



**MINISTRY OF WATER AND ENVIRONMENT**

**INTEGRATED WATER MANAGEMENT AND DEVELOPMENT PROJECT (IWMDP)**

**GRIEVANCE MANAGEMENT GUIDELINES**

**JANUARY 2022**

## Table of Contents

<b>List of Abbreviations</b> .....	5
<b>SECTION ONE</b> .....	7
<b>OVERVIEW OF THE GUIDELINES</b> .....	7
1.1 Introduction.....	7
1.2 Justification for Grievance Management Guidelines .....	7
1.3 Purpose of the Grievance Management Guidelines (GMG).....	8
1.4 Objectives of Grievance Management Guidelines .....	8
1.5 Users of these guidelines.....	8
1.6 Guiding Principles .....	9
1.7 Overview of Content .....	9
<b>SECTION TWO</b> .....	10
<b>COMMUNITY GRIEVANCE REDERESS MECHANISM</b> .....	10
2.1 Common Community Grievances in Construction Projects.....	10
2.2 Grievance Management Structure.....	10
2.3 The Grievance Management Committees.....	11
2.4 Roles and Responsibilities of Community GMC.....	11
2.5 Membership and Composition of Grievance Management Committees .....	11
2.5.1 GMCs at Village or Parish Levels .....	11
2.5.2 GMCs at Construction Sites .....	12
2.5.3 GMC at Sub County Level .....	12
2.5.4 GMC at Town Council/ Municipal Level.....	13
2.5.5 GMC at District Level.....	13
2.5.6 GMC at Ministry Level .....	13
2.6 Roles of GMC Committee Members .....	14
2.6.1 Responsibilities of the Chairperson.....	14
2.6.2 Responsibilities of the Vice Chairperson .....	14
2.6.3 Responsibilities of the Secretary/ Grievance Officer .....	14
2.6.4 Responsibilities of the Committee Members.....	15
2.7 Project Affected Persons Representation during Grievance Handling .....	15

2.8	Appointment/ Formation of the Grievances Management Committees .....	15
2.9	Facilitation of the Grievance Management Committees .....	15
2.10	Complaints and Grievances Desk .....	16
2.11	Communication Protocols and Feedback.....	16
3.0	Receipt of Grievance, Hearing Process and Appeals .....	16
3.1	Receiving and Registering Complaints at Village/ Parish Level .....	17
3.2	Screening, Assessing and handling of Community Grievance at Construction Site .....	17
3.3	Referral/ Appeals to Sub County/ Town Council and Municipal Council Grievance Management Committees.....	18
3.4	Referral/ Appeals to District Grievance Management Committees (DGMC) .....	18
3.5	Referrals/ Appeals to MWE .....	19
3.6	Implementation and Verification of Negotiated Corrective Actions .....	19
3.7	Flow Chart of the Grievance Management Process .....	20
3.8	Flow of Appeals or Referral of Grievances and Timelines.....	22
3.9	The Office of the Grievance Officer .....	22
3.10	Competencies and Capacity building of the GO .....	23
3.11	Other Team Members of GMC.....	24
3.12	Involvement of Third Parties in Grievance Management.....	24
3.13	Grievances that are Criminal in Nature.....	24
3.14	Capacity Building Arrangements.....	24
3.15	Monitoring and Evaluation of the Grievance Handling System.....	25
<b>SECTION THREE .....</b>		<b>26</b>
<b>WORKERS' RELATED GRIEVANCE REDERESS MECHANISM.....</b>		<b>26</b>
4.1	Introduction.....	26
4.2	Common Workers' grievances at construction sites .....	26
4.3	Role of the Workers' Grievance Management System.....	26
4.4	Workers Grievance Committees .....	28
<b>4.4.1</b>	<b>Workers' Council.....</b>	<b>28</b>
<b>4.4.2</b>	<b>Site Disciplinary Committee.....</b>	<b>28</b>
<b>4.4.3</b>	<b>Overall Site Grievance Management Committee (GMC).....</b>	<b>29</b>
4.5	Reporting Requirements.....	29
4.6	Complaints Handling Flow Chart for Workers .....	30
4.7	Popularizing the Grievance Redress Mechanisms.....	31

<b>Appendix i: Grievances Register .....</b>	<b>32</b>
<b>Appendix ii: Grievances Referral Form.....</b>	<b>33</b>
<b>Appendix iii: Consent Form for Grievance Management Committee Members .....</b>	<b>35</b>
<b>Appendix iv: Grievances Register for Workers .....</b>	<b>36</b>
<b>Appendix v: Reporting and Referral of VAC, GBV and other Sexual Related Cates on the Project.....</b>	<b>37</b>
<b>Appendix VI: Reporting form for VAC and GBV incidents on the project.....</b>	<b>40</b>

## **List of Abbreviations**

CAO	Chief Administrative Officer
CGV	Chief Government Valuer
CESMP	Contractors Environmental and Social Management Plans
DGMC	District Grievance Management Committee
DCDO	District Community Development officer
DLG	District Local Government
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GBV	Gender Based Violence
GMC	Grievance Management Committee
GO	Grievance Officer
IWMDP	Integrated Water Management and Development Project
IDA	International Development Association
MDA	Ministries, Departments and Agencies
MWE	Ministry of Water and Environment
PAD	Project Appraisal Document
PAP	Project Affected Person
PIM	Project Implementation Manual
ESMF	Environmental and Social Management Framework
RPF	Resettlement Policy Framework
SC	Sub County
MC	Municipal Council
TC	Town Council
TCCC	Town Council Grievance Management Committee
VAC	Violence Against Children
WMDP	Water Management and Development Project

## **Foreword**

The Government of Uganda (GoU) represented by the Ministry of Water and Environment (MWE) and National Water and Sewerage Corporation (NWSC) received funding for the implementation of the Integrated Water Management and Development Project (IWMDP).

In accordance with the World Bank Environment and Social Safeguards Policies, an Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) were prepared to guide environmental and social risks management on the project. Subsequently, a number of site specific Environmental and Social Impact Assessments (ESIAs) as well as Resettlement Action Plans (RAPs) are being conducted to assess and propose site specific mitigation measures.

The ESMF, RPF, ESIAs and RAPs, identified risks which could be sources of grievances from the recipient communities and project workers. Hence, the need for a well harmonized, uniform and simplified mechanism through which communities and workers can raise grievances and seek redress to their complaints and concerns.

To effectively implement these guidelines, it is imperative that all project stakeholders including MWE staff, Consultants, Contractors and Local Governments are fully committed and facilitated to undertake their roles and responsibilities. MWE shall ensure that capacity building and awareness creation is made to popularize these guidelines on a continuous basis.

Special thanks and acknowledgements go to the staff of the Ministry of Water and Environment and the World Bank that have assisted the development of these guidelines. It is my sincere hope that if well adopted, there will be speedy implementation and high satisfaction rating of the project by the project beneficiaries.

**Hon. Sam Cheptoris**

Minister of Water and Environment

## SECTION ONE

### OVERVIEW OF THE GUIDELINES

#### **I.1 Introduction**

The Government of Uganda with support of the World Bank (IDA) is implementing the Integrated Water Management and Development Project (IWMDP). The project is focusing on (i) improving access to water supply and sanitation services in urban, small town and rural areas, including refugee hosting communities in the country; (ii) improving water resources management; and (iii) institutional strengthening to ensure improved service delivery and sustainable water resources management in Uganda.

From the experience under the Water Management and Development Project (WMDP) and as envisaged by the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF) and Site specific Environmental and Social Impact Assessments (ESIA), a number of complaints and grievances could emerge during construction and post construction phases of the sub-projects. To ensure timely resolution and management of these grievances, a robust and systematic mechanism of handling and addressing these complaints is required for all the sub-projects.

It should be noted that these guidelines do not replace the existing legal grievance system. Rather, they are developed to provide a proactive mechanism to manage project related complaints and grievances in a less adversarial, less costly, quicker and participatory way. At any stage, an aggrieved party may be free to use alternative redress including existing legal processes in Uganda. The proposed grievance system will last for the project construction period.

#### **I.2 Justification for Grievance Management Guidelines**

The project Environment and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF) require that a clear grievance management system is established and the stakeholders sensitized on such mechanisms. Subsequently, the Project Appraisal Document (PAD) and the Project Implementation Manual (PIM) provide for well guided grievance redress mechanism for the project.

Therefore, these guidelines have been formulated to operationalize the ESMF, RPF, PAD and PIM.

The ESIA reports revealed potential sources of grievances to include land acquisition, loss of livelihoods, Violence Against Children, Gender Based Violence, health issues, HIV and AIDS, accidents, sexual harassment, conflicts, displacement, theft, cultural shocks, and environmental issues among others which require a robust system to identify, respond and manage these issues.

### **I.3 Purpose of the Grievance Management Guidelines (GMG)**

The purpose of the grievance management guidelines is to ensure consistent, formal and effective institutionalized framework for easy submission of grievances as well as speedy and equitable resolution of grievances during project implementation.

### **I.4 Objectives of Grievance Management Guidelines**

- To enable a systematic receipt of grievances from affected communities and allow for pre-emptive engagements at an earliest opportunity.
- Provide impartial, equitable, appropriate, transparent, and consistent responses to complainants.
- Ensure fair, timely and equitable responses to complaints regarding compensation for loss of properties of local residents and other affected parties.
- To promote easy access to grievance redress by vulnerable groups including women, children, people with disabilities among others

### **I.5 Users of these guidelines**

These guidelines have been formulated, to provide guidance to the implementing agencies, benefiting local governments, consultants, contractors, communities and other stakeholders on the procedures to be followed in handling complaints and grievances related to the project. The MWE shall ensure that different stakeholders receive effective sensitizations and trainings on complaints and grievances redress mechanism for the project.

## **I.6 Guiding Principles**

This grievance management guidelines are founded on critical pillars of good governance and among the core guiding principles include;

- Equity and fairness in project implementation.
- Access and effective participation of stakeholders in grievance management
- Transparency and accountability in implementing the sub-project at all times and levels
- Independence from all interested parties, and bound by a clear set of rules and standards.
- Predictability in terms of clearly defined procedures/ process for addressing complaints with clear timelines on solving complaints.

## **I.7 Overview of Content**

The guidelines are divided into three sections.

**Section one** provides for the introduction of the guidelines, the justification, purpose, objectives, users and an overview of the content of the Grievance Management Guidelines

**Section two** contains a detailed description of community related grievances redress mechanism from the village level to the MWE level.

**Section three** provides for a detailed description of the Workers related grievance redress mechanism.

## SECTION TWO

### COMMUNITY GRIEVANCE REDERESS MECHANISM

#### 2.1 Common Community Grievances in Construction Projects

Considering the nature and extent of works, the following grievances may arise during the construction phase of the project:

- Grievances related to Land acquisition
- Restrictions on land due to civil works, workers camps, material storage areas, material sources, etc.
- Clearance of right of way which may affect crops and trees
- Temporary displacement of road side activities in urban centers, including vendors
- Complaints related to noise, dust, and traffic incidents
- Complaints on workers behavior or conduct specially towards women, girl and boy children
- Illicit behaviors like alcoholism, smoking, drug abuse etc. of the contractor's workers
- Disruption of social set up and security
- Disputes on compensation values
- Increased pressure on social services and infrastructure, including water supply
- Contractor failure to pay workers and suppliers
- Accidents arising out of contractor's negligence to provide necessary information, protective gears and supervision

#### 2.2 Grievance Management Structure

The key components of the grievance management structure include the following;

- Grievances Management Committees
- Complaints and Grievances Desk
- Appeals Procedure.
- Communication protocols and Feedback

### **2.3 The Grievance Management Committees**

Dedicated Grievance Management Committees (GMCs) will be established to manage grievances during project implementation. The committees will utilize existing administrative structures with the support of technical teams to ensure easy access and inclusion of stakeholders and to facilitate the appeal process.

When required, the GMCs shall be formed at village/ parish levels, Sub County, Town Council, Municipal Council, District levels and MWE level. This guideline does not propose a one size fits all to the structure, composition and level of GMCs for all projects. The principle of proportionality should guide the degree of effort

### **2.4 Roles and Responsibilities of Community GMC**

- Providing project information and attending to complaints that may be resolved by providing information
- Registering all grievances from the community or as referred at different levels
- Addressing those grievances that are manageable by the committee
- Referring any grievances to higher levels for action and further follow up.
- Escalating any unresolved grievances to appropriate levels as stated in these guidelines
- Liaising with local leaders to ensure health, safety and security of the communities, workers and construction materials during the project implementation

### **2.5 Membership and Composition of Grievance Management Committees**

#### **2.5.1 GMCs at Village or Parish Levels**

Village and Parish GRM committees will be established as voluntary committees for each infrastructure to be constructed at village or parish levels depending on the community dynamics, area covered and nature of works. Community GRM Committees will have 10 members including

- Chairperson,
- Vice Chairperson,
- Secretary,

- Other Members (7) including a youth, Elderly Person, PWD and at least 3 members should be female. Quorum sitting shall be of at least five (5 members).
- The LC I Chairpersons and Vice Chairpersons will be ex-officials to these committees.

NB: The committee shall be formed either at village or parish level given that linear projects traverse several communities. It is important that committees are accessible to communities at village or parish level.

### **2.5.2 GMCs at Construction Sites**

Each construction site shall have a Site GMC responsible for handling all community grievances related to construction including those grievances referred by the village/ Parish GMC. The Site GMC shall comprise of the following;

- The Resident Engineer/ Supervising Consultant (Chairperson)
- The Contractor's Contract Manager
- Sociologist for the Consultant
- Sociologist for Contractor (Secretary)
- Environmentalist for the Consultant
- Environmentalist for the Contractor
- Health and Safety Officer for the Contractor
- 2 Community Representatives (1 Female and 1 Male)

*This committee shall consolidate and address all grievances from the community at the site and escalate any matters appropriately to the respective Local Government and MWE.*

### **2.5.3 GMC at Sub County Level**

The committee will be formed at the sub-county level and its membership shall consist of;

- Local Council III (chairperson);
- The Sub County Chief,
- Community Development Officer (Secretary)

- Environment focal person
- Representatives of PAPs
- Parish Chief of the respective area where the complaint originated from.

#### **2.5.4 GMC at Town Council/ Municipal Level**

Given its extended nature of staffing and complexity, the town council grievance management committee shall include the following members;

- LC III Chairperson/ Mayor (Chairperson)
- Town Clerk
- Council Community Development Officer (Secretary)
- Environment Officer
- Physical Planner
- Representative of the PAPs

#### **2.5.5 GMC at District Level**

At the District Level, the Grievances Management Committee shall consist of;

- LC V Chairperson (Chairman)
- Chief Administrative Officer or a his/ her Representative
- District Community Development Officer (Secretary)
- Head of Natural Resources
- District Water Officer
- Representative from the PAPs
- District Lands officer

Note: Due to complex nature of grievances, the committees can be extended to include any other relevant officers suitable for addressing the prevailing grievances.

#### **2.5.6 GMC at Ministry Level**

At the Ministry of Water and Environment, a National Grievance Management Committee (NGMC) shall consist of;

- Project Coordinator- IWMDP (Chairperson)
- Social Safeguards Coordinator (Secretary)

- Environmental Safeguards Coordinator
- Social Safeguards Specialist
- Environmental Safeguards Specialist
- Safeguards Representative (Rural Component)
- Safeguards Representative (Urban Component)
- Safeguards Representative (Water Resource Component)
- Safeguards Representative (NWSC)

## **2.6 Roles of GMC Committee Members**

The committee members at all different levels shall have a number of roles including the following;

### **2.6.1 Responsibilities of the Chairperson**

- Calling meetings of the committee
- Preparing the agenda of committee meetings
- Guiding and settling disputes among committee members on their roles and responsibilities
- Chairing all committee meetings
- Sharing responsibilities to the committee members
- Ensuring that committee resolutions are implemented in consultation with the different offices/ departments
- Ensuring that GMC reports and other information are submitted in time

### **2.6.2 Responsibilities of the Vice Chairperson**

- Deputizes the role of the Chairperson above if the chairperson is absent or if s/he has been delegated by the Chairperson
- Advises the Chairperson on matters concerning the running of the committee from time to time

### **2.6.3 Responsibilities of the Secretary/ Grievance Officer**

- Registering all grievances and keeping the grievance register safely
- Writing committee minutes
- Writing invitation letters

- Writing grievance progress and close out reports for the committee
- Keeping all records
- Any other duty that the committee can decide/ or agree to.

#### **2.6.4 Responsibilities of the Committee Members**

- Carrying out any duty as assigned by the chairperson or committee
- Attending all meetings
- Guiding appropriately the chairperson and committee on matters to be implemented by the committee

#### **2.7 Project Affected Persons Representation during Grievance Handling**

The affected people or people within the Project Area within a Sub County/ Town/ Municipality shall be mobilized and sensitized on grievance redress mechanisms. They will then select a representative to the committee at Sub county/Town Council/ Municipality/ District level.

#### **2.8 Appointment/ Formation of the Grievances Management Committees**

MWE team shall work with the Local Governments and facilitate the selection of the Grievance Management Committees at the Ministry, District, Sub County/ Town Councils/ Municipal and village levels. .

#### **2.9 Facilitation of the Grievance Management Committees**

All grievance redress committees shall be nominated by the community and will work on voluntary basis and therefore no pay is expected for their service. However, during meetings organized by the project, members will be facilitated with travel refunds and refreshments. In addition, the committee members will be provided with trainings as part of empowerment to enable members able to serve their communities in different capacities. However, MWE shall endeavor to support the committees with basic stationery and appropriate personal protective equipment. The nominated members will also be sensitized and enabled to sign consent forms (appendix iii) accepting this voluntary work on behalf of the community. MWE will operationalize and popularize the

GRM and develop IEC materials, grievance registers and provide continuous training to members.

**2.10 Complaints and Grievances Desk**

The complaints and Grievance Desk will be the secretariat for grievances management. This desk is assigned with the responsibility of receiving, registering, and screening, assessing and following up complaints and grievances to their conclusion.

The desk will be hosted by the following officers who shall serve as Grievance Officer (GO) at different levels

No.	Grievance Committee Level	Responsibility/ Host office
1	Village/Parish level	Committee Secretary
2	Construction Site	Sociologist - Contractor
3	Sub- County/ Town Council/ Municipal	CDO- Council
4	District	CDO- District level
5	MWE	Principal Sociologist/ WESLD

**2.11 Communication Protocols and Feedback.**

The GO/ Secretary shall constitute the secretariat of the Grievance Resolution Mechanism. All decisions reached at the different resolution levels shall be communicated to the complainant and other stakeholders by the Chairperson of the respective Grievance Management Committee. It will be the responsibility of the GO to deliver the communications. Evidence of communication of decisions to complainants shall be acknowledged by way of signing a dispatch form or acknowledgement of a file copy.

**3.0 Receipt of Grievance, Hearing Process and Appeals**

The following sub-section provides the procedure for receiving and hearing of complaints as well as appealing against any decision from the grievance management committees at village, construction site, sub county/ Town Council/ Municipal Council, District, MWE and other mandated agencies.

### **3.1 Receiving and Registering Complaints at Village/ Parish Level**

The following procedure will be followed in registering a complaint at all community GMCs

- A verbal or written complaint is logged in to any member of the GMC by a complainant
- The secretary seeks clarification of specified details of the complaint
- Complaint is registered into the complaints register provided by MWE
- If complaint is not clearly understood, requires urgent attention, grave, fatal and/or bears serious implications, the GMC will visit site for on spot assessment and consultations
- The Community GMC will sit and decide if the issue can be addressed at their level or requires referral. If the concern can be addressed, the committee will sit with the complainant and decide on the course of action. The secretary will document the minutes and attendance list and if concluded, the complainant will sign off in the grievance register acknowledging resolution of his/her grievance. If the matter cannot be resolved by the village GMC then the GMC will forward it to the construction site for immediate redress.

***NB: It is recommended that the Contractor shall transfer all grievances in the village GMC and consolidate them in the construction site grievance register on a weekly basis and follow up to ensure that all grievances were well handled. This is because, all grievances that are project related have been triggered by construction activities. The construction team should therefore be the pivot of grievance documentation, redress and follow up.***

### **3.2 Screening, Assessing and handling of Community Grievance at Construction Site**

All complaints from the village/ parish GMCs shall be collected and consolidated into the main complaints register at the construction site. The Grievances Officer/ Contractor's Sociologist at the Construction site, will screen all complaints received to determine

whether action can be taken at the level of his/her office in consultation with other responsible officials, project contractor and the complainant. The site team should ensure that resolutions are made and compliant resolved within 5 days.

### **3.3 Referral/ Appeals to Sub County/ Town Council and Municipal Council Grievance Management Committees**

The Contract Manager for the Contractor will refer unresolved grievances to the Sub county or Town Council or Municipal Grievance grievances management committee for consideration. The Sub County GMC/ Town Council/ Municipal Council GMC will ensure that the grievance is addressed within 7 days.

Where the grievance hearing session is required, the complainant will be invited to the grievance hearing and redress meeting. Depending on the matter being addressed, it will be important that the area LC I Chairperson of the village where the complaint was lodged be invited to attend the meeting along with the complainant. This is intended to ensure fairness and the LC I will be observing and making inquiries to ensure that both parties understand each other point of view. This will instill confidence to the complainant as well. Upon successful resolution, the Chairperson of the Committee shall formally write to the complainant specifying details of actions, timeframes and any other details pertinent to the resolution. On agreeing to the resolution, the complainant will sign a consent form binding him/her to the negotiated resolutions.

### **3.4 Referral/ Appeals to District Grievance Management Committees (DGMC)**

If the Sub County/ Town Council/ Municipal Grievance Management committee fails to resolve the matter or if the complainant is not satisfied, the Chairperson on behalf of the GMC shall refer the matter to the District GMC. The DCDO will register the referred/ appealed case in the District Complaints Register that will be provided by MWE.

The DCDO who will also act as the Secretary to the DGMC will screen the matter referred and bring to the attention of the LC V chairperson who will write invite the complainant together with the respective LC I Chairperson to the DGMC with in Seven (7) days. A fair hearing process will then commence at the DGMC and upon satisfaction of the

resolutions/ agreement, the complainant shall sign the consent form and the grievance chairperson will officially write to the complainant with a copy to the LC III, Sub county Chief/ Town/ Municipal Clerk and the contractor/ Consultant.

If the matter cannot be resolved by the DGMC, then it will be referred to the Ministry of Water and Environment. The CAO on behalf of the District will officially refer the case to the Permanent Secretary MWE with a copy to the Project Coordinator IWMDP for action within 14 days. The Complainant can also lodge an appeal to the PS MWE if s/he was not satisfied with the outcomes of the DGMC.

### **3.5 Referrals/ Appeals to MWE**

Any unresolved grievances will be referred to MWE for appropriate action. The Grievance Desk (Principal Sociologist) shall work with PST to establish all necessary facts within 14 days upon receipt of the complaint. A report with the recommended course of action shall be forwarded to the Project Coordinator for implementation and follow up.

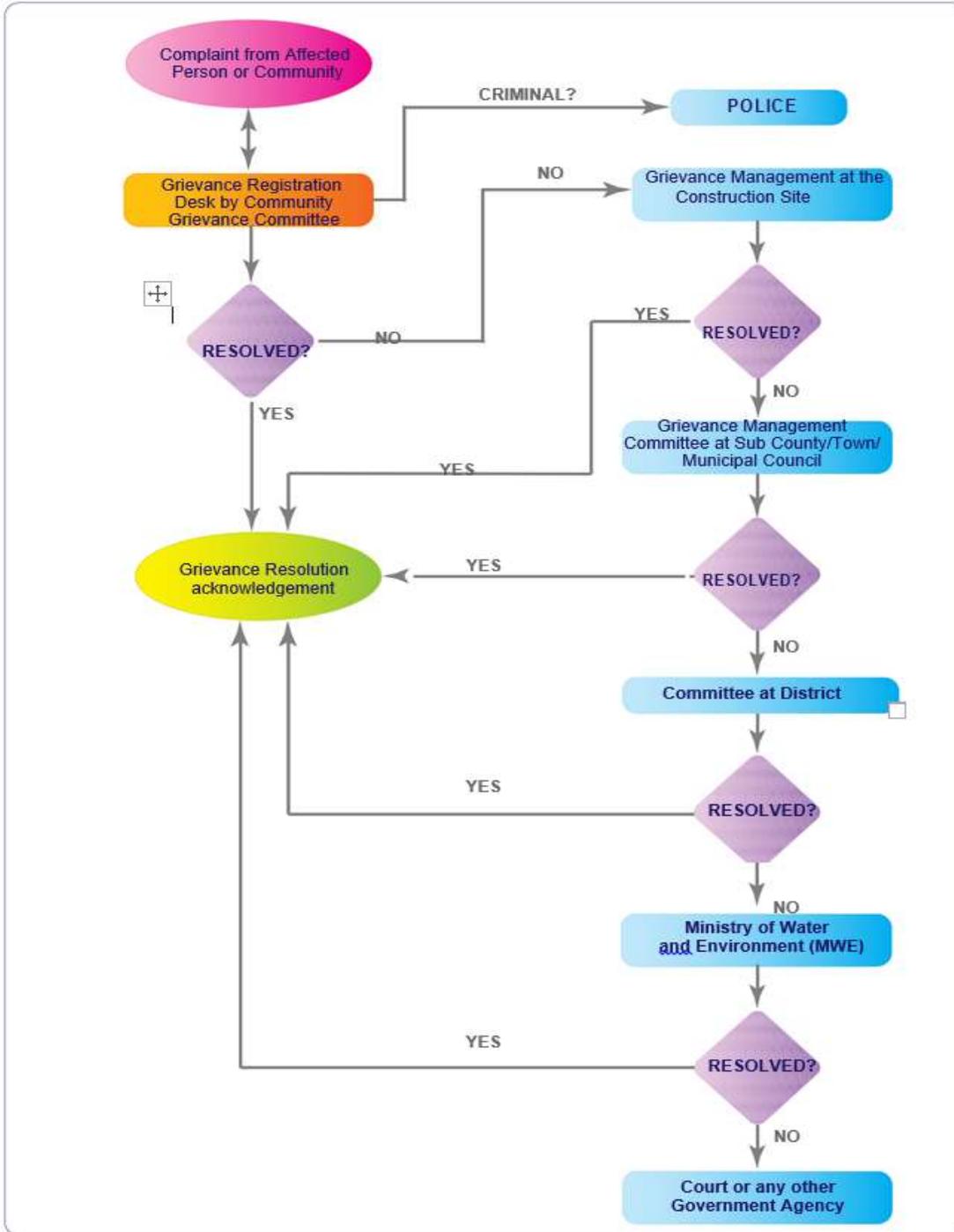
As much as possible, the Ministry team will engage the complainant at the district, Sub County or village levels to arrive at amicable solutions. Upon arriving at an agreed understanding, the complainant shall sign a consent form witnessed by the LC I Chairperson to close the grievance. If no agreement is reached at this level, the complainant shall be advised or shall decide on his/ her own to use any other lawful arrangements as may be applicable.

### **3.6 Implementation and Verification of Negotiated Corrective Actions**

Agreed corrective action will be undertaken by the responsible agency/ part for example a Local government, MWE, contractor or authorized sub-contractors in close consultation with the complainant within the agreed timeframe and completed action recorded in the grievance database. To verify satisfaction, the Grievance Committee will upon receipt of a completion report from the GO verify that corrective actions have been implemented. A signature of the complainant will be obtained on the consent form. If the complainant is not satisfied with the outcome of corrective action, additional steps may be undertaken to reach agreement or an appeal will be lodged by the complainant.

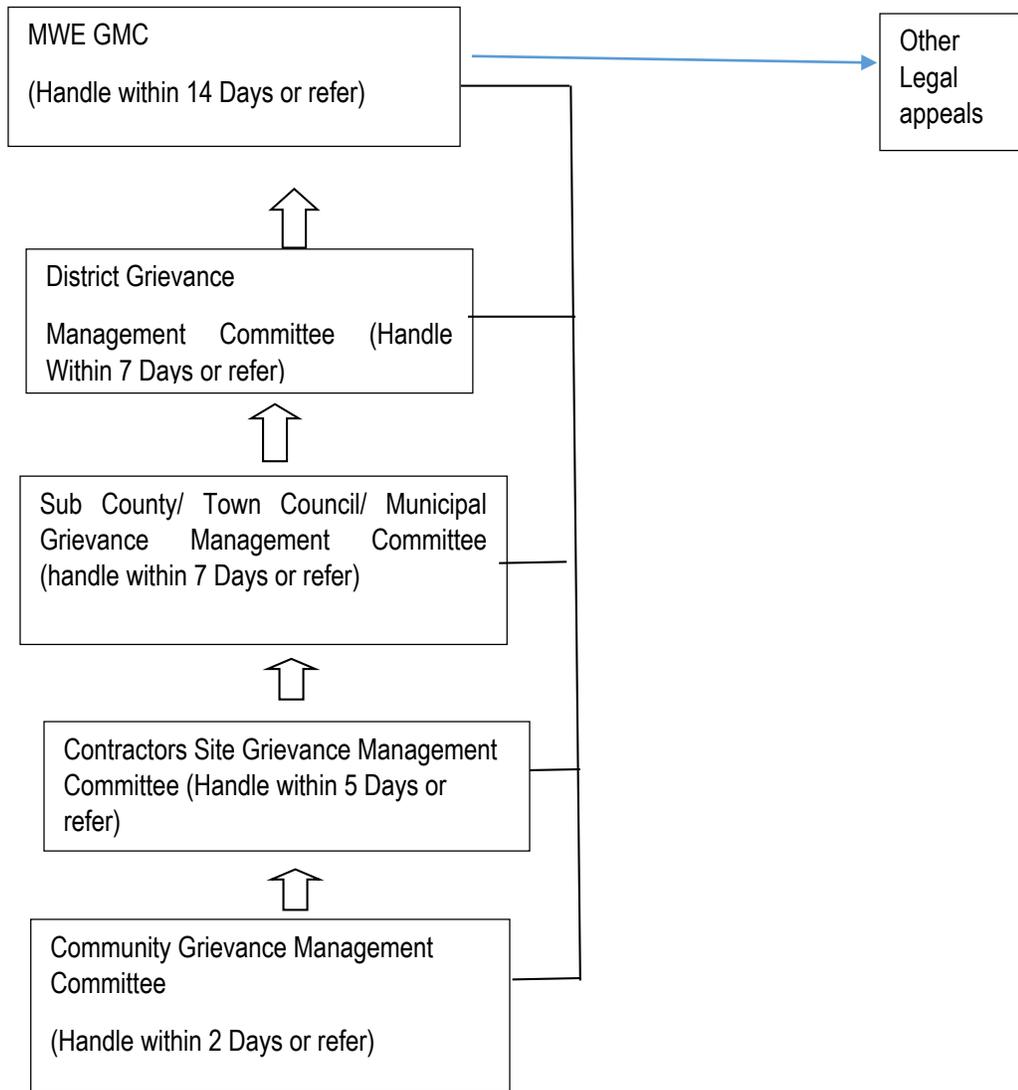
### **3.7 Flow Chart of the Grievance Management Process**

The grievance management process has several interdependent steps that will be followed as summarized below;



**Fig 1: The Grievance Handling Flow for Community**

### 3.8 Flow of Appeals or Referral of Grievances and Timelines



**Fig 2: Flow of Appeals or Referral of Grievances**

### 3.9 The Office of the Grievance Officer

At the community level, the Secretary of the village GMC and Consultants Sociologist will be the Grievance Officers at village and construction sites respectively. Cognizant of the resource requirements, the existing GoU staffing shall be used and at Sub county/ Town / Municipal Council, the CDO shall be the GO at lower local governments, while DCDO shall be the GO at district level. The Social Safeguards Coordinator under MWE shall be

the GO at the Ministry level. The office of the Grievance Officer will be the de-facto secretariat of the Grievance Mechanism.

Principal responsibilities of the GO will include:

- Receiving and screen grievances from affected people and organizations.
- Catalogue and develop a database of complaints received. This could be a manual log or an electronic data base. The created data base will be a 'living' document updated by the GO on a weekly basis. Confidentiality of information received from complainants will be maintained.
- Undertaking preliminary investigations to validate and authenticate the nature of complaints lodged.
- Initiate contact and arrange meetings with complainants
- Work with complainants, contractor and local authorities to resolve first level simple misunderstandings
- Schedule meetings of the Grievance Management Committee
- Serve as secretary to the Grievance Management Committee responsible for communicating all decisions of the committee to complainants, MWE and all concerned stakeholder.
- Report to the aggrieved parties about developments regarding their grievances and decisions taken.
- Submit monthly returns to MWE on the status of Grievances handled. This will be a comprehensive report categorizing and detailing complaints received, those resolved at the different levels, pending resolution and appeals.
- Lead sensitizations of PAPs and other stakeholders on the grievance's procedures
- Providing inputs into the Monitoring and Evaluation of grievance handling system.
- Ensure safe custody of all records relating to management of grievances include registers, consent forms, minutes, among others.

### **3.10 Competencies and Capacity building of the GO**

Where there are capacity issues, the priority will be given in building the GO in the following areas;

- Ability to communicate with PAPs in a language they understand
- Conflict management skills
- Basic computing skills
- Basic knowledge on archiving
- Community mobilization experiences
- Managerial competencies

### **3.11 Other Team Members of GMC**

The tasks and roles of other members on the committee will be derived from their professional and institutional mandates. For effective implementation of grievances redress, the committees shall work with different offices/ officials they deem fit to providing input in resolving the grievances.

### **3.12 Involvement of Third Parties in Grievance Management**

For grievances that require third party agencies like National Environment Management Authority (NEMA), Ministry of Lands, Housing and Urban Development (MLHUD), Ministry of Gender, Labour and Social Development (MGLSD) among others, it will be the responsibility of MWE project team to guide such engagements with the respective third parties. However, within the Local Governments, certain matters which require existing agencies involvement like security agencies, traditional institutions, etc. can be engaged by the respective LG under the guidance of the CAO.

### **3.13 Grievances that are Criminal in Nature**

When any criminal case has been detected, it should be registered and immediately referred to the relevant office like Uganda Police for investigation and other actions as provided by the criminal procedures in the Laws of Uganda. The Contractor, Consultant, and all the grievance committees shall have a duty to follow up such cases and report accordingly. The referral pathways and reporting forms are provided under appendix vi and vi.

### **3.14 Capacity Building Arrangements**

It will be the responsibility of the MWE to coordinate and arrange for capacity building of the grievance committees. Local government administration shall have the responsibility

of sensitizing and popularizing grievance redress arrangements to the local people and stakeholders. The PST shall lead the rollout the capacity building framework and trainings to ensure the committees perform to the expectations of the stakeholders.

### **3.15 Monitoring and Evaluation of the Grievance Handling System**

Complaints and grievances redress mechanism will be an integral part of the M&E framework of all the sub- project activities including site visits, field visits and missions. Review of minutes of the committees, communications on file, updated complaints and grievances registers at the Community, Construction Site, Sub County, Town Council, Municipal, District and Ministry levels shall be among the verification modalities for the different stakeholders.

Beneficiary satisfaction surveys which will be conducted by independent consultants that will be procured by MWE will also encompass the complaints and grievance mechanisms to assess the performance of the grievance redress mechanisms for each sub-project.

Monitoring and Evaluation Indicators shall among others include the following;

- No of GM Committees formed
- No of GM Committees trained
- No of grievance related community sensitizations conducted
- No of committees facilitated with basic stationery, standard grievance registers, & PPEs
- No of people (M, F) sensitized
- No of grievances registered
- Proportion of complaints resolved
- % of cases referred to higher committees
- % of cases appealed to other agencies of Government
- % of resources spent of C&G

## SECTION THREE

### WORKERS' RELATED GRIEVANCE REDERESS MECHANISM

#### 4.1 Introduction

The construction sites shall employ substantial numbers of workers. For better organization and management of workers' grievances, there shall be Workers' grievance management system. With management support from the Contractor's Management, Supervising Consultant and MWE, this system shall play a significant role in proactive management of employer –employee relations, workers' welfare and grievances within the workplace. This system shall not interfere with either management's authority or its obligation to manage their contracts but rather provides a formally recognized opportunity and avenue for their grievances to be managed and their rights to be heard and respected.

#### 4.2 Common Workers' grievances at construction sites

Employee Grievances may include;

- Unsafe physical working conditions
- Failure to issue formal contracts to workers
- Illegal termination of contracts
- Changes without prior notice.
- Poor employee relations.
- Poor/ failure/ delayed remuneration.
- Dissatisfactory office policies in case of: Promotion, Demotion, Leaves, Overtime
- Violation of workers' rights.
- Inadequate safety, health, and welfare amenities.
- Labor-management hostility.
- Incidences of workplace favoritism and nepotism, among others.

#### 4.3 Role of the Workers' Grievance Management System

The roles of the Workers' Grievance Management System include:

- Providing a forum for consultation, frank exchange of information, discussion and joint problem solving between management and employee representatives

on issues pertaining to staff welfare, rights, discipline; any proposed changes dealing with policies, procedures and working conditions.

- Receiving and reporting workers complaints/grievances to management and negotiate for timely redress, / participate in arbitration of cases between workers and management through disciplinary hearings and / or between fellow workers through conflict resolution meetings
- Representing the interests of workers pertaining to their terms and conditions of employment, staff welfare, staff development and other matters of concern to the workers, and to negotiate with the contractor's management on their behalf accordingly.
- Educating Workers on their rights, discipline, code of conduct, spirit of staff unity across the project as well as on respect for cultural diversity pertaining to workers of different races, tribes, religion and other cultural differences
- Regularly soliciting for employees' suggestions/opinions to management through appropriate and organized channels such as their representatives, suggestion box, or joint meetings from time to time
- Act as a point of contact between the employees and employer's management; establish and maintain good relations, foster effective two-way communication and mutual understanding between workers on one hand, and with management on another.
- Identifying and representing concerns of special interest groups on the project such as women, expectant and lactating mothers, workers with disability etc.
- Organizing and conducting monthly Workers' meetings to review and discuss staff welfare, discipline and related matters; compile and share in timely manner meeting minutes with the contractor, supervising consultant and MWE pointing to key action areas requiring attention.
- Reporting any incident(s) of violation of workers' rights, staff indiscipline and related issues to management for redress
- Keeping adequate log and other documentation of all matters that come before the Workers' committees for better reference and effective management

#### **4.4 Workers Grievance Committees**

The grievance redress system for workers shall have three major committees set up and supported. These include the Workers' Council, Site Disciplinary Committee and overall Grievance Committee.

##### **4.4.1 Workers' Council**

The workers' council shall be constituted on the basis of directly elected representatives on the basis of different work sections. It will have representative workers including operators, drivers, mechanics, office/administration, technicians/lab, masons, flag ladies, foremen, clinic, casual laborers, surveyors etc. The different workers' categories shall mobilize and elect a representative to form a council of 5 members.

The 5 members shall select a Chairperson, Vice Chairperson, Secretary and members.

The council shall sit on a regular basis or monthly to discuss all complaints, welfare, working conditions among others. The Supervising Consultant's Sociologist shall be the patron of the Worker's Council and shall ensure that the members are provided with the support and protection to freely discuss and voice workers' issues.

Any issue that has not been addressed by the Workers' Council shall be escalated or referred to either disciplinary or Site Grievance Committee. The issues that disciplinary in nature shall be referred to the Disciplinary Committee while other issues that are not disciplinary shall be referred to the Grievance Committee.

##### **4.4.2 Site Disciplinary Committee**

During the construction phase, a number of disciplinary related cases might emerge. Hence, each Site shall have to set up site disciplinary committee to ensure self-enforcement mechanism of discipline among workers.

- The committee shall comprise of;
- Consultant's Sociologist (Chairperson)
- Contractor's Human Resource Officer (Secretary)
- Workers' representatives (a Female and a Male).

The site disciplinary committee shall receive all disciplinary related complaints referred from the Workers' Council or from the Contractor's Management.

#### **4.4.3 Overall Site Grievance Management Committee (GMC)**

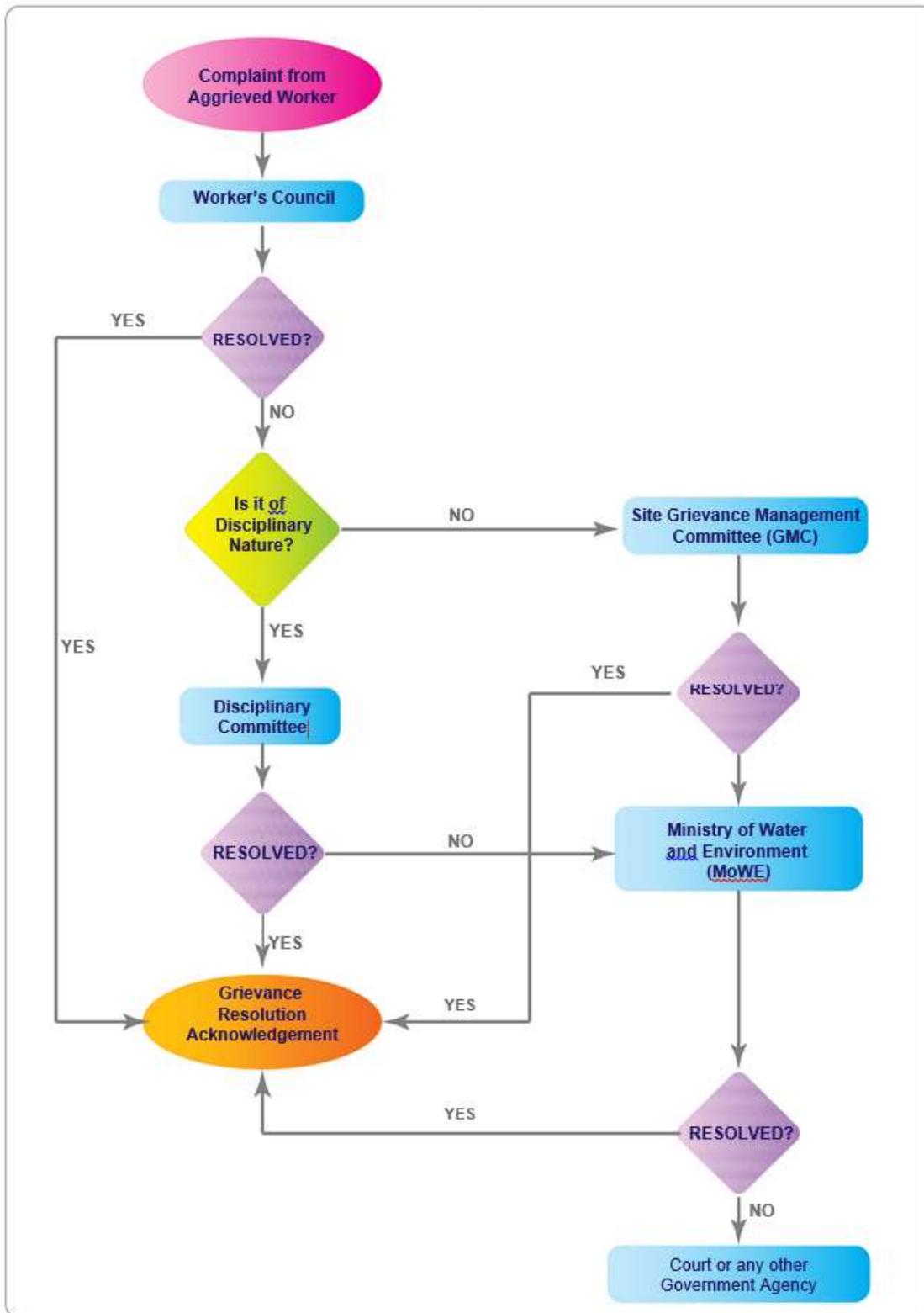
Each construction site shall have a Site Grievance Management Committee comprising of the following;

- The Resident Engineer/ Supervising Consultant (Chairperson)
- The Contractor's Contract Manager
- Sociologist for the Consultant
- Sociologist for Contractor (Secretary)
- Environmentalist for the Consultant
- Environmentalist for the Contractor
- Health and Safety Officer for the Contractor

#### **4.5 Reporting Requirements**

All grievances and any cases detected on site and in the community that are project related are recorded in the grievance register at all levels. Cases which are criminal in nature for example sexual harassment, gender based violence shall be reported to Uganda Police and the Ministry notified within 12 hours. Any other life threatening grievances and incidents like accidents, homicides, etc. shall be reported to the Ministry immediately. The Ministry shall then give initial notifications to the World Bank within 24 hours, and a detailed incident report submitted to the World Bank within 48 hours. All other mandate agencies like Uganda Police, Community Development Officers shall be involved to have well documented cases and investigations. The contractor shall provide in her monthly report the progress of implementing grievance redress mechanism for the community and workers. The MWE shall also update the World Bank on progress of grievance handling during monthly and quarterly reporting. During monitoring field visits by the MWE teams, there shall be meetings with GMC committees and reviewing their registers to ensure that all grievances are well documented and closed.

#### 4.6 Complaints Handling Flow Chart for Workers



**Figure 3: The Complaints Handling Flow for Workers**

#### **4.7 Popularizing the Grievance Redress Mechanisms**

MWE shall ensure that stakeholder engagement plans include sensitization of stakeholders on the available grievance redress system for the project. The sensitizations shall be done through various channels including but not limited to meetings, IEC materials, radio talk shows and announcements among others. It will be the responsibility of MWE to provide adequate resources including funds, personnel and equipment to operationalize grievance redress mechanisms on the project. On IWMDP, MWE has provided dedicated stakeholder engagement, environment and social risk management consultant for every sub-project with adequate budget to implement grievance redress mechanism for each sub-project. During stakeholder engagements, resulting feedback shall be utilized to continuously improve the GRM of the project.

**Appendix i: Grievances Register**

*(A2 Book Hardcover Bound 20 pages water proof) Per Community GRC, Construction Site, Sub County, Town Council, Municipal, District, & MWE)*

MINISTRY OF WATER AND ENVIRONMENT

INTEGRATED WATER MANAGEMENT AND DEVELOPMENT PROJECT (IWDMP)

Complaints and Grievances Register

**Sub County/ Town council/ Municipality.....District.....**

S/N	Date received	Name of complainant	Zone	Parish	Contacts	Complaint Description	Compliant Category <sup>1</sup>	Solution Sought by Complainant	Complaint Registered By	Action Taken	Closure Date	Referral Date	Comments on status of the complaint	Sign of Complainant (after closure of complaint)

<sup>1</sup> L= Land, H= Health and Safety, E= Employment, C= Cultural, LL= Loss of Livelihood, EV= Environment, GBV=Gender Based Violence, VAC= Violence Against Children, SH= Sexual Harassment/ Defilement, T= Theft

**Appendix ii: Grievances Referral Form**

*(A4 perforated/carbonated papers in triplicate Book of 50 pages) One book per committee at Community, Construction Site, Sub County, Town Council, Municipal, District, and MWE)*

**MINISTRY OF WATER AND ENVIRONMENT**

**INTEGRATED WATER MANAGEMENT AND DEVELOPMENT PROJECT**

**(IWMDP)**

Grievances Referral Form

**Sub County/ Town council/**

**Municipality.....District..... Serial No: ..**

<b>Name of Complainant:</b>	<b>Gender:</b>	<b>Age:</b>
<b>Village/Zone of Residence:</b>	<b>Parish/ Ward:</b>	<b>Telephone Contact:</b>
<b>Date Registered:</b>	<b>Registration Number:</b>	<b>Date Referred</b>
<b>Description of the Grievance:</b>		
<b>Summary of the Committee Decision (quote the minute reference):</b>		

**Reasons for Referral:**

**Prepared by Secretary:**

**Name:**

**Signature:**

**Date:**

**Approved by Chairperson**

**Name:**

**Signature:**

**Date:**

***Official Stamp***

**Appendix iii: Consent Form for Grievance Management Committee Members  
MINISTRY OF WATER AND ENVIRONMENT**

**INTEGRATED WATER MANAGEMENT AND DEVELOPMENT PROJECT (IWMDP)**

**CONSENT FORM FOR GRIEVANCE COMMITTEE MEMBERS**

I..... a resident of .....  
(Village) of .....(Parish) do accept to voluntarily offer myself as a  
.....(Position) of the Grievance Management  
Committee for ..... (Name of the project) and commit  
to execute this responsibility on this committee for the benefit of my community.

**Signed by**

Name: .....

Telephone: .....

Village: .....

Signature: .....

**Approved by**

Name: .....

Title: .....

Signature: .....

Official Stamp: .....

Date: .....

**Appendix iv: Grievances Register for Workers**  
*(A2 Book Hardcover Bound 20 pages water proof) for the Workers' Council*

**MINISTRY OF WATER AND ENVIRONMENT**

**INTEGRATED WATER MANAGEMENT AND DEVELOPMENT PROJECT (IWDMP)**

Complaints and Grievances Register for Workers

Name of Contractor..... Name of Site.....District.....

S/N	Date received	Category of Worker	Complaint Description	Solution Sought by Complainant	Complaint Registered By	Action Taken	Closure Date	Referral Date	Comments on status of the complaint	Confirmation of Closure by the Supervising Consultant

## Appendix v: Reporting and Referral of VAC, GBV and other Sexual Related Cases on the Project.

Stakeholder	Action and support is to be provided	Where the case should be Referred?
VAC /GBV Victim	Reports to immediate persons like relatives, friends, peers, and other resourceful persons such as teacher, religious leaders, CSOs, LC, Police Makes a statement providing details on what happened, form of violence, perpetrator, and any witnesses.	Immediately refer the case to LC and Police for recording and further investigation.
Community Persons including LCs, parents, guardians, Roads Committees, Project Management Committees, contractors' management teams, Grievance committees, Contractor's worker, Faith based member like church members, CSOs	Reports the case and perpetrator immediately to nearby Local Council, Contractor's supervisor, Probation Officer/ CDOs and Police for further action. Liaises with other actors and ensures that the survivor gets support services such as medical care and check-up, counselling and other basic needs such as food. Follow-up the case with LCs, Police, health services and courts of law.	Refers the case to Police for further investigation.
Police	Investigates the case, Signs the PF3 forms and other sources of evidence to support court proceedings, Supports the child survivor to access required support services and evidence such as a medical report.	Refers the case to State Attorney for committing the perpetrator to courts of Law for hearing and sentencing
Designated Medical Centre	Medical Examination for bodily harm or other injuries caused, Produces medical report for police investigations and other evidence for the courts of law, Provides medical care for the victim survivor to ensure recovery.	Reports to the Police and to the Courts of Law as evidence against the perpetrator.
Probation and Social Welfare Officer/ CDO	Assess the needs of the survivor/victim and refers the victim to services providers for appropriate support services, Collects data and information on the victim for processing and management	Reports to Police
Courts of law	Hears the case, decides on support services to the child survivor or the parents of the child victim, Sentences the perpetrator according to the existing laws regarding the case.	Commits the person found guilty to serve his/her sentence and orders for any care and support to be provided to the victims



Stakeholder	Action and support is to be provided	Where the case should be Referred?
	<p>Monitors VAC &amp; GBV cases in the community and assesses any cases involving the contractors and their workers</p> <p>Provides reports to World Bank on any incidents related to VAC &amp; GBV within 48 hours; provides root cause analysis (RCA) and safeguards correction action plans (SCAP)</p> <p>Make follow up to ensure that all cases are judiciously managed</p> <p>Liaise with other MDAs to ensure appropriate actions to the VAC &amp; GBV victims and offenders</p>	

**Appendix VI: Reporting form for VAC and GBV incidents on the project.**

**Part 1: Details of the Reporter**

Name of the Person reporting the case	Address:  Location:	Date of reporting the case:
Designation and relationship with the child victim and survivor	Contact details; Tel. No (Landline): Tel. No (Mobile): Email:	Time of Reporting:

**Part 11: Details of Victim/ Survivor**

S/N	Indicators	Details captured
1.	Name of the victim	
2.	Sex	
3.	Date of birth and Age	
4.	Residence	
5.	Contacts- telephone	
6.	Reference number	
7.	Nature/type of the alleged act of violence:	
8.	Location: where the incident took place	
9.	Number of times the victim has encountered such a form of violence	
10.	Other associated forms of violence the victim has encountered by the alleged perpetrator	
11.	Relationship of the victim with the alleged perpetrator	
12.	Impact of the act of violence on the victim i.e. physical, mental, health etc	

13.	Date or time frame of the act of violence	
14.	Witnesses (if any) and their observations and their willingness to appear in case of further investigations and their telephone contacts	
15.	Status of reporting (if there are previous efforts of reporting the case and the person/officer reported to	
16.	Measures or actions taken	
17.	Outcomes of the measures if any	
18.	Recommended actions and support services for the survivor/victim	
19.	Witnesses Name: Address: Contact number:	Describe the event as witnessed:
20.	Any other information found necessary to support the case- photographic or recorded evidence	
21.	Form compiled by: Name: ----- -----Signature: ----- ----- -	Position----- Date-----

### Part III: Details of the alleged perpetrator

<b>Notes</b>		Attach all the necessary supporting information or documents and remember to retain a copy for follow-up
S/N	Indicators	Details captured
1	Name of the alleged perpetrator (attach a photo) if available	
2	Sex	
3	Age (if known)	
4	Residence	

5	Marital status	
6	Contacts- telephone	
11	Consent or non-consent of the perpetrator on committing the act	
12	Previous incidents of violence committed by the alleged perpetrator	
13	Measures taken by the duty bearers and other stakeholders against the perpetrator	
14	Outcomes of the measures if any	
15	Recommended actions against the perpetrator	
16	Any other information found necessary	
17	<p>Form compiled by:</p> <p>Name: -----</p> <p>-----Signature: -----</p> <p>-----</p> <p>Position:-----</p> <p>-----Date:-----</p> <p>-----</p>	<p>Contact details:</p> <p>Tel:-----Email:-----</p> <p>-----</p>