



REPUBLIC OF THE GAMBIA
MINISTRY OF AGRICULTURE

**GRIEVANCE REDRESS MECHANISM
MANUAL**

FOR THE MINISTRY OF AGRICULTURE



**PROPOSED REGIONAL RICE RESILIENT
VALUE CHAIN DEVELOPMENT
PROGRAM (REWARD) AT THE GAMBIA**

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**TABLE OF CONTENTS**

List of Figures -	-	-	-	-	-	-	-	-	-	iii
List of Tables -	-	-	-	-	-	-	-	-	-	iv
List of Abbreviations and Acronyms -	-	-	-	-	-	-	-	-	-	v

CHAPTER ONE: INTRODUCTION

1.0	Introduction	-	-	-	-	-	-	-	-	1
1.1	Approach	-	-	-	-	-	-	-	-	2
1.2	Scope and Applicability of the GRM	-	-	-	-	-	-	-	-	4
1.3	Objectives of Grievance Mechanism-	-	-	-	-	-	-	-	-	5
1.4	Guiding Principles of GRM	-	-	-	-	-	-	-	-	6
1.5	Structure of the GRM	-	-	-	-	-	-	-	-	7
1.6	Project Description	-	-	-	-	-	-	-	-	12
1.7	Project Sites and Locations	-	-	-	-	-	-	-	-	13
1.8	Key Stakeholder Identification	-	-	-	-	-	-	-	-	13
1.9	Potential Grievances	-	-	-	-	-	-	-	-	14

CHAPTER TWO: LEGAL AND OTHER REQUIREMENTS

2.1	National Legal Requirements	-	-	-	-	-	-	-	-	17
2.2	AfDB's OS Requirements on Project Grievance and Redress Mechanisms	-	-	-	-	-	-	-	-	18

CHAPTER THREE: CONTENT OF A COMPLAINT AND ADMISSIBILITY CRITERIA

3.1	Content of a Complaint	-	-	-	-	-	-	-	-	20
3.2	Language	-	-	-	-	-	-	-	-	21
3.3	Complaint Admissibility	-	-	-	-	-	-	-	-	21

CHAPTER FOUR: REWARD GRIEVANCE REDRESS MECHANISM-**PROCEDURAL STEPS**

4.1	Information Availability	-	-	-	-	-	-	-	-	25
4.2	Complaint Channels-	-	-	-	-	-	-	-	-	25
4.3	Steps and Process	-	-	-	-	-	-	-	-	25
4.4	Grievance Handling Process	-	-	-	-	-	-	-	-	26
4.5	Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH)/ Violence Against Children (VAC)	-	-	-	-	-	-	-	-	27
4.6	Raising Awareness	-	-	-	-	-	-	-	-	28



CHAPTER FIVE MONITORING THE GRIEVANCE PROCESS

5.1	Monitoring and Evaluation Process	-	-	-	-	-	-	-	33
5.2	Bi-Annual Review	-	-	-	-	-	-	-	34

CHAPTER SIX: ROLES AND RESPONSIBILITIES

6.0	Roles and Responsibilities	-	-	-	-	-	-	-	36
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CHAPTER SEVEN: GRIEVANCE REDRESS MECHANISMS TOOLS AND RESOURCES

7.1	Communication Tools	-	-	-	-	-	-	-	37
7.2	Grievance Form	-	-	-	-	-	-	-	37
7.3	Grievance Tracking Spreadsheet	-	-	-	-	-	-	-	38
7.4	Grievance Database	-	-	-	-	-	-	-	39
7.5	Grievance Records Transfer	-	-	-	-	-	-	-	39
7.6	Budget for GRM Activities	-	-	-	-	-	-	-	39

CHAPTER EIGHT: CONCLUSION

8.0	Conclusion	-	-	-	-	-	-	-	41
-----	------------	---	---	---	---	---	---	---	----

APPENDIXES



LIST OF FIGURES

Figure 1	Basic Elements of a Grievance Redress Mechanism-	-	-	-	-	6
Figure 2	Grievance Mechanism Structure	-	-	-	-	11
Figure 3	Flow Diagram of Grievance Redress Procedural Steps	-	-	-	-	24



LIST OF TABLES

Table 1	Anticipated Grievances and Concerns for the REWARD Program	-	-	15
Table 2	Grievance Redress Mechanism Process for the REWARD Project	-	-	29
Table 3	Grievance Lodging/Register Matrix	-	-	33
Table 4	Roles and Responsibilities	-	-	36
Table 5	Summary Budget Estimate for GRM Activities	-	-	40



LIST OF ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
CEO	Chief Executive Officer
CPCU	Central Project Coordinating Unit
CRC	Community Relations Committee
CRR	Central River Region
DDCs	District Development Committees
DOA	Department of Agricultural
DoF	Department of Forestry
DPWM	Department of Parks and Wildlife Management
DWR	Department of Water Resources
CPCU	Central Project Coordinating Unit
EIA	Environmental Impact Assessment
E & S	Environmental and Social
ESMF	Environmental and Social Management Framework
ESMS	Environmental and Social Management Systems
ESIA	Environmental & Social Impact Assessment
GPPA	Gambia Public Procurement Authority
GBV	Gender-Based Violence
GM	Grievance Mechanism
GoTG	Government of The Gambia
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IESIA	Integrated Environmental and Social Impact Assessment
IFC	International Finance Corporation
ISS	Integrated Safeguards System
NEA	National Environment Agency
NEMA	National Environment Management Act



OS	Operational Safeguards
PACs	Project-Affected Communities
PAP s	Project Affected Persons
PIU	Project Implementation Unit
PURA	Public Utilities Regulatory Authority
REWARD	Regional Rice Resilient Value Chain Development Program
SEP	Stakeholder Engagement Plan
SDO	Social Development Specialist
TAC	Technical Advisory Committee
VDCs	Village Development Committees

**Definition of Key Terms**

Term	Definition
Affected Party(ies)	Stakeholders who are affected by the operation, both positively and negatively. Within this, it is possible to distinguish between those who are directly affected and indirectly affected by the operation.
Environmental and Social Impact Assessment	Process of evaluating and addressing potential social and environmental impacts resulting from REWARD's Project and identifying any mitigation or corrective measures that will enable the project to meet the requirements of the AfDB Operational Standards, and applicable to the Gambian laws and regulations.
Complaint	A notification provided by a community member, group, or institution to the Project that they have suffered some form of offence, detriment, impairment or loss as a result of business activity and/or contractor behaviour.
Complainant	A person who brings an allegation of the grievance in accordance with established procedures.
Consent	This must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action.
Employer	In relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specified on this behalf



Term	Definition
External Stakeholders	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way by the decisions of the business, such as customers, suppliers, community, NGOs, and the government.
Gender-based violence (GBV)	GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.
Grievance	An issue, complaint and/or dispute that has escalated to the point where it requires third-party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner
Grievance Database	System for logging and monitoring all grievances received, including any records of communication/consultation and details of grievance settlement.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behaviour of the company, its contractors, or workers.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors.
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and



Term	Definition
	trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none">• Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.• Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual harassment (SH)	Any unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature.
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and international third parties.
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between REWARD and stakeholders (two-way communication) over the life of a project that is designated to promote transparent, accountable, positive, and mutually beneficial working relationships.
Vulnerable People	People who by gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.



EXECUTIVE SUMMARY

ES 1: INTRODUCTION AND BACKGROUND

The Grievance Redress Mechanism Framework for the Regional Rice Resilient Value Chain Development (REWARD) Program includes four distinct investment components:

Component 1: Development of Sustainable, Climate-Resilient Rice Production Systems

Component 2: Processing & Marketing

Component 3: Policy & Governance

Component 4: Program Coordination and Management

The REWARD Grievance Redress Mechanism (GRM) offers stakeholders affected by development activities access to mechanisms for presenting grievances and finding solutions. These mechanisms are designed to be legitimate, reliable, transparent, cost-effective, and easily accessible at the lowest level, preventing grievances from escalating. This access is inclusive, with consideration for people living with disabilities.

ES 2: POTENTIAL ISSUES AND COMPLAINTS

Potential issues and grievances to monitor include:

- Environmental concerns due to the use of pesticides and presence of machinery and equipment, waste management (e.g. rice husk), water pollution etc.
- Social-related issues such as grazing conflicts between farmers and nomadic cattle rearers, wildlife attacks on rice farms by warthogs, hippopotamuses and cattle, child labour, accidents or injuries due to construction, potential risk of Gender-based violence/ sexual harassment of locals as a result of labour influx etc.
- Occupational-related issues such as lack of drying floor and waiting shed, lack/insufficient of personal protective equipment, etc.



ES 3: PROPOSED GRIEVANCE REDRESS STRUCTURE

The proposed Grievance Redress Mechanism (GRM) of the project is presented in the table below.

Structure	Responsible Grievance Redress Committee	Composition of Committee	Grievance Redress Committee Task	Location of the Committee
Level I: Local level or at the project site	Local Grievance Redress Committee (Local GRC)	The Social Development Specialist (SDO) representing the CPCU/PIU, The village head, the village development committee chairperson, the youth representative, the religious leader (imam), the women representative and the district chief as the chairperson of the local committee	<ul style="list-style-type: none"> • Receive and register a grievance/complaint at the site. • Investigate and internally review the grievance/complaint. • Propose a resolution for the grievance/complaint. • Report the grievance/complaint and proposed resolution to the regional level. 	Rice fields and work sites at the selected communities
Level II: Regional level:	Regional Grievance Redress Committee (Regional GRC)	Members of the Technical Advisory Committee (TAC) (staff representative of national institutions such as Department of Agriculture, Department of Forestry, National Environment Agency, Ministry of Youths and Sports, Ministry of Gender, Women	<ul style="list-style-type: none"> • Establish a procedure for receiving and logging complaints. • Resolve disputes and verify grievances and their merits. • Communicate decisions to the complainant and provide necessary documentation. • Implement and monitor redress actions. • Record grievances, categorize them, and prioritize those to be resolved by the Committee. 	Regional Governor's Office



Structure	Responsible Grievance Redress Committee	Composition of Committee	Grievance Redress Committee Task	Location of the Committee
		and Children Department of water resources, Department of livestock and the security forces etc.) Headed by the Regional Governor including the SDO which serves as the secretary.	<ul style="list-style-type: none"> • Maintain records, including registers, meeting minutes, and correspondence, for reference and inspection. • Document all received complaints and the progress of remediation for future reference. • Report to the National Level where grievances cannot be handled at the Regional level. • Provide update grievances regularly to the REWARD CPCU. 	
Level III: National Level	The Gambian Judiciary and Courts	National Legal structure	Arbitrate between the Project and the complainant as the last resort in the grievance redress process	Law courts

ES 4: GRIEVANCE REDRESS PROCEDURES

Step 1. Receive and Log/Register Grievance

Step 2. Acknowledge Grievance

Step 3. Review and Investigate Grievances

Step 4. Develop Resolution Options and Prepare Response

Step 5. Closure of Grievance

Step 6. Monitor, Report, and Evaluate



ES 5: IMPLEMENTATION OF THE REWARD GRIEVANCE REDRESS MECHANISM

For the effective operation of the Project GRM, its objectives, procedures, available channels for submitting complaints, and responsible officers must be clearly communicated to potential users. This communication should encourage not only access but also a sense of ownership, taking into account the cultural peculiarities of each community. This will be achieved through various means of communication, including workshops, trainings involving stakeholders and representatives from states, local governments, traditional institutions, and key groups and personalities in the project areas, including community members. Basic Communication Channels will include: Letters, Telephone Calls, Emails, Grievance Focal Person, Social media, Face-to-face' Communication, Suggestion Boxes, etc.

ES 6: TRAINING AND SUPPORT TO PARTICIPANTS

This will involve orientation and training for beneficiaries, GR implementers, relevant staff of the contractors, security personnel etc. and provision of external consultancy and support staff to strengthen organizational capacity. The training requirements for the GRM are multifaceted, diverse and layered through the orientation and implementation phases.

ES 7: SUMMARY ACTION PLAN AND BUDGET ESTIMATE FOR IMPLEMENTATION

Clear action plans have been designated for the CPCU/PIU Grievance Redress Committees to manage grievances through awareness building and training, GRC setup and operations, modes of operations, and monitoring.

A provisional budget estimate of ninety-five thousand dollars (\$95,000) is proposed for operationalizing the Grievance Redress Mechanism as presented in this report.



1. INTRODUCTION

The Regional Rice Resilient Value Chains Development (REWARD) Program is a regional rice development program designed in response to the African Development Bank's (AfDB) commitment to financing the implementation of countries' food and Agriculture Compacts as presented at the Feed Africa II themed "Feed Africa: Food Sovereignty and Resilience", that was held in Dakar in January 2023. The program is targeted at 15 West African countries, to progressively cover a total area of 750,000 hectares of irrigated land.

The Government of the Gambia (GoTG) through the Gambian Ministry of Agriculture in collaboration with the African Development Bank (AfDB) proposes the implementation of the Regional Rice Reliant Value Chains Development (REWARD) Programme in the country. The initiative aims to propel the rice sector towards a market-driven, commercialized model, fostering private sector engagement in production, processing, and marketing.

The REWARD's overarching objective is to contribute to food and nutrition security, reduce rice imports, and stimulate economic growth. Specific goals include increasing rice production, promoting market-driven farming, and enhancing the role of the private sector in the rice value chain. Therefore, as an integral part of the ESIA this standalone Grievance Redress Mechanism (GRM) Report is Prepared. This Grievance Mechanism provides an external Grievance Mechanism to be adopted and implemented by REWARD. The establishment of a grievance management system is a widely accepted international best practice for the management of stakeholder interactions and social impacts.

The AfDB defines project GRM as a systematic process for receiving, evaluating and facilitating resolution of affected people's project-related concerns, complaints and grievances about the borrower's/client's social and environmental performance on a project. AfDB requires its clients to be aware of and respond to stakeholders' concerns related to the project in a timely manner.

It is a requirement of the International Finance Corporation Performance Standards and project lenders in this case the African Development Bank (AfDB). The African Development Bank (AfDB) has several Operational Safeguards (OS) that are particularly relevant to Grievance Redress Mechanisms (GRMs). In Operational Safeguard (OS) 1, the Bank mandates that the borrower/client institute a robust local grievance and redress mechanism (GRM) that is credible, independent, and empowered. This mechanism is essential for receiving, facilitating, and following up on grievances and concerns from affected stakeholders regarding the



environmental and social aspects of the project throughout its lifecycle. All responses to grievances must be documented and incorporated into project supervision formats and reports. Under AfDB Operational Safeguard 5 (OS5) on Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement, the emphasis is on promoting social equity and ensuring sustainable project outcomes. This safeguard establishes frameworks that enable affected parties to promptly address issues related to land use, thereby fostering transparency and fairness in the resolution process relevant to land development. Additionally, Operational Safeguard 7 (OS7) on Vulnerable Groups plays a crucial role in poverty reduction and sustainable development by ensuring that Bank-supported projects create opportunities for vulnerable groups to participate in and benefit from development initiatives without threatening their well-being. OS7 guarantees that vulnerable groups have access to grievance mechanisms, allowing them to voice their concerns and ensure their inclusion in project activities.

The local grievance mechanism needs to be sufficiently independent, empowered and accessible to the stakeholders at all times during the project cycle and all responses to grievances shall be recorded and included in project supervision formats and reports.”

The Grievance Redress Mechanism provides a clear description of the formal process whereby stakeholders can submit a grievance or report an incident regarding the REWARD project, through a defined process within a predictable timeframe and receive a response and a resolution (where possible) to the grievance. This process should be adhered to by REWARD management upon receipt of a stakeholder complaint.

1.1 Approach

Grievance mechanisms are a vital component of REWARD’s strategy for stakeholder engagement, integral to the Environmental Impact Assessment (ESIA) processes. These mechanisms are designed to support the project in achieving outcomes aligned with REWARD’s commitments to transparency, accountability, and stakeholder participation. It is established to address any issues, concerns, or claims (whether perceived or actual) that individuals, groups, or communities may have regarding the REWARD project. The GRM provides a structured approach for the effective management and resolution of grievances, ensuring they are identified, reported, and addressed in a manner that is open, fair, transparent, and timely.

The main advantages of establishing and maintaining an appropriate Grievance Redress Mechanism (GRM) are as follows:



Timely Response to Concerns: GRMs ensure that concerns and grievances of project-affected parties related to the environmental and social (E&S) performance of the project are addressed promptly, effectively, and transparently.

Accessibility and Inclusivity: An effective GRM is designed to be accessible and inclusive, providing multiple ways for users to submit their grievances. This includes in-person submissions, phone, text messages, mail, email, or website. It ensures that all project-affected parties can easily access the mechanism.

Cultural Appropriateness: GRMs are handled in a culturally appropriate manner, ensuring that they are sensitive and responsive to the needs and concerns of the project-affected parties. This includes allowing for anonymous complaints to be raised and addressed.

Transparency and Accountability: The GRM process is transparent about its procedures, governing structure, and decision-makers. This transparency helps build trust and accountability between the project implementers and the stakeholders.

Mitigation of Risks and Impacts: By providing a structured way to address grievances, GRMs help mitigate potential risks and impacts of the project, ensuring that negative consequences are minimized and addressed appropriately.

Enhancing Project Acceptance and Success: Effective stakeholder engagement through GRMs can improve the overall environmental and social sustainability of projects, enhance project acceptance, and contribute significantly to successful project design and implementation.

Preventing Reprisal Risks: GRMs help ensure that the process is free of external manipulation, interference, coercion, discrimination, intimidation, and reprisal, thereby encouraging stakeholders to participate without fear.

The REWARD GRM is designed based on the project preparation approach as prescribed in the AfDB ISS. The Bank's ISS through its Integrated Environmental and Social Impact Assessment (IESIA) Guidelines Notes guides development and Implementation of GRM. The cultural context in which GRMs operate also helps to defuse complaints and find appropriate and commensurate solutions. This process should be adhered to by the REWARD CPCU/PIU and contractors executing projects as part of the REWARD project upon receipt of a complaint.



1.2 Scope and Applicability of the GRM

The REWARD Grievance Redress Mechanism (GRM) provides a channel for affected parties—such as individuals, groups, and communities - to submit complaints or grievances directly to the REWARD Program if they believe that a REWARD-supported project has or is likely to have adverse effects on them, their community, or their environment. This enables external parties to lodge complaints regarding projects funded by the program. This mechanism ensures that all grievances are acknowledged, documented, and resolved in a fair, transparent, and timely manner. Complainants who feel impacted by REWARD investments or operations have the right to report and be heard under this mechanism.

As a development initiative, REWARD does not directly account for material environmental and social risks and impacts to the host communities of projects it supports. However, through its activities, the program's portfolio may give rise to potential adverse environmental or social risks or impacts. The objective of the GRM is to address and resolve grievances or complaints from stakeholders and affected persons promptly, fairly, and to the extent possible acceptable to all parties. REWARD, through its Environmental and Social Management Framework (ESMF) and contractual E&S safeguards under its financing instruments, ensures that its portfolio projects have effective and functioning Environmental and Social Management Systems (ESMS) in place. These systems are designed to mitigate and manage the environmental and social impact of their operations in line with international standards. This includes the need for ongoing stakeholder engagements and an effective, fully embedded grievance redress mechanism that ensures any stakeholder grievances relating to a project's operations are properly identified, assessed, reported, and resolved in line with local and international standards.

REWARD will actively monitor stakeholder grievance reports filed to its portfolio projects through contractual information rights. It works closely with each project and stakeholders to ensure that community and stakeholder grievances addressed to REWARD are adequately managed and resolved. This serves as a recourse instrument for escalation by Project Affected Persons (PAPs) whose grievances have not been satisfactorily addressed by a REWARD-financed project in line with the mechanism at the project level. Stakeholders are required to first report their grievances to the respective project and go through the project's grievance redress process. They should only escalate to REWARD if they believe that:

- a. Their grievance has not been satisfactorily addressed.



- b. The project has failed to respect its laid-down process for grievance redress (including extended delays, etc.).

1.3 Objectives of Grievance Mechanism

This grievance management system provides a formal way to register stakeholders' concerns to be addressed in good faith and through a transparent and impartial process.

This mechanism aims to:

- i. Establish a systematic approach to handle grievances related to the REWARD activities.
- ii. Provide a clear and accessible process for stakeholders to report grievances.
- iii. Ensure that incidents, complaints, and grievances are logged and managed consistently to build trust in the legitimacy and efficiency of the procedure and system;
- iv. Assist in the resolution of grievances between and among stakeholders, such as the various government Ministries, Departments, Agencies, Non-Government Organisations, communities,
- v. Ensure that unwanted events with negative impacts on external stakeholders are dealt with swiftly and appropriately;
- vi. Ensure that vulnerable people can log grievances in a non-threatening and accessible way;
- vii. Allow REWARD to identify and correct problems before they recur or escalate into more serious problems;
- viii. Allow REWARD to monitor and track stakeholder concerns, issues, complaints and report on them.
- ix. Provide an efficient and low-cost means of resolving disputes and providing control measures where appropriate; and
- x. Elevate the credibility and reputation of REWARD by efficiently demonstrating that the external stakeholders are taken seriously.

1.4 Guiding Principles of GRM

The GRM should effectively and efficiently receive and respond to concerns and complaints arising from the various projects and programmes being implemented, financed, or supported



by REWARD and should provide efficient routes for stakeholders to raise issues about project, programme implementation and performance.

The principles that guide the GRM's procedures by which their performance should be evaluated are:

- **Accessibility:** It should be accessible to everybody who would like to submit a complaint and should assist those who face barriers such as language, literacy, awareness, cost, or fear of reprisal.
- **Predictability:** It should offer a clear procedure with time frames for each stage and clarity on the types of results it can and cannot deliver;
- **Fairness:** Its procedures should be widely perceived as fair, especially in terms of access to information and opportunities for meaningful participation in the final decision;
- **Rights compatibility:** Its outcomes should be consistent with applicable national and international standards and should not restrict access to other redress mechanisms.
- **Transparency:** Its procedures and outcomes should be transparent enough to meet the public interest concerns at stake;
- **Capability:** It should have the necessary technical, human and financial resources to deal with the grievance at hand.
- **Speed and Proportionality:** All grievances, regardless of complexity, are addressed and resolved in a timely manner.
- **Participatory and Social Inclusion:** All stakeholders are equally encouraged to report grievances to the attention of the Grievance Redress Mechanism Committee.
- **Cultural Appropriateness:** Designed taking into account culturally appropriate ways of handling community concerns,
- **Feedback and Learning:** It should serve as a means to channel stakeholder feedback to improve project impacts and reduce the risk of inadvertently affecting sub-project beneficiaries.

All complaints are registered and follow the basic procedures outlined in this framework. Feedback is handled at the level closest to the complaint, ensuring that resolutions are practical and context-specific. This approach not only enhances stakeholder trust but also contributes to the overall success and sustainability of the REWARD project.

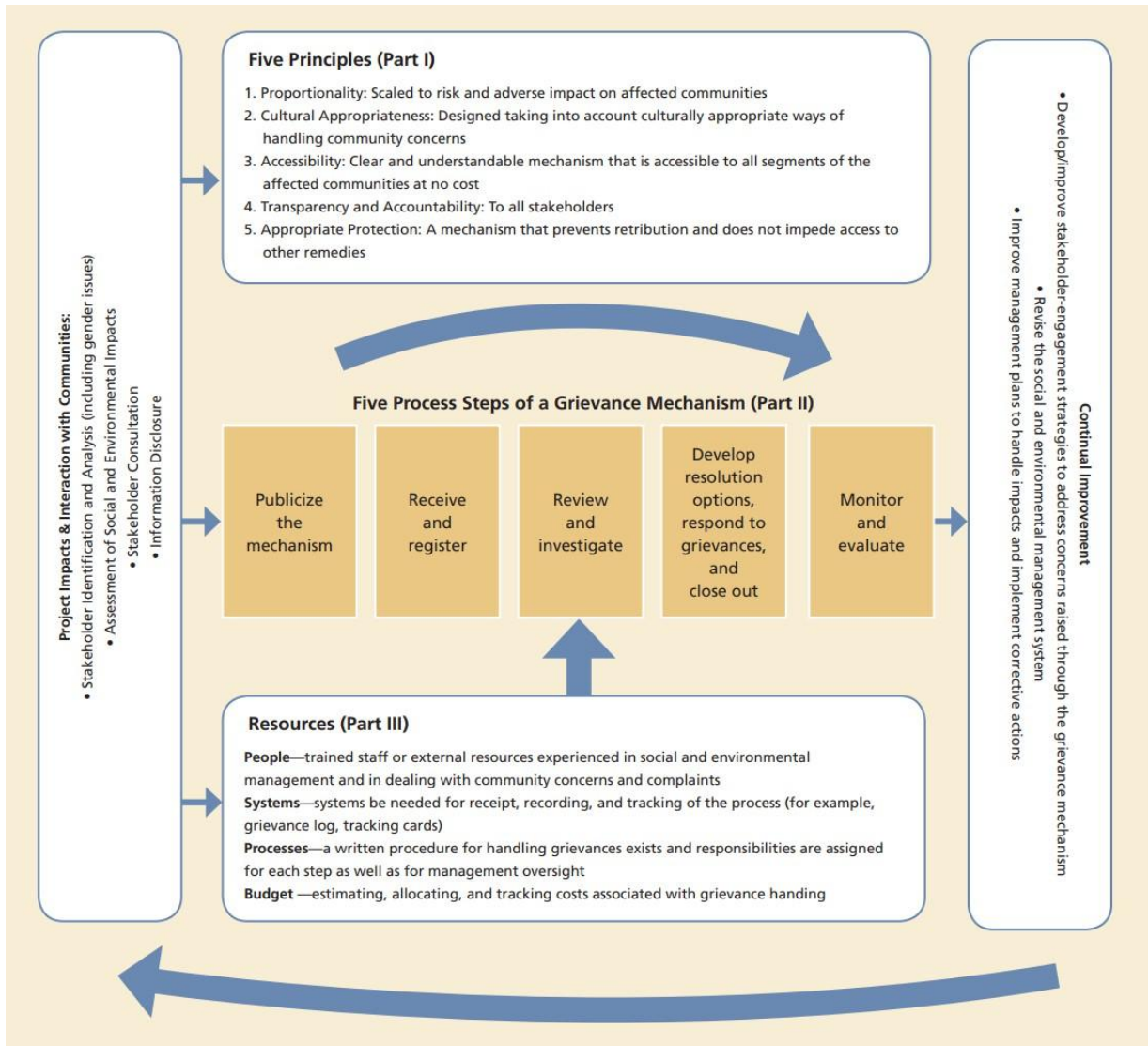


Figure 1: Basic Elements of a Grievance Redress Mechanism

1.5 Structure of the GRM

The mechanism applies to the REWARD project in addressing complaints, grievances, and issues raised by stakeholders due to perceived project impacts and/or incidents including, but not limited to, socio-economic, environmental, health, or safety aspects. Following international good practice, the REWARD project will establish a specific mechanism for dealing with grievances that as much as possible do not involve court action, by establishing a Grievance Redress Committee (GRC)¹ at different levels to handle and address grievances

¹ The Grievance Redress Committee (GRC) involves already established committees among key stakeholder group representatives, including the Social Development Specialist (SDO) representing the CPCU/PIU. The committee is intended to formalise a system for stakeholders to solve problems and/or issues related to the REWARD project collectively and to receive regular feedback from the REWARD CPCU/PIU on the project. It will serve as a forum for the project stakeholders to express and channel their concerns which affect them directly regarding important issues related to the project.



following standard procedural steps.

The GRM for the REWARD project shall consist of a three-tier system, organized under the following structures;

- The Local levels;
- The Regional level; and
- The National level.

Level I – Local Level

At the local level, the grievance redress mechanism is managed by the local committee based in the local communities, which have existing traditional and cultural grievance redress mechanisms. This committee consists of the village head, the village development committee chairperson, the youth representative, the religious leader (imam), the women representative and the district chief as the chairperson of the local committee. The REWARD Social Development Specialist is also part of this committee representing the CPCU/PIU. The committee's primary responsibility involves handling grievances and complaints directly at the project site, which includes communities around the rice fields and work sites. The general process requires that the aggrieved stakeholder/complainant first raise a grievance at the local level, which is furthered referred to other higher levels if not resolved at the local level. The local level GRC will work closely with the aggrieved stakeholders to clarify and resolve any misunderstanding that could give rise to conflicts or further complaints.

The local committee is responsible for receiving and registering grievances and complaints from the stakeholders within the local community. Upon receiving a complaint, the committee conducts an investigation and internally reviews the grievance to determine its merits. After a thorough review, the committee proposes a resolution and communicates it to the complainant. The local GRM Committee also has the responsibility to report the grievance and the proposed resolution to the regional level for further action and documentation.

Level II – Regional Level

At the regional level, the grievance redress mechanism committee constitutes members of the Technical Advisory Committee (TAC) headed by the Regional Governor who is the supreme authority at the regional level, with the Social Development Specialist (SDO) representing the REWARD CPCU/PIU serving as the secretary to the committee. The TAC members primarily



comprise staff representatives of National institutions such as the Department of Agriculture (DAA), Department of Forestry (DoF), National Environment Agency, Ministry of Youths and Sports, Ministry of Gender, Women and Children, Department of Water Resources, Department of Livestock as well as the security forces etc.

The regional GRM is saddled with the responsibility of receiving and resolving complaints/issues that cannot be resolved at the local level in a fair, objective, timely and accountable manner. The committee is also tasked with resolving complaints and verifying the merits of grievances reported by the local-level GRM committee. Once a grievance is reviewed, the committee communicates its decisions to the complainant and provides any necessary documentation to support the resolution process.

The committee through the SDO records all grievances, categorizes them, and prioritizes those that need immediate resolution. It maintains comprehensive records, including registers, meeting minutes, and correspondence, to ensure transparency and accountability. All received complaints and the progress of remediation are documented for future reference. The regional committee is also responsible for forwarding complaints and grievances that it fails to resolve at the regional level.

Level III – National Level

At the National level, the grievance redress mechanism involves the Judiciary and Courts. This level is characterized by the national legal structure, which includes law courts tasked with arbitrating between the project and the complainant. The National legal structure is responsible for providing a formal legal platform to resolve disputes that cannot be settled at the local and regional level.

Grievances escalated to the national level are examined thoroughly by the courts and legal system, considering all the evidence and testimonies presented by both the complainant and the project representatives. The judiciary ensures that all parties receive a fair hearing and that the resolution complies with national laws and regulations. The role of the courts is critical in upholding justice and ensuring that the grievance redress mechanism operates with integrity and impartiality.

This structured approach, spanning from the local to the national level, ensures that grievances and complaints related to the project are addressed promptly and effectively, maintaining transparency, fairness, and accountability at every stage.

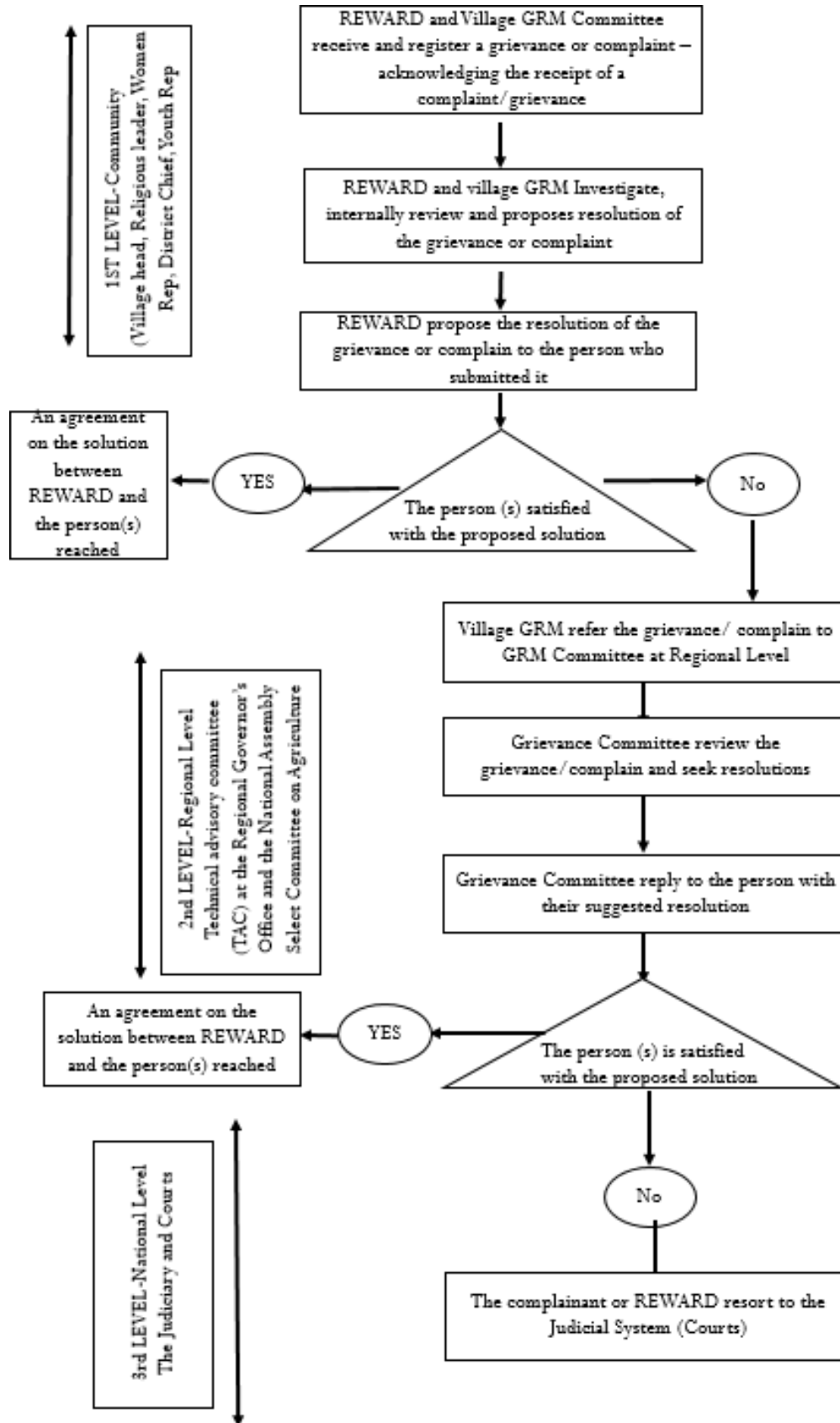


Figure 2: Grievance Mechanism Structure



1.6 Project Description

The Regional Rice Resilient Value Chains Development (REWARD) Program has four distinct investment components:

Component 1: Development of sustainable, climate-resilient rice production systems to ensure adequate production of quality rice paddy for millers, encompassing climate-resilient irrigation schemes and management services, and improving access to climate-resilient quality inputs, mechanization services, and knowledge for climate-smart agriculture.

Component 2: Processing & Marketing, which focuses on developing rice processing clusters, agribusiness, and market links for trade facilitation. It encompasses developing and modernizing processing infrastructure and strengthening capacities of smallholders and commercial players along the value chain; developing information systems, innovative technologies (including digital), and consumer-oriented branding to improve market access; and promoting private sector investment by supporting businesses, especially those run by women and youth, and improving the availability of finance across the value chain to facilitate lending to processors, farmers, and other businesses.

Component 3: Policy & Governance, which focuses on supporting policy and regulatory reforms and harmonization at regional and national levels to ensure a competitive rice value chain compared to imports. It entails support for policy reforms and harmonization at regional and national scales; enhancement of control and regulations for agricultural inputs at regional and national levels; and development of regional and national management and monitoring systems based on digital technologies in line with the ECOWAS Rice Observatory (ERO).

Component 4: Program Coordination and Management aims to ensure swift and efficient implementation of project activities and attainment of objectives. This component supports regional and national coordination, monitoring, and evaluation, and facilitates results management and reporting on project implementation. Specific activities include reporting (including fiduciary), operations (including procurement and day-to-day management), communication and visibility enhancement (via TV and other mass media), and knowledge management. It also covers monitoring and evaluation (Mid-term Review and Project Completion Report) and provides for vehicles, motorcycles, and office equipment.



1.7 Project Sites and Locations

The project sites cover two (2) administrative regions comprising three agricultural regions namely: The Central River Region North (CRR-N), Central River Region South (CRR- S) and the Upper River Region (URR).

There are a total of five (5) intervention sites identified and selected for the REWARD Project. While there are two (2) sites selected at the Central River Region North (CRR-N), one (1) site at the Central River Region South (CRR-S), and two (2) sites were selected at the Upper River Region (URR). The choice and selection of the project sites have primarily been based on the production potential (availability of fresh water throughout the year) as well as the high potential in pump irrigable lands that will enhance agricultural production in the country thus prioritizing investment in areas with high market potential as well as areas with low risk of crop failure and high market potential.

The intervention sites are:

1. Central River Region North (CRR-N): Sanguley and Safalu
2. Central River Region South (CRR- S): Keserr Kunda
3. Upper River Region (URR): Dumpha Kunda and Limbambulu Bambo.

1.8 Key Stakeholder Identification

To define stakeholder relationships, vulnerability, and interest in and influence on Project activities, stakeholders were assessed and mapped. Mapping was done according to influence, interest, and the degree of potential impact based on the stakeholder mapping matrix. In addition, based on data from the various policy documents of the Project, and interactions with the internal personnel, key stakeholders were identified. These stakeholders are those who are to be involved, concerned and interested in the successful implementation of the project. The identified stakeholders (list not exhaustive) are:

- The Gambian National Environment Agency (NEA)
- The Gambian Ministry of Agriculture
- REWARD Project Implementation Unit (PIU)
- Central Project Coordinating Unit (CPCU) Members
- Members of Sanguley Community, Traditional ruler, Men group, Women group, Youth group, Religious leaders



- Members of Safalu Community, Traditional ruler, Men group, Women group, Youth group, Religious leaders
- Members of Keserr Kunda Community, Traditional ruler, Men group, Women group, Youth group, Religious leaders
- Members of Dampha Kunda Community, Traditional ruler, Men group, Women group, Youth group, Religious leaders
- Members of Limbambulu Bambo Community, Traditional ruler, Men group, Women group, Youth group, Religious leaders
- The Governor of Central River Region (CRR), Upper River Region (URR) and the Technical Advisory Committee (TAC)
- Regional Agricultural Team (CRR and URR)
- National Agency for Women Farmers Association (NAWFA)
- National Farmers platform
- Plant Protection Services (PPS)
- Department of Forestry (DoF)
- Rice Farmers' Cooperative Society (Keserr Kunda)
- Maruo's Farm
- Department of Parks and Wildlife Management (DPWM)
- Department of Water Resources (DWR)
- African Development Bank (AfDB)
- Soil and Water Management Services (SWMS) of the Department of Agriculture
- Agricultural Engineering Services (AES)
- The Gambian Department of Labour
- The Gambian Ministry of Employment and Trade
- The Gambian Ministry of Gender and Children Affairs
- The Gambian Traditional leaders, Representatives of local groups including youth and women group
- Vulnerable Groups
- NGOs, etc

1.9 Potential Grievances

The REWARD Program, fully aligned with the Bank's strategic frameworks, addresses key outcomes of the Feed Africa Strategy, bridging the rice self-sufficiency gap, reducing import



bills, and creating gainful employment reflecting the Bank's commitment to climate change and green growth. In this course of actualizing these objectives, it is anticipated that, among other likely issues, under component 1 (Sub-component 1.1: Sustainable climate-resilient irrigation schemes and irrigation management services and Sub-component 1.2: Improving the availability of, and access to, climate-resilient quality inputs, mechanization services, and knowledge for climate-smart Agriculture) and component 2 (Sub-component 2.3: Promoting private sector investment by supporting businesses, especially those run by women/youth, and improving the availability of finance across the value chain to facilitate lending to processors, farmers, and other businesses) will leads to poor land development and change of the land modalities, restriction in the usage of land, Increased road accidents due to unsafe driving habits; Occupational accidents around the construction areas, Increase in Noise levels and excessive vibrations with the associated disturbance to communities and fauna, Risk of Child labour and Violence against Children, gender-based abuse, particularly affecting females etc. if improperly managed could also lead to complaints and grievances or misunderstandings between the communities and all relevant parties in the project. The consultations generated valuable contributions to the proposed development. All stakeholders support the idea of the project to be developed in the proposed project areas taking into consideration the potential for the growth of economic activities in the region and the country at large. This does not eliminate the fact that people will be impacted by the project activities.

Other Potential Grievances that are likely to come up as a result of the Project activities are presented in Table 1 below:

Table 1: Anticipated Grievances and Concerns for the REWARD Program

Category	Anticipated Grievance/Concern
Inclusion and Representation	<ul style="list-style-type: none"> • Exclusion of certain farmer groups, women, youth, or marginalized communities from key initiatives. • Insufficient representation of local stakeholders in planning and implementation. • Lack of meaningful engagement and participation in project decisions. • Insufficient representation of voices in policy and regulatory discussions.
Communication and Information Dissemination	<ul style="list-style-type: none"> • Inadequate dissemination of information about new initiatives, policies, training and technologies. • Miscommunication about the benefits and requirements of new practices.



Category	Anticipated Grievance/Concern
	<ul style="list-style-type: none">• Concerns about meeting new project update requirements or adapting to changes.
Adoption and Implementation Challenges	<ul style="list-style-type: none">• Opposition to adopting new irrigation methods, crop varieties, or processing technologies.• Resistance to changes in traditional farming, processing, and marketing practices.• Poor coordination between project partners and local stakeholders.• Inconsistent application of new practices across different regions.• Delays in the implementation of infrastructure and technologies
Quality and Effectiveness of Services and Infrastructure	<ul style="list-style-type: none">• Dissatisfaction with the quality and effectiveness of irrigation, processing, and support services.• Concerns about the reliability and suitability of climate-resilient inputs and technologies.• Delays in procurement affect project timelines.• Health and safety concerns due to inadequate facilities and practices (e.g., waiting shades, sanitary facilities).
Environmental and Health Concerns	<ul style="list-style-type: none">• Concerns about the environmental impact of new schemes on water resources.• Health risks from improper handling or application of pesticides.• Risks of pesticide contamination affecting local ecosystems, water sources, and soil health.• Respiratory and health issues due to dust from windstorms and strenuous labour conditions.
Social and Safety Concerns	<ul style="list-style-type: none">• Exclusion of victims from support and protection in cases of sexual exploitation and abuse (SEA).• Ineffective reporting and accountability mechanisms for SEA incidents.• Safety concerns due to inadequate protective measures and facilities.• Concerns about child labour and forced labour practices at the rice fields.• Incidents of gender-based violence (GBV) linked to project activities.



2.0 LEGAL FRAMEWORK AND OTHER REQUIREMENTS ON GRM IN THE GAMBIA

2.1 National Legal Requirements

The Constitution of the Republic of the Gambia, 1997

As the major binding law for all national and regional policies, laws and regulations, the Constitution has several provisions relevant to consultation and participation. The right of the public and the community to full consultations and participation is enshrined in the following articles:

- Article 17: This article guarantees the protection of fundamental human rights and freedoms, emphasizing the state's responsibility to promote and protect the welfare of the people. It provides a foundation for ensuring that grievances are addressed fairly and justly.
- Article 25: This article provides for the right to freedom of expression, which includes the freedom to seek, receive, and impart information. This right supports the transparency required for an effective GRM.
- Article 207: This article mandates the establishment of an independent judiciary to ensure justice and fairness. It supports the legal recourse for grievances that cannot be resolved through administrative means.

The Environmental Impact Assessment (EIA) Regulations, 2014

- Regulation 15: This regulation requires that an Environmental Impact Assessment (EIA) report includes a description of the grievance redress mechanisms that will be used to handle complaints related to environmental impacts. It ensures that stakeholders have a clear process for addressing environmental grievances.
- Regulation 20: This regulation mandates public consultation and participation in the EIA process, ensuring that stakeholders have the opportunity to voice their concerns and grievances during the planning stages of a project.

The Local Government Act, 2002

- Section 28: This section mandates the establishment of District Development Committees (DDCs) and Village Development Committees (VDCs) which are responsible for facilitating community participation in local governance and



development projects. These committees play a crucial role in the GRM by serving as initial points of contact for community grievances.

- Section 78: This section requires local authorities to involve communities in the planning and implementation of development projects. It supports the establishment of GRMs at the local level to handle grievances related to these projects.

The Public Utilities Regulatory Authority (PURA) Act, 2001

- Section 12: This section empowers PURA to establish mechanisms for the resolution of complaints and disputes between consumers and service providers. This provision is particularly relevant for grievances related to utility projects funded by the REWARD Program.

The National Environment Management Act (NEMA), 1994

- Section 5: This section mandates the National Environment Agency (NEA) to ensure that all development projects comply with environmental regulations, including the provision of grievance redress mechanisms for affected communities.
- Section 18: This section requires that environmental management plans include procedures for addressing grievances related to environmental impacts, ensuring that stakeholders have recourse if they are adversely affected by a project.

The Gambia Public Procurement Authority (GPPA) Act, 2014

- Section 40: This section mandates that public procurement processes include mechanisms for addressing grievances and complaints related to procurement activities. This ensures that grievances related to the procurement aspects of development projects are handled transparently and fairly.

The Access to Information Act, 2021

- Section 14: This section guarantees the right of access to information held by public authorities, supporting the transparency required for an effective GRM. It ensures that stakeholders can obtain the information necessary to lodge informed grievances.

2.2 AfDB's OS Requirements on Project Grievance and Redress Mechanisms

The Operational Safeguard (OS) requirement on Project Grievance and Redress Mechanisms (GRM) is presented in AfDB's OS5 and OS7.



Hence, OS5 related to Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement requires that:

- The client shall establish a Grievance Redress Mechanism (GRM) that is credible, independent, and empowered at the local level to receive, facilitate, and address the grievances and concerns of affected people regarding land development and access to land.
- The local GRM must maintain sufficient independence, empowerment, and accessibility to stakeholders throughout all stages of the project cycle.
- All responses to grievances must be documented and included in project supervision formats and reports.

According to OS7 on Vulnerable Groups, the client ensures:

- Vulnerable groups, including but not limited to indigenous peoples, ethnic minorities, and marginalized communities, are identified and consulted during the project's planning, implementation, and monitoring phases.
- Specific measures are implemented to mitigate adverse impacts on vulnerable groups and enhance their participation and access to project benefits.
- Grievance mechanisms are designed to be accessible and responsive to the unique needs and concerns of vulnerable groups, ensuring they can raise grievances without fear of retaliation or discrimination.



3.0 CONTENT OF A COMPLAINT AND ADMISSIBILITY CRITERIA

3.1 Content of a Complaint

When submitting a complaint under the REWARD Program's Grievance Redress Mechanism (GRM), the complaint must identify the individual(s) submitting it, their contact details, and whether they are individuals or communities affected by REWARD-financed projects or investments or an authorized representative. If the complaint is submitted through an authorized representative, the representative must include their name and contact details and provide written proof of their authority to represent and act on behalf of the complainant. Such proof could be in the form of a power of attorney or an equivalent signed letter by the complainant, legally valid per the laws of The Gambia. The representative must also list the duly named complainant(s). REWARD will communicate directly with the authorized representative as necessary and appropriate. A complainant may also submit the complaint on their own behalf and appoint a contact person or persons for further communications regarding the complaint. REWARD may also communicate with the complainant directly if necessary and appropriate.

Required Information: The complaint must include the following details:

- **Name and Contact Information:** (telephone, email, and physical address) of the complainants (and their representative, if applicable).
- **Nature of the Grievance:** A clear definition or description of the project or investment, including project or investment name, implementing organization, location, and brief description of activities where possible, and parties involved (if known).
- **Adverse Impacts:** Any specific damages or losses allegedly caused or likely to be caused by the REWARD-financed operation, supported by documentation (such as photographs, contracts, and correspondence) where possible and appropriate, or provided later upon request.
- **Effective Date:** The effective date of the grievance and/or the date the impact was discovered.
- **Previous Steps:** A description of steps already taken and the status of discussions between the project or investment and the complainant or their representative.



- **Exhaustion of Remedies:** Evidence that out-of-court remedies provided by the project or investment have been exhausted and are unsuccessful, and/or evidence of delay by the project or investment beyond the stipulated timeline in the project or investment's grievance redress accountability mechanism.
- **Desired Outcome:** A description of how the complainant would like the grievance to be resolved.
- **New Evidence:** A statement of new evidence or changed circumstances justifying revisiting a complaint if the same issues have been examined previously.
- **Consent for Investigation:** A statement of consent for investigation and addressing the grievance and authorization to share relevant information with involved parties for resolution purposes.

3.2 Language

It is recommended to submit complaints in English or the preferred local dialect. If a complaint is filed in a language other than English, REWARD may require additional time to respond due to the need for translation. In such cases, REWARD will promptly inform the complainant or their representative about any expected delays.

3.3 Complaint Admissibility

Admissibility Criteria: A complaint is admissible for processing via this GRM if it:

- Is directly related to a project financed or supported by REWARD.
- Provides all the requisite information to be included in a complaint, as specified in Section 3.1 above.
- Describes the good faith, yet unsatisfactory, efforts that the complainant has made with the project to resolve the issues related to the complaint. Such efforts may include out-of-court avenues offered by the project, such as a project-level grievance redress accountability mechanism. Additionally, a description of the outcome of such efforts must be provided and an explanation for why such avenues failed to resolve the dispute.
- Is received, at least, post-financial close of the project and, at most, within twelve (12) months of the closure of the investment.



- The complainant must have a legitimate interest or be directly affected by the alleged harm or wrongdoing. The complainant should demonstrate a sufficient connection to the project to justify their involvement in the complaint process.
- The complainant is expected to have pursued and exhausted available administrative or project-level grievance mechanisms, if they exist, before approaching REWARD's complaint mechanism.
- The complaint should provide sufficient information, evidence, or documentation to support the allegations made. It should outline the nature of the harm, the parties involved, and the specific violations or issues raised.

Exclusions: A complaint will not be admissible for processing via this GRM if it:

- Exclusively concerns an issue or impact that does not fall within the scope of the REWARD Environmental and Social Management Policy, in which case the complaint will be forwarded to the relevant National institution.
- Concerns a project or parties that REWARD did not finance.
- Concerns one or more issues or impacts that the GRM has already treated in a previous complaint unless the current complaint describes new issues, facts, and/or impacts that were unknown when the previous complaint was filed.
- The complainant has not exhausted or used other avenues of out-of-court dispute resolution provided by the project unless the complainant proves that their good-faith use of such avenues could not occur.
- Lacks substance, is vague, or fails to provide relevant details may be considered frivolous and may not be admissible. Similarly, anonymous complaints, where the identity of the complainant cannot be ascertained, may be excluded.
- Relates to commercial disputes, contractual disagreements, or purely private matters between parties.
- Is unrelated to the REWARD-financed projects or programs may be excluded.
- Falls under the jurisdiction of another independent mechanism or legal process, it may be deemed inadmissible and redirected to the appropriate authority.



- Has already been submitted and addressed through the institution's complaint mechanism, a subsequent complaint on the same issue may be excluded unless there are new and substantial grounds to justify reconsideration.



4.0 REWARD GRIEVANCE REDRESS MECHANISM- PROCEDURAL STEPS

The REWARD Program is committed to ensuring that all stakeholders have a clear, transparent, and effective process for addressing grievances related to its projects. Recognizing the potential for development initiatives to impact communities and individuals, the Grievance Redress Mechanism (GRM) has been established as a critical component of our commitment to accountability, transparency, and stakeholder engagement.

The purpose of this chapter is to outline the procedural steps for the GRM, detailing how grievances can be lodged, acknowledged, reviewed, and resolved. By providing a structured approach to grievance redress, REWARD aims to ensure that all complaints are handled promptly and fairly, minimizing any negative impacts and fostering positive relationships with all stakeholders.

This mechanism not only addresses grievances but also serves as a feedback loop to improve project implementation and mitigate future issues. Through continuous monitoring, reporting, and evaluation, the GRM helps maintain high standards of environmental and social governance, ensuring that the REWARD Program operates in a manner that respects and responds to the needs and concerns of the communities it serves.

The following sections detail the specific procedural steps involved in the GRM, from the initial receipt and logging of a grievance to its resolution and closure, and the subsequent monitoring and evaluation of the grievance handling process. This comprehensive approach ensures that all grievances are given due attention and resolved in a manner that is satisfactory to all parties involved.

Ensuring that stakeholders are well-informed and have easy access to the Grievance Redress Mechanism (GRM) is fundamental to the success of the REWARD Program. A transparent, accessible, and effective GRM fosters trust and accountability between the program and the communities it serves. This chapter outlines the measures and strategies implemented by the REWARD Program to raise awareness about the GRM and make it easily accessible to all stakeholders, including the most vulnerable groups.

The REWARD Program is committed to providing clear, comprehensive information about the GRM and its processes. Stakeholders must understand their rights and the avenues available for addressing grievances. This chapter details how information about the GRM will be



disseminated, the various channels through which grievances can be lodged, and the roles and responsibilities of different entities in managing and resolving grievances.

By promoting awareness and ensuring accessibility, the REWARD Program aims to create an environment where stakeholders feel confident in voicing their concerns, knowing that they will be heard and addressed promptly and fairly. This proactive approach not only helps in mitigating potential conflicts but also contributes to the overall effectiveness and sustainability of the program.

4.1 Information Availability

The REWARD Program will ensure that adequate information on the Grievance Redress Mechanism (GRM) is provided and clearly explained to stakeholders. The program will display posters informing stakeholders of their right to redress if they are dissatisfied with activities associated with REWARD-financed projects or investments. These posters will be displayed conspicuously and may also be presented digitally or in other forms as desired. The REWARD Program will inform stakeholders of the various channels available for redress, both within and outside the program's structure.

4.2 Complaint Channels

Aggrieved stakeholders (“complainants”) may communicate their grievances through a variety of channels, including phone, WhatsApp group, email, website, meetings, suggestion boxes, and walk-ins. Complaints can be made directly, anonymously (if necessary), or through third parties.

Affected parties may lodge/register a grievance using the following process:

4.3 Steps and Process

1. Receive and log/register grievance
2. Acknowledge grievance
3. Review and investigate grievance
4. Develop resolution options and prepare a response
5. Close grievance
6. Monitor, report, and evaluate

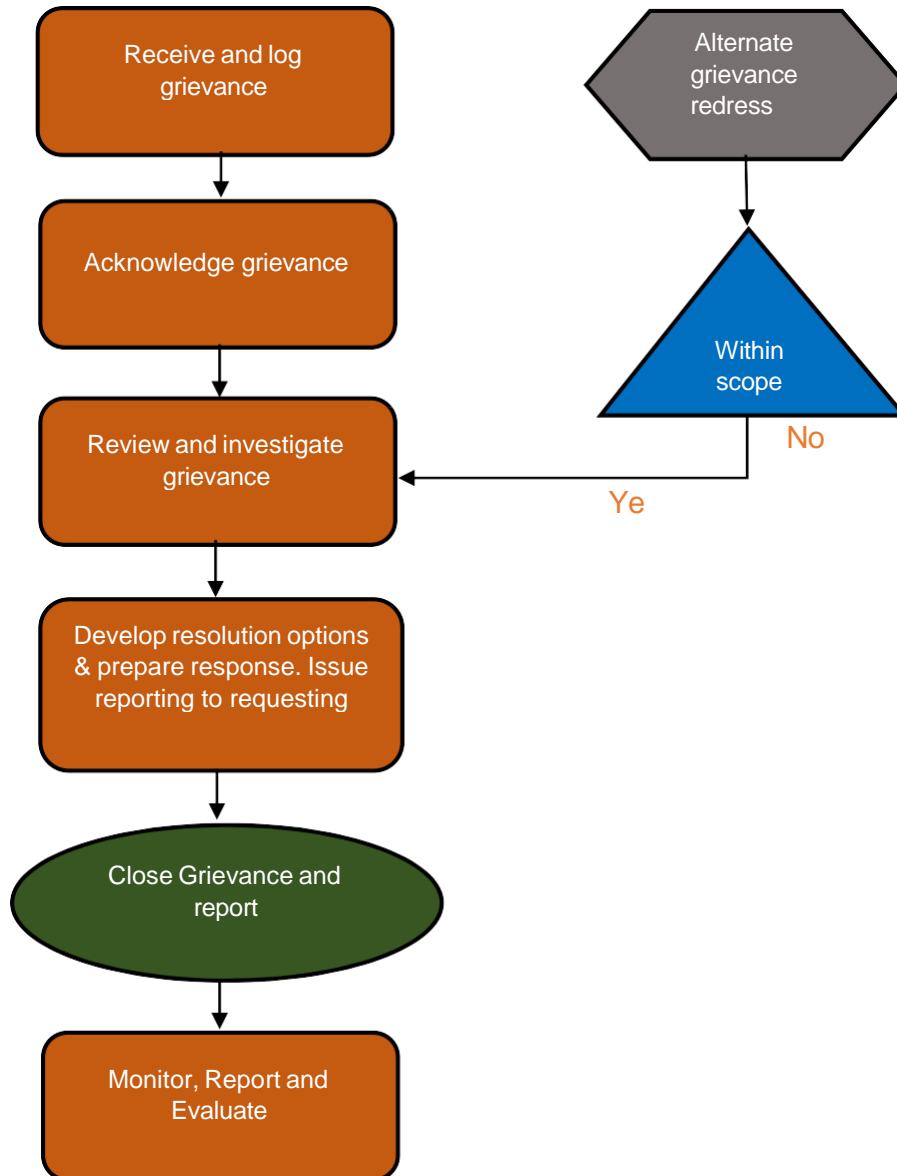


Figure 3: Flow Diagram of Grievance Redress Procedural Steps.

4.4 Grievance Handling Process

The REWARD Program is committed to addressing grievances in a transparent, timely, and culturally appropriate manner. The GRM process involves multiple layers to ensure all grievances are resolved effectively and fairly. For cases of Gender-Based Violence (GBV), the procedure for receiving and treating the complaint differs from the general procedure outlined below. The anonymity of the survivor will be maintained, and the confidentiality of the survivor's express consent will be upheld. The involved parties will not have their security breached. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) complaints shall be STRICTLY handled as prescribed in section 4.5 below.



- a) **Initial Submission:** Stakeholders can submit their grievances through the various channels provided. All grievances will be logged and assigned a unique reference number for tracking.
- b) **Acknowledgement:** The GRM team will acknowledge receipt of the grievance promptly, informing the complainant of the next steps and expected timelines.
- c) **Review and Investigation:** The Grievance Redress Mechanism Manager will review and investigate the grievance to determine its validity and the appropriate course of action. This may involve consultations with relevant departments or senior management.
- d) **Resolution Development:** The GRM team will develop resolution options in consultation with the complainant and relevant stakeholders. This may include site visits, dialogue, and implementation of corrective measures.
- e) **Communication of Resolution:** The preferred resolution or notice of further consultation will be communicated to the complainant in writing within a specified timeframe. Both parties will sign off on the agreed resolution.
- f) **Escalation:** If the grievance cannot be resolved at the initial level, it will be escalated to the REWARD Program management or an appropriate regulatory authority for further review and resolution.
- g) **Judiciary and Courts:** If a complainant seeks redress in a court of competent jurisdiction, the GRM process will be suspended unless the court action is withdrawn. Court action is a last resort after all other avenues have been exhausted.

4.5 Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH)/Violence Against Children (VC)

All complaints related to SEA/SH as well as VC shall be treated privately and confidentially, limiting information to what the survivor or complainant is freely willing to provide. A separate register shall be opened for this category of cases and shall ONLY be accessed by a member of the compliance team set up to handle cases of SEA/SH as well as issues related to violence against children (VAC). The complainant (if a survivor) shall be attended to with empathy, assurance of safety and confidentiality. If the complainant is not willing to divulge any information, this view should be respected by the GRC member receiving the complaint, and the complainant referred to the appropriate nearest health facility, approved available SEA/SH service provider or police, depending on the complainant's choice. Such a complaint should



also be reported to the African Bank Task Team as well by the REWARD PIU or any authorised representative.

Other considerations for the handling of SEA/SH grievances include: No SEA/SH data on anyone who may be a survivor should be collected without making referral services available to support them. All SEA/SH complaints should be referred to the right service provider and other relevant institutions and the information to be requested should be limited to:

- The nature of the complaint (what the complainant says in his/ her own words without direct questioning)
- If, to the best of their knowledge, the perpetrator was associated with the project; and
- If possible, the age and sex of the survivor.

4.6 Raising Awareness

To ensure stakeholders are aware of the GRM, the REWARD Program will undertake the following:

- **Community Meetings:** Conduct regular community meetings to inform and update stakeholders about the GRM.
- **Workshops and Training:** Organize workshops and training sessions for stakeholders, particularly focusing on how to lodge grievances and the processes involved.
- **Information Materials:** Distribute brochures, flyers, and other informational materials that explain the GRM process in simple terms.
- **Media Campaigns:** Utilize local media, including radio and newspapers, to raise awareness about the GRM and encourage stakeholders to voice their concerns.

The table below outlines the grievance handling process and the responsible institution/person at each phase:



Table 2: Grievance Redress Mechanism Process for the REWARD Project

Phase	Process	Description	Completion Time Frame	Responsible Institution/Person	Additional Notes
1	Receive and Log/Register Grievance	<ul style="list-style-type: none"> <i>Eligibility:</i> Any party affected by a REWARD-funded project or program, and who reasonably believes the project may have adverse impacts, can report it as a grievance. <i>Registration Platforms:</i> Complainants can use the GRM platform via email (grievances@rewardprogram.gm), in-person, phone, or written formats. Each complaint will be assigned a unique reference number and recorded. 	1 day	REWARD/GRC	Contact Information for Logging Grievances: Email: grievances@rewardprogram.gm Phone: +220 _____ Address: General Post Office Box 3875, Banjul Office Address: 8th Floor, Banjul Financial Center, Liberation Road, Banjul, The Gambia
2	Acknowledge Grievance	<i>Formal Acknowledgment:</i> After recording the grievance in the register, formally acknowledge receipt via letter, email, or phone. If the grievance is outside the scope of the GRM, inform the complainant and recommend an alternate means of redress.	1-3 days	REWARD/GRC	Acknowledge receipt of the grievance and inform the complainant if outside the scope of GRM
3	Screen and Establish the Merit of the Grievance	<ul style="list-style-type: none"> <i>Initial Review:</i> The complaint will be reviewed by the Grievance Redress Mechanism Manager to determine its validity. <i>Immediate Resolution:</i> Determine if the grievance can be resolved immediately or requires further investigation. 	3-7 days	REWARD/GRC	Engage relevant departments and senior management as needed. Conduct extensive investigations for complex grievances.



Phase	Process	Description	Completion Time Frame	Responsible Institution/Person	Additional Notes
		<ul style="list-style-type: none"> • <i>Departmental Involvement:</i> Various units or senior management may need to be involved. • <i>Complex Grievances:</i> An extensive investigation may be required for complex or widespread grievances. 			
4	Develop Resolution Options and Prepare a Response	<ul style="list-style-type: none"> • <i>Case-by-Case Basis:</i> All grievances will be dealt with on a case-by-case basis, considering the nature of the grievance, frequency of occurrence, and the number of complainants. • <i>Resolution Steps:</i> <ol style="list-style-type: none"> i. Convene an Incident Investigation Team to seek resolution within 30 days. This may include site visits and dialogue with affected parties. ii. Coordinate conflict resolution activities within 30 days. iii. Complete an Incident Investigation Report and present it within 30 days. iv. Discuss the preferred course of action with the affected person(s). v. Provide a written response within 14 working days. Both parties must sign the agreed resolution. vi. If necessary, escalate the grievance to the CEO for resolution within 14 days. 	30 days for investigation, 14 days for GRC escalation	REWARD/GRC	Case-by-case resolution steps include investigation, conflict resolution, and escalation if necessary. Provide interim response for complex cases.



Phase	Process	Description	Completion Time Frame	Responsible Institution/Person	Additional Notes
		vii. Provide an interim response in complex cases where resolution is delayed.			
5	Extra Intervention as a Disadvantaged Situation	Review the steps taken for redress and the conclusions reached. Provide additional intervention if needed, especially for complex cases.	2-4 weeks	REWARD/GRC/ Legal	Additional intervention may be required for complex grievances.
6	Judicial Adjudication	If unresolved, forward the complaint to the judicial system for adjudication.	Week 4 onwards	REWARD/GRC/ Legal	Escalate unresolved grievances to the judicial system for formal adjudication.
7	Closure of Grievance	Provide a written response to the complainant(s) outlining the decision reached, along with stipulated mutual commitments. The Grievance Redress Mechanism Manager will close the investigation through acknowledgement and sign-off from the complainant(s). If unresolved, the affected party may refer their grievance to an alternative dispute resolution mechanism, request government arbitration, or take legal action as a last resort.	Week 4 onwards	REWARD/GRC/ Legal	Final written response and sign-off from the complainant(s). Escalate to alternative dispute resolution or legal action if necessary.
8	Reporting	Once resolved, record the resolution in the grievance logbook.	Within 10 working days	REWARD/GRC/ Legal	Document resolution in the grievance logbook.
9	Archiving	Establish a physical and electronic filing system for all complaints received.	Within 5 working days	REWARD/GRC	Maintain both physical and electronic records of all grievances.
10	Monitor, Report, and Evaluate	<ul style="list-style-type: none"> <i>Monthly Monitoring:</i> The grievance process will be monitored monthly as 	Monthly/Annually	REWARD/GRC/ Legal	Continuous monitoring and reporting on grievance resolution. Capture lessons



Phase	Process	Description	Completion Time Frame	Responsible Institution/Person	Additional Notes
		<p>part of environmental and social monitoring.</p> <ul style="list-style-type: none">• <i>Special Reports</i>: Create special reports for complex grievances.• <i>Lessons Learned</i>: Capture lessons to update and improve the process.• <i>Monthly Internal Reports</i>: Include the number of grievances lodged, nature of grievances, resolution statistics, and ongoing efforts.• <i>Annual Detailed Report</i>: Prepare an annual detailed report.			learned and provide regular updates through monthly and annual reports.



5.0 MONITORING THE GRIEVANCE PROCESS

The grievance management system provides a formal mechanism for stakeholders to register concerns and for these to be addressed transparently, impartially, and in good faith. Effective monitoring of grievances is essential to identify any escalating conflicts or disputes early and ensure they are resolved promptly. The REWARD Grievance Redress Committee (GRC) will review the grievance mechanism and its effectiveness bi-annually. Based on the review outcomes, necessary amendments will be made, and the updated mechanism will be disclosed in a formal meeting.

5.1 Monitoring and Evaluation Process

Grievances will be logged, tracked, and monitored systematically to ensure they are managed effectively. The following matrix outlines the key aspects of the monitoring process within the REWARD Program:

Table 3: Grievance Lodging/Register Matrix

Field	Details	Example
Unique Reference Number	A unique identifier assigned to each grievance.	GRM-2024-001
Date Received	The date when the grievance was received.	2024-05-16
Complainant Name	The name of the individual(s) or community submitting the grievance.	Fatou Mendy / Village ABC
Complainant Contact Information	Contact details of the complainant (telephone, email, physical address).	Phone:+220123457Email: johndoe@example.com
Authorized Representative	Name and contact details of the authorized representative (if applicable).	Bakari Phone: +220 7654321 Email: bakari@example.com
Proof of Representation	Documentation proving the authority of the representative to act on behalf of the complainant.	Power of Attorney signed by John Doe
Project/Investment Name	Name of the project or investment related to the grievance.	REWARD Rice Development Project
Implementing Organization	Name of the organization implementing the project.	REWARD Program
Project Location	The location where the project is being implemented.	Village ABC, Region XYZ
Nature of Grievance	A brief description of the grievance.	Environmental impact from construction activities
Adverse Impacts	Specific damages, harm, or losses allegedly caused by the project.	Water contamination, crop damage
Supporting Documentation	Documents supporting the grievance (photos, contracts, correspondence).	Photos of contaminated water, email correspondence
Date of Impact	The date when the adverse impact was discovered.	2024-05-01



Field	Details	Example
Steps Taken	Description of steps already taken to address the grievance.	Discussions with the project manager, complaint to local authorities
Status of Discussions	Current status of discussions between complainant and project representatives.	Ongoing, no resolution reached
Exhaustion of Remedies	Evidence that other remedies have been exhausted or are unsuccessful.	Attempted resolution through project-level GRM, no success
Desired Outcome	The complainant's suggested resolution to the grievance.	Clean-up of contaminated water, compensation for crop damage
New Evidence	Any new evidence or changed circumstances justifying the complaint.	Recent water test results showing contamination
Consent for Investigation	Consent for investigation and sharing of information with involved parties.	Yes
Acknowledgment Date	Date when the grievance was formally acknowledged by REWARD.	2024-05-17
Assigned To	Name of the person/department assigned to handle the grievance.	Grievance Redress Mechanism Manager
Resolution Options Developed	Options for resolving the grievance developed by the GRM team.	Clean-up plan, compensation offer
Resolution Date	Date when the resolution was communicated to the complainant.	2024-06-01
Complainant Sign-off	Confirmation of complainant's satisfaction with the resolution (signature).	John Doe (Signature)
Follow-Up Date	Date for follow-up to ensure grievance resolution is effective.	2024-06-15
Closure Date	Date when the grievance was officially closed.	2024-06-20
Notes	Additional notes or comments.	Follow-up needed to ensure clean-up is maintained

5.2 Bi-Annual Review

Every six months, the REWARD Management will review the effectiveness of the grievance mechanism. This review will include:

1. Analyzing the number and types of grievances received.
2. Assessing the timeliness and effectiveness of grievance resolutions.
3. Identifying any recurring issues or trends.
4. Making necessary amendments to the GRM process to enhance its effectiveness.
5. Formally disclosing any amendments to the during a formal meeting.



6.0 ROLES AND RESPONSIBILITIES

Effective management and monitoring of grievances require clear roles and responsibilities. Below is a detailed outline of these roles:

Table 4: Roles and Responsibilities

Role	Responsibility
Grievance Redress Committee (GRC) (Local and Regional Committee).	<ul style="list-style-type: none">• Receive and record formal grievances in a grievance form provided.• Depending on the complexity of the grievance, the committee shall review, investigate and analyze the grievance at various levels.• Provide resolution and feedback to the complainant within the stipulated timeframe.
Social Development Specialist (SDO)	<ul style="list-style-type: none">• Represents the CPCU/PIU at the various GRC• Shall report the grievances in the registry to the REWARD CPCU/PIU on a bi-annual basis



7.0 GRIEVANCE REDRESS MECHANISMS TOOLS AND RESOURCES

The Grievance Redress Mechanism (GRM) for the REWARD Program provides various tools and resources to ensure grievances are effectively managed from receipt to resolution. These tools facilitate the clear communication of decisions, documentation, and overall transparency throughout the GRM process. This section outlines the key tools and resources used in the GRM, including communication channels, budgetary allocations, grievance forms, tracking spreadsheets, and databases.

7.1 Communication Tools

The following communication tools are used to convey decisions regarding grievances and to document the entire GRM process:

- **Letters:** Formal written communication to inform stakeholders of the status and resolution of their grievances.
- **Telephone Calls:** Direct phone conversations to provide timely updates and resolutions to stakeholders.
- **Emails:** Electronic communication for quick and efficient grievance handling and follow-up.
- **Grievance Focal Person:** A designated individual who manages grievance documentation and serves as the secretary to the relevant committees.
- **Informal Communications:** As agreed by the respective committees, informal methods may also be used to address and resolve grievances.

7.2 Grievance Form

A Grievance Form is a structured document used by stakeholders to formally submit their complaints, concerns, or grievances regarding a specific issue or situation. It is designed to gather essential information about the nature of the grievance and the individual or group raising the concern. Grievance Forms are crucial components of a Grievance Redress Mechanism, facilitating the systematic and organized handling of complaints efficiently and transparently.

Key elements of a Grievance Form:

- **Contact Information:** Name, address, phone number, and email address of the complainant.
- **Nature of Grievance:** Description of the grievance with checkboxes or drop-down menus to categorize the type.



- **Date and Location:** When and where the grievance occurred.
- **Description of the Grievance:** Comprehensive description of the grievance, including relevant facts, incidents, and supporting evidence.
- **Witnesses and Supporting Documents:** Information about witnesses and any supporting documents.
- **Desired Outcome:** Complainant's suggested resolution.
- **Anonymity Option:** Option for complainants to remain anonymous.
- **Signature and Date:** Complainant's signature and date of submission.
- **Grievance Number:** Unique grievance number assigned upon receipt.

7.3 Grievance Tracking Spreadsheet

A Grievance Tracking Spreadsheet is a dynamic and organized electronic document used to monitor and manage grievances received through the GRM. It serves as a central repository for recording and tracking the progress of each complaint from its initial submission to its resolution.

Key features of a Grievance Tracking Spreadsheet:

- **Grievance Number:** Unique identification number for each grievance.
- **Date of Submission:** Date when the grievance was submitted.
- **Complainant Information:** Contact details of the complainants.
- **Nature of Grievance:** Categorization of grievances.
- **Description of Grievance:** Brief description of the issue.
- **Current Status:** Status of each grievance (e.g., under investigation, resolved).
- **Assigned Responsible Person:** Person or team handling the grievance.
- **Date of Action:** Dates of specific actions taken.
- **Resolution Outcome:** Final outcome of each grievance.
- **Remarks and Comments:** Additional information or updates.
- **Trends and Analysis:** Charts or graphs to visualize trends and patterns.



7.4 Grievance Database

The Grievance Database is a crucial component of the REWARD project's GRM. It serves as a centralized and organized repository for recording, managing, and tracking all grievances raised by stakeholders throughout the project's implementation.

Key elements and functionalities of the Grievance Database:

- **Comprehensive Data Management:** Secure storage of all relevant data related to grievances.
- **Context-Specific Search and Retrieval:** Easily retrieve information based on specific criteria.
- **Real-Time Status Tracking:** Track the real-time status of each grievance.
- **Assignment and Responsibility:** Assign specific responsibilities for handling grievances.
- **Communication Log:** Record all interactions related to each grievance.
- **Reporting and Analytics:** Generate reports and analytics on key metrics.
- **Confidentiality and Data Security:** Prioritize the confidentiality and security of sensitive information.
- **Integration with GRM Procedures:** Seamless integration with the project's GRM procedures.

7.5 Grievance Records Transfer

Upon project closure, all grievance records should be compiled and transferred to the Department of Agriculture for continuous monitoring and future reference. The Project Implementation Unit (PIU) under the Department of Agriculture will be responsible for securely storing and organizing the grievances during the project implementation. The transfer of these records will help facilitate reporting, analysis, and monitoring of grievances in the long term, ensuring a comprehensive understanding of stakeholder concerns and the project's impact on the community.

7.6 Budget Estimate for GRM Activities

The REWARD will periodically review the functioning of the GRM and provide information on the effectiveness of the mechanism, especially with regard to the Project's ability to prevent and address grievances. A provisional budget estimate of Ninety-five thousand US dollars (\$ 95,000)



is proposed as a one-off budget for operationalizing the Grievance Redress Mechanism presented in this report. A summary breakdown is provided in *Table 5* below.

Table 5: Summary Budget Estimate for GRM Activities

GRM Activities	Amount (US \$)
Preliminary stakeholder engagements/awareness building	4,000
Orientation and training workshop for GRC members, involving an external consultant	15,000
Information dissemination and sensitization of the GRM (awareness and instructive materials), including complaint boxes	15,000
Secretarial costs (printing of forms, reports etc.)	12,000
Establish Telephone hotlines, WhatsApp portals and maintenance	4,000
Travel, verification, and investigation including meetings and logistics	20,000 (yearly)
Funding of GRC for optimal support to GRM	5,000
Procurement of Legal Services for GRM at the National level	8,000
Communication and logistic support to key GRC members (Chairmen)	8,000
Bi-annual town hall meetings and FGDs for GRM feedback on performance	4,000
Total	\$ 95,000



8.0 CONCLUSION

The Grievance Redress Mechanism (GRM) established for the REWARD Program embodies a commitment to transparency, accountability, and stakeholder engagement. It is designed to ensure that all grievances related to the program's activities are addressed promptly, fairly, and effectively, thereby enhancing trust and confidence among stakeholders. It provides a structured and systematic approach to handling grievances, from initial receipt to final resolution, involving clear procedural steps and well-defined roles and responsibilities. By leveraging various tools and resources such as communication channels, grievance forms, tracking spreadsheets, and databases, the GRM ensures comprehensive documentation and efficient management of grievances.



APPENDIXES



Appendix I: Grievance complaint form

Date: _____

Region _____ District _____ Area of Concern _____

File No.....

COMPLAINT

Name of Complainant: _____

Address: _____

Type of assets affected: _____

DESCRIPTION OF COMPLAINT:

.....
.....
.....
.....
.....
.....
.....

At, Date.....

Signature Complainant

Follow-up actions undertaken:

.....
.....



.....
.....
.....
.....
.....

At, Date.....

(Signature of Complainant)

Signature of Chairman of Committee

Resolution

.....
.....
.....
.....
.....

At..... Date.....

Signature of Complainant

Signature of Chairman of the Committee



Appendix II: Acknowledgement Receipt Registration

No.

Subproject:

Location:

Name and Address of Complainant:

PFI of Concern.....

Date of Complaint (DD/MM/YYYY)

Documents comprising the complaint: (petition, supporting documents etc.)

1)

2)

3)

4)

Summary of Complaint:

.....
.....
.....
.....
.....

Name and Signature of the Complainant:

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.....
.....
.....

Name and Signature of the Person receiving the complaint:

.....
.....



Appendix III: Grievance Information Form (GIF)

Subproject: Location:

Date: (DD/MM/YYYY)

Place of Registration:

Registration No:

Contact details of the complainant:

Name: Age: Gender:
Address:

Telephone No. Email Address:

Location-related to the complaint/issue: Location/Town:
.....

PFI of Concern:.....

Category of complainant:

- Affected person
- Mediator for the affected person
- Civil organization / Service Organization
- Other(specify)

Summary of grievance:

.....

(Attach letter or a petition/documents as submitted) Source of complaint: Attachments:

1) _____

2) _____

3) _____ Prepared by: Date:.....(DD/MM/YYYY)

Appendix IV: Grievance Information Documentation Form (GIF)



Sub-project:Location:

Date:..... (DD/MM/YYYY) Place of Registration:

Registration No.:

Concern PFI.....

Contact details of the complainant:

Name:..... Age:.....Gender:

Address:.....Phone No.....

Email Address:Location related to the complaint/issue:

Location/Town:.....

Category of complainant:

- Affected person
- Mediator for the affected person
- Civil organization / Service Organization
- Other (specify)

Summary of grievance:

.....

.....

.....

.....

.....

.....

(Attach letter or a petition/documents as submitted) Source of complaint: Attachments:

1) _____ 2) _____ 3) _____

Prepared by: Date:.....(DD/MM/YYYY)

Letter

Telephone;.....

Email:.....

Verbal Complaint Box



Other (Specify

Attachments: 1) _____ 2) _____ 3) _____

Prepared by: Date:.....(DD/MM/YYYY)



Appendix V: Meeting Record Format – (Grievance Redress Committee (GRC) and Other Meetings)

Project: Location:

Concern PFI.....

Date of the Meeting: Complaint Register No:

Venue of meeting:

Details of Participants:

Summary of Grievance:

.....
.....
.....
.....

Notes on Discussion:

.....
.....
.....

Decisions taken in the meeting / Recommendations of GRC:

.....
.....
.....
.....

Issue Solved / Unsolved _____

Signature of Chair Person of the meeting: Name of Chair Person:

Date: DD/MM/YYYY



Appendix VI: Grievance Tracking Sheet

Grievance Number	Date of Submission	Complainant Name	Contact Information	Nature of Grievance	Current Status	Assigned Responsible Person	Date of Action	Resolution Outcome	Remarks/ Comments

**Appendix VII: GBV/SEA/Sexual Harassment Complaint Form**

Name:	
Sex:	1. Male <input type="checkbox"/> 2. Female <input type="checkbox"/>
Age:	
Place of Incident:	
Date of Incident:	
Time of the Incident:	AM <input type="checkbox"/> PM <input type="checkbox"/>
Was the abuse against	a) An individual <input type="checkbox"/> b) Group <input type="checkbox"/>
The form of incident:	Harassment <input type="checkbox"/> Verbal Abuse <input type="checkbox"/> Discrimination <input type="checkbox"/>
Assault/physical abuse <input type="checkbox"/> Rape/Sexual assault <input type="checkbox"/> Illegal arrest <input type="checkbox"/>	
PERPETRATORS	
Discriminated/ Harassed / Abused by:	
Co-worker:	Yes <input type="checkbox"/> No <input type="checkbox"/> Contractor: Yes <input type="checkbox"/> No <input type="checkbox"/>
Supervisor/Manager:	Yes <input type="checkbox"/> No <input type="checkbox"/> Security Personnel Yes <input type="checkbox"/> No <input type="checkbox"/>
Employer:	Yes <input type="checkbox"/> No <input type="checkbox"/> Partner: Yes <input type="checkbox"/> No <input type="checkbox"/>
Community members:	Yes <input type="checkbox"/> No <input type="checkbox"/> Other (specify) _____
Date and time the compliance team made its first attempt to address the incident through its staff	
<input type="text"/> <input type="text"/> <input type="text"/>	Time am pm
Type of post-violence support provided	

**Section B**

Services	Duration of service	Provided within 5 days
Tick the applicable post-rape care service provided		
a) HIV testing service		
b) Emergency contraception		
c) Complaint registration at the police station (provide details)		
d) Psychosocial/trauma counselling		
e) PEP provided		
f) STI screening and treatment		
g) Legal support		
h) Medical examination		
i) PRC form filled		
j) Other services provided: specify:		
Non-sexual violence		
a) Medical services and care		
b) Psychosocial/trauma counselling		
c) Complaint registration at the police station (Provide details)		
d) Legal Support		
Where is the person now: Dead <input type="checkbox"/> Imprisoned <input type="checkbox"/> Hospitalized <input type="checkbox"/> At home <input type="checkbox"/> Safe space <input type="checkbox"/>		
Follow-up action plan:		
Date issue was completely addressed <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		

Compliance Team member (enter name): _____