



GRIEVANCE REDRESSAL MECHANISM (GRM) SINDH FLOOD EMERGENCY REHABILITATION PROJECT (SFERP)



**Project Implementation Unit (PIU)
SFERP (P&DD Component)**

Table of Contents

1. Background:	2
2. Project Description:	2
3. Rational	3
4. Grievance Redress Mechanism (GRM)	3
4.1 Objective and Composition of GRM:.....	3
4.2 Specific Objectives:	4
4.3 GRM structure.....	4
4.3.1 Project Steering Committee (PSC) Level	5
4.3.2 GRC at PIU Level	5
4.3.3 GRC at SMP's Head Office Level:	6
4.3.4 Grievance Redressal Committee I at Sites for component 1 & 3/District for component 02:	6
5. GRM for workers/ labor	8
4. Grievance Redress Mechanisms for GBV and SEA/SH	8
5. Role of Contractors/SMPs in GRM Complaints Register	9
6. Capacity building/ Training.....	9
7. Reporting and Monitoring.....	9
8. Dissemination.....	10

List Of Abbreviation

CLO	Community Liaison Officer
CSC	Construction Supervisory Consultant
E&S	Environmental & Social Safeguard
ESMP	Environmental Social Management Plan
GRM	Grievance Redress Mechanism
GoS	Government of Sindh
GFPs	Grievance Focal Points
GRC	Grievance Redressal Committee
P&DD	Planning and Development Department
PAPs	Project Affected Persons
PIU	Project Implementation Unit
PSC	Project Steering Committee
SOPs	Standard Operating Procedures
GBV	Gender Based Violence
M&E	Monitoring & Evaluation
MIS	Management Information System
SH	Sexual Harassment
SEA	Sexual Exploitation & Abuse
SFERP	Sindh Flood Emergency Rehabilitation Project
SMP	Social Mobilization Partners
VO	Village Organization
WB	World Bank

GRIEVANCE REDRESSAL MECHANISM (GRM)

1. Background:

The monsoon season of 2022 has brought heavy rains causing high river flood in the province. The rainfall in various districts has been recorded up to 900 mm. The river Indus discharge recorded above 0.6 million cusecs due to heavy downpours in its catchment coupled with local rains. The high flood at Kotri Barrage persisted due to hill torrent emanating from Khirthar Mountains. The two month's rains and River Indus Flood caused heavy losses to human life, livestock, crops, houses, private buildings, Industries, and public infrastructures like roads, irrigation; river protective embankments (Bunds) and drainage networks, and railways.

The 2022 floods will also impact the economy of Pakistan. Growth is expected to reach only around 2 percent in FY23. Due to higher energy prices, the weaker Rupee, and flood-related disruptions to agricultural production, inflation is projected to rise to around 23 percent in FY23. Pakistan consistently ranks among the top 10 countries worldwide most affected by climate change. Extreme weather events have increased in frequency and intensity, impacting ecosystems, people, settlements, and infrastructure. Heatwaves, heavy precipitation events, droughts, and cyclones are prevalent risks. There is also significant uncertainty surrounding future precipitation rates in Pakistan, underscoring the need for better preparedness for unforeseen extreme precipitation events. Research highlights the risk of increased frequency and intensity of flood and drought events, brought on by changes in the seasonality, regularity, and extremes of precipitation. These changes in climate and extreme events are likely to disproportionately affect the most disadvantaged groups, among these low-income businesses, those engaged in manual labor jobs, poorer farmers, women and children. Emergency rehabilitation is essential to facilitate communities in recovering from the 2022 floods.

2. Project Description:

The Sindh Flood Emergency Rehabilitation Project (SFERP) will respond to the impact of the 2022 floods in Sindh by supporting recovery, improving livelihoods, rehabilitating selected infrastructure, and strengthening institutional disaster management capacity, with an aim to improve the climate change and disaster resilience of communities and build back better. The Project Development Objective is to rehabilitate infrastructure and restore livelihoods in selected areas affected by the floods and strengthen the Government's capacity to manage disaster risks and climate impacts. The Project includes the following components:

Component 1 – Infrastructure Rehabilitation

Subcomponent 1.2: Restoration of Roads and Allied Infrastructure.

Subcomponent 1.3: Restoration of Water Supply Schemes

Component 2 – Livelihood Restoration

Component 3 – Institutional Strengthening for Resilience and Technical Assistance

Subcomponent 3.1: Expansion of Sindh Emergency Rescue Service

Subcomponent 3.2: Enhancing Preparedness for Floods

Component 4 – Project Management and Operational Costs

Component 5 – Contingent Emergency Response

3. Rational

Sindh Flood Emergency Rehabilitation Project is a multi-dimensional project with diversified interventions including: i) Infrastructure Rehabilitation ii) Livelihoods Restoration iii) Institutional Strengthening for Resilience and Technical Assistance and iv) Project Management. This mega project is being executed all over Sindh involving a variety of stakeholders mainly the poor, small and medium sized farmers, tenants, women, female headed households, laborers, equipment suppliers, contractor, SMPs and all others linked directly or indirectly with public infrastructure sector. As such, multifarious issues and constraints may arise as a result of the project execution. In this situation, with an inadequate means to voice and resolve grievances, communities/stakeholders/staff/contractors/partners may turn to other venues to protest where the risk level for the project may dramatically increase. Alternatively, they may feel powerless to act, while their grievances—unresolved, ignored, or scorned, accumulate over time, eventually erupting into intractable stakeholders opposition. Therefore, the complaints / grievances / feedback/ quarries/ suggestion are to be addressed through a well-organized Grievance Redressal Mechanism at the Department, project, project partners and site/VO level for the success of the project.

4. Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is an institutional arrangement that allows stakeholders to address grievances related to the project through a timely, transparent, and predictable process. A grievance is defined as any formal communication that expresses dissatisfaction about an action or lack of action, about the standard of services, works or policy, deficiency of service, works or policy of the project management and its implementation mechanism. During project execution, different issues and constraints may arise. In this situation, if stakeholders have inadequate means to voice and resolve grievances, they may turn to other venues, which may be cumbersome and lengthy, leading to delays in the project. Alternatively, if their grievances remain unresolved or ignored over time, it may lead to inflexibility, stalemate and delays for the project to meet its sustainable development goals.

The SFERP GRM will be gender-responsive, culturally appropriate, and readily accessible to the stakeholders at no cost and without retribution. It will enable Project Affected Persons (PAPs), local communities, employees, and other affected stakeholders to raise grievances and provide suggestions vis the sub-projects, with the project proponents and contractors, and seek redress when they perceive a negative impact arising from the activities. This mechanism serves as a platform to promptly resolve and address community concerns, reduce risks, and strengthen systems and processes, thereby contributing to positive service delivery. Therefore, the complaints/grievances should be addressed through a well-organized Grievance Redress Mechanism (GRM) covering all activities under the project.

4.1 Objective and Composition of GRM:

The principal objective of GRM is to implement and maintain a procedure for handling the all type of grievances/ concerns of the project stakeholders. This procedure will include a redressal mechanism scaled to the project's identified risks and adverse impacts, focusing on stakeholders. Standard Operating Procedures (SOPs) and informational material will be prepared for the SFERP GRM in Urdu, Sindhi and English and made publicly available as soon as the project begins implementation phase.

4.2 Specific Objectives:

- i. To systematically process complaints received from the Project Affected Persons (PAPs) and other stakeholders and provide a prompt, transparent and fair response and resolution without reprisals;
- ii. To provide project staff with practical suggestions/feedback that allows them to be more effective, accountable, transparent, and responsive to beneficiaries;
- iii. Increasing stakeholder involvement in the project
- iv. To train staff of the project so as to handle grievances effectively and amicably.
- v. To redress all types of grievances including technical, social, environmental, procurement and financial management aspects of the project.
- vi. The proposed GRM should ensure responsiveness at all level of complaint handling and confidentiality to the PAPs regarding their complaints.
- vii. The GRM is expected to address different types of complaints such as Compensation, Environmental issues (e.g. noise, pollution, solid waste management, flora/fauna, etc.); Social issues (Exclusion, Inclusion); Gender Based Violence (GBV), Sub projects sites selections, Procurement & Financial and others.

4.3 GRM structure

The SFERP Grievance Redressal Mechanism (GRM) is established at three levels starting from the site, PIU and Project Steering Committee (PSC) for component 1 & 3 and at four levels starting from the VO, District, Head Office & PIU and Project Steering Committee (PSC) for component 2. The process at each level is defined as under:

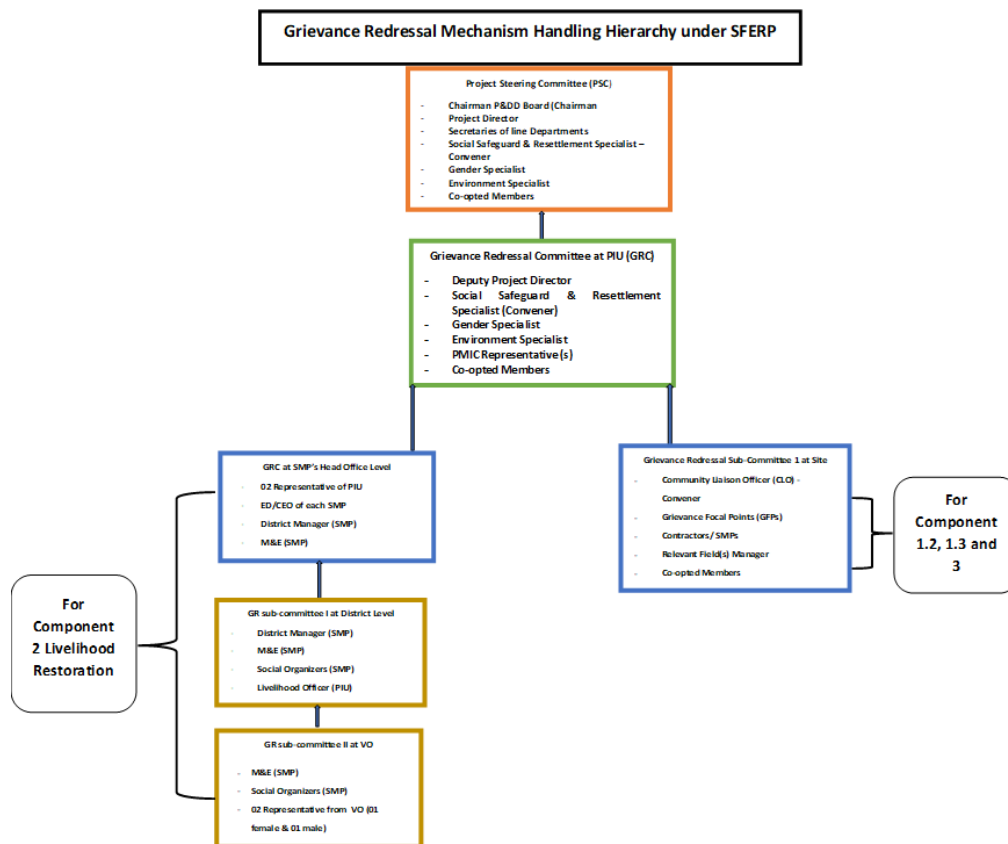


Figure I: SFERP Grievances Handling Hierarchy

The different GRM forums, units, sub-units and field units, and their GRM roles and responsibilities are described below.

4.3.1 Project Steering Committee (PSC) Level

The PSC will meet on a quarterly basis to review the grievances during subproject implementation phase, and will be convened for special grievance redressal meetings as needed. PSC members and the Secretary will address the grievance with a viable resolution in coordination with Project Director. Grievance must be lodged with the GRC first for onward submission and reporting to the PSC level.

4.3.2 GRC at PIU Level

A Grievance Redress Committee (GRC) has been established at SFERP PIU office which shall resolve the grievances of affected persons/parties received at the PIU level and also forwarded from the GRC II which is unresolved at site level. If a grievance remains unresolved at the PIU level despite making best efforts till the stipulated time of 21 days, it will either be retained for another 21 days with prior agreement of the Project Director and the complainant, or sent to Project Steering Committee (PSC) for resolution, depending on the GRC's assessment on which is the best option to facilitate a resolution.

The GRC will function as a dedicated body that ensures the grievance redress process is effective and efficient. It will comprise Deputy Project Director, Social Safeguard & Resettlement, Gender Specialists, Environmental Specialist, Technical Specialist, Representative of CSC of PIU. Its Focal Person/Convener will be the Social Safeguards and Resettlement Specialist. Decisions or findings taken in the GRC would be binding upon the Consultants/Contractors/ SMPs.

The PIU will issue public notices to inform the public about the Grievance Redress Mechanism (GRM) sub-project area. The contractor/ SMPs will also display prominent signage containing the contact details of GRC and sub GRCs in the Sindhi language. The complainant(s) can lodge their grievances through toll free number **0800-90090** an email complaint@sferp.gos.pk phone (**021 34166273**), fax number (**021 34166273**) and in person visit the SFERP PIU office.

These toll-free number, phone, fax number and email address will be managed by GRC based at PIU. The Social Safeguard & Resettlement Specialist will be the designated focal person to receive complaint(s) in writing, through calls, fax, emails. Letter and office visit. The Social Safeguard & Resettlement Specialist will have resources and facilities to maintain a complaints database which will be digitized and available online, and will communicate with the Contractor/SMPs, Site Engineers/ field(s) managers, and CSC.

Given that female community members have restricted mobility outside their villages and homes, the female PIU staff (E&S and Gender Specialist) will be required to visit the local communities to record grievances. The frequency of visits will depend on the nature and magnitude of activity in an area and the frequency of grievances.

The responsibilities of the GRC at PIU are:

1. The Social Safeguard & Resettlement Specialist shall be the focal person for GRC, which is responsible for logging the complaint and date of receipt onto the complaint database and informing the CSC and the Contractors/SMPs;
2. The GRC will coordinate with local government to receive project-related complaints made directly to them;
3. The GRC shall review, consider and resolve grievances related to environmental, social, gender and other issues during implementation received at the PIU level;

4. The GRC, with the CSC/ SMPs, is responsible for investigating the complaint to determine its validity and assess whether the source of the problem is due to project activities and identifying appropriate corrective measures. If corrective measures are necessary, GRC, through the CSC/SMPs, will instruct the Contractors to take necessary action;
5. Resolve grievances presented to the GRC within a period of two weeks;
6. Inform the Complainant of the investigation results and the action taken;
7. Undertake analysis of data on grievances and use this to make informed decisions;
8. GRC decisions, if not acceptable to the complainant(s), can be appealed to the PSC;
9. Maintain an updated online GRM database/Complaints Log.

4.3.3 GRC at SMP's Head Office Level:

GRC I will consist for components 02, including the 02 representative of PIU, Head of SMPs, District Manager SMPs and M&E SMPs. The SMPs' M&E person will be focal point for maintaining all records in the register and excel database that will be the further configured on project Management Information System (MIS). The GRC-I for component 02 will be responsible to deal those cases that which not resolved at GRC-II level. The head of SMPs will setup the meeting with GRC-II for review and discussion on grievance mechanism and will address the unresolved grievance with a viable resolution. If any of the grievance will unresolve at GRC-I level then it will be forwarded to the competent authority for effective resolution process.

4.3.4 Grievance Redressal Committee I at Sites for component 1 & 3/District for component 02:

At the Site/district level, a GRC-I will be established to enter the PAPs concerns/grievances. The GRC-I will function as a dedicated body that ensures the grievance redress process is effective and efficient manner. As above diagram clearly stated that GRM have 02 tear as per the nature of component as following bellow:

1. GRC-I will consist for components 01 and 03, including the Community Liaison Officer (CLO) from the contractor, GFPs from the community (as required by the nature of the work), the relevant manager from the contractor, E&S staff from the CSC, and a co-opted member. The Community Liaison Officer (CLO) appointed by the sub-project Implementation Partners (Consultants/ Contractors /SMPs) will be its Focal Person/Convener and be responsible for registering grievances and maintaining all records in the register and excel database will be configured on project Management Information System (MIS). Grievance Focal Points (GFPs) will be nominated by the community at each sub-project sites. These will be men and women whom the community can easily approach. Grievances can be received by GFPs or the CLO in writing or by word of mouth, and recorded in the grievance register by the CLO. The Grievance Register contents will be kept updated by the CLO and s/he will share the monthly Grievance Register along with soft database with the Grievance Redress Committee (GRC) at PIU level for onward configured to the MIS, so that the GRC can maintain a consolidated record of all subproject sites grievances. The Consultants/Contractors and the relevant field(s) managers are responsible for resolving site level grievances. If a grievance remains unresolved, it will be sent in writing by the relevant field(s) managers or focal point for CSC of each sub-project to GRC PIU.

The responsibilities of GRC-I shall include the following:

1. Review, consider and resolve grievances site level;
2. Conduct fact-finding pertaining to grievances;
3. Resolve grievances within a period of one week;
4. Undertake analysis of data on grievances and use this to make informed decisions;
5. Maintain confidentiality if complainants wish to remain confidential;
6. Maintain an updated GRM Complaints Log/ database/MIS.

During the complaint investigation, the GRC works with the Contractor and the CSC. If mitigation measures are identified in the investigation, the Contractor promptly carries out the mitigation. CSC is responsible for ensuring that the Contractor carries out the measures.

2. GRC-II will consist of components 02, including the District Manager SMPs, M&E SMPs, Social Mobilizer SMPs and Livelihood Officer SFERP. The M&E person will be work as Community Liaison Officer from the SMPs and s/he will be responsible to maintaining all records in the register and excel database will be configured on project Management Information System (MIS).
The GRC-I for component 02 will be responsible to deal those cases that which not resolved at GRC-II level. The GRC-I will set internal meeting with committee members on monthly basis, where the all member actively participate and review the all-registered grievance (resolved and unresolved) and will provide viable solution for unaddressed grievance. If any of grievance will not be addressed after putting efforts from GRC-I so those will be forwarded to the competent authority for viable resolution.

4.3.5 Grievance Redressal Committee II at VO for component 02

GRC-II will be effective for components 02, consisting the M&E and SM from SMPs and 02 representative (01 female and 01 male) from the relevant Village Organization. The GFPs will be men and women from each VO who will assist and facilitate the community members in reporting grievances resulting from project activities. The GFPs will be identified by the relevant community in consultation with the concerned SMPs. The concerned SMP would be responsible to provide training to the GFPs on GRM and also for making the community aware of the following components:

- Inform people about the GRM and how it works, and their options depending on the types of complaint;
- Types of grievances not acceptable/eligible to the GRM;
- Intake channels at the GRM, e.g., toll free number, phone numbers, postal, email and website, and information that should be included in a complaint;
- Inform the Complainant of the investigation results and the action taken, and option of appeal to PSC if not satisfied with the outcome;

Two GFPs (a female and a male) will be selected for each sub-project site.

The flow-diagram for handling the grievances is presented below;

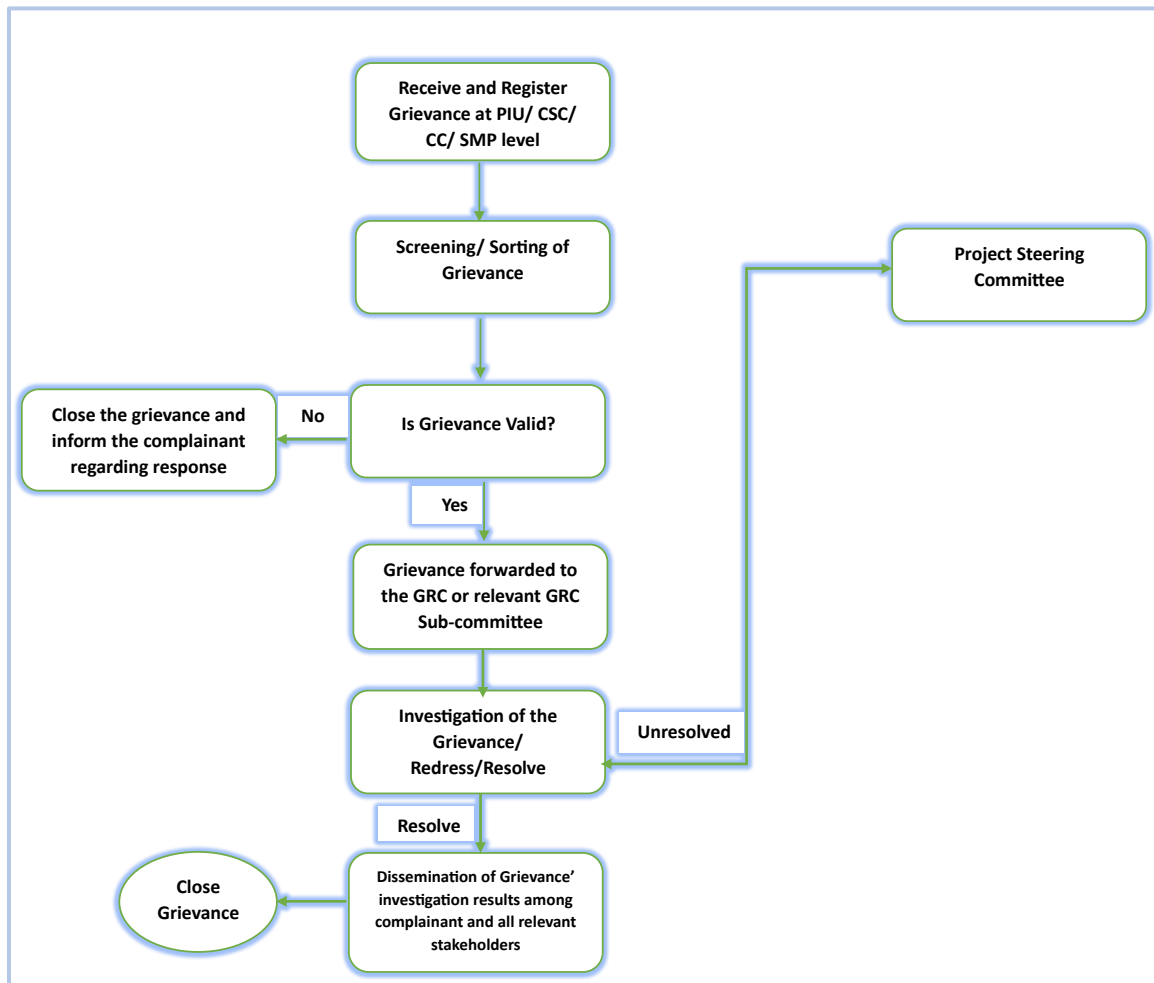


Figure II: SFERP GRM Process Flow

5. GRM for workers/ labor

Community Liaison Officer (CLO) will serve as Grievance Focal Point (GFP) for workers/labor complaints at site level. If the issue is successfully resolved, no further follow-up is required, and the case shall be documented and closed. In case the grievance is unresolved at the sites/contractors/SMPs level, the workers may directly approach GRC about their grievance. The prominent signage containing the contact details of GRC in the Sindhi language will be displayed at each site.

4. Grievance Redress Mechanisms for GBV and SEA/SH

Grievance Redress Mechanisms (GRM) will integrate mechanisms to track complaints related to SEA/GBV, including a feedback system for regular and timely feedback on actions taken to respond to complaints. These mechanisms will protect confidentiality of individuals without compromising access to justice.

Grievances related to GBV and SEA/SH will always be escalated to the PIU, and will be dealt with by the PIU designated Gender specialist. GBV/SEA related complaints will be communicated to World Bank no later than 48 hours after being received by the concerned GRC or sub GRCs.

The GRC/PIU will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of GBV service providers will already

be available with the GRC before project work commences. In general, the timeframe for resolution of complaints shall not exceed 21 days.

Grievances related to GBV and SEA/SH will be forwarded to the staff specifically trained to handle these types of complaints. The Social Safeguard & Resettlement Specialist (as GRC Focal Person) and the Gender Specialist at the PIU will receive the necessary training to handle such sensitive cases.

The GRC will develop specific procedures to ensure complainants are able to register their grievances anonymously, and in a survivor-centered and discreet manner. The GRC will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

5. Role of Contractors/SMPs in GRM Complaints Register

The Contractor/SMPs will maintain a complaint register at the campsite office to document all complaints received from the local communities. The register will also record the measures taken to mitigate these concerns. The final report regarding complaint closing will be communicated to CSC/SMPs, the relevant field(s) manager is responsible to provide the record to GRC/PIU. The PIU shall carry out the monitoring of the implementation of measures for the eradication of complaints.

6. Capacity building/ Training

The capacity to handle grievances effectively is an essential aspect of a good GRM. Capacity refers not only to providing training for and building the skills of the GRM implementors staff, but also to a range of other capabilities for which a mechanism should be set in place to facilitate and promote effective service delivery. The training/orientation programs may include the following:

- Procedural training on receiving, registering, and sorting grievances;
- Conduct of initial grievance assessments;
- Effective communication, negotiation, and facilitation skills;
- Techniques for problem solving, dispute resolution, and grievance handling
- Documentation and reporting.

7. Reporting and Monitoring

The GR Cell will enter the project affected people (PAPs) concerns/grievances at site level. The PIU gender specialist will be responsible for managing GBV and SEA/SH-related complaints at the project/PIU level. SFERP PIU will develop specific procedures to ensure complainants are able to register their grievances confidentially, and in a discreet manner. GBV/SEA/SH related complaints will be communicated to World Bank no later than 48 hours after being received by the GR Cell (site level) or by the GRC (PIU level).

The GRC will record the complaint, investigation, and subsequent actions and results in the monthly Environmental Management and Monitoring reports and Monthly Progress Report by Contractors and SMPs. In the construction and initial operational periods covered by loan covenants, the PIU will periodically report progress to the World Bank, including reporting complaints and their resolution. The tracking and documenting of grievance resolutions within the GRC PIU will include the following elements:

- i. tracking forms and procedures for gathering information from project personnel and complainant(s);
- ii. computerized grievance database with dedicated staff to update the database routinely;

- iii. systems with the capacity to analyze information to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled, and periodically evaluate the overall functioning of the mechanism;
- iv. processes for informing stakeholders about the status of a case; and
- v. procedures to retrieve data for reporting purposes, including the periodic reports to the PIU and GRC, reports into the monthly ESMP Compliance monitoring report to the World Bank.
- vi. an annual qualitative review of all complaints processed (ensuring filters such as gender, type of complaint, resolution status, time taken, intake channel, district/site, etc.) will also be undertaken to analyze the efficacy of the system.

The GRM will be provided the necessary budget required for its efficient functioning.

8. Dissemination

Once the redress process is completed and the GRC and/or GR Sub-Committee has reached a conclusion, the result will be communicated to the complainant and concerned stakeholders. The results of the redress process will be uploaded to the project website/MIS. Besides communicating the results to the Complainant, the Grievance Focal Point will also record the information pertaining to the decisions of the Committee(s) in the grievance register/log and corresponding grievance database. The actions suggested by the GRC or Sub-Committee will be communicated to the concerned person(s) and will be recorded in a register/log and database.