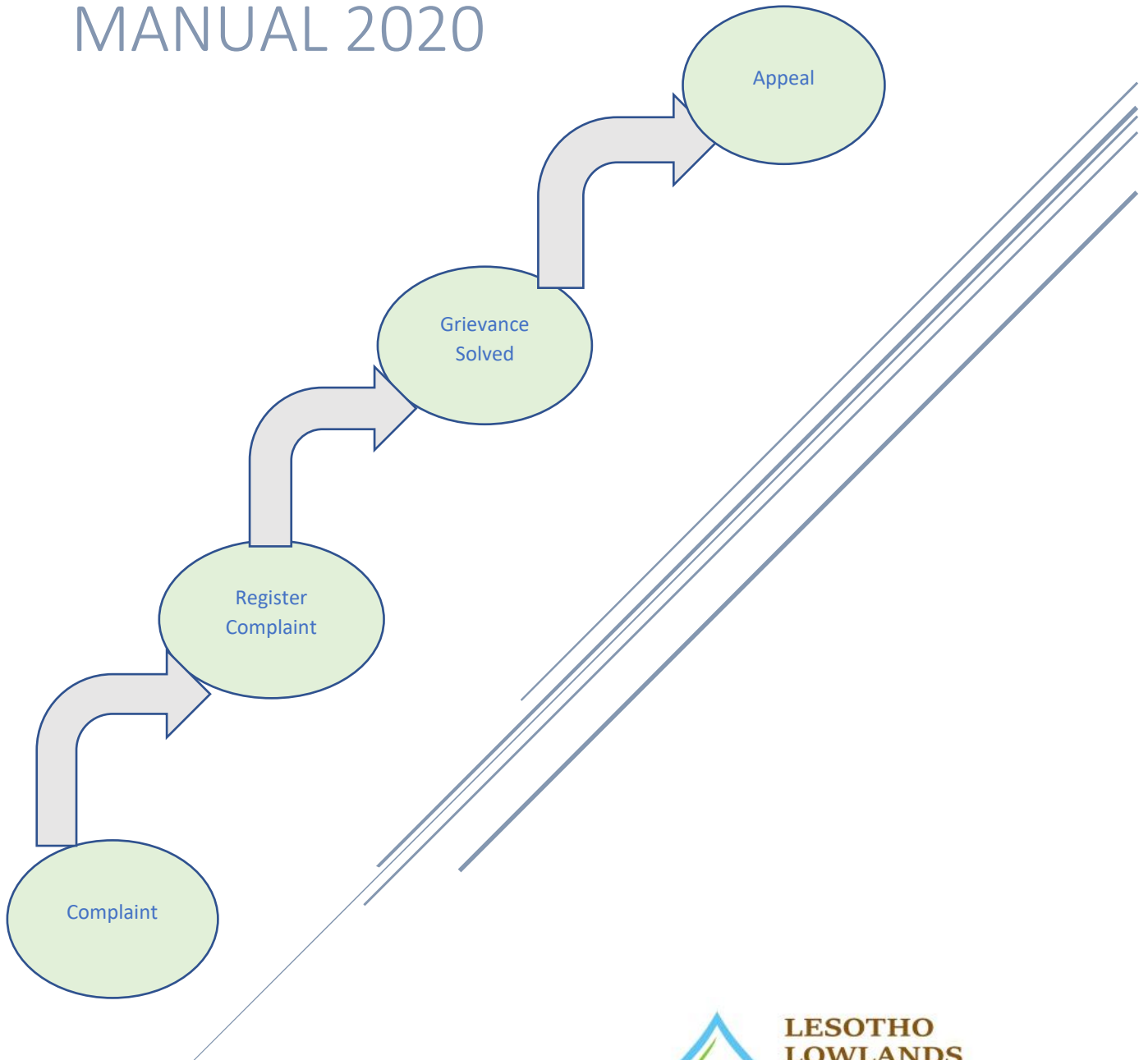


LESOTHO LOWLANDS WATER DEVELOPMENT PROJECT PHASE II GRIEVANCE REDRESS MECHANISM MANUAL 2020



Executive Summary

Sound GRM Guidelines for Lesotho Lowlands Water Development Project Phase II is necessary to ensure effective project implementation at all levels. These guidelines are intended to: a) provide operating procedure to support implementation of GRM through establishing and delineating structures and processes; b) avail a channel through which project related issues, concerns and grievances can be addressed in a timely, succinct manner and c) bring about a stakeholder engagement process that is transparent, accessible and predictable. This will ensure effective implementation and achievement of the LLWDP-II Project Development Objectives (PDO). The main goal of the GRM is to collect, collate, analyse and provide feedback to different levels of the project management on grievances raised by differing levels of stakeholders. The LLWDP-II GRM has the following specific objectives:

- (i) Generate public awareness about the project and its objectives. This will ensure accountability to beneficiary communities and the wider public on matters relating to the implementation of the project.
- (ii) Increase stakeholder involvement in and support to the project.
- (iii) Provide feedback to different levels of project management on project progress.
- (iv) Provide an early warning mechanism through which grievances can be resolved before they become too big to handle. This preserves the integrity of the project and safeguards its reputation.
- (v) Reduce risk for fraud and corruption
- (vi) Provide project staff with practical suggestions and feedback.
- (vii) Make staff more accountable, transparent and responsive to the information needs of beneficiaries.
- (viii) Assess the effectiveness of internal organizational processes
- (ix) Provide Vulnerable and Marginalised Groups and other stakeholders with a channel for making their concerns and dissatisfactions known.

Grievance Redress and ways of dealing with public complaints are founded on certain principles enshrined in global conventions applicable nationally and internationally. This GRM is principled on: Accessibility, predictability, fairness, right to compatibility, capability, feedback, legitimacy, transparency and accountability, anonymity and timely action.

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ABBREVIATIONS AND ACRONYMS

AP	-	Aggrieved Party
CCS	-	Community Council Secretary
CERC	-	Contingency Emergency Response Component
CLO	-	Community Liaison Officer
COW	-	Commissioner of Water
DA	-	District Administrator
DCS	-	District Community Council
DLI	-	Disbursement Linked Indicators
EIB	-	European Investment Bank
ESMP	-	Environmental and Social Management Plan
GRC	-	Grievance Redress Committee
GRM	-	Grievance Redress Mechanism
IEC	-	Information, Education and Communication
LEWA	-	Lesotho Electricity and Water and
LLWSS	-	Lesotho Lowlands Water Supply Scheme
LLWDP II	-	Lesotho Lowlands Water Development Project Phase-II
M&E	-	Monitoring & Evaluation
MOW	-	Ministry of Water
NGO	-	Non-Government Organisation

- OP - Operational policy
- PAPs - Project Affected Parties
- PDO - Project Development Objective
- PIU - Project Implementing Unit
- PMC - Project Management Consultant
- PSC - Project Steering Committee
- TA - Technical Advisor
- WB - World Bank
- WASCO - Water and Sewerage Company

GLOSSARY OF TERMS

For the purpose of this Grievance Redress Mechanism, the following terminology is relevant:

Term	Definition
Complainant	An individual, group or organisation that submits a Complaint to the project.
Complaint	An expression of dissatisfaction with the project, typically referring to a specific source of concern and/or seeking a specific solution. For the purposes of the Grievance Redress Mechanism, a question or request may also be treated as a Complaint.
Complaint Log	A database for maintaining information about Complaints received.
Contractor/Consultant	An individual or firm that has entered into a contract to provide goods or services to the Project. The term covers parties directly contracted by the Project and those contracted by a Contractor/Consultant engaged LLWDP-II.
Registration Form	A form used to capture information about an incoming Complaint.
Resolved Grievance	Resolution has been agreed and implemented and signed documentation evidences the fact
Unresolved Grievance	It has not been possible to reach an agreed resolution and the case has been referred for close off to the PIU
Abandoned Grievance	Attempts to contact the Complainant have not been successful for 2 months following receipt of formal grievance
Closed Grievance	When no further action can or needs to be taken either because the complaint has been addressed or the complaint is inadmissible. A complaint will be inadmissible if the Complainant cannot substantiate it or it is of a speculative or fraudulent nature,
Vulnerable Groups	People who by virtue of gender, age, physical or mental disability, ill-health, and economic disadvantage, may be more adversely affected by the Project, especially the physical relocation aspect, than others, and who may be limited in their ability to claim or take advantage of assistance, benefits and opportunities availed by the Project.

1.0 Introduction

1.1 Project Background

The LLWSS was designed to address the chronic shortage of potable water supply to the Lowlands area of the country and promote socioeconomic development to a design horizon of 2045. The original designs, which focused on bulk infrastructure only, were prepared with assistance from the EU in 2008. Under the Lesotho Lowlands Water Supply Scheme (LLWSS), the Lowlands area of Lesotho was divided into eight distinct zones covering all clusters of settlements with inhabitants of more than 2,500 persons. Accordingly, it covers urban, peri-urban, and rural areas.

Lesotho Lowlands Water Development Phase II was formed with the aim of improving supply of potable water to the Lowlands Region of Lesotho encompassing urban, peri-urban and rural settlements experiencing water shortages caused by unmet water demand, severe drought and climate change induced challenges. There is an expectation that improved water supply services will bring about positive impacts on livelihoods and economic activity in the areas being served.

With this rationale, the Government of Lesotho prioritized water-scarce areas into eight zones. LLWDP II operates in Zones 2 and 3 (Maputsoe and Hlotse) and Zones 6 and 7 (Mafeteng and Mohale's Hoek).

The Project will develop water resources by abstracting water from Hlotse River at Ha Setene and from Makhaleng River below Ha Maphohloane village. Water will then be treated and be distributed to different places in the Project areas. Works to be done consist of Water Treatment Facilities to treat estimated 119 megalitres raw water, 55 pump stations, 635 km of pipeline and 122 reservoirs. A projected population of 1.1 million people are expected to benefit from the Project by 2045.

Project activities will affect 267 households in Hlotse and Maputsoe with 828 people identified as PAPs and 274 in Mafeteng and Mohale's Hoek. All land that is to be affected will be compensated in line with provisions of the legislation and experience gained previous practice form other projects implemented in the country.

World Bank Safeguards Policy OP 4.12 on Involuntary Resettlement and European Investment Bank Environmental and Social Standards will be adhered to in order to mitigate negative impacts that accompany projects of this scale and type.

The proposed development objectives are to:

- (i) increase availability of bulk potable water in two priority zones;
- (ii) increase access to improved water supply services in two priority zones; and
- (iii) improve operational performance of WASCO.

The Project has four Components as follows:

Component 1 - Water Supply Investments - This component will improve access to reliable domestic and industrial water supply services in Maputsoe and Hlotse towns, and Mafeteng and Mohale's Hoek and settlements and villages along the transmission pipeline route.

Component 2. Project Management and Institutional Capacity Building - This component will strengthen sector institutions, support implementation of the LLWSS and develop a comprehensive Strategic Sanitation Plan through financing of consultancy services, systems, and equipment to support three broad categories of activities: Project management (PIU,PMC) , Institutional strengthening support to other sector departments and Strategic Sanitation Planning (TA).

Component 3 – WASCO Performance Improvements -This component will support WASCO to improve its performance through a mix of institutional strengthening complemented by output-based payments with disbursement dependent on verifiable achievement of targets set in three Disbursement Linked Indicators (DLI).

- i) improve the quality of their technical data and thus improve management decision making and the regulatory interface;
- ii) improve the quality of their financial data for improved management decision making, LEWA interface and for better statutory financial reporting; and
- iii) deliver improved technical and financial performance against annual targets set by the regulator (LEWA).

Component 4 -Contingent Emergency Response Component (CERC) - In the event of an Eligible Crisis or Emergency, this contingent component will provide immediate and effective response to said Eligible Crisis or Emergency, defined as “an event that has caused, or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disaster.

Table 1: Project Implementing Councils

DISTRICT	PRINIPAL CHIEF'S AREA	LOCAL AUTHORITY
Zone 2 and 3		
Leribe	Peka, Tsikoane and Kolobere	Maputsoe Urban Council
		Litjotjela Community Council
	Leribe	Hlotse Urban Council
		Maoa-Mafubelu Community Council
Zone 6 and 7		
Mafeteng	Likhoele	Mafeteng Urban Council
		Likhoele Community Council
		Makoabating Community Council
	Tebang	Qibing Community Council
	Matsieng	Tšana-talana Community Council
Mohale'sHoek	Phamong	Mohale'sHoek Urban Council
	Likueneng	Thaba-Mokhele Community Council
		Mashaleng Community Council
	Taung	Siloe Community Council

The direct beneficiaries of the project are estimated at about 115,000 in Maputsoe and Hlotse; 82,820 in Mafeteng and 52,216 in Mohale's Hoek. The project will supply water for domestic, institutional, industrial and agricultural uses. The total project cost is estimated at EUR 82 million loan and EUR 41 million in grant funding from the European Investment Bank for Zones 6 and 7 and US \$78 million loan from the World Bank for Zones 2 and 3.

The purpose of this GRM is to provide a standard operating procedure for implementing the project and to facilitate handling of project related concerns and grievances in a timely and responsive manner that promotes effective stakeholder engagement that builds assurance, trust and transparency.

1.2 Rationale for the GRM

- a. The Constitution of Lesotho 1993 provides for access to information and protects people's right to participate in public affairs. To realise these rights Lesotho has laws that provide

for creation of offices to address grievances from the public. GRMs may be project or organisation-specific or cross cutting. The non-project specific GRMs are already established within the judicial, administrative, and/or political system and exist outside the project. These include the government bureaucracy; courts (judicial institutions); and political institutions such as Parliament and parliament select committees and local authorities.

- b. It is a requirement by the World Bank that all projects funded by the Bank have a Grievance Redress Mechanism (GRM) or complaint handling policy in place. Grievance Redress Mechanisms are essential for a successful implementation of a project. Grievances may be in the form of specific complaints for actual damages or injury, general concerns about project activities, incidents, impacts, or perceived impacts, poor service delivery as well as suggestions. Therefore, the grievance may either be negative or positive. Effectively addressing grievances from people impacted by the project is a core component of managing operational risk and improving the project result. Therefore, the GRM is an effective tool for early identification, assessment, and resolution of complaints on projects.
- c. The GRM will ensure that community members or any stakeholders are able to raise their concerns regarding project-related activities, including the application of relevant social and environmental safeguards and mitigation measures. The GRM, once fully functional, will help to safeguard project management to enhance operational efficiency and reputation in that it gives the PIU a method of effectively collecting and responding to key stakeholders' inquiries, suggestions (positive or/and negative), concerns, and complaints that, if left unresolved, may result in the derailment of the whole project.
- d. A well-designed and functioning GRM assists project management in deterring fraud and corruption; mitigating risk and providing project staff with practical suggestions and feedback that enables them to be more accountable, transparent and responsive to beneficiaries' needs. This increases stakeholder engagement in the project.
- e. An effective GRM enables task teams to identify, assess and resolve grievances or concerns early enough before they escalate in proportion or become widespread. This safeguards project's funds and reputation.
- f. This GRM is specific to all phases of the Lesotho Lowlands Water Development Project Phase II and has been designed to ensure a speedy resolution of the project specific grievances. The GRM seeks to give the Project Affected Parties (PAPs) within the project scope access to seek redress to their perceived or actual grievance or any feedback that needs clarity.

- g. Grievance Redress Mechanisms, consultations and transparency are binding on all projects that trigger safeguards particularly Operational Policy (OP) 4.01 on Environmental Assessment, OP 4.12 on Involuntary Resettlement. The LLWDP II has triggered these two policies thus requiring affordable and accessible procedures for settlement of disputes arising from project implementation. The GRM take into account the availability of already established traditional dispute settlement mechanisms, government administrative channels and the right to seek redress in the courts. This GRM ensures that PAPs are free to express their grievances freely and at no cost to complainants.

1.3 Commitment of LLWDP-II on the GRM

LLWDP-II will undertake the following actions to ensure compliance to the rationale:

- Establish grievance uptake in the project implementing areas;
- Engage local intermediaries at community level to facilitate speedy handling of grievances;
- Publicising the grievance communication strategies;
- Treating grievances confidentially to protect the privacy of individuals or groups; and
- Acting speedily to resolve issues that may arise.

1.4 Advantages of GRM

GRM advantages are highlighted in the table below

Benefits to LLWDP II	Benefits to PAPs
<ul style="list-style-type: none"> <input type="checkbox"/> Provides information about project implementation <input type="checkbox"/> Provides an opportunity to comply with Government policies <input type="checkbox"/> Provides a forum for resolving grievances and disputes at the local level <input type="checkbox"/> Resolves disputes speedily before they reach unmanageable level <input type="checkbox"/> Encourages effective communication between the Project and PAPs <input type="checkbox"/> Helps build trust and confidence of community members in the Project <input type="checkbox"/> Ensures distribution of benefits, costs and risks <input type="checkbox"/> Avoids or mitigates adverse impacts of the project on communities and 	<ul style="list-style-type: none"> <input type="checkbox"/> Provides a cost-effective method to report grievances and complaints <input type="checkbox"/> Provides an avenue and a structure through which to report grievances with dignity and access to a hearing and remedy <input type="checkbox"/> Provides access to negotiate and influence decisions and policies of the project that might adversely affect them

<p>produces preventive or corrective action</p> <p><input type="checkbox"/> Helps avoid Project delays and cost escalations</p> <p><input type="checkbox"/> Improves quality of work</p>	
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1.5 Principles of GRM

The GRM is based on the following principles:

- ❖ Equity
- ❖ Transparency and fairness;
- ❖ Accessibility and cultural appropriateness;
- ❖ Capability;
- ❖ Written records;
- ❖ Dialogue and site visits; and
- ❖ Timely resolution.

1.5.1 Equity

No complaint is too big or small. All complaints received shall be treated with the urgency and the attention they deserve. All Aggrieved Parties, regardless of their social standing, gender, political affiliation, religious affiliation shall be given opportunity to be heard.

1.5.2 Transparency and Fairness

The GRM will be a platform for stakeholders to record their concerns, comments and suggestions. In order to ensure transparency in handling and processing of grievances, all project stakeholders, especially complainants will be kept informed about progress of their grievances in a timely manner. The process and procedures to follow will be transparent to meet public concerns.

1.5.3 Accessibility and Cultural Appropriateness

Community members or groups impacted by the project shall have access to the grievance redress process. Directly or indirectly affected individuals or groups either may positively or negatively raise a grievance. The stakeholders will have the opportunity to participate in the grievance process in the language preferred by the community. Assistance will be afforded those who may face barriers such as gender, vulnerability, literacy, awareness, cost or fear of reprisal to express their opinions/ complaints.

1.5.4 Capability

There will be available necessary technical, human and financial resources to address issues that may arise.

1.5.5 Written Records

Once a grievance has been raised formally, it is important that proper written records are kept, to aid transparency and allow for any review of the process or decision to be undertaken. If possible, the original complaint should be in writing. Any actions taken along with reasons should also be recorded, for example, a grievance hearing, findings and conclusions arrived at.

1.5.6 Dialogue and Site Visits

All grievances will be addressed through discussions with the complainant and a site visit, if required, to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to confirm the validity and severity of the grievance.

1.5.7 Timely Resolution

All grievances, regardless of their nature and size shall be considered and corrective actions taken within reasonable time. The channel of communication is to be kept open throughout the process of addressing each grievance, and an acknowledgement of receipts to be signed by the complainant ensuring that the complaint was resolved amicably for both the project and the stakeholder. All possible efforts will be made to complete the process within the shortest possible time.

1.5.8 Anonymity

The GRM will not disclose the identity(s) of the PAP/AP by name or otherwise to maintain confidentiality.

1.5.9. Feedback

The GRM will serve as a means to provide feedback to the project and improve outcomes for the people.

1.5.10 Building on existing informal and formal dispute resolution flows

The GRM will build on existing structures of informal and formal dispute resolution to enhance cost effectiveness and trust. The GRM will rely on two existing systems: informal dispute resolution practices (through the existing traditional conflict resolution structures) and formal resolution practices (through existing administrative and judicial flows by arbitration and courts of law). By doing this, the GRM will easily become acceptable as the majority of stakeholders are already familiar with these two systems.

Table 2: Grievance Redress Mechanism Principles and Strategic Action

Principle	Strategy/Action
Equity	<ul style="list-style-type: none"> . Register all grievances as they are presented . Investigate the grievance . Resolve the grievance . Inform the complainant of the right to appeal
Transparency and Fairness	<ul style="list-style-type: none"> . Maintain regular contact with complainants . Inform them of steps being taken to address their grievances
Accessibility and Cultural Appropriateness	<ul style="list-style-type: none"> . Deploy community conflict-resolution structures . Publish procedures in simple language and distribute widely . Publish ways in which those with barriers will be assisted
Capability	<ul style="list-style-type: none"> . Provide budget line for GRM . Establish and train GRM Committees at community level
Written Records	<ul style="list-style-type: none"> . Keep proper records of grievances and inputs . Write concise monthly reports for PIU
Dialogue and Site Visits	<ul style="list-style-type: none"> . Keep contact and dialogue with complainants . Maintain contact with GRM committees . Visit sites as soon as possible to make assessment
Timely Resolution	<ul style="list-style-type: none"> . Establish veracity of complaints . Provide solutions at community level . Refer complaints that cannot be resolved
Anonymity	<ul style="list-style-type: none"> . Keep in confidence the identity of PAPs or complainants . Respect the wishes of those that may be vulnerable
Feedback	<ul style="list-style-type: none"> . Ensure the complainant is aware of the process to resolve his/her issues . Inform the complainant of resolutions arrived at . Provide recourse by escalating the grievance if needed
Building on existing informal and formal dispute resolution flows	<ul style="list-style-type: none"> . Build linkages with existing dispute resolution channels at local level . Establish linkages between these and GRM committees . Inform people of their rights to escalate complaints if not satisfied with resolutions

1.6 Publicizing of the GRM

LLWDP-II will publicize the existence of the GRM, its structure and procedures to encourage participation through communication as integrated in the communication plan of the project. Messages to be given out will include: the importance of raising grievances, which people can raise grievances, grievance committees and guarantees for rights, protection and anonymity. These messages and information will be communicated at public gatherings, during focus group

meetings, stakeholders' leadership meetings and media releases. Resources for GRM implementation will be included in the annual work plans and budget.

1.7 Purpose of GRM

A GRM is necessary for addressing legitimate concerns of PAPs. The Mechanism for grievance redress includes:

- Establishment of grievance redress committee that includes a representation of men, women, youth and vulnerable households;
- Procedure for assessment of grievances;
- Timeline for responding to grievances; and
- Mechanism for adjudicating grievances and appealing decisions.

Even with good planning, mitigation measures and the adoption of procedures to avoid or reduce environmental and social risks for the project, new negative impacts may come to light during project operation. The purpose of this GRM is to outline the MOW – LLWDP II's approach to accepting, assessing, resolving, and monitoring grievances from those affected by the implementation of the project and sub projects in a positive or negative way. It provides for a transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting.

The GRM will encompass concerns as well as serious or long-term issues. They might be felt and expressed by a variety of parties including individuals, groups, communities, entities, or other parties affected or likely to be affected positively or negatively by the social or environmental impacts of the Project.

It is essential to have a vigorous and credible GRM to systematically handle, give feedback and resolve any complaints that might arise in order that they do not escalate and present a risk to operations or the reputation of the MOW – LLWDP II and the World Bank. If well-handled, GRM will help foster positive relationships and build trust with stakeholders. This GRM has been designed to promote dialogue and problem solving as an intermediate way for stakeholders to discuss and resolve problems. It is expected to primarily address grievances that may arise as a result of project implementation.

In addition to this GRM and the Government of Lesotho's administrative and judicial avenues, the World Bank has a Grievance Redress Service (GRS) that provides an additional and accessible way for individuals and communities to complain directly to the Bank if they believe that the World Bank-funded project had or is likely to have adverse effects on them or their community to expedite resolution of project-related complaints.

The objective of this GRM is to receive, respond to, consider and resolve as quickly as possible any Project, including grievances towards the personnel, Contractors/Consultants.

The procedure will also help to improve the Project's social, environmental as well as health and safety performance as the number and nature of grievances received is one of the indicators of the Project's employee conduct and behaviour.

The GRM has the following specific objectives:

- a. To be responsive to the needs of the beneficiaries by providing a channel for feedback and resolving grievances and disputes at the various levels (local, district) in the project area;
- b. To provide an opportunity to the aggrieved party and the project implementers to resolve disputes in a short time before they escalate to big problems;
- c. To collect information that can be used to improve project performance and mitigate project risks (Suggestions or/and positive feedback);
- d. To facilitate effective communication between the project and the affected parties;
- e. To enhance the project's legitimacy among stakeholders by promoting transparency and accountability, and deterring fraud and corruption;
- f. To provide a platform to ensure compliance with the provisions of the laws, regulations, and cultural and traditional rules in the project areas.
- g. To provide Vulnerable Groups and other stakeholders with an avenue for expressing their concerns.

2.0 Scope of GRM

LLWDP-II's GRM provides a channel for dispute resolution during project implementation. It serves to complement but not replace or supplant existing legally accepted channels of dispute resolution such as the courts of law, tribunals, ombudsman and other recourse mechanisms for addressing grievances.

This GRM is designed to improve project outcomes by creating public awareness about the project and its objectives. The Mechanism also serves to deter fraud and corruption, mitigate socio-economic and environmental risks and provides LLWDP- II with practical suggestions and feedback during implementation.

The targeted audience for this GRM covers all project stakeholders ranging from the Funding bodies (World Bank, European Investment Bank and Government of Lesotho), LLWDP-II project management, Project beneficiaries and their allied institutions. It is estimated that this GRM is robust enough to address conflicts and complaints in a timely manner across all scales of its application.

2.1 Potential Grievances

LLWDP- II Implementing Unit will be proactive in addressing grievances by ensuring that there is adequate stakeholder participation and consultation during the project processes. Based on the

understanding of the project area and the stakeholders, an indicative list of the types of grievances have been identified for the project, as can be seen below:

- ❖ Unfair award of tenders and contracts;
- ❖ Delay in commencement of sub-project activities;
- ❖ Behaviour of staff;
- ❖ Eligibility criteria for receiving compensation
- ❖ Compensation entitlements for loss of livelihood or use of land
- ❖ Resettlement and temporary displacement issues
- ❖ Value of loss of land and assets
- ❖ Recruitment processes;
- ❖ Delay in payments of Contractors and Consultants;
- ❖ Delay in disbursement of Project funds;
- ❖ Long procurement procedures;
- ❖ Delay in accessing project implementing resources;
- ❖ Concerns over the impact on local cultures and customs;
- ❖ Labour recruitment issues;
- ❖ Labour Issue from project and sub-project employees e.g. Nonpayment of salaries;
- ❖ Sexual Exploitation and Harassment; and
- ❖ Gender Violence based issues;
- ❖ Political Interference;
- ❖ Data or information provision;
- ❖ Environmental Pollution
- ❖ Timelines of services or Contract
- ❖ Access to sub-project resources;
- ❖ Resource based conflicts;
- ❖ Child Labour and Child Abuse.

Once grievances are received and acknowledged they will be further analyzed to ascertain its specific nature and cause.

2.1.1 Categories of Grievances

It is essential at the stage of receiving a grievance to categorize it as follows:

- (i) Is the grievance within the scope of the project? It is within the scope of the project if it can be attributed to the LLWDP-II activities or staff, contractors or consultants.

The GRC will have no role in addressing grievances outside the scope of the project. They should nevertheless, give the complainant feedback on the same complaint and where possible forward it to relevant offices.

- (ii) Is the grievance sensitive or non-sensitive?

Sensitive grievances are those that relate to the project but may require more complex investigation and resolution processes. Such grievances include misuse of funds, corruption or fraud, political interference, contravention of signed agreements, labour-related disputes, gender-based violence, harassment or exploitation. These types of grievances extend beyond the mandate of the Grievance Redress Committee (GRC) and involve Government Policies and procedures as well as those of the Funding Agencies' Guidelines.

Non-sensitive grievances are those that relate directly to the project's interventions by LLWDP-II and have a potential of being verified and resolved within the GRM structures according to the procedures described in this manual.

2.2 GRM Structure

A three-tier structure for the GRM is proposed to address all complaints during project and sub-project implementation.

2.2.1 First Tier Redress: Community Tier

The main target group at this level are communities and project beneficiaries. At every community unit, three community leaders will be selected by the communities themselves and trained to handle complaints. The three community leaders and one village chief will work under the supervision of the Community Council Secretary. All project beneficiaries will be informed of the designated complaints recipients. These three community leaders will dedicate days when they are available to receive and resolve complaints.

Once they receive a complaint, they will register it in the appropriate form (**Form LLWDP/GRM/001**), investigate it and recommend action.

If the complainant is not satisfied with the recommendation, they should be advised to report to the second-tier redress. The selected community leaders shall submit a quarterly report using standardized **LLWDP-II/GRM/005** format attached in the appendix. The report shall be submitted to the CLO for onward submittal to the PIU.

2.2.1.1 Membership of the Community Level GRM Committee

- Community Council Secretary
- Representative of the PAPs
- Women representative from the PAPs
- Youth representative from the PAPs
- Representative of Vulnerable Groups
- Village Chief
- Community Liaison Officer- Secretariat

2.2.2 Second Tier Redress: District Level

The main target group at this level are the project implementing agencies, executers, contractors, communities, project beneficiaries and their related institutions. A district level grievance handling committee shall be appointed and trained to handle complaints. This committee will work under the supervision of the District Council Secretary. All stakeholders will be informed of the existence of the committee. This committee shall dedicate days when they are available to receive and resolve complaints.

Once they receive a complaint, they will register it in the appropriate form (**Form LLWDP-II/GRM/001**), investigate it and recommend action.

If the complainant is not satisfied with the recommendation, they should be advised to report to the third-tier redress. The committee shall submit a quarterly report using standardized **LLWDP-II/GRM/005** format attached in the appendix. The report shall be submitted to the CLO for onward submittal to the PIU.

2.2.2.1 Membership of the District Level GRM Committee

- District Council Secretary
- District Officer (Ministry of Water)
- District Officer (Ministry of Environment)
- District Officer (Department of Roads)
- Representative of the Community Level Committee
- Community Liaison Officer- Secretary
- Non-Governmental Organizations

2.2.3 Third Tier Redress: National Level

The main targets at this level are the funding agencies, project implementers, communities and project beneficiaries. A national level grievance handling committee shall be made up of Environmental and Social safeguards Specialists and the Legal Manager of LLWDP-II.

Once they receive a complaint, they will register it in the appropriate form (**Form LLWDP-II/GRM/001**), investigate it and recommend action.

If the complainant is not satisfied with the recommendation, they shall be advised to seek further recourse with the Ombudsman or the courts of law. The PIU GRM committee shall prepare a quarterly report using standardized **LLWDP-II/GRM/005** format attached in the appendix. The report will be shared with Commissioner of Water, World Bank and European Investment Bank.

After registering a complaint, the committee will set a date to investigate the matter after which they will make a recommendation. If necessary, meetings will be held with the complainants and the officers concerned to find a solution to the problem and make arrangements for grievance

redress. The deliberations of the meetings and decisions will be recorded using LLWDP/GRM/003 format attached in the annex.

2.2.3.1 Membership of the National Level GRM Committee

- Social Safeguards Specialist
- Community Liaison Officer
- Environment Safeguards Specialist
- Legal Services Manager
- Project Manager
- Monitoring and Evaluation Specialist

2.3 Mode of submitting Grievances

At all levels of the GRM Structure complaints can be filed verbally, in writing, over the phone, via email, LLWDP-II website and social media channels. As soon as a complaint is received, an acknowledgement form LLWDP-II/GRM/002 shall be issued.

2.4 Timeline for processing Grievances

At First Tier: Community Level resolution of a grievance will be done within ten (10) working days and notification of the fact will be sent through standardized Disclosure Form LLWDP-II/GRM/004. Should the grievance not be resolved within this period it will be referred to the next level redress. Also, if the complainant requests immediate transfer of an issue to the next level or is dissatisfied with the recommendation made, the issue will be taken to the next level redress.

At Second Tier: District Level resolution of a grievance will be done within fourteen (14) working days and notification of the fact will be sent through standardized Disclosure Form LLWDP-II/GRM/004. Should the grievance not be resolved within this period it will be referred to the next level redress. Also, if the complainant requests immediate transfer of an issue to the next level or is dissatisfied with the recommendation made, the issue will be taken to the next level redress.

At Third Tier: National Level resolution will take a maximum of twenty (20) working days and the concerned shall be notified through LLWDP-II/GRM/004. If the grievance is not solved within this period, the complainant will be advised to seek recourse through the Ombudsman or the courts of law.

2.5 GRM Process

The process used to lodge a complaint follows World Bank Guidelines (The World Bank's Approach to Grievance Redress in Projects- Dispute Resolution and Prevention, 2014) which state that GRM should establish a recording and reporting system and that grievances can be filed verbally or in written form. The process is done in eight steps as follows;

1. The complainant will fill a grievance form **LLWDP-II/GRM/001** attached as Annex 1.
2. The grievance will be received and recorded
3. The grievance will be assessed and assigned to the level at which it will be dealt with.
4. The CLO will acknowledge the grievance
5. The CLO will investigate the grievance
6. Respond to the grievance
7. The grievance will be resolved
8. If not, the complainant can appeal to the Project Grievances Committee which comprises Project representatives, community representatives, Community or local Council
9. If a resolution is made, the matter is recorded and closed off.

Any complainant who still dissatisfied after the processes have been followed can seek redress in the courts of law.

3.0 Communication Plan for the GRM

This Communication plan describes the approach to be taken by the LLWDP-II project in communicating and working together with its relevant stakeholders on the GRM. This plan will facilitate effective and coordinated communication between Commission of Water- Ministry of Water, LLWDP-II PIU, World Bank, European Investment Bank, contractors, project beneficiaries and the general public on standard procedures of the GRM before and during project implementation.

3.1 Communication Plan Objectives

The primary objective of the GRM communicate plan is to outline the strategy and methodologies to be used for GRM communications, GRM information distribution, feedback and stakeholder engagement, and how these will be managed during project implementation. More specifically the GRM communication plan is intended to:

- i) Share information on GRM procedures to the relevant stakeholders before and during programme implementation
- ii) Provide a detailed communication methodology of disseminating GRM information to target audiences
- iii) Foster collaboration with project executors, beneficiaries and the wider public for successful grievance handling throughout the implementation phase.
- iv) Assign responsibilities to different levels of project structures regarding GRM procedures and structure.

3.2 Target Audiences

- ◆ Funding Agencies -World Bank, European Investment Bank, Government of Lesotho
- ◆ Ministry of Water- Commissioner of Water
- ◆ Project Executers- WASCO, LLWDP-II (Project Implementation Unit)
- ◆ National GRM Committee
- ◆ Consultants and Contractors
- ◆ Project Steering Committee
- ◆ Lesotho Mounted Police Services
- ◆ Urban and Community Council Offices
- ◆ Project beneficiaries (recipient communities and their local institutions)
- ◆ NGO's and CBO's
- ◆ Media Houses

3.3 GRM Communication Structure and Channels

3.3.1 Communication Structure

The three-tier structure outlines what type of information will be passed down to target audiences.

3.3.1.1 First Tier GRM Communication Structure

Targeted audiences for first -tier are project beneficiaries, local institutions and the general public at community level.

The audience will be informed about:

- ◆ GRM goals, objectives and procedures
- ◆ GRM planned activities and deliverables, including start and end dates
- ◆ Criteria for selecting community representatives to act as recipients of complaints
- ◆ GRM committee officials up to national government level
- ◆ Contact details, including how people can seek for redress of those aggrieved by project activities.
- ◆ Community members' right to provide feedback on project implementation and file grievances
- ◆ When and how complaints will be handled.

3.3.1.2 Second Tier GRM Communication Structure

Target audiences at this level are project implementers, executors, communities and project beneficiaries and their related district level institutions.

Stakeholders will be informed about:

- ◆ All information given at first level
- ◆ Criteria of appointing members to the GRM committees
- ◆ How people can participate in the GRM procedures
- ◆ Points of receipt of grievances at the national level
- ◆ Manner of receiving and recording grievances
- ◆ How and when complaints will be handled
- ◆ Alternative redress mechanisms open to the public in case of dissatisfaction.

3.3.1.3 Third Tier GRM Communication Structure

Targeted audiences are World Bank and European Investment Bank, project implementers, executing entities, general public, project beneficiaries and their related institutions.

Stakeholders at this level are informed about:

- ◆ All first and second tier information
- ◆ Progress of grievance handling performance in relation to its goals and activities
- ◆ How input from GRM progress has contributed to decisions
- ◆ Key staff, community representatives, GRM committees' roles and responsibilities in relation to GRM procedures.

3.4 GRM Communication Channels

In order to communicate all information regarding the GRM to the targeted audience, the existing avenues of communication at all levels will be made use of. Depending on which audience is the target of communication, the following channels will be used:

- ❖ Print media (posters, flyers, booklets, notices)
- ❖ LLWDP-II website
- ❖ Social media (Facebook, Twitter, WhatsApp)
- ❖ Radio Stations
- ❖ Television

In addition, the following activities will be undertaken to promote a two-way communication between LLWDP-II and all its relevant stakeholders:

- ❖ Information sessions and workshops on GRM
- ❖ Bulletins

- ❖ GRM awareness literature
- ❖ Public fora such as pitsos
- ❖ Training on GRM procedures and structure at community level.

4.0 GRM Monitoring and Evaluation

Monitoring and Evaluation (M&E) is critical to the success of the GRM. Monitoring is a process of tracking grievances and assessing the extent to which progress is made in resolving them. Evaluation involves the analysis of grievances data so that policy or process changes can be made to minimize similar grievances going forward.

LLWDP-II will conduct a comprehensive Monitoring and Evaluation of this GRM with a view to:

- Assessing the effectiveness of the GRM guidelines in meeting its stated objectives and determine its relevance to achieving community and project's needs;
- Identify gaps of the GRM and introduce improvements as necessary; and
- Provide a basis for accountability and responsiveness to issues raised by project beneficiaries, partners, funding agencies and the wider public.

The Monitoring and Evaluation Specialist will be in charge of monitoring and evaluation of the GRM. They will involve GRCs to participate in the joint supervision of project investments under their jurisdiction on a quarterly basis to assess the GRM feedback. The PIU will provide support to the process.

GRM M&E will be entrenched in the project M&E systems and integrated with the Compensation Information Management System. It will also generate information geared towards improvement of the GRM itself.

6.0 ANNEXES

Annex 1: LLWDP-II/GRM/001: Grievance/ Complaints Form

Name	Surname	Gender
Complaint Number	Date	Time
ID Number	Telephone Number	Address
Signature		
Category of Complaint <i>(Tick as appropriate)</i>	Compensation/Land-Access/Insufficient Notification/Disruption to Business or Amenity/Property Damage/Boundary Dispute/Environmental Damage/Construction Activities/Safety Risk/Traffic/Other	
Location/Village/Community Council/District		
Nature of Complaint		
Required Action		
Action Taken and Date		
Close out		
Signature and Date		

Annex 2: LLWDP-II/GRM/002: Acknowledgement of Grievance Receipt

Date Complaint was received:	Complaint Number:
Details of the Complainant Name: Address: Contacts:	Age: Gender:
Supporting Documents Submitted:	
Summary of Complaint:	
Name of Officer Receiving Complaint: Signature of Officer Receiving Complaint:	Date:

Annex 3: Meeting Record Form: LLWDP-II/GRM/003

Date of Meeting	Complaint No	Venue of Meeting
List of Participants		
Complainant Side		GRM Committee members
1.	1.	
2.	2.	
3.	3.	
	4.	
	5.	
Summary of Grievance		

Key points of Discussion

Decisions made/ Recommendations by GRC

Status of Grievance

Solved

Unsolved

Chairperson's Name:

Signature:

Date:

Annex 4: Grievance Disclosure Form: LLWDP-II/GRM/004

Village/ Town/Area:		District:	
Complaint No:			
Name of Complainant:		Contact Details:	
Date of Complaint:			
Summary of Complaint:			
Summary of Resolution or Feedback:			
Category: Compensation / Land Access / Inadequate Notification/ Disruption to Business or Property / Property Damage / Irrigation / Boundary Dispute / Environmental Damage / Construction Activities /Safety Risk /Traffic / Other			
Resolution Accepted:	YES	NO	
Reason for non- acceptance:			
Level of Redress (<i>Tick as Appropriate</i>)	First/Community	Secondary/District	Third/National
Date of Grievance Redress (dd/mm/yyyy)			
Name of Complainant:			
Signature of Complainant:			
Name of Grievance Handling Officer:			
Signature of Grievance Handling Officer:			
Date:			

Copy to be send to Complainant and PIU

Annex 5: LLWDP-II/GRM/005: Quarterly Report of Registered Complaints

Location:		Date:	Quarter ending:	
1.Details of Complaints Received:				
Place of issuing complaint	Name and Address of Complainant	Location of Complaint or Concern	Date of Receipt	Complaint No:
2.Details of Grievance				
Date of Complaint	Venue of Meeting	Name of participants	Decisions/Recommendations	
3.Details of Grievances Addressed				
Date of issue of complaint	Category of Complaint	Brief Description of Grievance	Date of Complete Resolution	

Copy to be send to Complainant and PIU

Annex 6: LLWDP-II/GRM/006: Grievance Redress Mechanism (GRM) Log Register

Grievance Number	Name of Complainant	Date Received	Date Acknowledge	Referred to	Reply Date	Date resolved	Status: <i>Resolved</i> <i>Unresolved</i> <i>Abandoned</i> <i>Closed</i>