



ADOLESCENT GIRLS INITIATIVE FOR LEARNING AND EMPOWERMENT PROGRAMME

FEDERAL MINISTRY OF EDUCATION



Grievance Redress Mechanism (GRM) Manual

Version 1

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ACRONYMS

AGILE	Adolescent Girls Initiative for Learning
FGD	Focal Group Discussion
FME	Federal Ministry of Education
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HILWA	High Level Women Association
MOU	Memorandum of Understanding
NPCU	National Project Coordinating Unit
PAP	Project Affected Persons
PDO	Project Development Objective
SEA	Sexual Exploitation and Abuse
SBMC	School Based Management Committee
SH	Sexual Harassment
SME	State Ministry of Environment
SPIU	State Project Implementation Unit
SUBEB	State Universal Basic Education Board

CHAPTER ONE INTRODUCTION

This manual has been developed for the grievance redress mechanism (GRM) under the Adolescent Girls Initiative for Learning and Empowerment (AGILE) Project, which is a platform to empower girls through education, life skills, health education (e.g., nutrition, reproductive health), GBV awareness and prevention, negotiations skills, self-agency and digital literacy skills.

The manual has been developed for the staff of the AGILE project in the project implementation and coordination units, and all staff and volunteers at Federal, State, and LGA levels. It is intended to guide project beneficiaries, interested parties and project implementation units on how to effectively handle grievances under the AGILE Project. This will ensure that grievances are appropriately channeled, documented, treated timely with fairness, and empathy to the complainant.

The manual explains the following:

- ✚ How to receive and document complaints
- ✚ Processes for handling and resolving complaints
- ✚ Roles and responsibilities for handling grievances
- ✚ How to treat a complainant
- ✚ Feedback and reporting mechanism
- ✚ GBV-GRM Protocols



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Grievance Redress Mechanism (GRM) Manual

The outline of the manual is as follows:

Chapter 1 provides an introduction to the AGILE Project and the GRM manual

Chapter 2 gives an overview grievance redress operationalization and design

Chapter 3 provides a guidance for GBV-GRM protocol

Chapter 4 outlines minimum expected timeframe for processing grievances

Chapter 5 presents GRM staffing, roles and responsibilities

Chapter 6 outlines stakeholder sensitization and training of GRCs

1.1 AGILE PROJECT

The AGILE Project is part of the Federal Government of Nigeria's (FGN's) long-term education reform agenda, to adequately address the identified constraints of accessing and completing secondary education facing adolescent girls in Nigeria. The project was developed by the Federal Ministry of Education (FME) in collaboration with the World Bank in line with the FGN's commitment to promote gender equality and girls' empowerment by introducing a number of initiatives including putting forward a set of prioritized policy and programmatic actions on doubling girls' secondary education enrolment and completion rates.

1.1.1 Project Development Objective

The Project Development Objective (PDO) of AGILE aims to improve secondary education opportunities among girls, with particular attention to adolescent girls, in targeted areas in participating states.

1.1.2 Project Components

The AGILE Project is structured into three components

Component	Sub-component
Component 1: Safe and accessible learning spaces	Subcomponent 1.1: Create new learning spaces in secondary schools
	Subcomponent 1.2: Improve existing infrastructure in secondary schools (school grants)
	Subcomponent 1.3: Teacher recruitment and deployment for new school
Component 2: Fostering an enabling environment for girls	Subcomponent 2.1: Promoting social and behavioural change through communications campaign, engagement with traditional rulers and advocacy
	Subcomponent 2.2: - Empowering girls with critical life skills and knowledge for navigating adulthood and Digital Literacy & Remote Learning Platforms
	Subcomponent 2.3 Providing financial incentives to the poorest households
Component 3: System strengthening and project management	Subcomponent 3.1 System strengthening for sustainability and technical assistance
	Subcomponent 3.2 Project management, monitoring and evaluation

1.2 Project Structure

The AGILE project is coordinated at the federal level by a National Project Coordinating Unit (NPCU), situated in the FME and implemented at the state level by State Project Implementation Units (SPIUs) domiciled in the State Ministry of Education (SME). There are seven participating states under the Project, which include Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau.

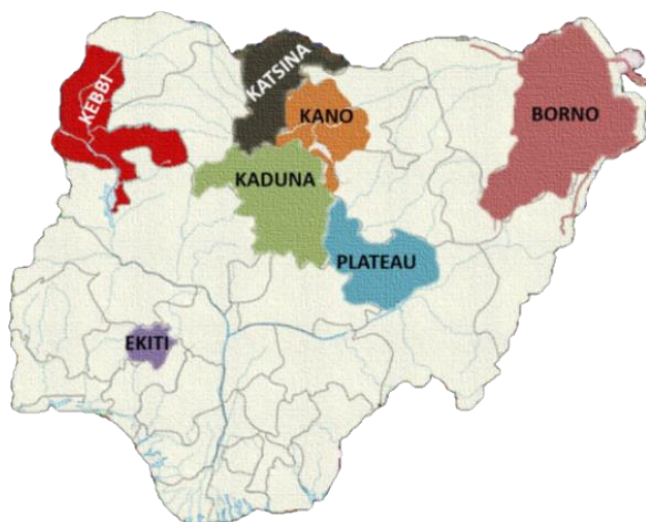


Figure 1: Map Showing AGILE Participating States

1.3 Potential for Grievances under AGILE Project

Some areas of potential concerns include grievances that may arise from any of the following:

- ✚ Construction activities due to noise, dust emission, community health and safety, waste management issues;
- ✚ Changes in land use, land donations, land acquisitions or restriction of land use;
- ✚ Community health and safety issues;

- ✚ Disruption of livelihood activities;
- ✚ Potential issues with the Conditional Cash Transfer activities ;
- ✚ Potential increase in sexual exploitation and abuse/sexual harassment (SEA/SH) due to labour influx, workers, school staff, etc ;
- ✚ Potential increase in intimate partner violence (IPV) from the financial incentive component of the project;
- ✚ Disagreements and conflicts from community members regarding the procurement of construction materials;
- ✚ Procurement process and selection of contractors;
- ✚ Exclusion of persons, communities and LGAs from project benefits;
- ✚ Non-compliance of the contractor to the agreement reached with AGILE or the community;
- ✚ Lack of alternative route for movement during construction, etc.

1.4 Grievance Avoidance and Minimising Strategies

AGILE will endeavor to implement sub-projects inline with the mitigation hierarchy as stated in the environmental and social frameworks including the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholders Engagement Plan (SEP) and Labour Management Procedures (LMP). Grievances will majorly arise from planning and implementation of project activities, as such the project will prioritise avoidance of impacts. Where impacts cannot be completely avoided, measures to minimize and mitigate impacts will be employed. Such mitigation measures have been detailed in the ESMF and RPF, in addition site specific ESMPs will be prepared to address specific impacts at the project site level. For the purpose of the GRM, grievance avoidance and mitigation strategies will include the following:

- i. Ensure continuous stakeholder engagement and communication at all levels during project planning and implementing stages in line with the SEP, and periodically update the SEP to reflect current realities
- ii. Ensure appropriate documentation, minutes of meetings and agreements during meetings and consultations
- iii. Implement measures to avoid and mitigate environmental and social impacts as identified in the ESMF, RPF and site-specific instruments to be prepared
- iv. Implement the actions in the project gender based violence (GBV) Action Plan
- v. Seek guidance timely on grey areas from appropriate officers and experts at the SPIU/NPCU/WB levels as required

CHAPTER TWO OVERVIEW OF THE GRM

2.1 Grievance Definition

A grievance is a concern or complaint raised by an individual or a group within communities affected by project operations. Both concerns and complaints can result from either real or perceived impacts of a project.

2.2 Grievance Redress Mechanism

A grievance redress mechanism is an accessible and inclusive system and process that provides the project stakeholders with avenues through which their queries will be channeled and facilitates resolution of concerns and grievances in a timely fashion.

Objectives of the GRM

- ✚ provide information on project implementation
- ✚ provide clear procedures for resolving grievances and disputes in the communities where the sub-projects will be implemented
- ✚ resolve disputes on time and effectively
- ✚ build trust with project beneficiaries and stakeholders for their buy-ins
- ✚ allow communities to express views, on project activities (for example, civil work quality and malpractices)
- ✚ Ensure people use the system and staff understand what is going well or poorly with the program

The GRM will be accessible and understandable for all stakeholders in the project and for the entire project life.

The GRM will be communicated to all relevant stakeholders including project beneficiaries, affected parties and interested parties

2.3 Principles of the GRM

To effectively manage grievances, there are basic principles that must be followed to ensure that the grievance redress mechanism is effective and valuable to beneficiaries and non-beneficiaries. The key principles include the following:

A. Communicated and Visible

A good grievance mechanism should be clearly communicated to all relevant stakeholders (beneficiaries, the public, and others).

Information on how to channel grievances should be clear and widely known by publishing in visible locations such as schools, community town halls, etc., and through other commonly used communication channels such as local media, local town criers, radio etc. To achieve this, all relevant stakeholders must be well sensitized and there should be regular, periodic engagement with them to reinforce GRM messaging.

Beneficiaries and non-beneficiaries should be informed on the timelines and the necessary steps that will be taken in handling their grievances. Information on what type of grievances can be made should also be clearly communicated to the beneficiaries, staff, and any other interested party. GRM Focal Persons (FPs)¹ and members of the GR committee² should also be provided with all the necessary information on the GRM, particularly the frontline staff who engage directly with citizens. In the case of AGILE Project, this includes the Guidance and Councilors, teachers, members of Parent Teachers Association, religious and traditional leaders, Community based organizations.

Communication of the grievance mechanism should aim to all and emphasize that:

- There is no financial charge for making a complaint.
- Grievances are welcome and encouraged because they help improve project design, systems, and service delivery.
- Grievances will be confidential, and complainants will not be punished for submitting them;
- Beneficiaries have both rights and responsibilities under AGILE Project to either complain and/or ensure that they receive quality service standards from drivers of the Project; and
- Feedback will be communicated on each complaint.

B. Accessible

An effective GRM should be easily accessible by all. It should offer multiple channels for receiving and responding to grievances (e.g., in person, by phone, in writing, etc.). The conditions of the beneficiaries and other interested citizens should be considered when establishing a GRM. For example, if the GRM has a hotline element and there are beneficiaries with no phones, the grievance handling process should offer other alternatives such as face to face interaction or writing letters as alternatives for channeling grievances.

Also, a good GRM should enable and encourage the use of local languages in channeling grievances, which makes it more accessible for those who may not understand the English.

C. Responsive

It is essential that a GRM should be responsive to the needs of its beneficiaries and non-beneficiaries. It should ensure that grievances are acknowledged, and issues resolved promptly. The GRM FPs handling the complaints must follow the agreed targeted timelines for resolving grievances. A

¹ A GRM Focal Person is designated staff or personnel who represents their organization/sector and participate in GR/GBV working groups

² A sub-committee established to address the grievances of affected persons at different levels (National through Community)

responsive GRM will ensure that complainants are regularly informed on the progress or status of their grievances. A good GRM should be responsive to the needs of different people, including vulnerable persons such as the elderly or disabled, and those who cannot speak or write in English. It should also take a survivor-centered approach to gender-based violence (GBV), including sexual exploitation and abuse / sexual harassment (SEA/SH) complaints.

The GRM Focal Person should assist vulnerable persons (e.g., persons with disabilities, young people, the elderly, GBV or SEA/SH survivors) in making complaints when necessary — for example helping in filling the forms, being able and willing to explain the complaints process to those who may find it difficult to read information, as well as being willing to engage with the complainant’s caretaker or interpreter (where applicable) in determining the details of a complaint. Also, people should be allowed to make complaints on behalf of those who cannot do so.

D. Fair and Objective

GRM Focal Persons (FPs) should be fair and objective when handling and managing grievances. Grievances should be handled with all sense of fairness and without any bias. GRM FPs should be objective and empathetic towards the complainant and should not be defensive, unfair, or seen to be taking sides. Complainants should feel that they were treated fairly and with respect.

E. GRM Focal Person Empowerment

GRM Focal Persons (FPs) should be empowered to resolve some of the grievances on the spot. This will help ensure that grievances are handled on time. However, in a situation where a complaint requires further investigation or response by other staff, then this process should be communicated to the complainant. Handling complaints requires good listening, questioning, and empathetic skills. It is important that officers/personnel designated to handle grievances have skills or are trained in developing these skills. Staff should be empowered with all the necessary information needed to help them in investigating and resolving grievances

F. Learning and Improvement

GRMs should be designed in a manner that can contribute to organizational learning and improvements in the delivery of services and implementation modalities of the mechanism itself. Grievances received should be regularly analyzed so that trends are identified, and key problem areas highlighted and resolved at an early stage, which will help in improving service delivery under the Project.



2.4 GRM DESIGN

This section outlines the end-to-end process of the GRM, from how complaints will be received to resolution, feedback and monitoring. Information on GBV-GRM Protocol is provided in Chapter Three.



2.4.1 Channels to Receive Complaints

The Project will utilize various channels provided below to receive complaints/grievances from Project affected persons and stakeholders:

- ✚ Through Grievance Redress Committees (GRCs), which will be formed at the school/community level, SPIUs and NPCU
- ✚ Complaint register /Suggestion Boxes located at strategic places in the communities such as within the school compound, community market, community leaders house etc.
- ✚ Dedicated Telephone Lines
- ✚ Meetings/consultations/Focus Group Discussions (FGDs)/ Oral reports to SBMC, community leaders, women leader, youth leader etc.
- ✚ Grievance Logbook

Channel 1: Grievance Redress Committees



- ✚ Complaints/suggestions can be received through Grievance Redress Committees (GRCs)
- ✚ GRCs will be set up at the project site/community level, the SPIU level and the NPCU level.
- ✚ Members of the communities would be sensitized on the GRM use, process and procedure.
- ✚ Stakeholders can channel their concerns through any member of the GRC, who will in-turn inform the committee for proper recording and subsequent action
- ✚ It is important that grievances are channeled sequentially from the 1st level GRC -2nd level – 3rd level – Court redress. However, grievances should be received at all without turning the aggrieved person down at any level.






1st level GRC – Project Site/Community Level

This GRC is easily accessible to complainants in the project area (school/community people), without any costs.

Members of the 1st level GRC should include:

- ✚ A Representative of community leadership
- ✚ School Principal
- ✚ PTA Chairman of the school
- ✚ Guidance Counsellor of the school
- ✚ Representative from the SBMC
- ✚ Women representative (community women/ HILWA/Mothers Association)

-  Student representative*³
-  LGEA officers responsible for schools monitoring and inspection (from SME and SUBEB)*
-  Representative of Supervision Consultant**⁴



The committee will appoint a chairperson and a secretary (roles are defined in section 5.1 and 5.2)



It is advisable to keep the GRC numbers manageable to aid easy discussions and resolution

With the support of the SPIU Social and GRM Officers, the GRC will sensitise student, staff, community members on how to channel complaints to the committee through any of its members or other available channels such as complaint boxes, phone lines etc.

This committee will be expected to receive complaints through the designated channels (complaints boxes, designated phone numbers, direct complaints lodged with any member, complaints raised at progress review meetings/FGDs/public consultations etc., anonymous complaints amongst others)



Where complaints are directly related to the AGILE project, the GRC secretary should lodge it in the grievance logbook and proceed to inform the Chairman to enable the committee meet and take action towards resolving the complaint.



Where complaints are not directly related to the AGILE project, they should be directed to the appropriate authority to handle such complaints and inform the complainant accordingly.





Where complaints relate to GBV, SEA/SH, complaints can be made directly to the Guidance Counsellor.



2nd level GRC – SPIU Level

This GRC is formed at the SPIU level and can receive complaints from the 1st level GRC or directly from complainants through phone calls or in-person during visit to the communities.

Members of the 2nd level GRC include:

-  Project Coordinator
-  GRM Officer

³ Student representative and SME/SUBEB can be extended members of the GRC who may be involved in dispute resolution as required, in order to limit exposure for the former and avoid lengthy processes where unnecessary for the later.

⁴ Representative of Supervision Consultant will be included when grievance is related to construction activities or contractors

- ✚ Social Development Officer
- ✚ Environmental Officer
- ✚ Communication Officer
- ✚ GBV Officer

* The Project Coordinator will be the Chairman while the GRM officer will be the Secretary of the GRC



The GRM officer will record the complaint in the grievance logbook and ensure the GRC meets timely to discuss the matter.



Component leads to be co-opted were necessary when resolving grievance within their components.



3rd level GRC – NPCU Level

This GRC is formed at the National office level and can receive complaints from the 2nd level GRC or directly from complainants.

Members of the 3rd level GRC include:

- ✚ National Coordinator
- ✚ GRM Officer
- ✚ Social Development Officer
- ✚ Environmental Officer
- ✚ Communication Officer
- ✚ GBV Officer

* Component leads to be co-opted were necessary when resolving grievance within their components

* The National Coordinator will be the Chairman while the GRM officer will be the Secretary of the GRC

* The GRM officer will record the complaint in the grievance logbook and ensure the GRC meets timely to discuss the matter



Court Redressal

✚ Where the complaint remains unresolved or complainant dissatisfied, the parties can seek court redressal. However, this should be as a last resort as court cases are lengthy, costly and could lead to a total halt of the project pending the resolution of the matter. Concerning incidents of GBV complaints, the survivors is free to pursue judicial redress if they wish. The Project will support them to seek legal and justice services if this is the wish of the survivor.

✚ The State Project Coordinator through the National Coordinator should ensure a detailed report including actions taken to resolve the issue is sent to the TTL prior to referring the matter to court.



Channel 2: Complaint/Suggestion Boxes



- ✚ Complaints/suggestions can be written by project affected persons, interested parties and other stakeholders and dropped in the complaint boxes in the project area.
 - ✚ Complaints boxes to be located within the school and in the community – marketplace, near community leader’s residence, other public places etc.
 - ✚ The name of the project and dedicated GRM number should be on the box
 - ✚ It should have a lock
 - ✚ It should be on a stand and safe from rain
-
- ✚ The boxes should be accessible to persons in the project area but also provide some form of privacy in case of anonymous complaints
 - ✚ The designated GRM focal person (usually the secretary of the community level GRC) should retrieve complaints from the box at least every 48hrs.
 - ✚ Project related complaints should be documented in the grievance logbook for further action, while complaints not directly related to AGILE should be forwarded to the appropriate authority for action.
 - ✚ Following the record of the complaints, the GRC will schedule a meeting to address the complaints timely
 - ✚ GRCs to sensitise student, staff and community members on the locations and use of the complaint boxes.

Channel 3: Dedicated Phone Lines



- ✚ Dedicated GRM phone numbers will be provided by the SPIU to the GRCs
 - ✚ The lines will be toll free
 - ✚ This number will be provided on the project signpost and the complaint box for easy access of stakeholders
 - ✚ All complaints received on the phone will be recorded in the grievance logbook
 - ✚ Subsequently, this will be addressed by the GRC
-
- ✚ GRCs to sensitise student, staff and community members on the numbers
 - ✚ The cost of maintaining the phone lines will be borne by the SPIU

Channel 4: Meetings/consultations/Focus Group Discussions (FGDs)/Oral reports



- ✚ Complaints and suggestions could be received during on-site project progress meetings, focal group discussions, community meetings, student meetings, through the SBMC or other forms of oral receipt etc.
- ✚ This complaints from such meetings should be channelled to the GRC and documented
- ✚ This should also follow the complaints resolution process

Channel 5: Grievance Logbook



- ✚ Grievance logbook should be maintained by the GRCs at the project site, SPIU and NPCU level
- ✚ This will be used to record grievances and how they are resolved
- ✚ The SPIU will provide the logbook for the GRC at the project sites
- ✚ The logbook will be kept by the GRC secretary/GRM officer at each level
- ✚ A separate GRM log would be available for recording GBV related issues. The log will be manned by the Guidance Counsellor at the Community level and kept in a confidential manner.

Logbook will contain...

- details of complainant and complaint
- date and time the complaint was reported
- information on corrective action/ how it was addressed
- date the complaint was closed
- date feedback was sent to complainant

- ✚ SPIU GRM officer to review the project sites logbooks on a bi-weekly basis to see the type of grievances received and how they were addressed. The officer should maintain an electronic version of the grievance logbooks and upload details of grievances from all project sites in the GRM database.
- ✚ NPCU GRM Officer to review the SPIU grievance logbooks on a monthly basis either as scanned copies/emails or during monitoring & supervisory visits
- ✚ Similarly, the NPCU GRM officer to review the project site logbooks on a quarterly basis during monitoring & supervisory visits and maintain a GRM database for all the states.
- ✚ NPCU GRM Officer will transmit the quarterly report to the TTL.

Complainants should not feel threatened or coerced, rather they should feel safe and heard

2.4.2 Processing of Complaints

This section explains the step by step process that a complaint goes through from receipt to resolution. This covers the following:

- ✚ Receiving and Recording Grievances
- ✚ Acknowledgement of Grievance
- ✚ Verification/Screening
- ✚ Allocation of Responsibility
- ✚ Grievance Investigation
- ✚ Resolution, Closure and Feedback
- ✚ Process chart
- ✚ Timeframe

2.4.2.1 Receiving and Recording Grievances

As part of the GRM, the grievances from the stakeholders or their representatives may be communicated verbally in person or over a telephone conversation to the dedicated GRM line or in written form placed in the complaint boxes or submitted to the project representatives. All grievances communicated in any of these mediums will be recognized and recorded by the GRCs as and when it is expressed.

Each grievance thus received will be recorded in a Grievance logbook. The format is presented in table 1 below. This does not apply for GBV/SEA/SH cases, detailed information on how to handle such cases are provided in Chapter 3.

Table 1: Grievance Register Format

S/N	Date & Time	Grievance No.	Name of Grievant	Department/ Designation	Name of Recording Officer	Medium of Communication	Details of Grievance	Action Taken and Date	Status*	Remarks**
1.										
2.										
3.										
4.										
5.										
6.										

* **Status** – Open/Closed/Referred

Open – investigation and process of resolution is still ongoing

Closed – case has been resolved, feedback given to complainant and all parties are satisfied with the outcome

Referred – case has been referred to a higher-level Grievance Redress Committee

****Remarks** – provide a summary feedback and any strategy the project has put in place to prevent re-occurrence of such complaint

All project related grievances received must be registered in the grievance logbook.

Non-project related grievances to be channeled to the appropriate authority to take action and communicated to the complainant

2.4.2.2 Acknowledgement of Grievance

Once the grievance is received and registered by the GRC secretary, a grievance number will be allocated and communicated to the grievant. This communication will also serve as an acknowledgement of the grievance. In case the grievance is assessed to be out of the scope of the GRM, a communication towards the same will be made to the grievant, and an alternative mode of redressal will be suggested. As part of this acknowledgement, a tentative timeline for the redressal of the grievances will be identified, in keeping with the process below. This acknowledgement will be provided on the same day as the grievance is received.

2.4.2.3 Verification/Screening

Upon acknowledgement of the grievance, the recipient of the grievance in conjunction with the GRC secretary/ Chairman will quickly screen the complaint to ascertain its merit, relevance, categorisation and whether further action is required by the project or not -

- ✚ Where complaints are not project related, the GRC should channel this to the appropriate authority for resolution, complaint should be closed and feedback should be given to the complainant
- ✚ In the case of SEA/SH/ GBV complaint, this will not be investigated by the GRC, but rather the survivor will be referred to GBV service providers and, with the survivor's consent, further action will be taken by the SPIU/NPCU (Chapter three)
- ✚ Where the case is criminal in nature such as issues relating to armed robbery, serious bodily harm, manslaughter or murder, it should be immediately reported to the police/ other appropriate authorities

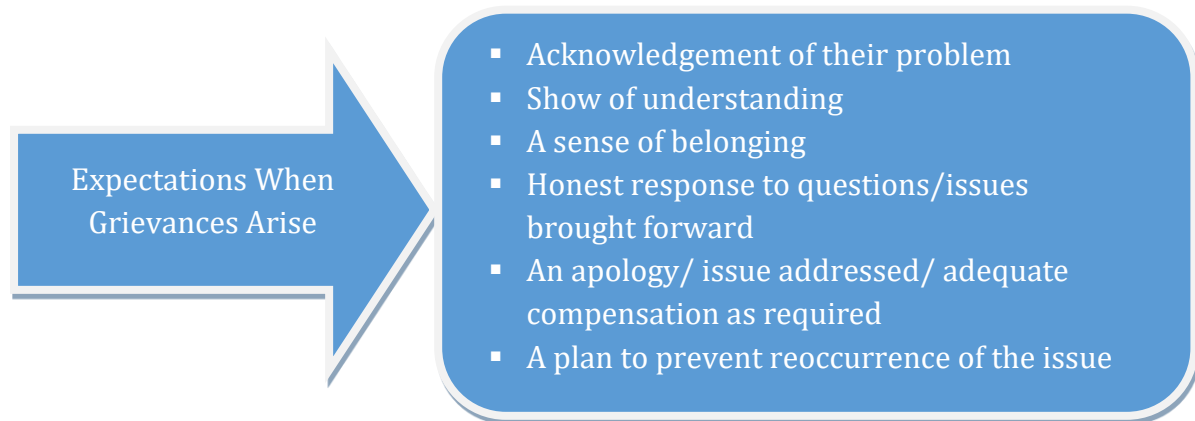
2.4.2.4 Allocation of Responsibility

- ✚ Once the grievance is received and recorded, based on the subject and issue, the Grievance Redress Officer will identify the department, contractor or personnel responsible for resolving the grievance, and also the GRC members that will be relevant to the matter and initiate a timeline for discussion/constitute a GRC meeting.
- ✚ Addressing a complaint will be timely, responsive and as less complicated as possible
- ✚ Where the complaint is an emergency, the matter will be treated urgently, pending when proper investigations and address can be made.



2.4.2.5 Grievance Investigation (for non-GBV/SEA/SH cases)

The Grievance Redress Committee will discuss and undertake an enquiry into the facts relating to the grievance. This will be aimed at establishing and analysing the cause of the grievance and subsequently identifying suitable mitigation measures for the same. The committee may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand.



The grievance redress committees will be responsible for the following:

- ✚ Communicate with the affected persons and evaluate what form of redress they are entitled to
- ✚ Investigate the complaint in a fair, honest and openminded manner
- ✚ Interview/discuss with concerned parties with a view to resolving the issue
- ✚ Recommend a solution to the grievance
- ✚ Communicate the decisions to the complainant
- ✚ Refer the grievance to a higher level GRC, if unresolved

The site investigation will be completed in the shortest possible time depending on the urgency and complexity of the matter as stipulated below:

Emergency/ Urgent Complaints	—————→	Immediately - within 24hrs
Simple/ Less Complex Complaints	—————→	1 - 3 days
Complex/ Sensitive Complaints	—————→	3 - 7 days

←————— Investigation Timelines —————→

The GRC will investigate all project related complaints and resolve/provide responses. Where the issue cannot be resolved at a particular GRC level, the complainant will be supported in escalating the grievance to the next level GRC. However, efforts will be made to resolve all grievances at the project site/community level.

This does not apply for GBV/SEA/SH cases, detailed information on how to handle such cases are provided in Chapter 3.

2.4.2.5 Resolution, Closure and Feedback

Based on the understanding developed from the investigation and consultations, the GRC will identify a suitable resolution to the issue. This resolution will be communicated accordingly to the grievant.

- ✚ If at any stage, the grievant is not satisfied with the resolution, s/he may choose to ask for an escalation of the grievance to the next level GRC, this should be facilitated by the GRM focal person.
- ✚ The status of the grievance will be updated in the grievance logbook frequently by the GRM secretary/officer.
- ✚ Once the grievance is resolved, and the same has been communicated to the grievant, the grievance shall be closed in the grievance logbook.
- ✚ The grievance register will also provide an understanding of the manner in which the grievance was resolved. These instances shall then serve as references for any future grievances of similar nature
- ✚ Where there is evidence of recurring issues or grievance coming up on the project, it is necessary to flag this up to the NPCU in order to assess if the project design requires updating

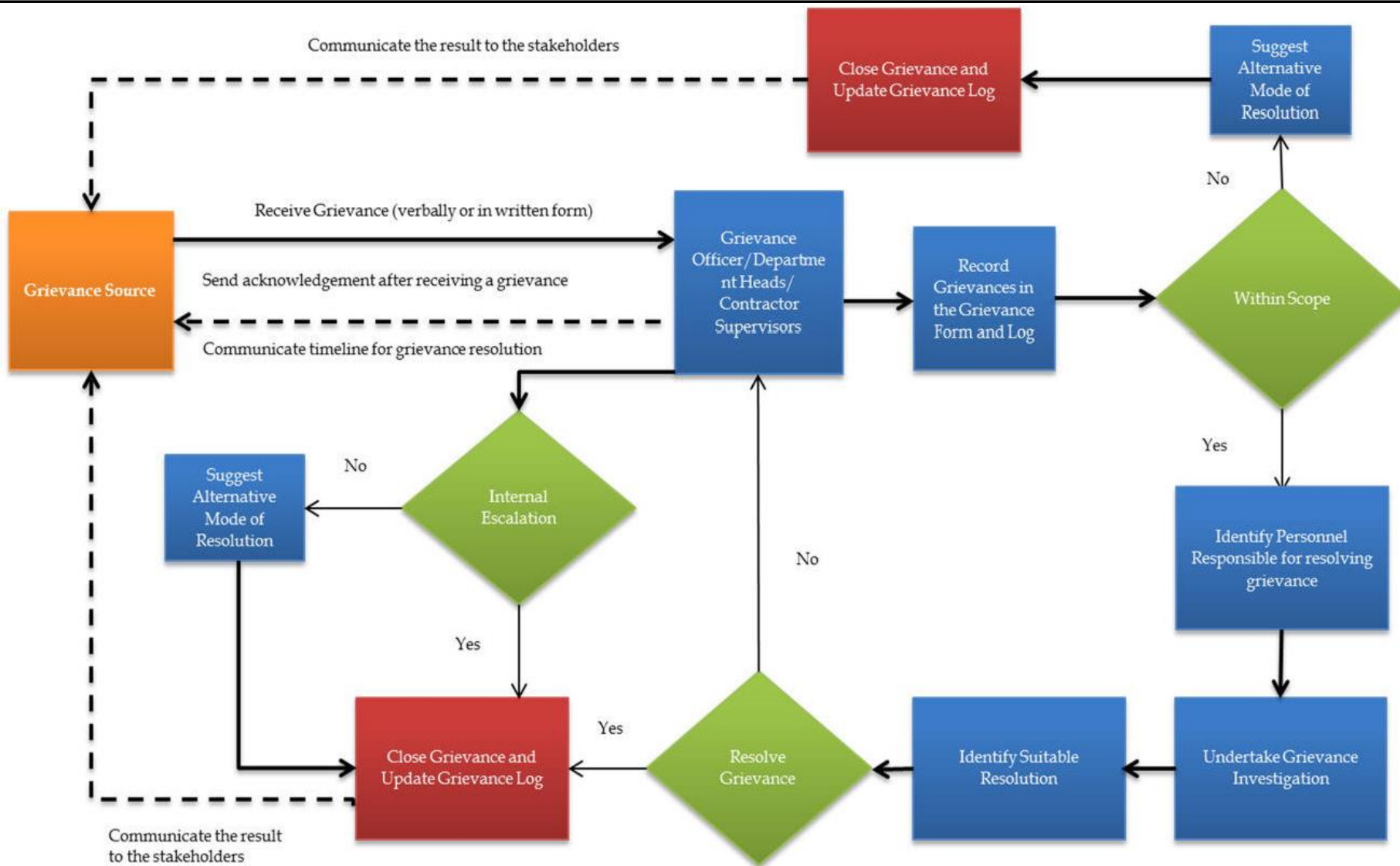


Fig 2 Summary of Schematic Representation of the Grievance Redressal Process

Chapter Three: GBV GRM Protocol

The AGILE Project has a substantial GBV risk profile due to the vulnerable population the project wishes to target (adolescent girls), thus a separate avenue for GBV related GRM will be constituted to receive GBV related complaints that is tailored to be responsive to the sensitivities of reporting GBV and for vulnerable population.

The GBV GRM will have special procedures for responding to allegations of sexual exploitation and abuse (SEA) and sexual harassment (SH) that are made against a project actor. However, for any complaint that is reported to the GRM (including complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers.

For the purposes of the GRM, these terms are defined as follows:

- **Gender-based violence.** Gender-based violence, or GBV, is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Across the globe, gender-based violence disproportionately affects women and girls. SEA/SH (defined below) is a subset of GBV.
- **Sexual exploitation.** Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
- **Sexual Abuse.** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment.** Any unwelcome sexual advance, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another, when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.
- **Intimate partner violence (IPV).** As defined by the World Health Organization (WHO), IPV refers to any behavior within an intimate relationship that causes physical, psychological or sexual harm to those in the relationship. Examples of types of behavior include:
 - Acts of physical violence, such as slapping, hitting, kicking and beating.
 - Sexual violence, including forced sexual intercourse and other forms of sexual coercion.
 - Emotional (psychological) abuse, such as insults, belittling, constant humiliation, intimidation (e.g. destroying things), threats of harm, threats to take away children.
 - Controlling behaviors, including isolating a person from family and friends; monitoring their movements; and restricting access to financial resources, employment, education or medical care.

To fulfill the role of addressing GBV, all staff and volunteers at all levels of AGILE Project should be trained (and/or have previous knowledge and experience) on the GBV Guiding Principles and the specialized procedures for receiving and referring GBV-related complaints. This set of skills will help GRM staff and volunteers to support the quality of the complaint mechanism, while at the same time ensuring the adherence to these Guiding Principles and a survivor-centered

approach, including right to safety, respect, and confidentiality, of the complaint intake and management. Hotline operators in particular should receive training on the handling of GBV-related complaints in line with the principles of confidentiality and the specialized procedures.

When receiving a grievance/during the intake process, the person receiving the complaint shall respect the wishes, choices, rights and dignity of the complainant. In order for the survivor/complainant to make informed decisions about whether to seek services and whether to file a complaint with the project (where the complaint involves SEA or SH), she/he needs to be provided with clear and simple information on the functioning of the system, on the possible outcomes, likely timelines, and the types of support that can be provided. The survivor/complainant must also give their consent for the sharing of basic, anonymous, non-identifiable monitoring data about the incident with the SPCU/NPCU and with the World Bank. If a complainant chooses not to be referred to GBV service providers or have the project take further action, then the case will be closed. The officer or volunteer must seek the survivor/complainant's consent to share basic monitoring data, and if no consent is given, no data will be recorded. For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant/survivor and that they clearly understand the referral process.

3.1 Principles of the GBV-GRM

In addition to the Guiding Principles provide in section 2.3 above, other principles are essential for the GRM to effectively manage complaints related to GBV, in particular SEA and SH. These other Guiding Principles include confidentiality, safety of complaints/survivors, and the use of the survivor centered approach specifically for handling SEA/SH cases as provided in figure 3. This set of skills will help the GRM Focal Persons (FPs) to support the quality of the complaint mechanism, while at the same time ensuring the adherence to GBV guiding principles and a survivor-centered approach, including a right to safety, respect, and confidentiality, of the complaint intake and management.



Figure 3 Guiding principles of effective GMs

Key principles include the following:

A. Confidentiality and Anonymity

The GM for the project would:

- Have multiple channels through which complaints can be registered.
- Allow safe and confidential reporting: survivors should be able to report SEA/SH without being identified publicly.

- Protect information about the complainants.
- Log cases information in a complainant logbook and stored in a locked cabinet, documenting only limited anonymous information about the incident as further explained below.

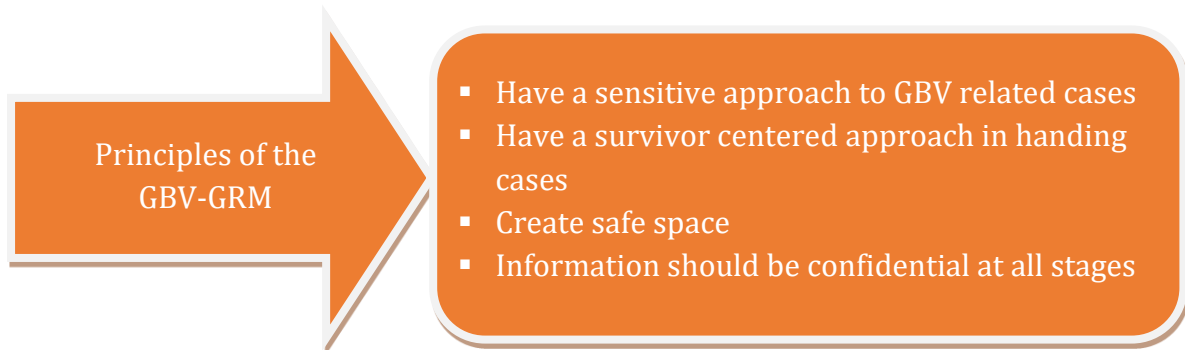
Only those having a role to play in the response to an allegation (i.e., GBV service providers) should receive case level information

B. Survivor-Centricity and Safety

The GM should:

- Support the creation of a supportive, dignified, and protective environment for the SEA/SH survivor, and full respect of his/her rights, wishes and choices.
- Be based on the survivor’s informed consent, which needs to be guaranteed throughout the GM.
- Maintain confidentiality and anonymity as a fundamental way to guarantee survivors’ safety: survivor files should not be discussed with anyone.
- Prioritize the safety of the survivor at all times
- Provide feedback on the case to the survivor only and exercise strong caution before communicating any results beyond the survivor.

There is also need to ensure that GRM procedures and mechanisms for reporting allegations of SEA/SH are known to all GRM actors, who will receive training on these topics.



3.2 Avenues for Channeling GBV-GRM Related Cases

GBV-GRM

The 1st level GRC at the project site/community level will designate 2 qualified persons within the committee who are most qualified to handle GBV-GRM matters (the Guidance Counsellor and the school principal/GBV focal person)



The SPIU to make dedicated toll-free contact numbers for the GBV focal persons at the project site for stakeholders' access - via posters, community consultations and awareness creation



GBV Officer

The GBV officers at the SPIU and NPCU is the focal point for the accountability, response aspects and monitoring the accountability process (e.g., determining if project-related, making sure employer, which might be the SPIU or Contractor, is taking appropriate disciplinary action and investigating, etc.

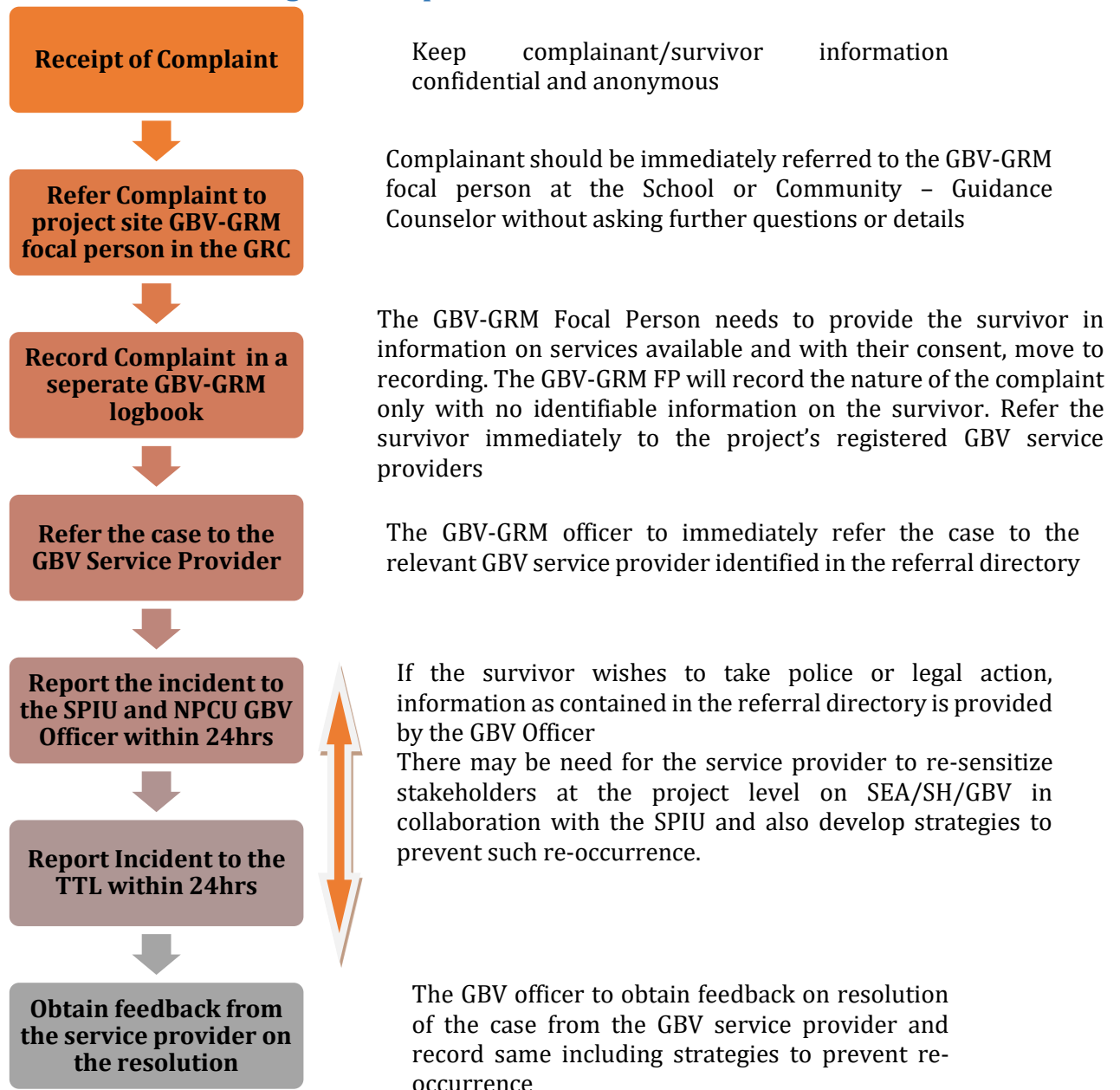
GBV Service

Each SPIU will identify existing GBV service providers in the communities, LGAs and State to maintain a Memorandum of Understanding (MOU) for referral of GBV-GRM cases

Provider

Note: The focal point at the GRC level will receive specialized training in both the survivor-centered approach and the protocols for handling incidents.

3.3 Process for Receiving GBV Complaint and Referral



3.4 Documentation of GBV-GRM Cases

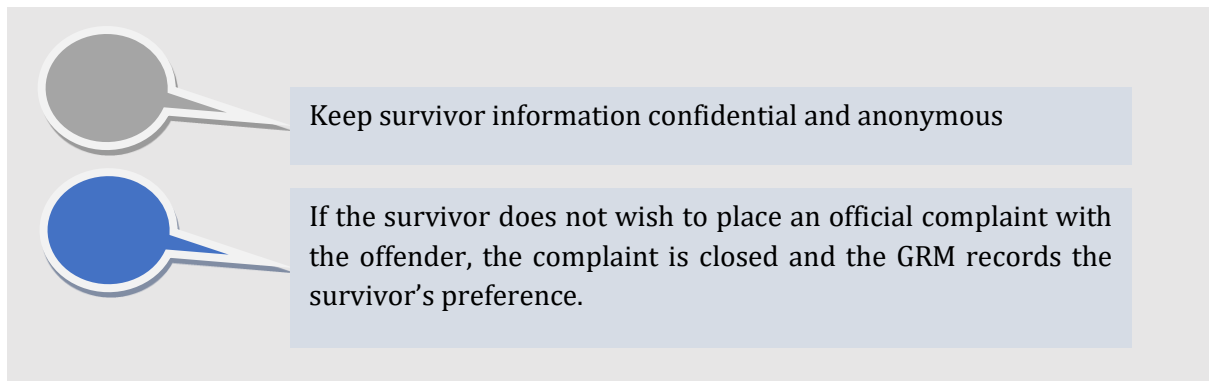
GBV-related complaints would provide information only on the nature of the complaint (what the complainant says in her/his own words), and operators would link the complaint to a GBV service provider for necessary attention and action

The GBV-GRM focal persons will be trained by the NPCU/SPIU GBV Officers in liaison with GBV service providers on how to collect GBV/SEA/SH cases confidentially and empathetically (with no judgement)

- ✓ In recording the incident, the identity of the survivor should be protected, keeping survivor information confidential and anonymous (no names in the record book). This information is limited to (a) the nature of the allegation or incident; (b) whether

the incident is likely to be project related; (c) the age/sex of the survivor (if known); and (d) whether the survivor was referred for services.

- ✓ Ensure that no identifiable information on the survivor is stored in the GRM
- ✓ Document the exact complaint (no detailed information of the incident is expected), date, action taken and close the report
- ✓ As required, refer complaints to the GBV service provider



Keep survivor information confidential and anonymous

If the survivor does not wish to place an official complaint with the offender, the complaint is closed and the GRM records the survivor's preference.

Chapter Four Timeframe for Processing Grievances

This section provides information on the expected timeframe for each stage of the GRM. It is expected that every responsible party will ensure they achieve the stipulated timelines.

GBV/SEA/SH cases will not follow this timeframe and support must be provided to the survivor immediately due to the serious natures of SEA/SH issues.

Table 2: Time Frame for Processing Complaints

PROCESS	DESCRIPTION	COMPLETION TIME FRAME	RESPONSIBLE AGENCY/PERSON
Receipt of complaint	Document date of receipt, name of complainant, location, nature of complaint etc.	1 day	Secretary to GRC at project level
Acknowledgement of grievance to the complainant	By letter, email, phone	1 day	Secretary to GRC at project level
Screen and Establish the Merit of the Grievance	Review the complaint/ Listen to the complainant and assess the merit	2 days	Project level GRC Secretary & the aggrieved PAP or his/her representative
Refer unrelated project grievances	Where complaint is not related to AGILE refer to appropriate authority and inform complainant	2 days	Project level GRC Secretary & the aggrieved PAP or his/her representative
Investigate the grievance	Visit the site, conduct investigations and interviews	1 – 3 days	Project level GRC members
Implement a redressal action	Discuss and agree on the grievance resolution	1 – 7 days	Project level GRC members & the aggrieved PAP or his/her representative
Escalate to SPIU for a dissatisfied scenario	Refer the complainant to the SPIU GRC	3 – 10 days	Project level GRC Chairman
Receipt and record of complaint at SPIU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	1 day	SPIU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the project level GRC/ conduct investigations and interviews. Recommend grievance resolution	2 – 7 days	SPIU GRC
Escalate to NPCU for a dissatisfied scenario	Refer the complainant to the NPCU GRC	3 – 10 days	State Project Coordinator
Receipt and record of complaint at NPCU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	1 day	NPCU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the GRCs/ conduct investigations and interviews. Recommend grievance resolution	2 – 5 days	NPCU GRC
Last resort - Advice complainant of option to seek judicial redress	Where resolution is not reached, complainant is free to seek judicial redress. NPCU to document the case including all attempts at resolution and send a report to the TTL	7days 5days	National Coordinator
Close the case	Follow up to obtain feedback and document resolution in logbook	As required	GRM officers

Chapter Five Staffing, Roles and Responsibilities

This section provides a description of the roles and responsibilities for operationalizing the GRM.

5.1 Staffing - GRM Officers/GR Focal Persons, project level, SPIU, NPCU

GR Focal
Person -
Project Level

- Each project site shall appoint a GR focal person
- Will be the secretary to the project level GRC
- Will be the custodian of the grievance logbook
- Will document grievances and update the logbook
- Will retrieve written complaints from the complaint boxes at least thrice every week
- Will maintain the dedicated grievance contact number and document complaints received in the logbook
- Will inform the chairman and other GRC members of complaints received
- Will liaise with the chairman on setting up GRC meetings and investigating/resolving grievances
- Will relate decisions/ resolutions/feedback to complainants
- Will communicate with the GRM Officer at the SPIU level and send weekly GR reports

GRM
Officer-
SPIU Level

- Each SPIU shall have a GRM Officer at the state level
- Will be the secretary to the SPIU level GRC
- Will be the custodian of the grievance logbook
- Will document grievances and update the logbook
- Will receive and review grievance reports from the project level GR focal person weekly
- Will escalate unresolved grievances to the Project Coordinator (chairman SPIU GRC)
- Will maintain the dedicated grievance contact number at the state level
- Will liaise with the chairman on setting up GRC meetings and investigating/resolving grievances
- Will relate decisions/ resolutions/feedback to complainants/ project level GRC
- Will conduct site visits on monitoring and evaluation for the GRM to the project sites at least twice every month or as required
- Will communicate with the GRM Officer at the NPCU level and send GR reports every two weeks

GRM Officer- NPCU Level

- The NPCU shall have a GRM Officer at the federal level
- Will be the secretary to the NPCU level GRC
- Will be the custodian of the grievance logbook
- Will document grievances and update the logbook
- Will receive and review grievance reports from the SPIU level GRM officers every two weeks
- Will escalate unresolved grievances to the National Coordinator (chairman NPCU GRC)
- Will liaise with the chairman on setting up GRC meetings and investigating/resolving grievances
- Will relate decisions/ resolutions/feedback to the SPIU GRM
- Will conduct site visits on monitoring and evaluation for the GRM to the project sites at least monthly or as required
- Will maintain a project GRM database and develop monthly GR reports for the attention of the National Coordinator and the Bank

5.2 GRCs – Roles and Responsibilities



5.2.1 Responsibilities of Grievance Redress Committees

- ✚ Receive complaints and suggestions about the project activities
- ✚ Acknowledge and record complaints received
- ✚ Communicate with the complainant and evaluate their claims
- ✚ Investigate complaints and convey meetings to resolve the complaints
- ✚ Provide a resolution and communicate to the complainant
- ✚ Escalate unresolved complaints/dissatisfaction to a higher level GRC
- ✚ Discuss with the SPIU and relevant parties on strategies to prevent future occurrence of complaints

5.2.2 Specific Roles of GRC Members

Chairman

- Convey and chair GRC committee meetings
- Give direction to the GRM Officer/focal person
- Officially escalate/inform the higher level GRC of unresolved complaints
- Responsible for decisions on grievance resolutions

Secretary

- The secretary to the GRC will be the GRM Officer/GR focal person
- refer to responsibilities stated in 5.2.1

GBV-GRM Officer

- Receive and record GBV-related complaints
- Create safe spaces for survivors and ensure confidentiality
- Maintain GBV complaints register
- Maintain the GBV contact numbers and receive complaints
- Refer cases to GBV service providers for investigation and resolution
- Follow up with the service provider on feedback

Chapter Six

Stakeholder sensitization and training of GRCs

This section highlights the methods to be employed in disseminating information about the GRM to stakeholders and building their knowledge and capacity to effectively use the GRM.

6.1 Publicity and Disclosure of the GRM

The GRM will be disclosed to the stakeholders through written and verbal communication. The mediums to be used for this purpose are staff meetings, community meetings, written communication and one-to-one meetings, posters etc. Stakeholders will be made aware of the GRM in place at each level of execution:

- ✚ Project sites and communities
- ✚ SPIU level
- ✚ NPCU level

The tools for GRM communication should be explained to the stakeholders and made available in local languages for comprehension including GRM posters, inscription on complaint boxes, notice of GRM sensitisation trainings amongst others, and these should also be demonstrated at the project levels.

6.2 Stakeholder and Beneficiary Sensitisation on the GRM

Sensitization on the GRM will be ongoing and will commence before commencement of major project activities at the site/ schools

- ✚ During the first sensitization meeting, the project level GRC chairperson supported by the SPIU GRM officer will introduce the GRM and the objectives of the GRM to the stakeholders
- ✚ The beneficiaries and stakeholders will be shown the complaint boxes, GRM register, phone lines, GRM posters and all other tools and means for reporting grievances
- ✚ A step-by-step explanation on how complaints will be received, handled, and when they expect to receive a response in line with the GRM time frame in chapter 4 of this manual. Some complaints may take longer to resolve than others based on the complexity, so community members should not be surprised if they do not receive a response immediately
- ✚ Responses will be delivered in writing and explained by the Community Grievance Focal Persons if the complainant cannot read
- ✚ However, regarding serious complaints, the sensitization meeting should explain that these complaints will be prioritized and be resolved on an urgent basis.
- ✚ During the meeting, the GRC Chairperson supported by the GBV-GRM officer and the SPIU GBV officer will use the opportunity to explain what GBV services are available in the community and for the project, and to channel GBV related complaints to the GBV-GRM officer
- ✚ The beneficiaries and stakeholders will participate in identifying where the Complaint Boxes should be placed in the community and/or school area. It should be in a place that beneficiaries/ stakeholders feel safe and comfortable accessing it (i.e. discrete location which could provide anonymity but also accessible)

Regarding GBV, sensitization will be done either the SPIU/NPCU GBV officer or an accredited GBV service provider and will include:

- ✚ Standards of Code of Conduct of teachers/project staff/ contractors with regards to GBV/SEA/SH
- ✚ Definitions of GBV, SEA, sexual harassment, etc.
- ✚ Right to benefit from project/Do No Harm principle
- ✚ Services available and how to access them
- ✚ What to expect after making a complaint, including potential referrals, timeframes, and the roles, responsibilities, and limitations
- ✚ Steps that will be taken to ensure safety and confidentiality

6.3 GRM Training

Table 3: List of GRM Trainings

Type of Training	Participants	When	Facilitator
Training on the GRM Manual	All GRCs (project level, SPIU, NPCU)	Project Planning Phase Every Quarter (Refresher)	NPCU/SPIUs (Can be supported by GRM Expert)
Sensitisation and awareness of GRM channels	Project site stakeholders, communities, students, committees, state actors, project beneficiaries including mothers, etc.	Project Planning Phase Implementation Phase Half Yearly	SPIU GRM Officer/ Social Development Officer/Project Coordinator
Effective communication, negotiation, and facilitation skills; problem solving; dispute resolution, decision making	GRM Officers/ GR Focal Persons GRCs	Implementation Phase Annually	GRM Expert
Effective documentation, fairness and inclusiveness in GRM	GRM Officers/ GR Focal Persons Project Coordinators/ GRC Chairpersons	Implementation Phase Annually (Review and update of the GRM)	NPCU GRM Officer (supported by GRM Expert/ World Bank GBV Experts)
Customer centred approach in receiving complaints	GRM Officers/ GR Focal Persons	Implementation Phase One-Off	GRM Expert
Training in conflict resolution, Alternative Dispute Resolution (ADR) and grievance management	GRM Officers/ GR Focal Persons GRCs	Implementation Phase Annually	GRM Expert
How to handle GBV-GRM Cases	GBV-GRM Officers/ GBV Officers, GRM Officers	Implementation Phase Half Yearly Review	GBV-GRM Expert/ GBV Service Provider/ World Bank GBV Experts

Chapter Seven Monitoring and Evaluation

This chapter provides a framework for continuous monitoring and evaluation of the GRM to ensure it is accessible, reliable, effective and project stakeholders feel confident in the GRM process. In addition, it will also improve the capacity of the GRCs and GRM Officers as required.

The monitoring and evaluation consists of the following:

- ☛ **Monitoring Indicators** – what are the parameters to be monitored, both quantitative and qualitative
- ☛ **Monitoring tools** – what will be used for the monitoring and evaluation including methods
- ☛ **Monitoring and evaluation process** – how will monitoring and evaluation be conducted at each level
- ☛ **Reporting** – how will this activities be reported including reporting frequency and methods
- ☛ **Responsibilities for monitoring and evaluation** – who is responsible for each stage of the monitoring and evaluation

7.1 Objectives of Monitoring and Evaluation of the GRM

- ✚ To ensure that stakeholders at all levels can access the GRM easily and without cost
- ✚ To identify weak areas and strengthen such areas to improve service delivery
- ✚ To modify the GRM processes and/or structures where necessary
- ✚ To provide information on trends and patterns of grievances which will inform project design/modifications
- ✚ To obtain feedback from the project stakeholders on the GRM

7.2 Monitoring Indicators

The GRM will be monitored using both qualitative and quantitative indicators as indicated in table 4 below

Table 4: GRM Monitoring Indicators

GRM Indicators	Data/ Information Source	Target
Accessibility		
Proximity of case uptake locations and channels	Site monitoring visits/ Stakeholder consultations	Complaint boxes, Telephone hotlines, GRCs to be easily accessible to stakeholders
Location of grievances boxes	Site monitoring visits/ Stakeholder consultations	Ensure boxes are strategically located in public areas, school compound/ stakeholders are satisfied with the location
Presence of grievance logs	Site monitoring visits/ monthly reports	Grievance logs available at every project site/ SPIUs/NPCU
Stakeholders reporting on whether the GRM is accessible or not	Stakeholder consultations/ feedback mechanisms/ GRM satisfaction survey	The GRM to be accessible to all stakeholders (irrespective of education, income, language, gender, vulnerability status etc.)
GRM in user-friendly language	Site observation – posters, complaint box/ Stakeholders feedback	Critical GRM information such as notification of phone numbers displayed in local language/ GRM

GRM Indicators	Data/ Information Source	Target
		consultations to incorporate local language
Participation		
Quality and timeliness of stakeholder sensitization meeting on the GRM	Minutes of meeting and activity reports/ Stakeholder consultations/ communication materials (fliers, billboards, Bills, other awareness and instructive materials)	Stakeholders at the project site to be sensitized on the GRM and the processes early on
Awareness of the GRM and the process	Stakeholders consultation/ GRM satisfaction survey	All stakeholders to be aware of the GRM (irrespective of education, income, language, gender, vulnerability status etc.)
Willingness to use the GRM process	Stakeholders consultation/ GRM satisfaction survey	Stakeholders should be willing and able to use the GRM
Percentages of grievances registered	GRM Register	All grievances received should be registered
Effectiveness		
Percentage of grievances resolved	GRM Register/ GRM satisfaction survey	All grievances to be resolved within the stipulated timeframe in the GRM
Percentage of grievances referred (GBV only)	GRM Register	All GBV-GRM cases to be referred to the appropriate GBV service provider
Percentage of grievances resolved or referred within specified time frame	GRM Register/ GRM satisfaction survey	All grievances to be resolved or referred within the stipulated timeframe in the GRM
Number of cases referred to the judicial system	NPCU GRM Report	All cases should be resolvable within the project GRM levels
Efficiency		
Compliance to the project GRM framework	Site visits, observations and interviews/ GRM Register/ Complaint box/ Stakeholder consultations	GRM Officers/ GRCs to comply with the project GRM framework at all levels
Percentage of recurring complaints by type/category/location	GRM Register	Minimal recurring complaints (less than 5%/year)/ Sustainable solutions to be adopted to prevent recurring complaints
Percentage of complainants satisfied with the GRM	Stakeholder Consultations/ GRM satisfaction survey/ Spot checks	All stakeholders to be satisfied with the GRM/ Modifications to be made to the GRM where necessary
Composition of GRC members with a focus to representation of trusted women and vulnerable people	List of GRCs/ GRC minutes of meetings	Inclusiveness of the GRCs: Women and vulnerable groups should not be disadvantaged
Adaptability of the GRM	Stakeholder Consultations/ GRM satisfaction survey	The GRM to be fit for purpose for all scenarios

GRM Indicators	Data/ Information Source	Target
Financial resources to offset administrative and seating costs	Meetings with the GRCs and GRM Officers	Logistics and costs should not hinder or delay GRM processes
Transparency, Fairness and Professionalism		
Complaints are handled professionally without prejudice, stigmatization, coercion or blame	Stakeholder Consultations/ GRM satisfaction survey	All complainants should feel safe and secure to use the GRM
GRM procedures and outcome are transparent and fair	GRM Register/Stakeholder Consultations/ GRM satisfaction survey	All complainants should be satisfied with the GRM
Grievances are traceable and retrievable	GRM Register	Adequate, timely and detailed documentation of grievances
Cases are handled confidentially (GBV related cases)	GRM Register	Identity and details of GBV related complainants to be kept confidential
Learning and Adaptation		
GRM data to improve project policies, processes, design and service delivery	Project satisfaction survey	The GRM should ultimately contribute to project efficiency and service delivery
Adaptability of the GRM	Stakeholder Consultations/ GRM satisfaction survey	The GRM to be fit for purpose for all scenarios

7.3 Monitoring Tools

GRM performance indicators

These are the quantitative and qualitative indices which will provide information on the GRM. They are specific, measurable, accurate, reliable and time bound. The indicators are specified in table 4 above.

GRM registers

These are the logbooks provided at each project level GRM for registering and tracking complaints. The GRM register will be in the custody of the GRM officers/ GR focal persons who are also the secretaries to the GRCs. section 2.4 provides details of the GRM register. For GBV grievances, information are not logged together in the general GRM register. GBV cases will be logged in a separate register and kept out of sight from the general public. Additionally, only the cases are logged with no reference to the contact details of the survivor.

Reporting and management templates

They provide minimum monitoring and reporting contents required to provide adequate information on the GRM and also for evaluation purposes. These include the monthly/annual GRM reporting templates and GRM repository/dashboard to be maintained by the SPIU and NPCU GRM officers.

Monitoring visits

Periodic visitation to the project sites to review the GRM operationalization by physical observation, stakeholder's consultation, spot checks, review of GRM registers, GRC minutes of meetings, project related minutes of meetings amongst others.

Physical observation

Physically observing certain parameters during site visits such as location and accessibility of complaint boxes, telephone lines, GRM posters etc. pictures and coordinates should be taken as evidence.

Stakeholder Consultations

Engage project stakeholders in meetings or focus group discussions to ascertain the effectiveness of the GRM including weak areas and improvement options. Such consultations should be duly documented.

Minutes of Meetings

These are documents that will provide relevant information. These include minutes of GRC meetings, minutes of project related consultations to identify unreported/ unresolved grievances/ lack of satisfaction of the GRM amongst others.

Spot checks and assessments

The use of audit-based assessments, ad-hoc review of documents, ad-hoc site visits, random interviews, which could either be based on information or random to assess the GRM. Robust report on such activities should be provided.

GRM Satisfaction Survey

These are specific surveys undertaken for the purpose of gathering information relating to the GRM operations. This will usually be designed either by the SPIU in collaboration with the NPCU or solely by the NPCU. Robust report on such activities should be provided. The Third Party Monitoring firm engaged by the Project will also undertake survey of the level of implementation of the GRM to assess its functionality.

Activity reports and monthly/quarterly/ annual reports

These are monthly, quarterly, annual reports which provide detailed information on GRM activities and GRM operationalization.

7.4 Monitoring and Evaluation Process

What to do	How	Responsibility	Timeline
Periodically review and update the GRM performance indicators	<ul style="list-style-type: none"> Identify additional indicators based on project reviews and needs Update the GRM indicators within the GRM Manual 	SPIU/ NPCU GRM Officers	As required
Review the GRM Registers	Review the project level GRM register via site visits/electronic copy	SPIU GRM Officers	Monthly
	<ul style="list-style-type: none"> Review the SPIU GRM registers via site visits/electronic copy Conduct spot checks on project level GRM during monitoring visits or based on complaints 	NPCU GRM Officer	Monthly
Develop and maintain reporting and monitoring templates	<ul style="list-style-type: none"> Maintain a repository of project grievances from all project sites in the state Monthly reports to contain required information on GRM activities 	SPIU GRM Officers	Monthly
	Maintain a dashboard for tracking grievances and GRM activities from all states	NPCU GRM Officer	Monthly
Conduct monitoring visits	Visit the project sites to review the GRM processes – ad hoc visits, GRC meetings, project beneficiary/community meetings etc.	SPIU GRM Officers	At least monthly for each site
		NPCU GRM Officer	Quarterly
Observe physical indicators	Observe certain parameters during site visits such as location and accessibility of complaint boxes, telephone lines, GRM posters	SPIU GRM Officers/ NPCU GRM Officer	As required
Conduct stakeholder consultations	<ul style="list-style-type: none"> Hold consultations/ focus group discussions with stakeholders to review the GRM Review minutes of meetings of project related consultations to identify unreported/ unresolved grievances/ lack of satisfaction of the GRM 	SPIU GRM Officers	Quarterly
		NPCU GRM Officers	Annually
Review minutes of meetings	<ul style="list-style-type: none"> Obtain and review minutes of GRC meetings Review minutes of meetings of project related consultations to identify unreported/ unresolved grievances/ lack of satisfaction of the GRM 	SPIU GRM Officers	Quarterly
		NPCU GRM Officers	Annually
Conduct GRM Satisfaction Survey	<ul style="list-style-type: none"> Design and implement a stakeholder satisfaction survey of the GRM in line with the objectives of the GRM Analyse survey report and identify weak areas and corresponding measures to be taken 	NPCU GRM Officer/ National Project Coordinator	Annually
		SPIU GRM Officers/ Third Party Monitoring	

What to do	How	Responsibility	Timeline
		firm/Independent parties	
	Provide report of this activity to the Bank	National Project Coordinator	Annually
Conduct spot checks and assessments	<ul style="list-style-type: none"> ▪ Conduct adhoc review of documents relating to the GRM ▪ Embark on adhoc site visits to conduct spot checks on the effectiveness of the GRM 	SPIU GRM Officers/ NPCU GRM Officer	As required/ based on information
Prepare GRM activity reports and monthly/quarterly/ annual reports	<ul style="list-style-type: none"> ▪ Prepare reports on GRM activities and submit to the NPCU through the state project coordinator ▪ Prepare monthly/quarterly/annual GRM reports and submit to the NPCU through the state project coordinator 	SPIU GRM Officers/ State PCs	Monthly/ quarterly/ Annually
	Prepare monthly/quarterly/annual GRM reports and submit to the Bank through the NPC	NPCU GRM Officer/ NPC	Monthly/ quarterly/ Annually
Incorporate Feedback and Improvement	<ul style="list-style-type: none"> ▪ Identify weak areas in the operationalization of the GRM ▪ Identify and implement actions for improvement ▪ Update the GRM as required ▪ Conduct capacity building as required 	GRM Officers/ GRCs/ Project Coordinators	As required

7.5 Monitoring and Evaluation Reporting



The GRM officers at the SPIUs and the NPCU will ensure that GRM activities are adequately and timely reported to the State Project Coordinators and the National Project Coordinator as required.



The State Project Coordinators and the National Project Coordinator will ensure that GRM activities are adequately and timely reported to the World Bank. This process will be coordinated by the NPC.

The GRM officers will prepare monthly reports on all grievances received and resolved in addition to any other GRM activity reports. Such reports can either be included as part of the monthly E&S reports or as stand - alone as may be requested by the reviewer.

Quarterly reports on all grievances received and resolved will be compiled at the State levels with the coordination of the National level GRM focal person. The Quarterly reports are then shared with the World Bank team.

Annual reports on GRM activities and operationalization will also be prepared at the state levels and the NPCU for the attention of relevant stakeholders and the Bank. It is worth nothing that GBV grievance **must not** be included in annual report.

The annual GRM report will consist of the following at a minimum:

- ✚ Number of grievances received for the reporting period per state/ per project location
- ✚ Percentages of grievances resolved or referred, and the average time it took in resolving complaints
- ✚ Percentages of grievances not resolved or referred and why they were not resolved
- ✚ Percentage of complaints satisfactorily addressed within specified timelines
- ✚ Categories/types of grievances received
- ✚ Most frequent grievance types
- ✚ Areas where complaints occur most
- ✚ Location where grievances occurs most
- ✚ Actions taken to resolve or refer grievances
- ✚ Percentages of outstanding grievances (ongoing investigations)
- ✚ Areas that need service improvement
- ✚ Steps taken to improve weak areas
- ✚ Good practices recorded in GRM operationalization
- ✚ Recommended modifications to project design based on complaints

7.6 Roles and Responsibilities for Monitoring the GRM

- ✚ The GRM officer at the NPCU will coordinate monitoring and evaluation information with respect to the GRM. The SPIU and NPCU GRM officers will make such information available to their coordinators, M&E Officers, NPC, World Bank and other interested parties as may be required.
- ✚ The SPIU/NPCU GRM Officers will also be responsible for providing monthly, quarterly, annual, adhoc reports on GRM operations.

- ✚ The State Project Coordinators and the National Project Coordinator have the overall responsibility for monitoring and evaluating the project GRM and approving changes as required to the GRM.
- ✚ The officers of the SPIUs and the NPCU will also support monitoring and evaluation of the GRM and provide adequate feedback and report to the GRM officers and the Project Coordinators
- ✚ Specific responsibilities with respect to GRM monitoring and evaluation have been detailed in section 7.4 above

Annex 1: GBV Guiding Principles

Guiding Principles

The AGILE GRM is grounded in the following guiding principles that need to be understood by all, especially those who will be interacting with survivors and those managing complaints relating to GBV, including SEA/SH. Those responsible for managing GBV complaints should have the capacity and capability to do so as it is a very sensitive area.

Safety & Well-Being: The safety of the survivor shall be ensured at all times, including when a complaint is made and is in the process of being addressed by the project. The AGILE GRM will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process.

The survivor is never to blame for reporting an act of GBV and should never be made feel judged or disbelieved. On the contrary, it is important that they feel that their story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights, and the dignity of the survivor. Furthermore, if a survivor chooses to seek further action through the Project in the case of an SEA/SH complaint, while the case is pending investigation by the appropriate team in the SPCU/FPCU (not the GRM team), the SPCU/FPCU should make efforts to ensure that the subject of the complaint does not have further contact with the survivor, such as by preventively suspending employment, and each survivor should have control over each step of the process and decisions making.

Confidentiality: The confidentiality of complainants, survivors, and other relevant parties must be respected at all times. All GBV-related complaints will be kept strictly confidential and information will be shared only on a strict need-to-know basis. The GRM will collect only limited, anonymized information about these complaints, using the special collection form within the GRM app. This information is limited to (a) the nature of the allegation or incident; (b) whether the incident is likely to be project related; (c) the age/sex of the survivor (if known); and (d) whether the survivor was referred for services. Where a survivor chooses to proceed with accountability measures, any other information will be kept by the SPCU GM FP or FPCU GM FP in password-protected files with highly restricted access available only on a need-to-know basis.

Survivor-Centered Approach: All prevention and response actions will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety, and wellbeing remain at the center in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

Accessibility and non-discrimination: The mechanism must be accessible to all potential complainants and sufficient information must be given on how to access it, making the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context-sensitive. To facilitate incidents reporting and avoid stigmatization, reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

Considerations regarding children: While all GRM actors should follow a survivor-center approach that prioritizes the consent of the survivor, obtaining the consent of children is different than obtaining the consent of adults, and may involve the application of different standards. "Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse" (World Bank 2020: 8). Special provisions are required for SEA/SH allegations that

involve minors, especially given how vulnerable they are, including child-friendly feedback channels and specialized training for staff.

In taking and responding to GBV complaints

Complaints of this nature should be handled differently from the other categories of complaints, because of the sensitivity and potential for stigma or further harm to a survivor. Accordingly, the process for resolving allegations will be different from other complaints. As further explained below, where the complainant/survivor makes an allegation involving SEA or SH, the project will have specific procedures in place to initiate disciplinary actions against an alleged perpetrator (with the survivor’s consent, and if the incident is confirmed). For other forms of GBV that may be reported to the GRM, such as IPV and domestic conflicts, the survivor/complainant can be referred to GBV service providers, but these claims are NOT subject to investigation or verification by the project. Follow the guidance below in the uptake and resolution of these two types of complaints.

Table 1. Illustrative operating procedures and response protocol for GBV/SEA/SH allegations

Step in the GRM	Function	Detail
Uptake	Receive SEA/SH allegations through multiple reporting channels	<p>GBV-related complaints can be made using all of the project’s grievance channels, including State and Federal hotlines, in-person complaints, etc.</p> <p>Intake points include the Grievance Committee (who should facilitate survivors to make complaints where they choose to do so, but should not record GBV/SEA/SH incidents in their record books), GBV Officer at the SPIU and NPCU level.</p> <p>Anyone who interacts with a survivor as part of the GM process should understand and implement the survivor-centered approach creating a supportive, empathetic environment, responding without judgment, and prioritizing confidentiality, safety and the survivor’s choice.</p>
Sorting and Processing (Documentation)	Document and register allegation	<p>The entity to whom the allegation was disclosed should provide information on any mandatory reporting requirements. The allegation is then captured: the recipient requests the consent of the survivor to share some non-identifiable, anonymous data with the SPIU/NPCU and the World Bank, specifically (1) the type of incident, (2) if the alleged perpetrator is associated with the project (if known), (3) the age and sex of the survivor (if available) and (4) whether the survivor was referred for services. In the absence of consent, there should be no sharing or recording of data.</p>

Step in the GRM	Function	Detail
		If consent is given, this information is recorded in the specialized forms.
Acknowledge and follow-up	Refer the survivor to relevant GBV service providers.	<p>The entity to whom the allegation is disclosed acknowledges receipt of the grievance and provides honest, clear, and complete information about services available from the various agencies that may be able to assist the survivor, as well as details on how to access them. The range of proposed referrals typically encompasses service providers of health/medical, psychosocial, safety- and security-related, justice and legal aid, economic empowerment, and livelihood support (see Referral Pathways for your State and LGA). The entity to whom a SEA/SH allegation is disclosed should inform the survivor of his or her legal rights and of the costs and benefits of choosing various referral options' The survivor/complainant should also clearly understand that the GRM is an administrative procedure, not a legal/judicial one, and the survivor is free to report to the police or seek legal advice at any time (this should be among the service referrals available). The entity to whom the SEA/SH allegation is disclosed explains to the survivor his or her right to control whether and how information about the case is shared with other agencies or individuals as well as any implications of sharing information with other actors. Survivors should be given adequate information to provide informed consent and should understand that they have the right to place limitations on the type of information they want shared and to specify which organizations can and cannot be given the information. As noted above, where possible, survivors should be notified of any mandatory reporting requirements prior to the disclosure of any information that could trigger mandatory reporting (World Bank 2020: 44 as cited in GMs for SEA/SH in WB-Financed Projects).</p> <p>The survivor's consent must be documented. This means that the survivor can choose to fill out, sign, or fingerprint a consent form that outlines the survivor's choices regarding whether information about the case is shared with other agencies or individuals and for what purpose. Ultimately, it is up to the survivor, and only the survivor, whether to take up the proposed referrals.</p> <p>Where the allegation appears to involve SEA or SH, the survivor also has the option to seek</p>

Step in the GRM	Function	Detail
		<p>accountability of the perpetrator through the project’s GM, as further discussed below. Where the allegation involves other forms of GBV that are not related to the project (for example IPV), then the survivor should still be provided with referrals to GBV service providers and the complaint recorded, however there is no investigation or verification of these complaints.</p> <p>The survivor/complainant should be provided with complete information about the possibility of reporting an incident of SEA/SH to the project and seeking perpetrator accountability. They should also understand that the GM process will not give rise to any compensation or payment, and is an administrative, not a legal process. They should also understand that participating in the process means that a person designated by the project will contact the survivor/complainant (the person’s identity should be provided), and that the alleged perpetrator and others may be contacted who may know the case to verify the information contained in the complaint.</p>
Verify, investigate and act (further action by the PIU - not sole responsibility of GRM)	Provide support services to survivors.	GBV service providers support survivors until their services are no longer needed.
	Review allegation and determine the likelihood that it is project-related.	Where the allegations involve SEA/SH, if a survivor wishes to proceed with accountability measures, the grievance team and State or National Coordinators consider the SEA/SH allegation, according to previously established protocols, to determine the likelihood that it is related to the project. The perpetrator’s employer is then responsible for determining appropriate sanctions.
	Implement sanctions for perpetrators in accordance with employment contracts and local labor laws.	If SEA/SH allegations are confirmed, the appropriate party—i.e., the employer of the perpetrator, which will be the Implementing Agency/NPCU/SPIU,—implements the adequate remedy/disciplinary action in accordance with the project’s Human Resources manual, employment contracts, and any applicable civil service or labor laws or regulations.

Step in the GRM	Function	Detail
	Resolve and close cases.	<p>There are two elements related to resolving and closing SEA/SH cases: (1) the internal project system, in which the survivor is referred to GBV service providers for support and appropriate actions are taken against perpetrators through the established SEA/SH resolution mechanism; and (2) the support the survivor receives from GBV service providers. When an allegation is received, it is registered in the project grievance mechanism and referred to GBV service providers, with the consent of the survivor.</p> <p>If the survivor does not wish to submit an official complaint with the employer, the complaint is closed. If the survivor proceeds with the complaint, the case is reviewed by the established SEA/ SH resolution mechanism, and a course of action is agreed on; the alleged perpetrator’s employer takes the agreed-on disciplinary action. Once an action is deemed appropriate according to the established SEA/SH resolution mechanism, the grievance mechanism operator is notified that the case is closed (World Bank 2020: 47 as cited in GMS for SEA/SH in WB- Financed Projects).</p> <p>In other words, if the survivor has been referred to the relevant GBV service providers, received adequate assistance, and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the GRM FP (at whichever level the case terminates) can close the case. The GRM FP records the resolution of the incident, the date it was resolved, and marks it as closed. The NPCU and SPU and World Bank are notified that the case is closed.</p>
Monitor and evaluate	Monitor, track, and provide regular reports.	<p>The GRM team compiles data about reported project-related SEA/SH allegations, making sure that it does not contain any information with the potential of being identifying, including names and addresses of survivors, their families, or of alleged perpetrators.</p> <p>The GRM team is responsible for issuing regular (e.g., monthly) reports that can contain data such as the total number of allegations, the number of alleged perpetrators who have a relationship to the project, the type of incident, and the age and sex of survivors.</p>

Step in the GRM	Function	Detail
Provide feedback	Respond to survivors.	<p>The SEA/SH allegation recipient needs to provide ongoing feedback to the survivor throughout the process but especially: (1) when the grievance is received; (2) when the case is reported to agency headquarters; (3) when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and (4) when an investigation concludes or when any outcomes are achieved or disciplinary action taken. The grievance mechanism should include templates and provisions for providing feedback to the survivor and the subject of the grievance (IASC 2016a as cited in GMs for SEA/SH in WB- Financed Projects).</p> <p>The responsibility for providing ongoing feedback to the survivor should rest with the GRM FP (who is also the gender anchor/social safeguards officer).</p> <p>When an investigation is concluded, the survivor must be informed first to assess his or her safety before the investigation’s conclusions are communicated to the perpetrator, particularly when sanctions will be taken.</p>

GBV = gender-based violence; SEA = sexual exploitation and abuse; SH = sexual harassment.

a. While most organizations should already have their own intake forms, samples can be found at <http://www.gbvims.com/gbvims-tools/intake-form/>.

b. For example, in the case of reporting to the police, this means explaining “who will interview them, who determines if the case proceeds to court, what happens if a report is made but the police does not press charges, what will happen if the matter proceeds to court (how much will it cost, how long it will take, what the survivor will need to do),” the likelihood that the case will actually proceed to court and/or result in conviction, etc. (USAID 2017: 68 as cited in GMs for SEA/SH in WB- Financed Projects).

Annex 2: Consent Form for Survivors

CONFIDENTIAL

Consent for Release of Information

This form should be read to the survivor or complainant in their first language, after a complete explanation of their options and the GM process

I, _____, give my permission for (**Name of PIU/GRM**) to share information about the incident I have reported to them as explained below. I understand that I am free to consent to all or only one of the options (for example, only to have access to services without consenting to the GM process), or may refuse consent to any option.

1. I give (**Name of PIU/GRM**) permission to share information about my complaint with the service provider(s) I have indicated below. I understand that the information provided will be treated with confidentiality and respect, and will only be disclosed if necessary to enable me to receive assistance I have requested. I retain the right to change my mind at any time regarding the disclosure of information. I would like my information to be communicated to: *(tick the appropriate boxes and specify the name, department and agency/organization, if applicable)*

- Security services / police (specify): _____
- Psychosocial services (specify): _____
- Health / medical services (specify): _____
- Safe place / refuge (specify): _____
- Legal assistance services (specify): _____
- Protective services (specify) : _____
- Livelihood services (specify): _____
- Other (specify type of service, name and organization): _____

1. Authorization to be marked by complainant: <i>(or parent/guardian if complainant is under 18)</i>	Yes	No
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2. I give (**Name of PIU/GRM**) permission to share information about my complaint with the alleged perpetrator's employer so they can initiate the complaint management mechanism. I understand that this will be an administrative process and not a judicial one, and can only give rise to administrative or employment-related penalties against the alleged perpetrator (if any), not criminal penalties. I understand that the GM will not give rise to any compensation or reparation, but that I have the right to seek legal advice or make a report to the police at any time.

I understand that the process will involve an inquiry, and that I will be contacted to provide details of the complaint. I have received detailed information about the GM process, who will contact me, with what purpose and the time frame, and I agree to participate in these steps. I retain the right to change my mind at any time regarding the disclosure of information, and if I do, the process of handling my complaint will be interrupted. The information provided will be treated with confidentiality and with respect, and will only be disclosed if necessary in the process of verifying my complaint.

I understand that if I choose not to pursue the complaint management mechanism (if I underlined "no" below), this means that my complaint will be closed and none of the confidential and/or identifiable information will be shared. This does not affect my rights to access support services.

2. Authorization to be marked by complainant: Yes No <i>(or parent/guardian if complainant is under 18)</i>

3. I have understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

3. Authorization to be marked by complainant: Yes No <i>(or parent/guardian if complainant is under 18)</i>

Signature/Thumbprint of complainant:
(or parent/guardian if the complainant is under 18)

Grievance Focal Point: _____

Date: _____

Agreed contacts with the complainant for all successive interactions, if desired:

Name:

Telephone:

Address:

Other:

Do not attach this consent form directly to a complaint registration form (if one is used); it should be kept separate to ensure the confidentiality of the information provided by the beneficiary. Keep all forms secure and prevent unauthorized access.