance in the grievance register, assigning a unique tracking number.
- **Categorization:** The GRC will categorize the grievance according to the categories outlined in Section 4.
- **Initial Assessment:** The GRC will conduct a preliminary assessment of the grievance to determine its validity and severity.
- **Referral:** If the grievance falls outside the scope of the GRC's authority, it will be referred to the appropriate entity (e.g., PIU, government agency, specialized service provider). Specifically, worker-related grievances will be immediately handed over to the dedicated Workers' Grievance Redress Procedure, and GBV/SEA/SH grievances will be referred to the GBV Specialist, following the strict GBV/SEA/SH referral system outlined in this manual.

Step 3: Acknowledgement and Follow-Up

- **Acknowledgement:** The GRC will acknowledge receipt of the grievance within 5 working days, informing the complainant of the tracking number and the next steps in the process.
- **Initial Assessment:** The GRC will complete an initial assessment of the grievance within 14 working days, determining its validity and potential impact.
- **Communication:** Regular communication will be maintained with the complainant throughout the grievance handling process, providing updates on the status of their

grievance and any actions taken.

Step 4: Verification, Investigation, and Action¹

- **Verification:** The PIU will verify the facts and circumstances surrounding the grievance, gathering relevant information and evidence.
- **Investigation:** If necessary, the PIU will conduct a thorough investigation of the grievance, interviewing relevant parties and examining documentation.
- **Action:** Based on the findings of the investigation, the PIU will develop and implement a corrective action plan to address the grievance. This may involve providing compensation, implementing mitigation measures, or taking disciplinary action against responsible parties.
- **GBV/SEA/SH Cases:** These cases will follow a survivor-centered approach, prioritizing the safety and well-being of the survivor. The PIU will work closely with specialized service providers to provide medical, legal, and psychosocial support to the survivor. All investigations will be conducted with strict confidentiality and sensitivity.

Step 5: Monitoring, Evaluation, and Feedback

- **Monitoring:** The PIU will monitor the implementation of the GRM, tracking the number of grievances received, the time taken to resolve them, and the satisfaction of complainants.
- **Evaluation:** The PIU will periodically evaluate the effectiveness of the GRM, identifying areas for improvement and making recommendations for changes to the process.
- **Feedback:** The PIU will provide feedback to complainants on the outcome of their grievances and the actions taken to address them.
- **Reporting:** The PIU will prepare periodic reports on grievance handling activities, submitting them to the MICT and the World Bank. In the event of severe incidents that cause a significant adverse impact on the environment, affected communities, public, or workers, such as fatalities, gender-based violence, forced or child labor, the GRC will immediately report to the PIU. The PIU will inform the World Bank/TTL within 48 hours of learning of such incidents, or within 24 hours in the case of GBV/SEA/SH.
- **Appeals Process:** An appeals process will be available for complainants who are dissatisfied with the outcome of their grievance.

¹ **Grievance Redress Committee (GRC):** A body established within the sub-project area to receive, review, and resolve complaints from stakeholders in a fair, transparent, and timely manner, ensuring accountability and trust.

4. Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) Grievance Management

Grievances related to Gender-Based Violence (GBV), Sexual Exploitation (SE), and Sexual Harassment (SH) require specialized handling, utmost sensitivity, and strict confidentiality. The EA-RDIP GRM is committed to a survivor-centered approach, ensuring that all such cases are managed with dignity, respect, and in full compliance with international best practices and the project's GBV/SEA/SH Action Plan and referral protocols.

4.1. Core Principles for GBV/SEA/SH Grievance Handling

All actions concerning GBV/SEA/SH cases will be guided by the following principles:

- **Survivor-Centered Approach:** This approach prioritizes the rights, needs, and wishes of the survivor. It seeks to empower survivors to make informed decisions regarding their case, foster an environment where survivors feel safe and supported, and ensure that no action is taken without the explicit, informed consent of the survivor.
- **Confidentiality:** Reports must not contain any identifying information about survivors, their families, or alleged perpetrators. Confidential reporting mechanisms will be available, allowing survivors to report incidents without fear of retaliation. All GBV/SEA/SH-related reports under the EA-RDIP Grievance Redress Mechanism (GRM) must ensure that survivors' identities remain completely confidential.
- **Informed Consent:** Crucially, no information about a GBV/SEA/SH case can be disclosed or forwarded, and no action can be taken, without the survivor's explicit, free, and informed consent. This means the survivor must be fully informed and understand all relevant facts, potential benefits, risks, and consequences of any intervention (e.g., referral, investigation, sharing of information) before providing their approval. The survivor retains the right to decline or refuse any part of an intervention at any stage without affecting access to essential support services.
- **Mandatory Reporting (Identity):** While reporting the incident itself may be mandatory for accountability and learning, it is **not** mandatory to disclose the identity of the victim unless it is done voluntarily and with their informed consent.
- **Ethical Considerations:** Personnel working on GBV/SEA/SH response must adhere to strict ethical guidelines. This includes ensuring no dual relations with the survivor, maintaining impartiality in judgments, upholding professionalism, and refraining from seeking any personal benefits from the survivor.

GBV/SEA/SH Grievance Handling and Referral System

A dedicated and separate GBV/SEA/SH referral system will be established to ensure survivors have immediate and comprehensive access to professional support and essential services.

Encouraging Reporting and Awareness

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Communities and project beneficiaries will be encouraged to report GBV/SEA/SH grievances through the dedicated GBV/SEA/SH referral system. This will be explicitly communicated during community awareness sessions and stakeholder engagement

processes to ensure that all affected persons understand the reporting mechanisms and available support services.

Roles and Responsibilities of GRM Personnel in GBV/SEA/SH Cases

All GRM personnel, including Help-Desk staff, Hotline Operators, and local personnel, must provide a safe, caring environment while handling complaints. Their responsibilities include:

- 1 Ensuring a confidential and survivor-centred response in all interactions.
 - 2 Obtaining informed consent before making referrals or taking further action.
- Providing clear, accurate, and comprehensive information on available support services, including medical, psychosocial, and legal assistance.

Who is Catered For?

Regardless of whether the GBV/SEA/SH incident is related to the EA-RDIP project or not, the GRM operator must provide survivors with access to referral services. This includes, at a minimum, health, psychosocial, legal, and protection services.

Referral Process and Support Services

Referrals serve as a crucial mechanism for GBV/SEA/SH survivors to access professional support and essential services, including healthcare, psychosocial counseling, security and protection, legal aid, and economic reintegration assistance.

- Upon receiving a GBV/SEA/SH grievance, the grievance recipient will immediately provide the survivor with contact details for available referral services in their respective location.
- If the survivor requires transportation assistance or financial support for accessing services, the grievance recipient will facilitate the necessary allowances to ensure seamless access to care.
- Referral services will be made available even if the survivor chooses not to pursue the grievance through the GRM or legal channels, prioritizing the survivor's well-being and informed decision-making.
- The survivor will be linked to the health sector in case of rape and to the rule of law if the survivor would like to pursue justice. Psychosocial referrals for support to the survivor must also be provided.
- A comprehensive and continuously updated list of referral services for different EA-RDIP project locations will be maintained by the PIU GBV Specialist. Updates to this list will be regularly communicated to all GRM recipients to ensure the latest and most relevant service providers are accessible.

Management of GBV/SEA/SH Grievances

For grievances related to GBV/SEA/SH, the PIU GBV and Gender Specialist will serve as the primary focal point responsible for managing these cases. The GBV Specialist will coordinate with local GBV Specialists, relevant implementing partners, and service providers to ensure the grievance is addressed in compliance with the EA-RDIP GBV/SEA/SH Action Plan and referral protocols.

- | | |
|------------|---|
| 3.1 | Case Submission and Initial Actions |
| | Once a GRM recipient receives a GBV/SEA/SH grievance and obtains the informed |

consent of the survivor, the case will be formally submitted to the PIU GBV Specialist. The specialist will:

- Ensure the survivor has immediate access to referral services, including medical, psychological, legal, and protective assistance, and verify their safety.
- Throughout the grievance process, the GRM recipient must provide ongoing feedback to the survivor regarding case developments.

3.2 Project-Related Incidents and Disciplinary Actions

- If the reported incident involves an EA-RDIP project-related worker, the grievance will be reported to the respective employing agency (e.g., implementing partner, sub-contractor, PIU, or government agency).
- The PIU GBV Specialist, in coordination with the local GRC Focal Point, will assess whether the allegation is related to the project.
- If a violation of the Code of Conduct is confirmed, appropriate disciplinary actions will be taken, including the removal of the perpetrator from their position and termination of employment. The employing entity will be responsible for implementing disciplinary measures following local labor laws, employment contracts, and the project's Code of Conduct.

3.3 Disciplinary Action for GBV/SEA/SH Offenses

- If an EA-RDIP project worker is found to have violated the GBV/SEA/SH Code of Conduct, the employer is responsible for enforcing disciplinary measures in compliance with: local labor laws; employment contracts; and the EA-RDIP Code of Conduct on GBV/SEA/SH.
- The PIU GBV/Social Specialist will monitor disciplinary actions to ensure accountability.
- Once appropriate action is taken, the GBV Specialist will document the case as closed.

3.4 Legal Process and GRM Limitations

- If a GBV/SEA/SH survivor chooses to pursue a formal legal process, the PIU GBV Specialist will ensure the survivor has all necessary support to file a case in court.
- The EA-RDIP Grievance Redress Mechanism (GRM) will continue to process the grievance only with the survivor's informed consent. However, ensuring due legal process is the responsibility of the formal justice system, not the grievance handlers.
- Unlike other types of grievances, the GRM does not conduct investigations, make public statements, or determine the credibility of an allegation in GBV/SEA/SH cases. Instead, upon obtaining the survivor's consent, the GRM will refer the case to the appropriate domestic legal and regulatory institutions for formal processing.

3.5 Survivor's Decision to Decline Further Action

- As EA-RDIP adopts a fully survivor-centered approach, no information about a GBV/SEA/SH case can be disclosed or forwarded without the survivor's explicit consent.
- If the survivor chooses not to pursue the case further (e.g., does not wish to file a complaint with the employer of the alleged perpetrator or declines to proceed), they will still be offered access to confidential referral services. The GRM operator or grievance recipient will record that the survivor declined to proceed, and the case will be considered resolved.

4.1 Training on GBV/SEA/SH Complaint Handling

To ensure that GBV/SEA/SH cases are handled with the highest level of sensitivity, confidentiality, and professionalism, all project personnel, including local authorities, Hotline Operators, and contractors, will undergo specialized training on:

- Receiving and managing GBV/SEA/SH complaints.
- Implementing the survivor-centred approach.
- The GBV/SEA/SH referral and complaints resolution system.
- Protocols for informed consent, reporting, and referrals.

The GRM Hotline Operators will receive additional training on how to appropriately receive and immediately forward GBV/SEA/SH cases to the specialized referral system

Process for Escalation of Grievances/Appeals

Table 2 Process for Escalation of Grievances/Appeals

Type of case	Action Required	Response Required
Straightforward Cases	Minimal Checks (These cases involve grievances that require minimal verification and consultations, with no significant complexities anticipated).	The GRM Focal Point will acknowledge receipt of the grievance, outline the follow-up steps, and set a timeline of 1-3 days for resolution. This may include verifying information, conducting a basic investigation if needed, and providing a response on the outcome and next steps.
Cases Requiring Additional Information Processing:	These cases involve grievances that require further information verification, deletion of misleading details, clarification of project-related concerns, or disclosure of delayed information.	The response process includes acknowledging receipt, detailing the steps to be followed, and providing clear timelines of 7-14 days to resolve the issue by gathering, analyzing, and clarifying information before responding to the complainant.
Cases Requiring Investigation:	These cases demand a more comprehensive review, including accessing and evaluating relevant documentation (e.g., reports, policies), conducting field visits and interviews, performing fact-finding missions, and consulting stakeholders to assess implementation adjustments where necessary.	The GRM Focal Point will acknowledge receipt of the grievance and communicate the investigation timeline, which will range between 14 to 21 days, depending on the complexity of the case.
Cases Requiring Escalation:	If a grievance requires a higher level of intervention beyond the local or state-level Grievance Redress	The complainant will be informed of the escalation, and a formal response will be provided within 7-14 days outlining the

Type of case	Action Required	Response Required
	Committee (GRC), it will be escalated to the Project Management Unit (PIU) for review and resolution	decision-making process, follow-up actions, and estimated resolution time frame.
Cases Requiring Referral to External Institutions	Transfer cases to relevant institution such as (the National Police Services, and the World Bank)	The GRM Focal Point will assess the grievance and determine the most appropriate entity for handling the matter. The complainant will be informed of the referral, and updates will be provided on the progress of the case. The timeline for referral resolution will range between 7 to 21 days, depending on the institution involved and the nature of the grievance.

Escalation to the Independent Review Board: If a complainant is not satisfied with the resolution provided by the PIU, they can escalate their grievance to the Independent Review Board.

World Bank GRS/Inspection Panel: If other levels fail, complainants can also approach the WBG's Inspection Panel through a letter, or electronic mail.

World Bank Grievance Redress Service (GRS)

Individuals or communities believing they are adversely affected by a World Bank-supported project may submit complaints to the World Bank's Grievance Redress Service (GRS).

For all registered grievances, contractors and project implementing partners must maintain a grievance register in a standardized format to ensure consistency in reporting to the PIU/PIU. Where contractors have an existing GRM, the PIU will assess its compliance with project standards and recommend necessary modifications to ensure alignment with the project's GRM framework. A centralized grievance register will be maintained by the PIU Coordinator, integrating all grievances into the Project Management Information System (MIS) for monitoring and reporting.

Step 5: Verify, Investigate and Act

Once a grievance has been received, the GRM Focal Point will take the necessary steps to verify, investigate, and determine the appropriate course of action. These activities will be conducted in a timely and transparent manner, ensuring that grievances are addressed effectively and in accordance with the EA-RDIP Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), sub-project Environmental and Social Impact Assessments (ESIAs), and project-specific agreements.

Verification Process:

- **Check Eligibility:** The GRM Focal Point will assess the validity and relevance of the complaint based on established project criteria. The grievance will be cross-checked against project documentation, including the Project Appraisal Document (PAD), Project Operations Manual (POM), ESMF, ESMPs/ESIAs, and sub-project agreements, to determine if it falls within the scope of the EA-RDIP GRM.
- **Escalate Grievances Requiring Higher-Level Intervention:** If the grievance requires a higher level of intervention within the implementing agency or partner institution, it will be escalated accordingly to ensure appropriate action.
- **Refer Grievances Outside the Scope of the Project:** If the grievance falls outside the jurisdiction of EA-RDIP implementing partners, it will be referred to the PIU or other relevant external institutions for further handling.
- **Immediate Resolution:** If the grievance is straightforward and can be addressed without escalation or extensive investigation, the GRM Focal Point will take immediate steps to resolve the issue and communicate the resolution to the complainant.

Once a grievance is determined to be **eligible**, the **Implementing Partner (IP)** will categorize the complaint into one of the following categories to ensure appropriate response and resolution.

Grievance Categories and Required Actions

Queries, Comments, and Suggestions

- These cases involve general inquiries, feedback, or suggestions related to the EA-RDIP project.
- The GRM Focal Point will acknowledge receipt of the query and provide clarification or additional information as needed.

Complaints and Concerns That Do Not Require Formal Investigation

- These grievances should be addressed and resolved by the designated GRM Focal Point or a dedicated project staff member at the local level.
- Each project site or district will have a Grievance Redress Committee (GRC), which includes relevant personnel from the Project Implementation Unit (PIU), contractor representatives, and community stakeholders.
- The GRC will review the grievance, facilitate dialogue between involved parties, and work towards a resolution within the EA-RDIP GRM structure.

Complaints and Concerns Requiring Investigation or Specialized Interventions

- These cases involve allegations requiring verification, negotiation, mediation, or arbitration and may necessitate coordination with relevant authorities, decision-making bodies, or escalation to legal or administrative institutions.
- The GRC will conduct a thorough review of the case, gathering necessary documentation, facilitating discussions with involved parties, and determining a course of action in alignment with the EA-RDIP Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), and Labor Management Procedures (LMP).
- Where necessary, the grievance may be escalated to higher-level committees, national institutions, or judicial bodies for further resolution.
- All implementing partners must appoint a Grievance Redress Committee (GRC) at relevant levels, ensuring a balanced gender representation to handle disputes transparently and fairly within the project framework.

Investigation:

To ensure fairness and transparency in handling grievances that require formal investigation, the local Grievance Redress Committee (GRC) GRM Focal Point will appoint an independent investigator, such as a Safeguard Expert or an external professional with no affiliation to the implementing institution. This investigator must be a neutral party with no vested interest in the outcome of the case.

The investigation process will involve the following steps:

- **Collection of Basic Information:** The investigator will gather relevant reports, conduct interviews with key stakeholders, and verify information using triangulation methods to ensure accuracy.
- **Collection and Preservation of Evidence:** Any supporting materials, including documents, photographs, videos, and testimonies, will be securely collected and preserved to maintain the integrity of the investigation.
- **Analysis and Reporting:** The investigator will analyse the gathered information, establish facts, and compile a comprehensive investigation report, which will be submitted to the

relevant Grievance Redress Committee (GRC) and the Project Implementation Unit (PIU) for review and appropriate action.

Grievance Action Plan under EA-RDIP GRM

Following an investigation, the next steps and necessary actions will be determined based on the findings and recommendations. The Grievance Redress Mechanism (GRM) Focal Point, in collaboration with the Grievance Redress Committee (GRC) and relevant stakeholders, will ensure that grievances are effectively addressed and resolved.

- Based on the investigation, appropriate actions will be identified, including:
 1. A comprehensive response and redress measures to resolve the grievance directly.
 2. Referral to the appropriate institution if the grievance falls outside the jurisdiction of the implementing partner.
- Implementation of mutually agreed follow-up actions, ensuring the complainant is engaged in the resolution process.
- Regular updates to the complainant on the status of the grievance, including decisions and actions taken at each stage.
- Coordination and communication across the GRM structure, ensuring that all relevant partners receive updated information on the grievance resolution process.

Step 5: Monitoring, Evaluation, and Feedback

To ensure the effectiveness, transparency, and credibility of the EA-RDIP Grievance Redress Mechanism (GRM), a structured monitoring, evaluation, and feedback process will be implemented. The local GRM Focal Point at each project site will provide regular updates to GRM users and the broader public regarding:

- Investigation outcomes and actions taken.
- Steps taken to address grievances and ensure resolutions.
- The significance of the GRM in promoting accountability and responsiveness.
- Increasing awareness and visibility of the GRM among beneficiaries.
- Strengthening user trust and confidence in the grievance resolution process.

Each Grievance Redress Committee (GRC) will submit a monthly report to the Project Implementation Unit (PIU) and Project Management Unit (PMU), detailing:

- The number and nature of grievances received.
- Actions taken to resolve grievances.
- Any outstanding cases and challenges encountered.
- Information from the grievance register, with names of complainants omitted where necessary to ensure confidentiality.

PIU Monitoring and Evaluation Actions

The PIU will undertake the following actions to monitor and improve the GRM system:

- Develop indicators to track grievance resolution across the GRM value chain.
- Monitor grievances and assess the progress of resolution efforts.
- Conduct stakeholder satisfaction surveys to evaluate the effectiveness of GRM services.

- Analyse grievance data to assess:
 - The average time taken to resolve complaints.
 - The percentage of complainants satisfied with the resolution process.
 - The number of grievances resolved at the first point of contact.
- Prepare a comprehensive grievance redress report summarizing findings and actions taken.

GRM Evaluation and Continuous Improvement

The PIU will regularly evaluate the GRM system by:

- Analysing grievance trends and patterns to identify recurring issues.
- Presenting GRM analysis findings during project management meetings.
- Implementing corrective measures to improve project implementation and grievance resolution efficiency.

Workers' Grievance Redress Procedure

Objectives of the Procedure

The primary objective of the Workers' Grievance Redress Mechanism (GRM) is to provide a structured system for resolving disputes between employers and employees before escalating cases to the formal court system, except where the grievance constitutes a criminal offense requiring law enforcement intervention.

Grievance Redress Process

Contractual and Legal Compliance

- All contractors must engage sub-contractors with a registered Code of Conduct or require them to sign an undertaking to comply with the Labor Law and community agreements related to workers' rights.

Induction on Workers' Rights and Grievance Mechanism

- Contractors must educate employees on their rights and the Workers' GRM upon employment.
- Induction records must be maintained and made available for PIU and World Bank inspections.

Lodging a Grievance

- If a worker experiences a grievance, they must report it to their immediate supervisor.
- If there is a conflict of interest, the worker may escalate the complaint to the supervisor's superior.

Initial Resolution (Within 48 Hours)

- The supervisor will verify the grievance and attempt to resolve it within 48 hours.

Escalation Process

- If the grievance remains unresolved within 48 hours, it will be escalated through the appropriate levels of management.
- If no resolution is found, the worker may:
 - Escalate the complaint to the 2nd Tier/Appeals Mechanism.
 - Refer the grievance to sector-specific regulatory institutions or formal courts.

- If courts are inaccessible, the case will be directed to the PIU Appeals Mechanism.

Record-Keeping and Reporting

- Contractors must document all grievance proceedings and submit reports to the PIU as part of periodic project updates.

2. GBV/SEA/SH-Related Worker Grievances

- If a worker experiences GBV/SEA/SH, they may bypass their employer and report directly to the PIU GBV Specialist.
- Upon survivor consent, all GBV/SEA/SH cases must be reported to:
 - The Project Manager of the implementing partner.
 - The PIU GBV Specialist, who will oversee appropriate organizational and legal action.
- If the survivor fears retaliation, they may escalate the case directly to law enforcement or the PIU, which will take steps to ensure confidentiality and protection.

Escalation of Grievances and Appeals Process under EA-RDIP

If an affected party or worker is dissatisfied with the outcome of the grievance resolution process at the local Grievance Redress Committee (GRC) level, they have the right to escalate the matter to the Project Implementation Unit (PIU). To facilitate this process, the PIU will provide a dedicated phone number and email address, which will be widely disseminated to ensure accessibility. Additionally, if a worker or affected party is unsatisfied with the grievance handling by their employer, they may escalate the case by contacting the GRM Hotline Operator, who will register and forward the grievance directly to the PIU, including its previous handling history.

In cases where a negotiated resolution is required, the PIU will establish a 2nd Tier Grievance Redress Committee, which will be composed of PIU representatives, led by the Project Manager and Safeguards Specialists. This committee will invite the complainant (or a designated representative) to a formal grievance resolution meeting, where a mutually acceptable solution will be sought. The grievance will only be considered closed once an agreement is reached between the involved parties.

Grievance Redress Mechanism Structure for EA-RDIP

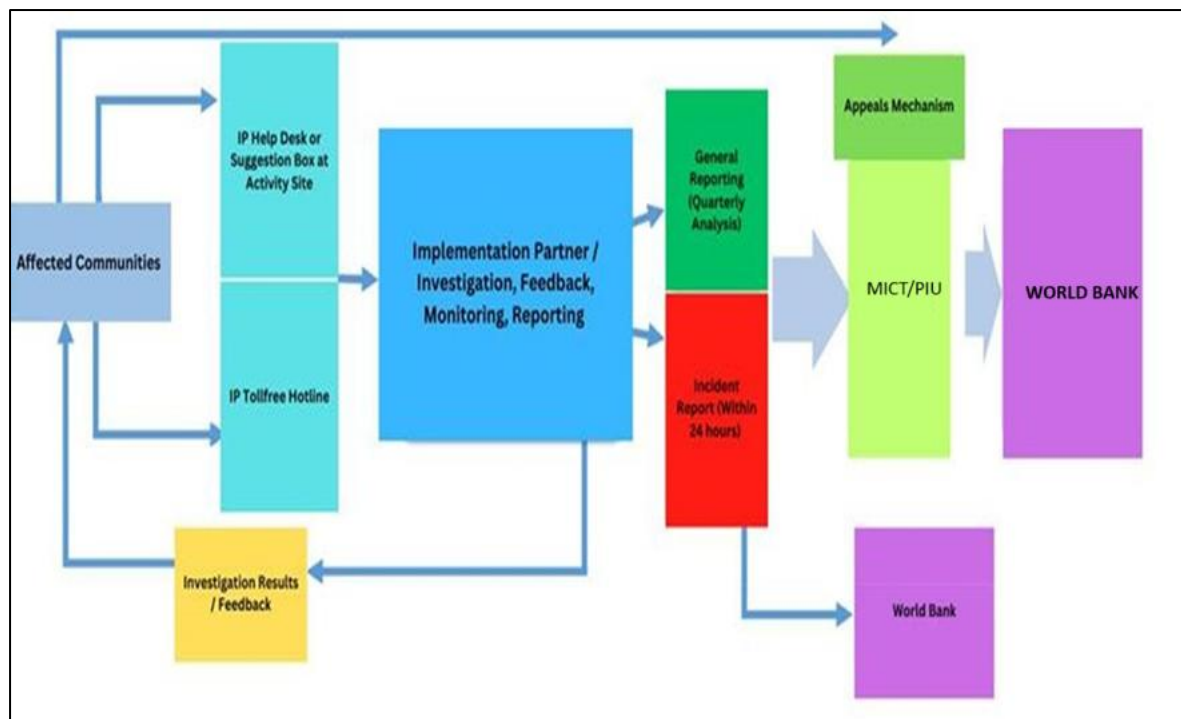


Figure 1: Structure of Grievance mechanism

The EA-RDIP Grievance Redress Mechanism (GRM) structure provides a multi-tiered process for addressing grievances from affected communities. Complaints can be submitted through Help Desks, Suggestion Boxes, or a Toll-Free Hotline. The Implementation Partner (IP) is responsible for investigation, feedback, monitoring, and reporting, sharing updates with the complainant.

Grievance reports are submitted to the Ministry of Information and Communication Technology (MICT) / Project Implementation Unit (PIU), with general reports sent quarterly and severe incidents reported within 24 hours. If grievance is unresolved, it can be escalated to the Appeals Mechanism at the MICT/PIU level. If dissatisfaction persists, the grievance can be further escalated to the World Bank for independent review.

World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. Please visit the following website for information

on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS):

<http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

Annex 1: Online GRM Form
[Online GRM Form](#)

Details of Complainant

Full name: _____

Note: You can remain ☐ I wish to raise my grievance anonymously
anonymous if you prefer or
request not to disclose your
identity to third parties without
your consent

☐ I request not to disclose my identity without my consent

☐ **By Mail:** Please provide mailing address:

Gender of Complainant: _____

Age of Complainant: _____

Contact Information

Please tick how you wish to be contacted:

☐ Email

☐ Telephone

☐ In-Person

Preferred Language of Communication: ☐ Somali ☐ English

☐ One time incident/grievance Date ____ / ____ / ____

☐ Happened more than once (how many times) _____

☐ On-going

(currently experiencing problem) **Description of Incident or Grievance:** Location of grievance:

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

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

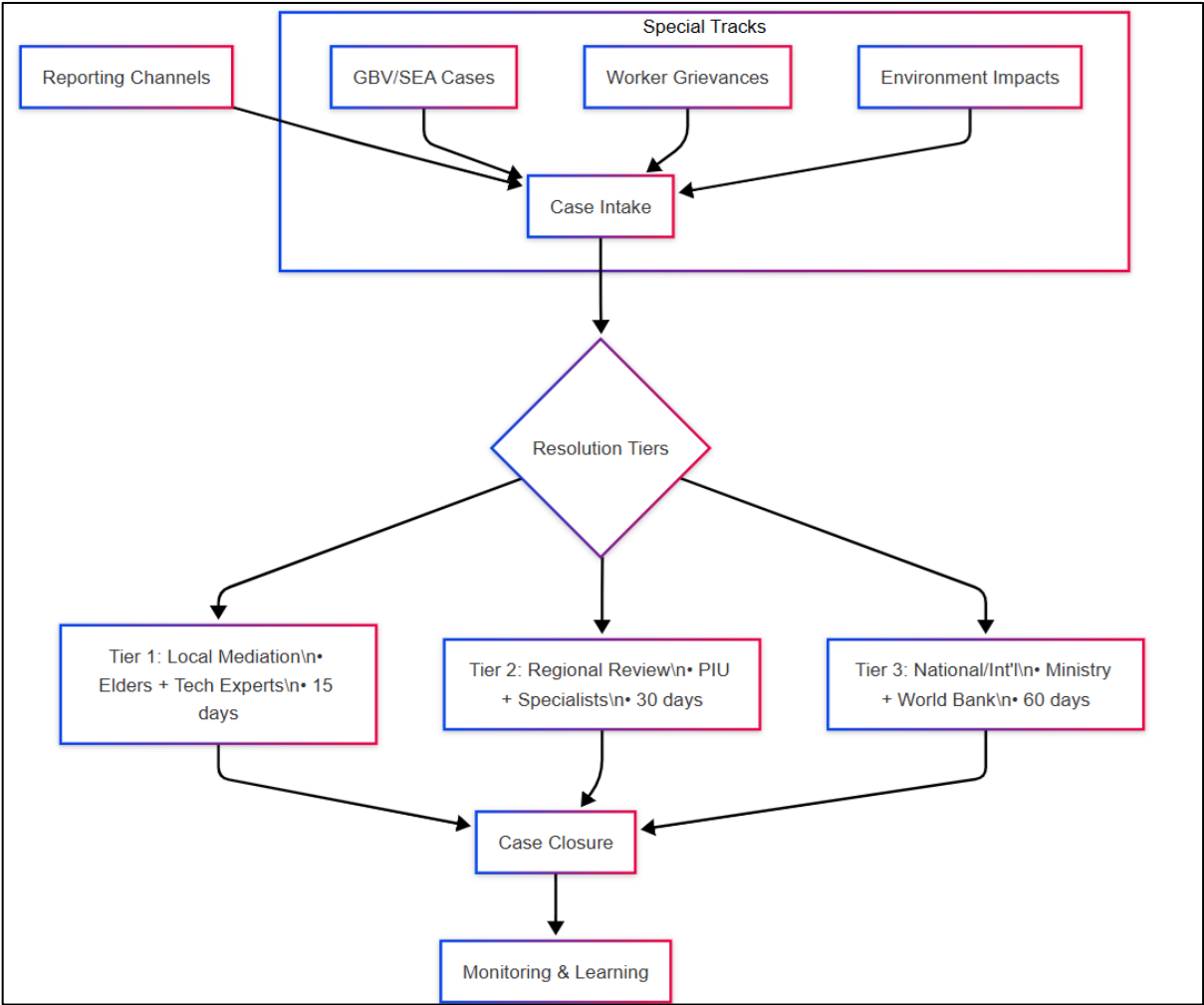
Annex 2: Grievance Register

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

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

Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date Resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

Annex 3: EARDIP Grievance Redress Mechanisms Flowchart



Annex 4: Incident Classification Guide

World Bank Incident Classification Guide:

Indicative
• Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people • Does not result in significant or irreparable harm • Failure to implement agreed E&S measures with limited immediate impacts
Serious
• An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources • Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents • Failure to remedy Indicative non-compliance that may potentially cause significant impacts • Is complex and/or costly to reverse • May result in some level of lasting damage or injury • Requires an urgent response • Could pose a significant reputational risk for the Bank.
Severe
• Any fatality • Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources • Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed • Failure to remedy Serious non-compliance that may potentially cause severe impactsIs complex and/or costly to reverse • May result in high levels of lasting damage or injury • Requires an urgent and immediate response • Poses a significant reputational risk to the Bank.

Incident Report Form

Please report any incident within 24 hours to the PIU

Implementing Partner	
Sub-project / Activity	
Report Date	
Reported By (Name and Title)	

i. Details of Incident

Incident Date	
Incident Time	
Incident Place	

ii. Identification of Type of Incident and Immediate Cause

1. Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incident: (and incident can cover more than one type):

Type of Incident – Health & Safety		Type of Incident – Social	Type of Incident - Environmental
Moving Machinery/vehicles at project site	Dust,Fumes, Vapours that impact the population	Misuse of EARDIP property	Chemical/Oil Spill with impact on population and/or

	and/or environment		environment
Powered Hand tools	Noise	Damage to Cultural Heritage	Improper Disposal Waste
Hand Tools	Temperature or heat	Occurrence of infringement of labor rights	Disasters (Earthquake, Flood, etc)
Animals or insects	Overexertion	Occurrence of infringement of human rights	Water Pollution/ Sedimentation
Fire or Explosion at project site	Structural Failure	Strike, demonstration	Damage to ecosystems (e.g. damage to flora/fauna)

Trips & smaller falls	Chemical/biological	Other (please specify)	Odor air Emissions
Drowning	Stress	GBV/SEA or Child Risks	Dust, Fumes, Vapors, Air pollution with impact on population and/or environment
Borrow-pit Management	Other (please specify)		Other(please specify)

2. For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

iii. Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc.

iv. Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify:

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		

Improper motivation or attitude		
---------------------------------	--	--

Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementers

Annex 6: Guidelines for Hotline Operators

The Hotline Operator must be thoroughly familiar with the EARDIP Project, including all implementing partners IPs (along with their key contact persons and contact details), the content of these GRM, and the GBV/SEA/SH referral pathways and required responses for such cases. Additionally, Hotline Operators should understand that grievances associated with different risk levels may require distinct handling procedures and that GBV/SEA/SH cases necessitate special redress procedures, demanding a high level of sensitivity and confidentiality. Furthermore, they should be well-versed in the incident reporting system outlined in the ESMF. The PIU will provide dedicated initial training to the Hotline Operators. For further details, refer to the ‘GRM Value Chain’ above.

Annex 7: Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint

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

Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint	
➤	Listen, inquire, validate enhance safety and support
➤	Be patient and give compassionate responses to the caller, particularly because the caller is likely to be upset and in distress
➤	Responses should be dealt with in a calm way
➤	Do not make judgements or ask inappropriate questions
➤	Be sensitive to cues survivors may give

Annex 8: Informed Consent Process

Informed Consent Process/Questions for Hotline Operator	
1.	Tell a survivor what is going to happen to him/her.
2.	Explain to him/her the benefits and risks of an intervention (investigation)
3.	Explain that s/he has the right to decline or refuse any part of an intervention
4.	Explain that pressure will not be exerted in any form.
5.	Explain that if the survivor does not want to be interviewed about the event or does not agree to any further investigations, this will NOT affect access to health and other services and does not preclude participation in future proceedings related to legal justice.
6.	Inform the survivor that there is no mandatory reporting in the setting.
7.	Inform the survivor that information about him/her will be discussed in the team.
8.	Inform that the de-identified data for program information purposes
9.	Emphasize the security of client information
10.	Ensure that the survivor understands what you have told him/her.

Annex 9: GBV/SEA/SH Case registration form

GBV/SEA/SH Case Registration Form		
Administrative Information		
	Grievance ID	
	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)	
	Date of grievance registration	
	Date of Incident	
	Reported by survivor or an escort of the survivor, in the presence of the survivor	
	Reported by someone other than the survivor without survivor present	
Survivor Information		
	Gender / age	
	Location / Residence	
	Current civil/marital status	
	Occupation	
	Is the survivor a person with mental or physical disabilities?	
	Is the survivor unaccompanied or separated child?	
	Was the perpetrator related to the project?	
	Has Informed consent been provided? Yes/No?	
	Has the case been reported elsewhere (including police /lawyer/health services/psychosocial counseling, other)?	
Sub-Section for Child Survivor		

	If the survivor is a child (less than 18 years), does he or she live alone?	
	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; relative; spouse; other)	
	What is the caretaker's current marital status?	
Details of the Incident (in survivor's words)		
	Details of the incident	
	Incident location and time	
	Were money, goods, benefits and/or services exchanged in relation to the incident?	
Alleged Perpetrator Information		
	Number of alleged perpetrators	
	Sex of alleged perpetrators	
	Age group of alleged perpetrators(s)	
	Indicate relationship between perpetrator(s) and survivor	
	Main occupation of the alleged perpetrator(s)	
	Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken		
	Was the survivor referred to by anyone?	
	Was the survivor referred to a safe house /shelter?	
	Which services does the survivor wish to be referred to? - Psychosocial services - Legal services - Police - Health services - Livelihood program	

	What actions were taken to ensure the survivor's safety?	
	Describe the emotional state of the client at the beginning of the report	
	Other relevant information	

Annex 10: List of GBV/SEA/SH Referral Services

Below is a link containing information on the actors involved in GBV service provision and referral pathways in Somaliland. To date, the type and quality of key services—including case management, Clinical Management of Rape (CMR), psychosocial support, livelihoods, safety, and legal and justice services.

<https://app.powerbi.com/view?r=eyJrIjoiM2Q0YTZiOGMtYjY3ZS00Nzg1LTBiYjgtN2NjNTZiZGYxMDRkIiwidCI6IjZjOTBmNzA3LTUxYzgtNGY1ZC04MGRiLTBINTA5ZWYxZGE2MCIslmMiOjI9&pageName=ReportSection>