

IRRIGATION DEVELOPMENT SUPPORT PROJECT (IDSP)

Grievance Redress Mechanism (GRM) for the IDSP Core Sites

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Executive Summary

The Irrigation Development Support Project (IDSP) Grievance Redress Mechanism (GRM) guides the effective resolution of complaints or grievances raised by stakeholders in connection with IDSP's activities in the project implementation areas. This 2021 update of the IDSP GRM is a living document that articulates the scope and procedural steps for the complaint/grievance handling process and specifies roles and responsibilities of the parties involved. Subsequently, the three main objectives of the IDSP GRM include:

- i. Establishing an efficient, effective, consistent, respectful, transparent and culturally appropriate mechanism for receiving, investigating and responding to complaints from community stakeholders;
- ii. Ensuring proper documentation of complaints and any corrective actions are taken; and
- iii. Contributing to continuous improvement in performance through the analysis of trends and lessons learned.

For the IDSP GRM to effectively achieve the objectives above, it is anchored on guiding principles which are based on the World Bank's six core principles which include fairness in GRM implementation; Objectiveness and independence of the GRM; simplicity and accessibility of the GRM and associated documents; GRM responsiveness and efficiency; and ensuring that all complaints or grievances are handled responsively and efficiently.

Given the foregoing, the GRM is divided into eleven chapters ten (10) of which focus on the scope of the GRM; definition of key terminologies; description of what a GRM is; the GRM procedure; performance monitoring and reporting; confidentiality; conflicts of interest; protection from retaliation; and annexes which comprise registration forms for complaints and grievances.

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Abbreviations and Acronyms

CLT	Community Land Trust
DLO	District Liaison Officer
GRC	Grievance Redress Committee
GRMCs	Grievance Redress Mechanism Committees
GRMs	Grievance Redress Mechanisms
IDA	International Development Association
IDSP	Irrigation Development and Support Program
MoA	Ministry of Agriculture
NPC	National Project Coordinator
PAPs	Project Affected Persons
PDO	Project Development Objective
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RCC	Resettlement and Compensation Committee

1.0 Introduction

The Irrigation Development Support Project (IDSP) is a World Bank funded irrigation infrastructure development project under the Ministry of Agriculture (MoA). The project became effective on November 11, 2011. The initial Project Development Objective (PDO) was to *"Increase yields per hectare and value of diverse products marketed by smallholders benefitting from investments in irrigation in selected project sites"*. During the midterm project evaluation, it was assessed that the PDO in its original form would not likely be achieved. The PDO has since been revised to read: *"to provide improved access to irrigation services in selected sites"*.

So far the project has been restructured twice, that is, in December 2018 (time extension only) and in May 2020 (time and Additional Financing). Following the restructuring, IDSP components were reorganized from four (4) to three (3) namely:

- i. Public Infrastructure Investment;
- ii. Development of irrigation management capacity; and
- iii. Management and Coordination.

The project closing date for the project has been extended from December 15, 2018 to November 30, 2022.

The IDSP is currently being implemented in three Group I sites, namely: Lusitu in Chirundu District of the Lusaka Province, Mwomboshi in Chisamba District of the Central Province and Musakashi in Mufulira District of the Copperbelt Province. Physical infrastructure development of irrigation facilities is vital to the implementation of the project that is targeting over 1500 smallholder farmer households at the irrigation scheme level.

IDSP uses a tier system approach where three types of irrigated plots are combined within each scheme as described below:

- i. Tier I-are small individually farmed plots with a maximum size of 1 ha. The system is designed to deliver water to the farm gate through a pipe network and each farmer has access to a hydrant. The irrigation system in tier I shall be determined by an individual farmer. For purposes of managing water distribution system, pests and diseases, marketing as well as payment for water fees, the tier I farmers shall be organised into sizable groups referred to as Water-User Groups (WUGs);
- ii. Tier II-are somewhat larger plots belonging to individual farmers or small groups of farmers with a size of 1 to 5 ha plots. These will be using sprinkler irrigation systems, and may be linked to the tier III farmer who may also provide support services such as input supply, extension, credit and marketing, etc; and

- iii. Tier III-are large plots of at least 60 ha which will be farmed under centre-pivot or other types of modern irrigation systems. A scheme may have one Tier III farmer or several, depending on the scale and capacity as well as the proposal of the fees payable to the CLT.

This document seeks to build strong relationships between IDSP and the communities in which the project is being implemented to manage the impact of its infrastructure development activities on affected communities. It, therefore, recognises that complaints about IDSP's activities may occur from time to time, especially during the compensation and construction of civil works.

1.1. Purpose

The purpose of this document is to establish the process for addressing complaints raised in connection with IDSP's activities in the project implementation areas. The document describes the scope and procedural steps for the complaint/grievance handling process and specifies roles and responsibilities of the parties involved. It will be revised and updated periodically based on experiences and feedback from stakeholders.

1.2. Objectives

This document has three key objectives and these include:

- iv. Establish an efficient, effective, consistent, respectful, transparent and culturally appropriate mechanism for receiving, investigating and responding to complaints from community stakeholders;
- v. Ensure proper documentation of complaints and any corrective actions are taken; and
- vi. Contribute to continuous improvement in performance through the analysis of trends and lessons learned.

2.0 Scope

This document has been prepared for all stakeholders who are affected by the IDSP's project and activities. The Document will point out a range of issues that are likely to be raised by the Project Affected Persons (PAPs). There are no restrictions on the type of issues a stakeholder may raise under this procedure.

Complaints may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent reasonably possible. All complaints received under this procedure shall be tracked until closed regardless of the process under which they are handled.

Since the project involves the construction of irrigation infrastructure it has resulted in the relocation of certain households including some households losing valuable assets. The anticipated types of grievances that IDSP will handle at the beginning and during project implementation may thus border on:

- i. Compensation for loss of dwelling houses;
- ii. Loss of cropping seasons due to ongoing works;
- iii. Compensation due to crop damage incurred due to ongoing works;
- iv. Boundary disputes; and
- v. Other construction-related impacts and inconveniences.

IDSP reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable with IDSP management, is otherwise malicious or exasperating or concerns a matter for which the IDSP has no mandate, for example, a matter that the government controls.

3.0 Key Terminologies

Table 1 below defines some of the terminologies used in the document.

Table 1: Terms and Definitions

Term	Definition
Complainant	An individual, group or organisation that submits a complaint to IDSP.
Complaint	An expression of dissatisfaction over a matter, typically referring to a specific source of concern and/or seeking a specific solution. For this document, a question or request may also be treated as a complaint.
Grievance	A grievance is therefore a complaint which the GRMC is unable to resolve on their own or with the help of the CLT by explanation and reference to the RAP and any other resettlement implementation guidelines.
Complaint Log	A database for maintaining information about complaints received.
Contractor	An individual or firm that has entered into a contract to provide goods or services or works to IDSP. The term covers parties directly contracted by IDSP and those sub-contracted by another contractor hired by IDSP.
Complaint/Grievance Register	A book/ledger used to capture information on complaints or grievances.

4.0 Description of the Grievance Redress Mechanism (GRM)

Grievance redress mechanisms (GRMs) are methods and processes by which a resolution to a grievance is sought and provided (ADB, 2010). The IDSP Community Grievance Procedure is a significant instrument through which local communities and other stakeholders exercise their voice, it allows stakeholders to raise questions or concerns with IDSP and have them addressed in a prompt and dignified manner. Further, this will also ensure the mitigation and resolution of any negative impact complaints may have on the implementation of the project.

For this purpose, the role of IDSP management is to address all complaints received, regardless of whether they originate from real or perceived issues and whether the complainant is named or anonymous. Any stakeholder that may be affected by IDSP's activities will have access to this procedure at no cost at all. It is important to note that the statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process.

Incidentally, IDSP intends to ensure transparency, integrity, trust and reliability in the process and its outcomes. To this end, IDSP will communicate this procedure clearly and understandably to affected stakeholder groups or individuals. Confidentiality will always be maintained and the IDSP management will take all reasonable steps in protecting the information of affected individuals and parties to avoid any form of retaliation.

4.1 GRM Objectives

The general objective of the IDSP GRM is to facilitate effective communication between IDSP and Project Affected Persons (PAPs) to promote project transparency and accountability.

Specifically, the objectives of the GRM are to:

- i. Provide a cost-effective method for PAPs to report their complaints and/or grievances;
- ii. Resolve disputes relatively quickly before they escalate to an unmanageable level; and
- iii. Generally, mitigate adverse impacts of the project on communities.

4.2 Guiding principles

For the IDSP GRM to be effective, its guiding principles will be based on the World Bank's (Post & Agarwal, 2011) six core principles as outlined below.

- i. **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently.
- ii. **Objectiveness and independence:** The GRM operates independently of all interested parties to guarantee fair, objective, and impartial treatment to each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- iii. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them. Project beneficiaries have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).
- iv. **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances are trained to take effective action upon and respond quickly to, grievances and suggestions.
- v. **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
- vi. **Participatory and social inclusion:** A wide range of project-affected people—community members, members of vulnerable groups, project implementers, civil society, and the media—are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, can access the GRM.

4.3 Types of Complaints and Grievances

A complaint as defined in this document is an expression of dissatisfaction with IDSP activities, typically referring to a specific source of concern and/or seeking a specific solution.

For this document, a question or request may also be treated as a complaint and this may include non-contentious inquiries and clarifications about the project as

well as issues and concerns that emanate due to non-compliance to project processes. These complaints can therefore be categorised into three types namely; Specific, Un-specific (general) and Un-actionable.

In this context, a **Specific Complaint** refers to “a clearly defined or identified complaint”; an **Unspecific (General) Complain** refers to “a vague (not clearly defined/identified) complaint”; and **Un-actionable complaint** which refers to “a complaint whose resolution does not lie within IDSP's mandate”.

Further, a grievance in this document is defined as a complaint which the GRMC is unable to resolve on their own or with the help of the CLT by explanation and reference to the RAP and any other resettlement implementation guidelines. As is the case with complaints, grievances may be categorised into three types namely; Specific, Un-specific (General) and un-actionable.

In this context, the definition of a **Specific Grievance, An Unspecific (General) Grievance**; and **Un-Actionable Grievance** are as defined in the types of complaints paragraph above.

5.0 GRM Procedure

In this document, the GRM procedure starts with the submission of a Complaint by the Complainant to the GRMC. Once a complaint has been logged in, the GRMC records it in the Complaints Register and attempts to address the complaint using existing Safeguards Documents. Should the complaint not be resolved, then it may be upgraded to a grievance. Thus the commencement of the process for grievance resolutions begins at the end of an unresolved complaint. Below is a description of the processes followed in resolving complaints and grievances.

This section, therefore, sets out the process followed for receiving, investigating and resolving complaints and grievances. To enable the GRM to be accessible to all those who wish to send or lodge their complaints, IDSP allows affected people to personally submit complaints and grievances through their respective Grievance Redress Mechanism Committees (GRMCs) at each of the three core sites. The GRMCs are subcommittees of the Community Land Trusts (CLTs) and has a membership of five members elected into office by the community. The five include at least one member of the CLT Executive.

5.1 Procedure for Resolving Complaints

The process to resolve a complaint is initiated by a member of the community when they submit a complaint to the GRMC. The chart below (Figure 1) summarizes the process for managing complaints brought to the attention of the GRMC.

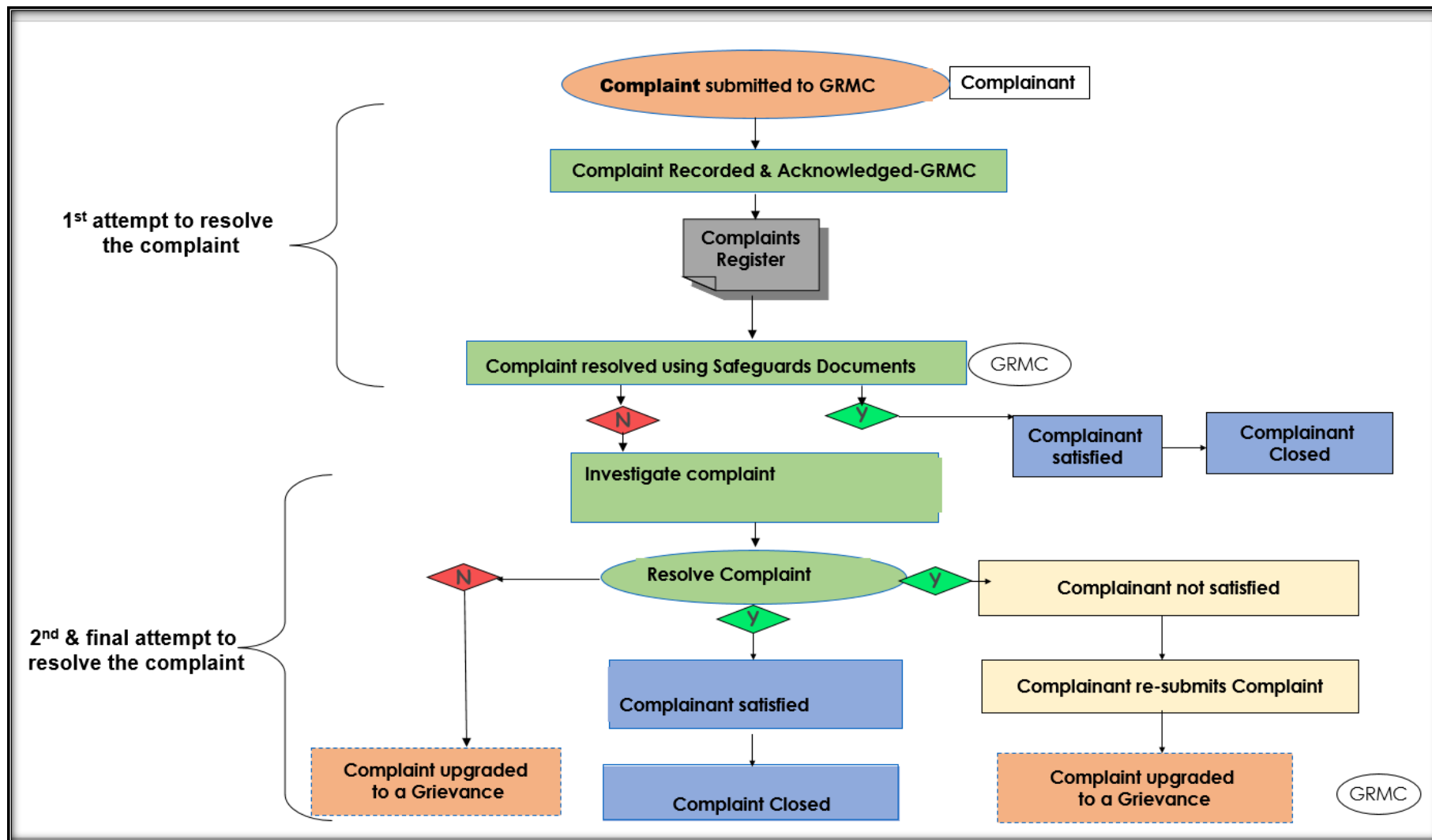


Figure 1: Flow Chart for management of Complaints

5.1.1 Receipt of Complaints

The process of resolving complaints is initiated when a Complainant submits a complaint through GRMC. Upon receipt of the complaint, the GRMC enters the complaint into the Complaints Register and acknowledges receipt of the complaint to the Complainant. If the Complaint is readily resolvable and can be dealt with immediately, using safeguards documents, the GRMC (working with the District Liaison Officer (DLO)) takes action to address the issue directly and records the details in the Complaints Register. If the matter is adequately addressed and the Complainant is satisfied, the GRMC records in the Complaints Register that the matter is closed.

However, if the matter may not be addressed using Safeguards documents the GRMC member will record in the complaints register that a particular complaint is closed and has been upgraded to a grievance. The upgraded complaint will then be recorded in the **Grievance Register** immediately.

On the other hand, should the Complainant not be happy with the efforts made to resolve the complaint, then the Complainant may re-submit the complaint and the GRMC will, in turn, upgrade it to a grievance. Once the upgrade is done, the grievance is recorded in the Grievance register and the process for resolving grievances commences.

5.1.2 Acknowledgement of Receipt of Complaint

Once a Complaint has been received, the GRMC sends a written acknowledgement to the Complainant. The acknowledgement should be made within **10 working days** of receiving the Complaint. The GRMC documents the acknowledgement and reflects it in the Complaints Register.

5.1.3 Investigation of Complaint Received

If the complaint is not resolved by referring to safeguards documents, the Complaint Owner investigates the factual basis for the complaint and proposes options to resolve the issue.

The Complaint Owner may involve third parties in the fact-finding process as required. The identity of the Complainant can only be disclosed to the extent necessary to resolve the issue or as required by law. If the Complainant has specifically requested that their identity should not be disclosed, their personal information may not be shared with third parties unless required by law.

Where possible, IDSP generally seeks to resolve grievances within **15 working days**. The maximum resolution period should not normally exceed 30 calendar days. The GRMC working with the DLO is responsible for providing regular progress reports to the Complainant, including a verbal update on a bi-weekly basis and a written update after 20 to 25 working days depending on the severity of the complaint. If additional time is needed to complete an investigation, the Grievance Owner will notify the GRMC, who in turn will inform the Complainant of the reason for the delay.

When the investigation is complete, the Complaint Owner either resolves the complaint or proposes options for resolving the complaint as appropriate.

5.1.4 Response

The Complaint Owner, GRMC and DLO agree on the response to the Complainant. The response should communicate the findings of the investigations, set out the proposed solution and timelines, and seek feedback from the Complainant.

The Complaint Owner, GRMC and DLO will determine the next steps to be taken based on feedback from the Complainant. If the Complainant accepts the resolution, the complaint will be closed. If the Aggrieved Party does not accept the resolution, the Complainant re-submits the complaint, which is then upgraded to a Grievance by the GRMC. At this point, the Complainant becomes the Aggrieved Party and the grievance is entered in the Grievance register.

5.1.5 Complaint Resolution

If the Complainant accepts the proposed resolution, the agreed actions are implemented. The Complaint Owner is responsible for assigning action parties, actions and deadlines to implement the resolution. These are recorded in the Complaints Register with any supporting documentation. Monitoring arrangements may need to be put in place to verify implementation by both the Complaint Owner and the M&E Specialist.

The Complaint Owner informs the GRMC and DLO once the resolution has been implemented. The GRMC then consults with the Complainant if they are satisfied with the action taken to resolve their complaint. If they are, the complaint is closed. If the Complainant is not satisfied, the Complaint is upgraded to a Grievance.

5.1.6 Close Out

A Complaint is closed out when no further action can be or needs to be taken to resolve it.

Closure status is classified in the Complaints Register as follows:

- i. **Resolved:** Complaints where a resolution has been agreed and implemented and the Complainant is satisfied with the action taken.
- ii. **Unresolved:** Complaints where it has not been possible to reach an agreed resolution and the case has been closed.
- iii. **Abandoned:** Complaints, where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts, have been unsuccessful.

The GRMC, working with the DLO, is responsible for updating the Complaints Register and the logistics associated with closing out the case. At the end of a case, regardless of whether an agreement was achieved, the GRMC will seek feedback from the Complainant on their level of satisfaction with the complaint handling process and its outcome.

5.2 Procedure for Resolving Grievances

A grievance is triggered when either the GRMC is unable to resolve a complaint or the Complainant is not satisfied with the attempts made to resolve the complaint. At this point, the complaint is upgraded to a grievance and the procedure to resolve grievances is triggered.

The chart below (*Figure 2*) summarizes the process for managing complaints brought to the attention of the GRMC.

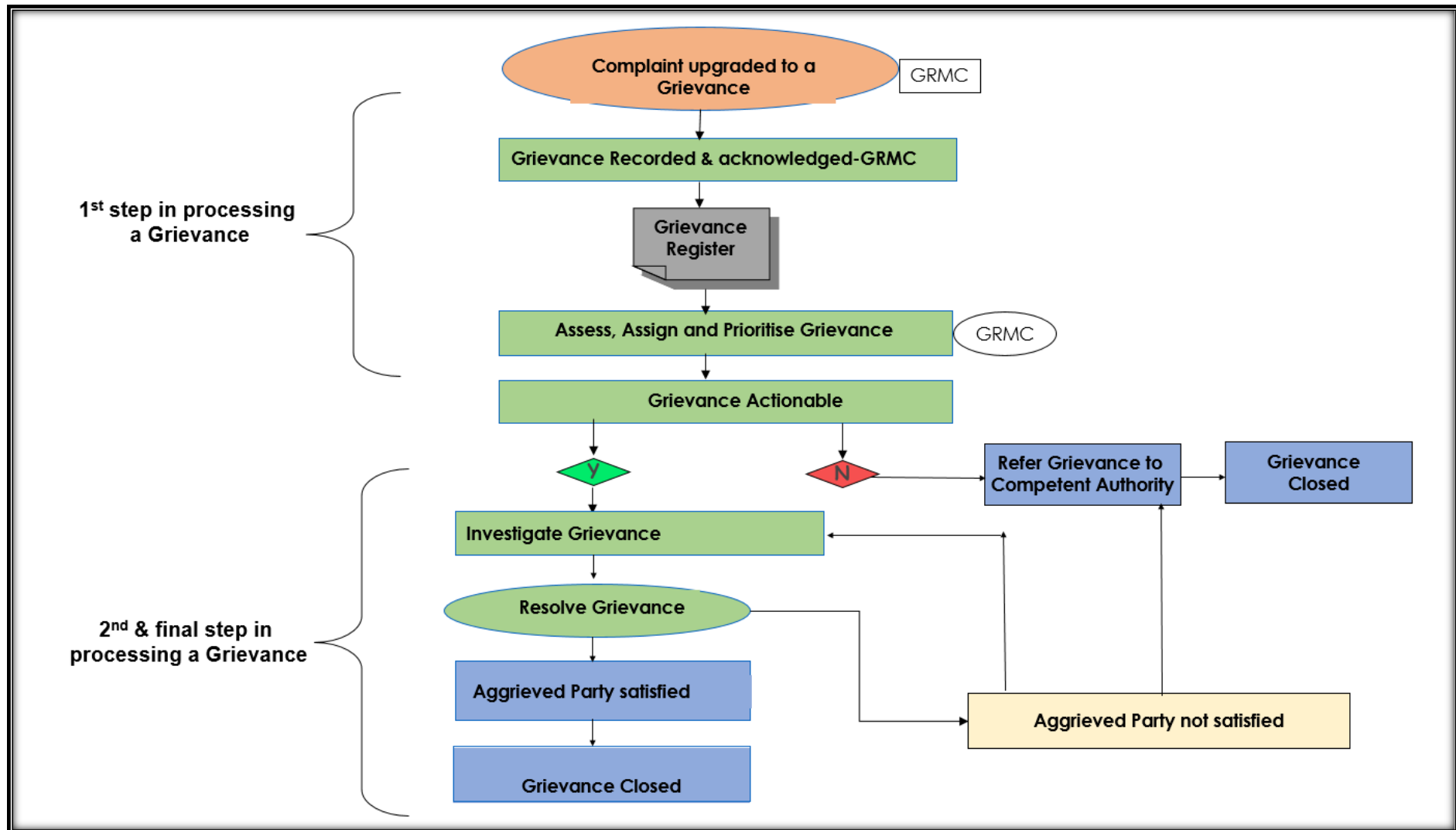


Figure 2: Flowchart for management of Grievances

5.2.1 Upgrading of Complaint to a grievance

The procedure to resolve a grievance is initiated when a complaint is upgraded to a grievance by the GRMC. The three circumstances under which a complaint may be upgraded to a grievance includes:

- i. If the complaint cannot be resolved by referring to the existing safeguards documents (RAP, resettlement guidelines and any other applicable documents);
- ii. If efforts made to resolve the complaint do not result in resolving the complaint;
- iii. If the Complainant is not satisfied with the resolution made from efforts to resolve the complaint.

If the Complaint is not readily resolvable as outlined above, the GRMC enters the grievance in the Grievance Register. Details of the information to be reflected when entering a grievance are as reflected in annexe 11.2 of this document. Even at this point, Aggrieved Parties still have an option to have the Complaint treated on an anonymous basis should that be their preference.

5.2.2 Acknowledgement of Grievance

Once a grievance has been upgraded and entered in the Grievance Register, the GRMC sends a written acknowledgement to the Aggrieved Party. The acknowledgement should be made within **10 working days** of entering the grievance in the Grievance Register. The GRMC documents the acknowledgement and reflects it in the Grievance Register.

5.2.3 Assess, Assign and Prioritise

The GRMC, in consultation with the DLO, makes an initial assessment of severity and assigns the Grievance to a **Grievance Owner**. The GRMC and the Grievance Owner agree on timelines for investigations and any follow-up actions. The GRMC, in conjunction with the DLO, provides access to all relevant documentation to the Grievance Owner.

For Grievances regarding issues for which a more appropriate IDSP process already exists, the GRMC shall refer the matter to the appropriate process owner for further action. This will typically be the case for grievances to contractual or commercial issues; industrial relations and employee relations; business integrity or criminal matters; and issues subject to current or pending litigation. The GRMC updates the Grievance Register (Records) as appropriate.

5.2.4 Investigate

The Grievance Owner investigates the factual basis for the Grievance and proposes options to resolve the issue.

Where applicable, the Grievance Owner may involve third parties in the fact-finding process as required. The identity of the Aggrieved Party may only be disclosed to the extent necessary to resolve the issue or as required by law. If the Aggrieved Party has specifically requested that their identity not be disclosed, their personal information may not be shared with third parties unless required by law.

Where possible, IDSP generally seeks to resolve grievances within 15 working days. The maximum resolution period should not normally exceed 30 calendar days. The GRMC working with the DLO is responsible for providing regular progress reports to the Aggrieved Party, including a verbal update on a bi-weekly basis and a written update after 20 to 25 working days depending on the severity of the grievance. If additional time is needed to complete an investigation, the Grievance Owner will notify the GRMC, who in turn will inform the Aggrieved Party of the reason for the delay. When the investigation is complete, the Grievance Owner documents the findings and proposes options for resolving the Grievance as appropriate.

5.2.5 Response

The Grievance Owner and DLO agree on a response to the Aggrieved Party. The response should communicate the findings of the investigations, set out the proposed solution and timelines, and seek feedback from the Aggrieved Party.

The Grievance Owner and DLO will determine the next steps to be taken based on feedback from the Aggrieved Party. If the Aggrieved Party accepts the resolution, the IDSP will proceed to implement an action/actions to resolve the grievance. If the Aggrieved Party does not accept the resolution, alternative actions will be considered with the engagement of the Aggrieved Party until an amicable resolution is reached. However, should it be realised that the intricacies of the grievance demand attention outside of the IDSP's mandate, even at this stage, the grievance will be escalated to the competent authority.

5.2.6 Resolution

If the Complainant accepts the proposed resolution, the agreed actions are implemented.

The Grievance Owner is responsible for assigning action parties, actions and deadlines to implement the resolution. These are recorded in the Grievance Register with any supporting documentation.

The Grievance Owner informs the GRMC once the resolution has been implemented and seeks feedback from the Aggrieved Party on whether or not they are satisfied with the action taken to resolve the grievance. If the Aggrieved Party is satisfied, then the grievance is closed and the GRMC is up-dated as such. Should the Aggrieved Party not be satisfied with the action taken to resolve the grievance, the Grievance owner engages the Aggrieved Party to consider how best the grievance may be resolved. The agreed actions will then be re-implemented again to the satisfaction of the Aggrieved Party within reasonable limits.

5.2.7 Closing a Grievance

A Grievance is closed when no further action can be or needs to be taken to resolve it. Closure status is classified in the Grievance Register as follows:

- i. **Resolved:** Grievances where a resolution has been agreed and implemented and the Aggrieved Party is satisfied with the action taken.
- ii. **Unresolved:** Grievances where it has not been possible to reach an agreed resolution and the case has been closed out.
- iii. **Abandoned:** Grievances, where the Aggrieved Party is not contactable after one month following receipt of the grievance and efforts to trace their whereabouts, have been unsuccessful.

The GRMC, working with the DLO, is responsible for updating the Grievance Register and the logistics associated with closing out the case.

At the end of a case, regardless of whether an agreement was achieved, the GRMC will seek feedback from the Aggrieved Party on their level of satisfaction with the grievance handling process and its outcome.

5.3 GRM Hierarchy

5.3.1 GRM Hierarchy for Complaint Handling

The GRM hierarchy emphasises that prevention of complaints through proactivity ("preventing/avoiding complaints") is the most preferred method to manage the complaint. This is an ongoing process for sustainability. However, should there be unavoidable activities that may result in complaints or grievances, the minimisation of such activities is the next best possible option. Having endeavoured to prevent/avoided and minimise complaints, arising complaints ought to be addressed effectively and efficiently. According to the GRMC hierarchy adopted in this document, choosing to upgrade a complaint to a grievance is the least preferred option only to be taken if all else fails.

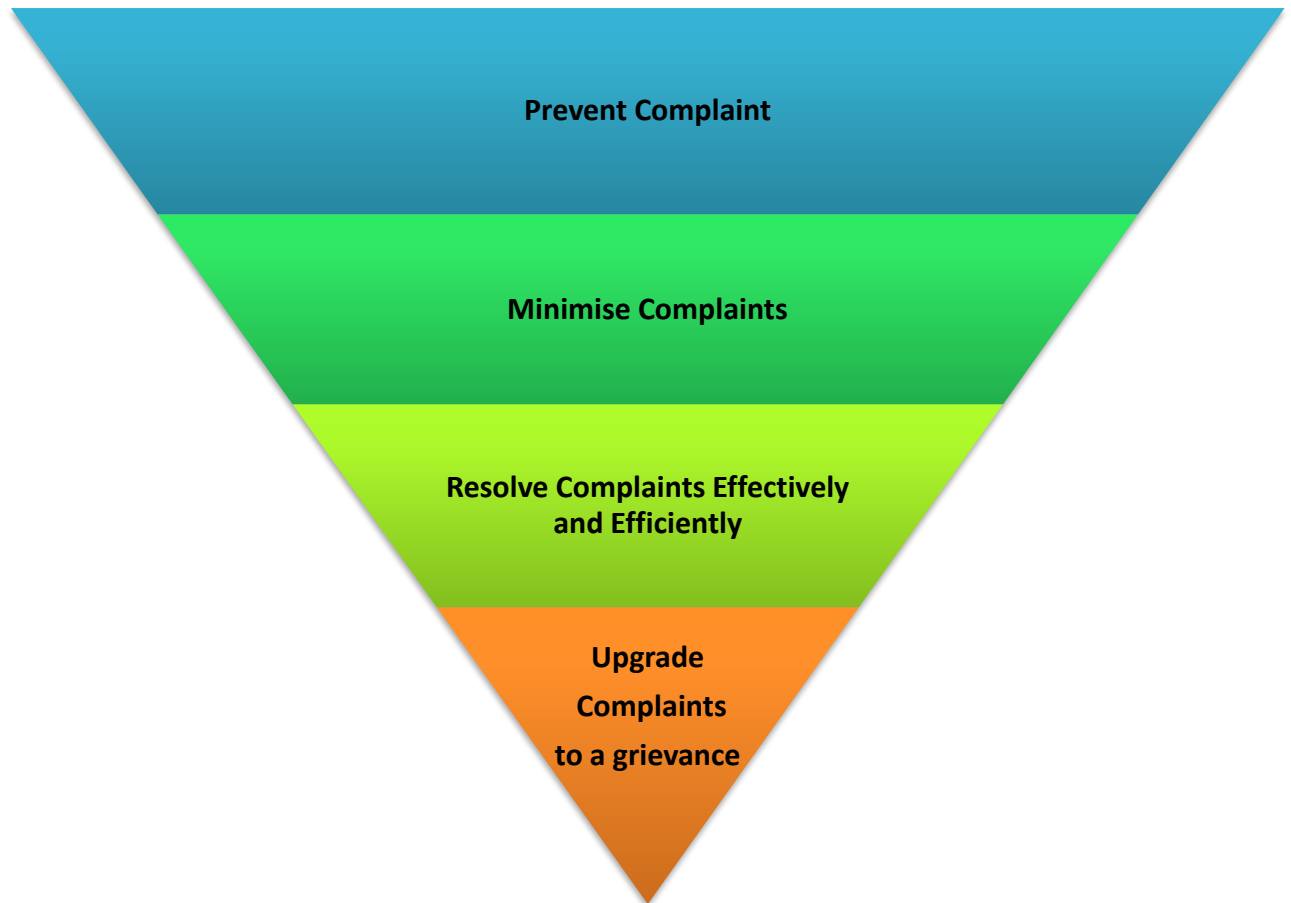


Figure 3: Hierarchy for Complaint Handling

5.3.2 GRM Hierarchy for Grievance Handling

The GRM hierarchy in this document emphasises on prevention of grievances (through the effective and efficient resolution of complaints) as the most preferred method to manage grievances. As is the case in the Hierarchy for complaints handling, this approach is an ongoing process for sustainability. However, should there be unavoidable incidences where a complaint has to be escalated to be a grievance; minimisation of such instances through investigations of options before up-grading of complaints is the next best possible option. Having endeavoured to prevent/avoided and minimise grievances, the un-avoidable grievances ought to be addressed effectively and efficiently. According to the GRMC hierarchy adopted in this document, leaving a grievance un-resolved and/or abandoning a grievance is the least preferred option only to be taken if all else fails.

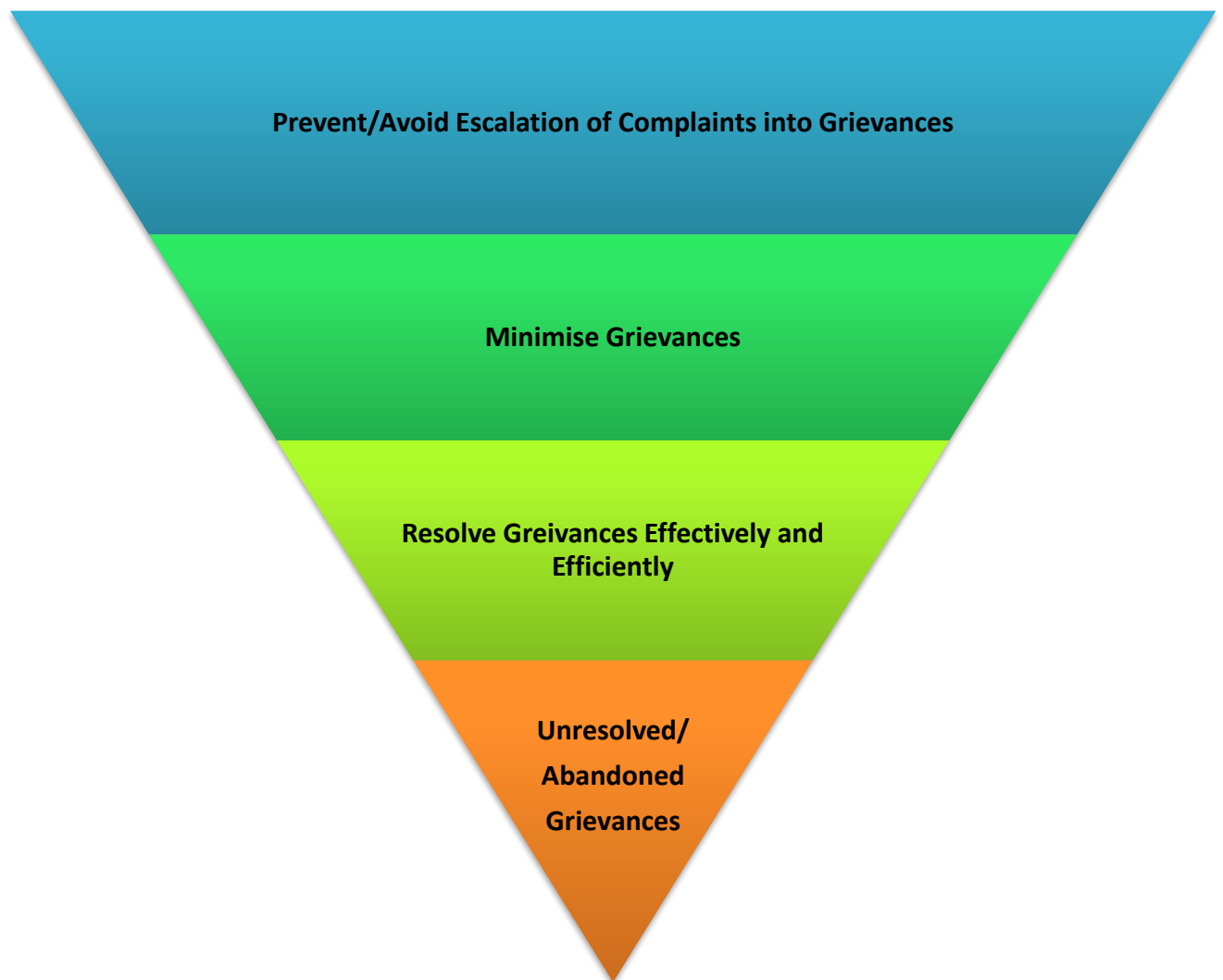


Figure 4: Hierarchy for Grievance Handling

5.4 Grievance Redress Composition

At each of the three IDSP Core Sites (Lusitu, Musakashi and Mwomboshi), the overarching leadership within the community is the leadership of the Community Land Trusts (CLTs). This is a legal entity with a membership of ten (10) Community representatives elected into office by the community members. The CLT is an entity that holds title to land on behalf of the community. Further to holding title, the CLT generally executes leadership roles related to the irrigation schemes at each of the sites.

One of the key sub-committees of the CLT Executive Committee is the Grievance Redress Mechanism Committee (GRMC). The GRMC comprises at least one member of the CLT Executive and utmost four (04) representatives from the affected communities.

5.5 Grievance Redress Roles and Responsibilities

Roles and responsibilities under this Procedure are as depicted in Table 2 below.

Table 2: Roles and responsibilities of different stakeholders

Role	Responsibility
Safeguards Specialist & M&E Specialist	Accountable for the implementation of this procedure.
Grievance Redress Committee under the Community land Trust (CLT)	Responsible for receiving the complaint and assess its severity. The complaint regardless of its magnitude should be registered in the complaint log and submitted to the Liaison officer for record-keeping and further action where necessary.
Liaison Officer	Responsible for coordinating the response to a Complaint and serving as the main point of contact with the Complainant. This includes receiving and reporting Complaints, maintaining the Complaints Log, supporting the resolution of Complaints; and liaise with the Complainant.
Complaint Owner	Responsible for investigating and resolving a complaint. This includes conducting investigations, proposing resolutions, implementing corrective actions and coordinating with the Liaison Officer and other parties. The Complaint Owner will usually be the specialist with the complaint.
National Project Coordinator	Responsible for reviewing escalated complaints and authorizing additional actions to be taken. This includes reviewing overdue or escalated complaints, authorizing additional actions, and approving the closing of complaints where it is not reasonably possible to reach an agreed resolution with the complainant.

6.0 Performance Monitoring and Reporting

Monitoring and evaluation are critical to the success of any GRM. Monitoring in this aspect refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them (Post & Agarwal, 2011).

The M&E Specialist will be responsible for gathering and reporting aggregated performance monitoring data under this Procedure. Key performance indicators (KPIs) will be collected to enable the IDSP to analyse trends in complaints received and identify underlying systemic issues. The M&E Specialist is responsible for making recommendations for changes to IDSP policies or practices based upon ongoing learning from Complaints. Management of documentation is critical and will be conducted throughout the procedure and maintained in the project database.

7.0 Confidentiality

7.1 Duty of Confidentiality

IDSP is committed to protecting the identity of the Complainant and handling personal information in accordance with legal requirements. This duty extends to all employees, representatives of IDSP and Contractors who participate in the complaint handling process.

Information about a Complaint will be shared within the IDSP on a need-to-know basis and only to the extent necessary to complete a step under this Procedure. IDSP will not share personal information with third parties unless required by law or authorised by the Complainant.

7.2 Personal Data

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period according to IDSP's or Ministry's Data Privacy Policy.

8.0 Conflicts of Interest

A conflict of interest exists where there is a divergence between the interests of an employee or Contractor and his or her responsibilities under this Procedure, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her interests.

This procedure seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the complaint handling process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a Complaint relates to a specific IDSP or Contractor employee, that person shall not play a role in the complaint handling process.

9.0 Protection from Retaliation

Retaliation is any adverse action taken against a Complainant, employee or Contractor whose purpose is to frustrate the operation of this Procedure. IDSP will not tolerate such conduct. When concerns about retaliation or victimisation are raised, they will be investigated under IDSP's Code of Conduct procedure.

10.0 References

- ADB. (2010). Designing and implementing Grievance redress mechanisms: A Guide for Implementors of Transport Projects in Sri Lanka. In Office. <http://www.adb.org/documents/reports/grievance-redress-mechanisms/grievance-redress-mechanisms.pdf>
- Post, D., & Agarwal, S. (2011). *Feedback Matters : Designing Effective Grievance Redress, Part 1. Part 1: The Theory of Grievance Redress.*

11.0 Annexes

11.1 Complaint Registration Form

District Name:.....

Site Name:.....

Date:.....

No.	Date Received	Received by	Name of Complainant	Brief Description of Concern	¹ Specified, General (Unspecified) or Un-actionable?	Responsible Unit or Contractor	Complaint Owner	Closure Status (Resolved, Unresolved or Abandoned)

¹ If complaint is general, unspecified or un-actionable, malicious or exasperating in nature, IDSP may refer it to other relevant institutions for its resolve.

11.2 Grievance Redress Registration Form

District Name:.....

Site Name:.....

Date:.....

No.	Date Received	Received by	Name of Aggrieved Party	Brief Description of Grievance	² Specified, General, (Unspecified) or Un-actionable?	Responsible Unit or Contractor	Grievance Owner	Closure Status (Resolved, Unresolved or Abandoned)

² If complaint is general, unspecified or un-actionable, malicious or exasperating in nature, IDSP may refer it to other relevant institutions for its resolve.