



THE DIGITAL MALAWI ACCELERATION PROJECT

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GRIEVANCE REDRESS MECHANISM MANUAL

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ACRONYMS AND ABBREVIATIONS

ACB	Anti-Corruption Bureau
CGRC	Community Grievance Redressal Committee
CLA	Customary Land Act
CLB	Cutomary Land Board
CLC	Customary Land Commitee
CLT	Customer Land Tribunal
CSO	Civil Society Organisation
DFS	Digital Financial Services
DLT	District Land Tribunal
DMAP	Digital Malawi Acceleration Project
DPI	Digital Public Infrastructure
DPD	Director of Planning and Development
DoA	Director of Administration
EO	Environmental Officer
ESF	Environmental and Social Framework
ESMP	Environme ntal and Social Safeguards Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental Standards Specialist
GBV	Gender Based Violence
GRC	Grievance Redressal Committee
GRM	Grievance Redress Mechanism
IC	Integrity Commitee
ICT	Information Communication Technology
LCGRC	Local Council Grievance Redressal Committee
LMP	Labour Management Plan
MoID	Ministry of Information and Digitalisation
MACRA	Malawi Communications Regulatory Authority
MAREN	Malawi Research and Education Network
MDA	Ministries, Departments and Agencies
PAPs	Project Affected Persons
PIU	Project Implementation Unit
PIC	Public Institution Connectivity
PPE	Personal Protective Equipment
PPPC	Public Private Partnership Commission
PGRC	Project Grievance Redressal Committee

SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SH	Sexual Harassment
SSS	Social Standards Specialist
TA	Traditional Authority
VDC	Village Development Committee
WB	World Bank
WGRC	Workers Grievance Redressal Committee

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1.0 INTRODUCTION

1.1 Background Information

The Ministry of Information and Digitalisation (MoID) through the Public Private Partnership Commission (PPPC) is implementing the Digital Malawi Acceleration Project (DMAP) with financial and technical support from the World Bank (WB).

The overall aim of the DMAP is to increase access to, and inclusive use of, the internet and to improve the government's capacity to deliver digitally enabled services. The project has four components, with each component further divided into sub-components. The components are briefly described as follows:

- i. **Component I – Affordable broadband and secure data hosting.** This component focuses on expanding essential, high-quality, resilient, and affordable broadband infrastructure and services while supporting investment in secure data infrastructure and the development of cloud and data hosting markets. Activities under this component aim to strengthen institutions and help drive private investment in telecom networks and data hosting facilities, which are key foundations for using digital technologies and data productively.
- ii. **Component II – Interoperable and secure data platforms.** This component will focus on deploying interoperable Digital Public Infrastructure (DPI) to enhance efficiencies in both the public and private sectors, strengthening institutions, and developing the cross-cutting enablers and digital safeguards needed to promote trusted and safe use of digital technologies and digitally enabled services at the national level and across borders.
- iii. **Component III – High-impact digital services and productive digital usage.** This component focuses on (a) advancing digitally enabled applications and services, which can potentially have a high impact on economic and social activities (prioritizing social protection, education, Digital Financial Services (DFS), and climate-related applications in the initial phases); (b) increasing digital and financial literacy to support general uptake of digital services; (c) strengthening digital skills and competencies among citizens, businesses, and the public sector; and (d) developing a digitally enabled entrepreneurial ecosystem to increase productive usage and the development of these services.
- iv. **Component IV – Project Management.** This Component will support the critical building blocks for strong implementation, learnings, and coordination of the Program at regional and national levels, and provide funding for strategic communications and partnerships, monitoring and evaluation activities as well as funding for audits, logistics and operational overheads.

1.2 Grievance Redress Mechanism for DMAP

The implementation of DMAP has the potential to negatively impact the public, businesses and institutions in different ways. The Project identified negative environmental, social, safety and health impacts through its Environmental and Social Management Framework (ESMF) and Resettlement

Policy Framework (RPF) that can affect different stakeholders. In addition to these impacts, the project can impact the public and institutions through its processes including those of procurement and financial management as well as from poor governance. The World Bank through its Environmental and Social Framework (ESF) requires projects to implement Grievance Redress Mechanism (GRM) to provide a platform for reporting and redressal of grievances. A GRM is defined as an accessible and inclusive system, process, or procedure that receives and acts upon complaints, queries, inquiries and suggestions for improvement in a timely fashion, and facilitates resolution of concerns and grievances arising in connection with a project. An effective GRM provides affected parties with redress and helps address issues at an early stage. When effectively implemented, a GRM will improve overall project performance. This GRM Manual is designed based on understanding of the issues that are likely to be the subject of concerns and grievances related to the DMAP.

1.3 Rationale for GRM

Grievances, concerns and problems are inevitable during project implementation and an effective mechanism is needed to address them promptly. Failure or delays to resolve the grievances and concerns can derail the implementation of the project. GRM is therefore established to:

- Provide a predictable, transparent, credible process to all project affected people (PAPs) and other interested groups resulting in outcomes that are seen to be fair, effective and sustainable
- Enhance mutual communication and stakeholder engagement, encouraging interaction among all parties involved and interested in the project
- Build trust as an integral component of broader community relations
- Enable more systematic identification of emerging issues and trends, facilitating corrective actions and pre-emptive engagement
- Deter project related fraud and corruption
- To enhance the legitimacy of the project amongst stakeholders

1.4 Objectives of the DMAP GRM

Grievances are useful indicators of a project's performance. A high number of grievances may point to a need to adjust work practices or procedures in order to mitigate adverse impacts or conflicts with the public. The objectives of this GRM are to:

- i. Provide an accessible process to receive grievances, dissatisfaction, concerns or feedback from project affected people (or those likely to be affected) and the general public on project design and implementation.
- ii. Provide procedures for resolving and addressing project related grievances and concerns.
- iii. Facilitate effective communication between the project and affected persons and other stakeholders.

- iv. To be responsive to the concerns and complaints of project beneficiaries and interested and affected parties; and to address and resolve their grievances.
- v. To promote transparency and accountability throughout the implementation of the DMAP by providing a conduit/channel for soliciting inquiries and inviting suggestion from the relevant stakeholders including project beneficiaries.
- vi. To promote relations between the project implementers, executers and beneficiaries thereby creating a sense of ownership.
- vii. To give a voice to the marginalised and promote inclusion.

1.5 GRM Manual

The World Bank as well as the Government of Malawi recognise that successful implementation of projects requires a well-developed Grievance Redress Mechanism (GRM) which is effectively implemented to address grievances. This GRM Manual has therefore been prepared to describe the procedures, systems and principles to be followed by the Project Implementation Unit (PIU), Grievance Redressal Committees (GRCs) and project affected and interested parties to lodge, receive and address grievances such as complaints, concerns queries, clarifications, suggestions and feedback related to the DMAP. The manual describes how complaints will be received, assessed, sorted and resolved; and how this entire process will be monitored. It also indicates the timelines for milestones to be achieved during grievance processing and provides tools for implementation.

Therefore, all personnel charged with responsibilities in the implementation of the DMAP shall be required to adhere to the procedures and guidelines set forth in this manual.

1.6 Potential Users of this GRM Manual

The GRM will be used by those who have an interest or are affected by the DAMAP implementation activities. The GRM can be accessed either individually or collectively as a group by persons, institutions or communities.

The potential users of this GRM manual include but not limited to the following:

- a) PIU and its implementing partners
- b) DMAP beneficiaries (institutions and personnel (including students))
- c) Contractors
- d) Contractor workers/ labourers
- e) Local Councils
- f) Lead Ministry, Departments and Agencies (MDAs)
- g) Consultants
- h) Project workers
- i) PAPs (Individuals, Institutions and communities); and other interested stakeholders

2.0 PRINCIPLES FOR EFFECTIVE GRM

A GRM is set up to receive and act in a timely manner upon grievances which will be received from different stakeholders including the marginalised and vulnerable people. To ensure that grievances are received from and harmoniously addressed to the satisfaction of all aggrieved persons, communities and institutions, a set of guiding principles has been included to guide the design and implementation of the GRM to ensure its effectiveness. These principles will be used to evaluate the performance of this GRM. The following principles provide a framework to redress grievances arising from implementation of the DMAP.

2.1 Accessibility

The GRM should be accessible to PAPs, other interested parties and vulnerable groups who wants to lodge a complaint or provide feedback. It should take into consideration potential barriers such as language, literacy, awareness, cost or fear of reprisal and seek to address them. The Grievance Redress Committees (GRCs) shall be established and capacitated at the project, local council and community levels to make it accessible.

2.2 Predictability

GRM shall should have clear procedures with time frames for each stage and should present the results to be expected.

2.3 Fairness

GRM procedures should be as fair as possible, especially in terms of access to information and opportunities, for meaningful participation in the final decision.

2.4 Rule of Law

Outcomes of the GRM should be consistent with the Malawi Constitution, laws and international standards on human rights. The GRM should not restrict access to other redress mechanisms that the communities and PAPs have access to or decide to access.

2.5 Transparency

GRM procedures and outcomes should be widely publicized to all concerned. All supporting documents of meetings needed to achieve resolution should be part of the file related to the complaint.

2.6 Capability

GRM should be provided with the necessary technical, human and financial resources to facilitate the grievance mediation process.

2.7 Feedback

GRM should serve as a means to channel citizens' feedback to improve project outcomes for the people.

2.8 Human dignity

GRM should recognize the inherent dignity and the equal and inalienable human rights of all individuals.

2.9 Equity and justice

GRM should recognize that equality between individuals may require acknowledging their differences and taking positive action, including empowerment, to balance their powers and ensure that women, men, youth, the vulnerable and marginalized people have equal access to information, and expertise for redressing grievances and acceptable resolution.

2.10 Gender equality

GRM should ensure equal rights of women and men to the enjoyment of all human rights, while acknowledging differences between women and men and taking specific measures to accelerate de facto equality when necessary.

2.11 Accountability

GRM should hold individuals, leaders and decision makers and duty bearers responsible for their actions and decisions according to the principles of the rule of law. Accountability should build stakeholder trust and assure the parties to a grievance process of its fair conduct.

2.12 Appeal

Where the complainant does not accept the mediation option or if he/she does but a resolution agreement is not reached and all the grievance resolution levels are exhausted, the complainant may seek redress through the courts of law or other mechanisms available at the country level.

2.13 Consensus and negotiations

The GRM should engage regularly with affected stakeholder groups on the GRM's design and performance. This can help to ensure that it meets their needs, that they will use it in practice, and that there is a shared interest in ensuring its success.

3.0 LIKELY GRIEVANCES ON THE DMAP

The implementation of the DMAP is expected to receive grievances from the PAPs, other interested parties and vulnerable groups as well as project workers (direct, contracted and primary suppliers). The Stakeholders Engagement Plan (SEP) for DMAP will provide the GRM process for PAPs, other interested parties and vulnerable groups while the Labour Management Plan (LMP) will address DMAP's Workers GRM.

3.1 Likely grievances from PAPs, other interested parties and vulnerable groups.

Likely grievances that may come from the PAPs, other interested parties and vulnerable groups may include:

a) Procurement related grievances

This project involves the procurement of contractors, consultants, goods and services to undertake implementation work under the relevant sub-pillars. It is expected that some PAPs may not be satisfied with the outcome of the procurement processes and may lodge a complaint. Other allegations such as political interference in the procurement process may also be reported. Examples may include grievances from unsuccessful bidders regarding bidding procedures, delays in awarding contracts, delayed payments for goods and services.

When the project receives a procurement related grievance, it will be referred to procurement section to assess the admissibility of the complaint and provide remedy based on the procurement regulations and guidelines.

b) Compensation related grievances

This applies when an individual or communities lose land or other assets to the project intervention including from property damage. Individuals or communities may lose their access to livelihood activities such as businesses. These issues may require compensations to affected parties. Other related grievances may include discrimination in compensation, inadequate compensation, and delayed remittance of compensation money.

When the DMAP receives land-related grievances, the issue will be referred to existing Land Tribunals established under the Customary Land Act (CLA) of Malawi for resolution.

c) Corruption (bribes, nepotism and favouritism).

Allegations of corruption in all its forms may arise during the project implementation. These allegations may be reported to the committees established under DMP. Such issues will be referred to PPPC Integrity Committee (IC) for mediation and remedy. The complainants may approach the law enforcing

agencies such as the Police and Anti-corruption Bureau (ACB) if they decide to do so. Corruption grievances may include flouting procurement procedures, misuse of project funds etc.

d) Theft of project properties

Allegations of theft may arise at all levels in the course of project implementation. These grievances may be reported through the committees established under the project or referred to law enforcement agents. Grievances can be lodged in cases where project workers have their personal belongings stolen at the work site, theft of institutional properties and theft of contractor equipment at the institution.

e) Environmental pollution related grievances

Concerns may be raised regarding the air, soil, land and water pollution, uncontrolled ground clearing, waste management, dust and noise pollution, open trenches with stagnant water, siltation of drains and water bodies during the implementation of this project. Such issues shall be reported, investigated, and mitigated accordingly.

f) Property damage

There may be cases of institutional or contractor's property damage caused by workers, beneficiary workers and people within the work site. Activities such as drilling, excavations, height work can cause damages on ceilings, walls and on equipment. Aggrieved institutions, workers and contractors can lodge a grievance to relevant committees to ensure the property is replaced or restored to former state.

g) Project enquiries and feedback

Beneficiaries and stakeholders can provide positive and negative feedback about the project that may not be grievances. This feedback is useful for improving project delivery to achieve the expected outcomes. The GRM will also receive enquiries related to the project status and progress and on any other relevant issues.

3.2 Likely grievances from project workers

These may include:

a) Breach of contract

Grievances may arise in the course of contract execution. This may include breach of contract clause by either the contractor or the project, poor workmanship, delayed as well as incomplete works. Other forms of the complaint may include lower wage, delayed payment of wages, unfair dismissal from work and long working hours/poor working conditions.

h) Incidences of social ills such as Gender Based Violence (GBV) Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Child Labour

Social ills such as GBV, SEA SH and Child labour may emerge during the implementation of the project. For sensitive grievances such as these, the survivor centric approaches shall be applied. Unless there is a need for mandatory reporting, it is the survivors' choice to decide whether or not to report the case to the police and other competent bodies on the subject matter such as NGOs or service providers who are experienced in handling such cases. If the survivor opts to report the issue through project's GRM channel, the case will be handled in strict confidentiality while ensuring anonymity.

i) Safety related grievances

Grievances related to site accidents, occupation injuries, risk of fire, lack of Personal Protective Equipment (PPE) and community safety issues may be raised during the implementation of this project. These issues shall be investigated and resolved promptly.

3.3 Management of Land-Related and other Grievances

The implementation of DMAP may lead to land-related grievances. When such cases arise, stakeholders in this project are encouraged to use existing Land Tribunals established under the Customary Land Act (CLA) of Malawi. The committees under Land Tribunals are established to operate at group village head, traditional authority (T/A), district, and national levels. The committees are as follows:

a) Customary Land Committee (CLC).

This manages grievances at the level. Group village head for the area chairs the committee. The Land Clerk is the secretary to the committee. The other members are six in total elected by and from within the community, at least three of whom are women. This is the entry point of all land disputes. A person aggrieved by a decision of a CLC may appeal to the Customary Land Tribunal.

b) Customary Land Tribunal (CLT)

This manages grievances at the TA level. The TA for the area chairs the committee. The other members are six members in total nominated by the TA and approved by the Commissioner of Lands, at least three of whom are women. A person aggrieved by a decision of a CLT may appeal to the District Land Tribunal.

c) District Land Tribunal (DLT).

This manages grievances at the district level. The District Commissioner (DC) responsible for the district chairs the committee. The other members are up to three TAs, three reputable persons that come from and reside in the district, two of whom are women. The District Land Registrar is the secretary. An appeal from a DLT is heard by the Central Land Board.

d) Central Land Board (CLB).

This manages grievances from the DLT. A magistrate presides over the proceedings of the board. The other members are three TAs, one from each region of Malawi, one of whom is a woman, and two other members with good standing in the society, one of whom is a woman. Members of the CLB are appointed by the Commissioner of Lands, with the approval of the Minister.

4.0 DMAP GRM INSTITUTIONAL FRAMEWORK

4.1 GRM FRAMEWORK

The DMAP shall set up a three tier GRM structure for timely and effective resolution of project related grievances. This GRM will adopt a cascade model where grievances will be managed through GRCs.

These committees shall consist of (1) Project level Grievance Redress Committee (PGRC) at national level (highest) (2) the Local Council level Grievance Redress Committee (LCGRC) at the City/Municipal/District level (Middle) and (3) the Community level Grievance Redress Committee (CGRC) (lowest level). There will also be a separate Workers Grievance Committee (WGRC) for work or labour-related grievances.

A grievance may be lodged at WGRC, CGRC, LGRC or PGRC depending on where the grievance has emerged. However, the same grievance cannot be lodged simultaneously at different GRCs. A grievance can only be referred to a higher committee (middle or highest level GRCs) through an appeals process. If the grievance remains unresolved by the GRCs, the complainant has a right to seek redressal from law enforcement agencies such as Ombudsman and the court of law.

4.2 GRCs

The GRCs should always have representation of the youth and women to ensure accessibility. Women should be included in the committee, with at least 30% representation. Committee members should be the ones who are willing to devote their time to attend to the GRM function. The selected committee members should be trustworthy and reputable.

The GRCs will conduct meetings as and when required by the GRM processes. The chairperson of the committee shall preside over and maintain due and proper conduct of meetings and ensure that the rules and regulations of the committee sets for its operation are properly administered at all times. In the absence of the chairperson, an interim chairperson will be nominated and duly seconded to preside over the meeting. The secretary of the committee will be responsible for calling meetings, taking minutes, circulating the duly signed copy of the minutes and filing the minutes. The quorum at any meeting of the committee shall be 50% of the members of the committee eligible to attend the

meeting. The committee shall always enforce transparency and accountability in the conduct of its affairs.

4.2.1 CGRC

The CGRC will be established within the communities (at the TA Level) where the DMAP will be implementing its various sub-components across the country. Some of the required work, specifically the installation of optic fibre, will be undertaken along the road reserves and may impact on the surrounding communities. The CGRC will be established within these communities to cater for grievances that may arise from these areas.

4.2.1.1 Terms of Reference for CGRC

The election of the CGRC members shall follow democratic principles. The local leaders (chiefs, councillors) shall not be allowed to be members of this committee. Instead, they should play an oversight and advisory role. The committee shall update the local leaders and members of the community on the grievances they are handling, and the resolutions made. The committee shall meet within five working days upon receiving a grievance concerning the DMAP activities. It has a maximum of 14 days to hear and resolve the grievance at that level.

4.2.1.2 Membership Composition for CGRC

The committee shall consist of bona fide members of the community including:

- A Government extension worker working within the area
- Four (4) representatives of Village Development Committees (VDC)
- Two project beneficiary institutions representatives
- A youth representative
- A women's representative
- Representative from community policing and
- Customary Land Tribunal representative

Where applicable, a contractor or consultant or their representative may attend the meetings. The committee which shall serve for the period of project implementation, shall select one member as Chairperson. Secretary shall be the Government Extension Worker in the area.

4.2.1.3 Roles and Responsibilities of the CGRC

The CGRC acts as an entry point for all grievances arising from the Digital Malawi Acceleration Project intervention at the community level. The committee shall have the following duties:

- Receives and records all grievances as submitted to them by the PAPs.
- Reviews and screens all received grievances.

- Investigating and facilitating grievance resolution process.
- Documenting status of the complaint and its resolution.
- Refers non-resolved grievances to DGRC for action.
- Refers GBV, SEA, SH and other cases which are criminal in nature to law enforcement agency for action. However, survivor centric approach will be encouraged for GBV/SEA and SH cases.
- Provides feedback on grievance to PAPs, other interested parties and vulnerable groups.
- Submits monthly reports to PIU and updates the local chiefs.

4.2.2 WGRC

The Workers Grievance Redressal Committee (WGRC) shall be established by the contractors who shall undertake any sub-component of the DMAP. This committee will be established for contractor workers to have a platform for raising their grievances during the time they will be working with the project.

4.2.2.1 Terms of Reference for WGRC

The WGRC is an entry point for worker-related grievances. This may include but not limited to labour related concerns, theft, SEA and SH incidents and safety concerns regarding the works. Employee representatives shall be selected by fellow workers to serve in the committee which will ensure female representation. Worker's representatives should work without fear of reprisal. The committee shall appoint the chairperson from one of the worker representatives. The contractor site representative should be the Secretary. The WGRC shall meet within 5 days after a grievance is received. The maximum redress period at this level is fourteen (14) days.

4.2.2.2 Membership of WGRC

The following shall constitute WGRC membership

- 1) Three (3) Contractor workers representatives
- 2) One (1) Contractor representative
- 3) District Labour Officer
- 4) Two (2) beneficiary institution representatives

The chairperson and secretary will be chosen among the committee members, who shall serve in that capacity for the duration of project implementation works.

4.2.2.3 Roles and Responsibilities of WGRC

The WGRC shall have the following duties:

- Conducts grievance redress sensitisation or awareness meetings for workers.
- Ensures that the grievance box is accessible to all workers in a secure manner.
- Opens grievance boxes every week.

- Records all grievances as submitted to them by the complainant.
- Vets, reviews and assesses the grievance to filter those not related to the project.
- Ensures that there is transparency and accountability in handling the cases.
- Investigates and facilitates grievance resolution process.
- Hears and determines all cases reported by workers or PAPs.
- Document's status of the complaint and its resolution.
- Refers GBV/SEA/SH and other criminal cases to law enforcement agencies or authorised victim support units for action while respecting survivor-centric approach on GBV/SH/SEA related cases
- Refers non-resolved grievances and other grievances beyond their capacity to relevant DGRC or PGRC.
- Provides feedback on grievance to the aggrieved workers.
- Prepares grievance progress reports and presents them to DGRC/PGRC during monthly meetings.

4.2.3 LCGRC

During the implementation of all sub-components of the DMAP, a total of 35 Local Council Grievance Redressal Committee (LCGRC) shall be established in all the 28 Districts, 3 Municipalities and 4 City councils. Where the LCGRC already exists for other World Bank funded projects, the DMAP will use the same committee after orienting them on its scope. New committees will be established where no structures exist at this level.

4.2.3.1 Terms of Reference LCGRC

The LCGRC shall handle cases submitted to it by PAPs and cases referred to it by the CGRC and WGRC. Thus, the LCGRC acts as entry or appeal point for grievances arising from DMAP activities. The committee shall meet within 5 days upon receiving a referral from the CGRC and or WGRC and make a resolution within 7 days. If the PAP is not satisfied with the resolution made by the LCGRC, the case shall be referred to Project Grievances Redressal Management (PGRC).

4.2.3.2 Membership of LCGRC

The following is the membership of LCGRC.

- 1) Director of Planning and Development (DPD) or Director of Administration (DOA)-
Chairperson
- 2) Environmental Officers-Secretary
- 3) Management Information Systems Officers (MISO)
- 4) Lands Officer

- 5) Community Development Officer
- 6) Gender Officer
- 7) Labour Officer
- 8) Information Officer
- 9) Police representative- victim support unit
- 10) NGO representative

The DPD/DOA shall be the Chairperson and Environmental officer (EO) shall be the Secretary.

4.2.3.3 Roles and Responsibilities of LCGRC

The following shall be duties of LCGRC:

- Facilitates establishment of CGRCs and WGRCs
- Facilitates GRM training and awareness meetings at community level where applicable.
- Records all grievances as submitted to them by the complainant.
- Reviews all grievances referred by the CGRC and WGRC.
- Investigates and facilitates grievance resolution process.
- Determines cases and provides feedback to the CGRC, WGRC and the aggrieved persons
- Ensures that there is transparency and accountability in the implementation of Digital Foundation Project interventions.
- Ensures that safety standards, labour requirements, human rights, economic empowerment, gender, disability, environment and community health standards are adhered to during and after Digital Foundation Project implementation.
- Periodically reviews (monthly) all grievances in the councils.
- Refers unresolved grievances to Project GRC for action.
- Referring GBV/SEA/SH and other serious cases to relevant authorities for action.

4.2.4 PGRC

The Project Grievances Redressal Committee (PGRC) shall be at the Project level.

4.2.4.1 Terms of Reference for PGRC

It shall hear cases submitted to it by PAPs and cases referred to it by the lower committees. The committee shall meet within 48 hours upon receiving a referral from the BIGRC and or LCGRC and make a resolution within 7 days. If the PAP is satisfied with the resolution of the PGRC, the case is closed. If the PAP is not satisfied and the case is not closed at PGRC, the PAP shall be directed to seek justice from any court of law and the court shall make the final decision.

4.2.4.2 Membership of the PGRC

The committee will be valid as long as the Digital Malawi Acceleration Project is being implemented.

The following is the membership of the PGRC.

- 1) Project Manager- Chairperson
- 2) Digital Technical Specialist
- 3) Senior Project Procurement Specialist,
- 4) Finance Management Specialist,
- 5) Environmental Standards Specialist,
- 6) Social Standards Specialist
- 7) Director of Legal and Compliance and Contracting
- 8) Representative from Department of e-Government
- 9) Representative from Malawi Communication Regulatory Authority (MACRA)
- 10) Representative from Ministry of Lands
- 11) Representative from Malawi Environment Protection Authority (MEPA)
- 12) Representative from Malawi Research and Education Network (MAREN)

The Project Manager (PM) shall be the Chairperson of the committee and the Social Standards Specialist (SSS) shall be the secretary.

1. Roles and Responsibilities of the PGRC

The following shall be roles and responsibilities of PGRC:

- Facilitates establishment and operationalization of CGRCs, LCGRCs, WGRCs and BIGRCs
- Ensures that there is transparency and accountability in the implementation of Digital Malawi Acceleration Project
- Records all grievances submitted to them by the PAPs.
- Reviews unresolved grievances referred by LCGRCs.
- Investigates and facilitates grievance resolution process.
- Refers unresolved grievances to court.
- Refers GBV/SEA/SH and other criminal cases to relevant authorities for action.
- Provides feedback to LCGRCs on referred cases.
- Carries out quarterly reviews of all grievances from the Councils and provides appropriate policy guidance to the Councils and other stakeholders.
- Prepares periodic Project level grievance handling progress reports and presents them to the relevant agencies and stakeholders.
- Supports the capacity building of LCGRCs.
- Supervises, monitors and evaluates the effectiveness of GRCs.

5.0 GRIEVANCE REDRESSAL PROCEDURES

There are five main steps that are supposed to be undertaken in grievance redressal processes. These stages include: (i) The grievance uptake (ii) complaint handling and assessment (iii) Case resolution and closure (iv) Registry update (v) GRM monitoring and evaluation as illustrated in Figure 1.

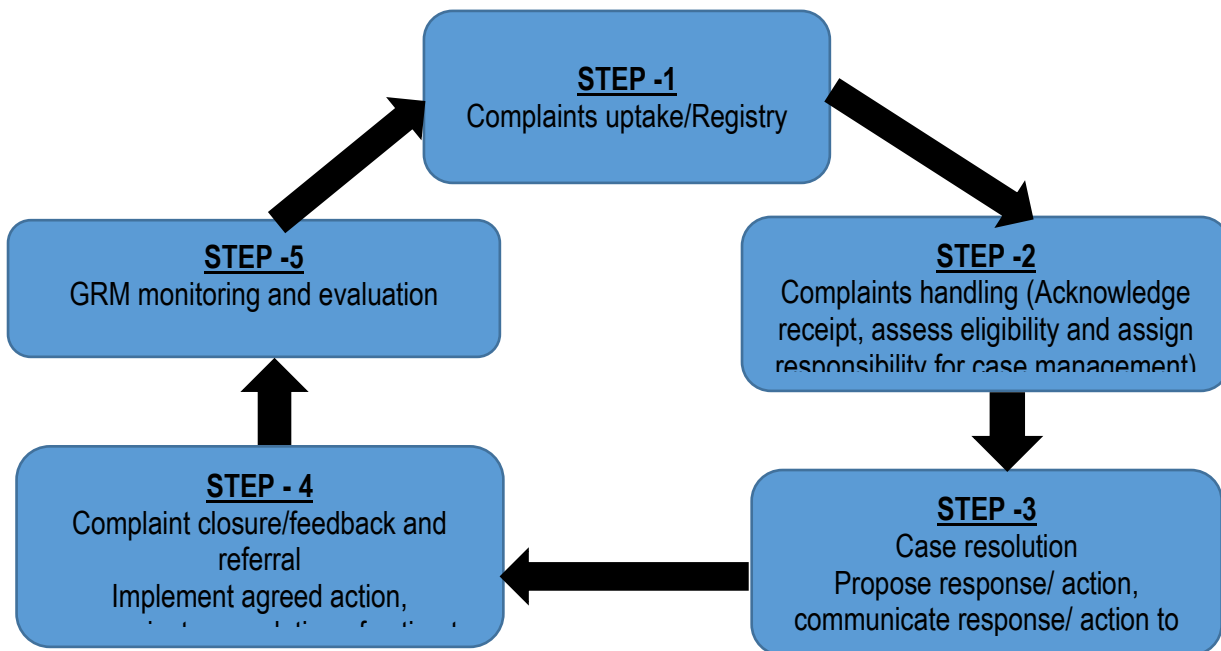


Figure 1. Grievance Redressal Process

5.1 Complaint Uptake and Grievance Recording

All the PAPs, other interested parties and vulnerable groups will report their complaints or grievances to the relevant committee i.e. CGRC, WGRC, LCGRC or PGRC.

The cases may be reported in different ways including the following:

- **Face-to-face:** This includes verbal or written submissions through face-to-face interactions with members of grievance redressal committees, programme officials, local structures (chiefs, councillors, members of parliament) at any time.
- **Grievance box:** **Grievance boxes** will be placed in strategic places in project communities aggrieved parties can drop in their grievances at any time. These will also be made available at Project sites.
- A dedicated **GRM Phone Number (+265999988870)** with **WhatsApp** and **Text** facility.
- A dedicated **GRM Toll-Free Number 3108** with voice functions.
- A dedicated email address (digitalmalawigram@pppc.mw).

The email and phone call facilities (both cell phone and toll-free number) will be domiciled at the PPPC, and Project's Social Safeguards Specialists will be responsible for ensuring receipt, recording and directing of grievances to the relevant entity.

All received complaints or grievances will be recorded in a GRM Logbook which contains **Grievance Reporting Forms**. The GRM Reporting Form is attached in **Appendix 1**. The GRM Logbooks will be available with all the GRM committees at all levels.

The grievance recipient should ensure to collect all the relevant information as per the GRM reporting form including, name, contact details and description of the complaint. The complaint receiver should verify with the complainant on their preference in terms of confidentiality.

5.2 Complaint Handling

5.2.1 Acknowledgement of grievance receipt

Once a grievance is received and recorded, the secretary of the GRM committee or the one who received the grievance should in a timely manner within 2 to 3 working days provide an acknowledgement of receipt of the grievance to the complainant. The acknowledgement can be in form of an email, phone call or a letter. A template of an **Acknowledgement Letter** is provided in **Appendix 3**. The acknowledgement should indicate that the grievance has been received, and that it will be assessed for eligibility before the complainant can be called for a dialogue with the respondent. A brief GRM procedure that will be undertaken should also be provided including a GRM tracking number for the grievance and the timeline for resolution and closure. The complainant will be advised on the contact numbers/ emails to be used in following up on the grievance as well as contact person.

5.2.2 Assessment of eligibility of a received grievance

The reported grievances should be screened to ensure that they are relevant or related to the DMAP. The committee which received the grievance (CGRC, WGRC, LCGRC and PGRC) shall meet within 3 to 5 working days to assess whether the complaint or grievance is related to DMAP activities or not. In case complaints are not related to the projects, the aggrieved party shall be advised to channel their complaints to the right institutions. For DMAP complaints or grievances, the relevant committee shall hear such cases and make necessary follow ups to establish the truth of the matter. The committee shall use a GRM screening checklist to ascertain how the complaint relates to the project. **The Grievance Eligibility Assessment Checklist** is provided in **Appendix 4**.

5.3 Case resolution and closure

5.3.1 Investigation and Recommendation of Response

After the committee has verified the eligibility of the grievance, the appropriate respondent should be identified and notified of the grievance. This is because grievances can be lodged against an

individual, an institution, a contractor, as well as the PIU. It is therefore imperative to identify the appropriate individual or institution that is responsible for addressing the grievance. The respondent should be appraised on the grievance and the GRM procedures that will be followed to resolve the complaint.

An investigation of the grievance will be required in order for the committee to fully understand the complaint and for them to make an informed decision for an effective settlement of the grievance. The investigation will gather all the facts and collect evidence related to the grievance. The investigator should have a clarity of what is to be investigated and should document all the findings.

The investigation will involve both respondent and complainant to crosscheck the information provided. It should establish the respondents stand on the grievance as well as the outcome that the complainant is looking for through the GRM process. The investigations of the complaint will be undertaken by the GR committee. Through the investigations, conclusions will be made based on the information and evidence. The GRC will then make a recommendation on the resolution to address the grievance.

5.3.2 Closure of the Grievance and Referral

After completion of all investigations, a meeting will be convened by the committee to resolve the complaint. The respondent and complainant or their representatives will be required to attend the meeting. Through this meeting a resolution will be reached, and the required action will be communicated to the respondent to implement. The resolution of the grievance shall be made and be communicated to the complainant within 14 days in writing. The respondent should commit to a timeline for completion of the required action. The GRCs as well as the PIU must verify that the proposed response or action by the respondent has been completed to warrant closure of the grievance.

Once the action or response has been implemented, the complainant will be communicated of the completed action. If the complainant is satisfied with the resolution, he shall be required to sign the resolution and closure section of the **Grievance Resolution Agreement Form** as attached in **Appendix 2**. At least three committee members shall also be required to countersign to mark closure of the grievance. This shall indicate that the complaint or grievance which was presented has been fully discussed and closed. If the complainant is not satisfied with the resolution, they shall also indicate and sign on the Grievance Resolution Form together with the same committee members. The complaint will in this case be referred to a higher-level GR Committee or to the courts of law. This will be signifying that the case was not closed and has been referred to another entity.

With the project having three levels or points of GRM resolution, unresolved grievances will be referred to higher level GRM committees for another attempt at resolution. The initial GRC will provide to the referral GRC all the information regarding the grievance and the reason for non-resolution. The

grievance referred to the higher GRC will follow the case resolution and closure stage where it will be investigated in detail to identify why the complainant was not satisfied with initial response.

The GRC will work with the respondent to ensure acceptable response or action is implemented. When the resolution is still not achieved, the complaint will be referred to the highest level of resolution. When all the three GRM resolution levels fail to address the grievance, the complainant will be advised to seek assistance from the courts of law.

5.4 Grievance Processing Timelines

The grievance resolution processes should be guided by timelines to ensure timely delivery of resolutions and justice to the complainants. Delayed communication and resolution may lead to new grievances being raised against the project. The Grievance Redress Committees shall endeavour to process and resolve grievances in a timely manner. It must be noted that the period for resolution of the grievances may differ according to the nature and seriousness of the grievance and the required response and action.

The GRC levels will also have different timelines as the higher level GRC may have more cases due to referral than the lower level GRCs.

This GRM Manual stipulates the timelines that should be adhered to at all the levels of grievance redress processes to avoid delays in the processes. The Manual provides for processing times for the three levels of grievance management as well as for the GRM process steps.

5.4.1 Grievance processing timelines at GRC levels

- Level 1 (CGRC, WGRC, LCGRC and PGRC) grievances will be redressed within a period of two weeks.
- Level 2 (Referrals from CGRC or WGRC to Local Council GRC) grievances will be redressed within a period of three weeks.
- Level 3 (referrals from Level 1 and 2) to PGRC grievances will be redressed within a period of four weeks.

5.4.2 Grievance processing timelines for GRM process steps

The following timelines are provided as a guide for every step in the grievance resolution process. The number of days indicated count from the day of receiving the grievance. For referral grievances, the timeline will be more than what is stipulated below.

- Grievance registration: 1 working day
- Acknowledgement of receipt: 2 working days
- Assessment of eligibility of grievance: 3 working days
- Case investigation and resolution: 8 working days
- communication to complainant: 8 working days

- Grievance closure:10 working days

5.5 GRM Registry

All grievances received will be recorded in the GRM registry that shall be maintained at the project level. The register will present a database showing the

- types of grievances received
- the description of the grievance
- name of the complainant
- nature of complainant
- gender of complainant
- GRC responsible for the grievance
- name of the respondent of the grievance
- the resolution or agreed action
- closure of the grievance and,
- those that have been referred to higher GRC levels or courts of law

The information provided in the database is expected to help the project team to check progress of grievances and to improve the mechanism and to better understand how to address adverse impacts of the project. It will also indicate the issues around which complaints are being received and the areas from which the complaints are coming. Each complaint shall have an individual reference number that will be used to track progress of grievance resolution.

The grievance registry should contain a record of the person responsible for the complaint and should have dates for the following events:

- The date the complaint was reported
- Dates of meetings for screening and investigations
- The date of and information on proposed corrective action sent to complainant (if appropriate)
- Date action/ response was completed
- The date when confirmation of completion of action was sent to the complainant and
- The date the complaint was closed out

5.6 GRM Monitoring and Evaluation

The GRM monitoring and evaluation process will assess and analyse the functionality of the projects GRM at all levels. This will assist to trace whether the GRM system is effective in responding appropriately and timely to stakeholders' complaints and whether the GRM Principles are being met during the grievance redress processes. Monitoring will be undertaken by the Environmental and Social Safeguards team alongside other monitoring and evaluation exercises for the project. Monitoring and evaluation will be undertaken at all GRC levels and through review of the GRM data

registry available at PIU. Selected GRC members and users of the GRM will be interviewed to identify gaps and come up with recommendations for improving the GRM processes. Monitoring will be conducted once a month.

Analysis of grievance data and resolutions should be undertaken by the safeguards personnel to identify systemic issues that need addressing within the GRM system and the project. Review of grievance handling procedures will be undertaken to verify their effectiveness in resolving grievances in a timely manner whilst ensuring that the marginalised people are able to report their grievances.

The performance indicators for the GRM that should be monitored shall as a minimum include:

- Number of complaints/ grievances/ feedback received and registered
- Percentage of grievances resolved or addressed
- Percentage of grievances resolved within stipulated period
- Percentage of grievance referrals
- Time required to resolve complex complaints
- Percentage of complainants satisfied with resolution and GRM process
- Percentage of project beneficiaries that use specific uptake locations
- Types of complainants and their gender disaggregation
- Recurring grievances
- Types of issues raised in grievances/feedback
- Trends in reported grievances/feedback over time
- The causes of grievances/feedback
- Whether remedial action was warranted
- What redress was provided
- Recommendations/strategies to prevent or limit future recurrences
- Level of the GRM awareness by the stakeholders

6.0 GRM REPORTING

The GRC will be responsible for preparing and submitting reports for all grievances handled at their level. The reports will summarise all grievance redress activities undertaken monthly and should include an outline of the processes undertaken to resolve the grievances.

The reports will include as a minimum information on the typology of grievances received, the nature of complainant such as individual, group or institution, the respondent of the grievance, the specific issue requiring redress, the level of grievance registration and on grievances referred to other levels. The report should also indicate the status of grievance redress including unresolved grievances, resolved grievances and on feedback given to complainant.

The PIU will use data collected during monitoring and evaluation and from GRC reports to prepare update reports to the World Bank, project management and the public. These reports will also be used to provide feedback to the public on all grievances under the project, investigations and how they are resolved including outcomes and referrals. Feedback to the public will be provided through the PIU website.

7.0 GRM COMMUNICATION

The GRM for the DMAP should be communicated to the public and project stakeholder to ensure their awareness of the GRM procedures. GRM communication will be undertaken through the following means:

- Public adverts through print and electronic media
- Sensitization Meetings with project beneficiaries
- Stakeholder consultation meetings
- PPPC Website
- GRM Posters
- Brochures & fliers
- Digital Malawi Acceleration Project Social Network sites (Facebook, Twitter, YouTube) and
- Training (Capacity building) for GRM Committees

GRM communication should inform the public, project beneficiaries and stakeholders of the presence of the GRM as a platform for receiving and resolving grievances. It should encourage project affected persons and stakeholders to complain if they are dissatisfied or feel aggrieved by project activities. The communication should highlight that grievances are treated confidentially and that there are no adverse repercussions for lodging a complaint. The communication should also indicate that there is no cost for filing grievances through the toll-free phone number. Other information that should be included in the communication include:

- Types of grievances that can be submitted
- Grievance uptake locations
- Timelines for handling grievances
- Options available to complainants who are dissatisfied with the resolution or outcome

Capacity building training should be offered to all GRC members who will be at the core of implementing the GRM. GRC members should be trained before undertaking grievance redressal commitments.

8.0 GRM BUDGET

The estimated budget for the grievance redress mechanism activities is provided in Table 1.

Table 1: Estimated GRM Budget (5 years)

GRM Planned Activities	Qty (years)	Unit cost (USD)	Total cost (USD)
Communication materials (leaflets, posters, public relation kits including design, per locality and sub-project) over 05 years	05	8500	42,500
Outreach for e-Government, PPPC staff, local authorities, other stakeholders including contractors and subcontractors	05	5000	25,000
Establishment and training of GRCs (CGRCs, LCGRCs, WGRCs and PGRCs)	01	10000	10,000
Monitoring and Evaluation of GRM system (cost for 5 years)	05	7500	37,500
Total			115,000

APPENDICES

Appendix 1. Grievance Reporting Form



DIGITAL MALAWI ACCELERATION PROJECT

SUB-COMPONENT NAME:
PROJECT SITE (Location of grievance):

Grievance Tracking Number: DMAP/ _____ / BT / _____ / GR _____

1. RECEIVING DETAILS				2. COMPLAINANT'S DETAILS	
Received on (Date):				Full Name:	
Receiving time:				Gender: Male <input type="checkbox"/> Female <input type="checkbox"/>	
Means used to log a complaint <i>(tick against options provided)</i>				ID Number:	
Email	Verbally	Phone	Others <i>(specify)</i>	Contact Address:	
Type of grievance <i>(tick against options provided)</i>				Phone Number:	
				Email:	
Damage	Theft	GBV/ SEA/ SH		Request for Confidentiality? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Project progress	Work quality	Other <i>(specify)</i> _____		Category of Beneficiary <input type="checkbox"/> Contractor <input type="checkbox"/> Implementer <input type="checkbox"/> Other _____	

3. DESCRIPTION OF THE GRIEVANCE			
<i>(Provide the nature of the complaint including; what happened, when it happened, where it happened, who was involved, and the problem that occurred etc.)</i>			

Received by		Complainant	
Signature		Signature	
Date		Date	

Attached Supporting Documents:

Appendix 2. Grievance Resolution Agreement Form



DIGITAL MALAWI ACCELERATION PROJECT

Grievance Tracking Number: DMAP/____ / BT / ____ / GR____

Grievance Resolution updated by:

1. GENERAL INFORMATION		2. RESPONDENT'S DETAILS	
Name of Complainant:		Full name:	
Project Site:		Name of Organization:	
Type of Grievance:		Designation:	
Date of Grievance Registration:		Phone number:	
Date of Grievance Resolution:		Email:	
3. SUMMARY OF GRIEVANCE RESOLUTION PROCESS			
(a) Brief description of complaint			
(b) Brief description of the Resolution/Recommendations from GRC			
4. GRIEVANCE RESOLUTION AGREEMENT			
Level of redress: Institutional <input type="checkbox"/> Community <input type="checkbox"/> Local Council <input type="checkbox"/> Project Level <input type="checkbox"/>			
Was the Grievance Resolution satisfactory: Yes <input type="checkbox"/> No <input type="checkbox"/>			
If No, Grievance to be escalated to:			
Agreement and Consent of the Complainant to the above Decision			
I _____ Agree /Disagree with the resolution.			
Signature _____ Date _____			
Grievance Redress Committee Members <i>(At least three members to sign)</i>			
Name	Position	Signature	

Appendix 3. Grievance Receipt Acknowledgement

[Insert the name and address of the Grievance Redressal Committee]

[Insert the Date]

Dear **[Insert complainant name]**

CONFIRMATION OF RECEIPT OF THE GRIEVANCE

I write to acknowledge receipt of the grievance that you logged with this committee on **[date of receipt]**. In your grievance, you raised the following issue(s) **[Insert brief description of the complaint]**.

Be advised that the committee met on **[Insert date]** and assessed the eligibility of your grievance in relation to the Digital Malawi Acceleration Project activities. Your grievance has been recorded in the GRM register and is assigned a Grievance Tracking Number **[Insert the unique code]**.

The committee would like to invite you to the hearing session of your case scheduled as follows:

Date	
Venue	
Time	

The alleged offender will also be present during the hearing to accord him fair trial.

Yours Faithfully,

Grievance Redress Committee Chairperson.

Appendix 4. Grievance Eligibility Assessment Checklist

This checklist is prepared to guide the Grievance Redressal Committee at any level when determining the eligibility of the grievances submitted by PAP.

Question(s)	Answer(s)	
Describe the grievance logged as recorded in the grievance registration form		
(a) What harm did the Digital Malawi Acceleration Project caused or is likely to cause?		
(b) Is the alleged problem resulting from the Digital Malawi Acceleration Project activities?	No <input type="checkbox"/> Yes <input type="checkbox"/>	
	If yes, please explain	
(c) Are there any other supporting documents that have been shared as proof of the alleged problem?		
(d) Is the complaint raised with any other authorities?	No <input type="checkbox"/> Yes <input type="checkbox"/>	
If Yes (Please, provide the following details):		
(i) When?		
(ii) How and with whom the issues were raised?		
(iii) What response were received from and/or any actions taken?		
(iv) Why the response or actions taken were not satisfactory?		
If No,		
(i) Why?		
(ii) How should the complaint be resolved?		
5. Name of the person who completed this form	Signature	Date