



# **GRIEVANCE REDRESS MECHANISM**

For Environmental & Social related concerns and  
complaints

**March 2020**

**Responsible Unit: Risk**  
**Responsible Officer: Chief Risk Officer**

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## **ABBREVIATIONS AND ACRONYMS**

<b>CIO</b>	Chief Investment Officer
<b>CRO</b>	Chief Risk Officer
<b>DBZ</b>	Development Bank of Zambia
<b>DFI</b>	Development Finance Institution
<b>EIA</b>	Environmental Impact Assessment
<b>ESIA</b>	Environmental & Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMS</b>	Environmental & Social Management System
<b>ESS</b>	Environmental & Social Safeguards
<b>FI</b>	Financial Intermediary
<b>GRM</b>	Grievance Redress Mechanism
<b>IFC</b>	International Finance Corporation
<b>SRO</b>	Stakeholder Relations Officer
<b>TOR</b>	Terms of Reference

## 1. INTRODUCTION

The Development Bank of Zambia (DBZ) is a Development Finance Institution (DFI) that is committed to support government's sustainable development agenda. The Bank recognizes that customers are the backbone of its operations and that the highest standard of customer service must be offered before, during and after the client has accessed services from the Bank.

This document presents the *Grievance Redressal Mechanism (GRM)*<sup>1</sup> and supplements the Bank's *Customer Complaints Procedures*<sup>2</sup>. It has been prepared as part of a larger Environmental and Social Management Framework (ESMF), with the aim of guiding the stakeholder consultation and grievance redressal processes across the life of the Project and during the implementation of the Environmental and Social Management Plan (ESMP).

### 1.1 Purpose

The purpose of the GRM procedure is to provide guidelines on managing and responding to complaints related to the implementation of any projects and programmes funded by the Bank. By allowing stakeholder engagement to be undertaken in a systematic manner, the Bank will be able to respond in a more appropriate manner. Such a mechanism would provide the stakeholders with one project personnel or one channel through which their queries will be channelled and will ensure timely responses to each query

### 1.2 Objectives

The specific objectives of the GRM are as follows:

- To allow stakeholders the opportunity to raise comments/concerns.
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of the effectiveness of the mechanism; and
- To ensure that comments, responses, and grievances are handled in a fair and transparent manner, in line with the applicable reference framework.
- To work as a risk management tool by hedging the Bank's reputational risk

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<sup>1</sup> A *Grievance* shall refer to a real or imagined cause for complaint. The grievance procedure applies to all complaints received in relation to the implementation of any projects/programmes supported by DBZ.

<sup>2</sup> A *Complaint* shall refer to a statement that something is unsatisfactory or unacceptable

## 2. GUIDING PRINCIPLES OF THE GRM

The stakeholder engagement and grievance redressal process for the Project will be based on the following principles:

- a) Responsiveness and Confidentiality.* As confidentiality is an integral part of fairness, the identity and personal details of complainants will only be disclosed to those involved in the resolution of the grievance. The GRM will entertain all types of complaints, comments and suggestions, with a view to improve the project's efficacy and efficiency.
- b) Objectivity and Independence.* The mechanism empowers the responsible officers in the grievance redress hierarchy to operate independently and objectively while handling grievances and to ensure that all information, stakeholders and records required for inquiry and analysis are easily accessible.
- c) Simplicity.* Simple procedures will be adopted from the GRM for lodging complaint and/or submitting suggestions or comments guided by the Complaints Handling Officer. All grievances are registered on a standardized Grievance Form. The form shall be made accessible and understandable to all stakeholders' especially marginal groups and female beneficiaries.
- d) Fairness.* The GRM will equally consider all complaints irrespective of their nature, size and complexity. It should explicitly assure potential users that the mechanism will not impede their access to other judicial or administrative remedies. All complaints, comments and suggestions received will be registered and the person or entity making the request for Redress will be acknowledged in writing.
- e) Timeliness.* All grievances, irrespective of their nature and size shall be considered and corrective actions taken within reasonable time. All possible efforts will be made to complete the process within the shortest possible time.
- f) Accessibility.* Any individual or group that is directly or indirectly affected by the Project's and its contractors' activities, as well as those who may have an interest in the Project or the ability to influence its outcome, either positively or negatively, can raise a grievance.
- g) Openness and communication regularity:* There are multiple channels available for individuals and groups to choose their preferred method of lodging grievances. Channels of communication are kept open throughout the process of addressing each grievance, and up to 3 months after the situation has been resolved

*h) Dialogue and site visits.* All grievances are considered to warrant discussions with the complainant and a site visit, if required, to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to verify the validity and severity of the grievance.

### **3. SCOPE OF GRIEVANCE PROCEDURE**

The GRM will apply to all genuine concerns raised in relation to the adverse Environmental and Social (E&S) impacts in relation to all DBZ financed or co-financed programmes and projects.

The procedure will not apply to complaints related to unsuccessful funding outcomes.

#### *Types of Complaints*

This GRM will be made available to parties who have grievances arising from activities related to the project 's implementation. These grievances could be related, but not limited to:

- Environmental, social, health and safety,
- Service delivery,
- Gender bias,
- Labour, compensation and any issues that may arise due to interactions between the labour workforce and host communities.
- Resettlement-related grievances, such as the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts, and timing of compensation, amongst others, will also be handled by this process.

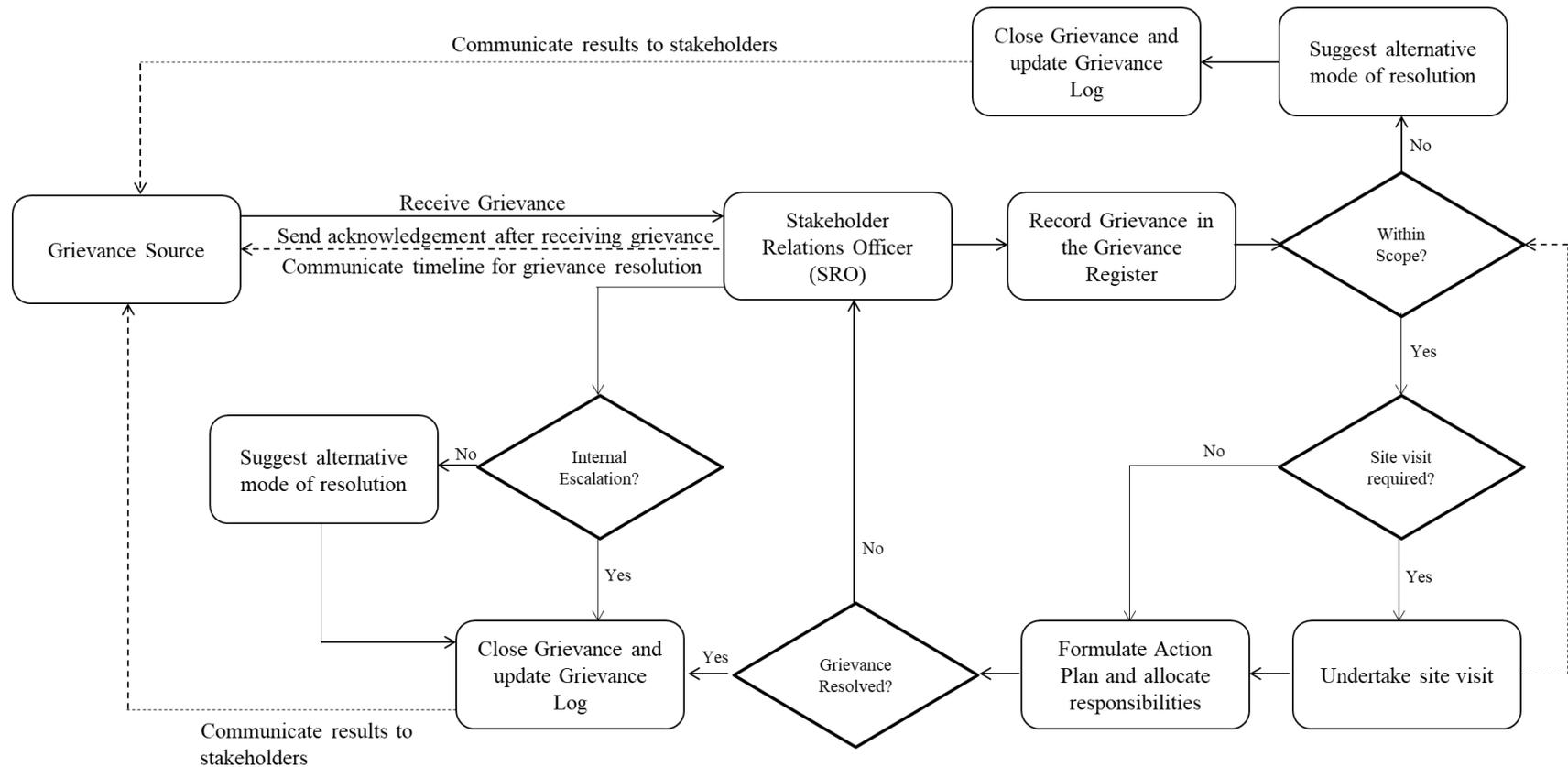
Grievances will be deemed non eligible if:

- i. Complaints submitted 2 years after the funded project or programme has been closed;
- ii. Complaints submitted 2 years after the date that the complainant became aware of the negative impacts by a Bank funded project or programme.

#### 4. PROCEDURE GUIDELINES

The illustration in Figure 1 below summarizes the procedure and key steps for grievances redress mechanism and Table 1 stipulates the timeframes for the Process.

**Figure 1: Grievance and Investigation Procedure**



**Table 1: Suggested Timeframes for Grievance Redress**

Process	Duration (Working Days)
1) Receive and register grievance	within 3 Days
2) Acknowledge, assess grievance and assign responsibility	within 7 Days
3) Development of response	within 3 Days
4) Implementation of response if agreement is reached	within 2 weeks
5) Close grievance	Within 5 Days
6) Initiate grievance review process if no agreement is reached at the first instance	within 2 weeks
7) Implement, review recommendation and close grievance	within 2 weeks

#### 4.1 Receiving and Recording Grievances

- i) As part of the GRM, the grievances from the stakeholder or their representatives may be communicated verbally (in person or over a telephonic conversation) or in written form to the project or the Bank directly through mail or email to dbz@dbzmail.co.zm
- ii) Any project affected party who has a reasonable belief that a DBZ funded project or programme may potentially result in a health, environmental or social risk or adverse impact may raise a concern or report a complaint.
- iii) The grievance is recorded directly into the *Grievance Redress Form*<sup>3</sup>.

#### 4.2 Maintaining a Grievance Register

- i) A register of grievances which will be held by the Stakeholder Relations Officer (SRO)
- ii) Each grievance thus received, shall be recorded in a *Grievance Register*<sup>4</sup>. This grievance register shall be updated at each stage of the grievance redressal.
- iii) Once the grievance is recorded in the register, a preliminary analysis shall be undertaken by the SRO to ensure that the grievance is within the scope of the GRM
- iv) Concerns or grievances must be genuine and be raised without malice and in good faith.
- v) When reporting a concern or grievance it is important that the complainant provide enough information that will enable thorough investigation.

<sup>3</sup> A sample *Grievance Redress Form* is annexed to this document

<sup>4</sup> A sample *Grievance Register* is annexed to this document.

### **4.3 Acknowledgment of Grievance**

- i) Upon the completion of the recording of the grievance, an acknowledgement of receipt of the concern and/or grievance will be communicated within stipulated timeframes for handling of complaints, through convenient means of communications such as written letter, verbal and email.
- ii) An investigation will be conducted as speedily as possible and the outcomes / action plan communicated to the complainant within the shortest possible time.
- iii) In case the grievance is assessed to be out of the scope of the GRM, a communication towards the same shall be made to the grievant, and an alternative mode of redressal shall be suggested.
- iv) The reasons for any delays in feedback will be notified to the complainant.

### **4.4 Grievance and Investigation Procedure**

- i) The complaint will be received through the Managing Director's office and reviewed by the SRO.
- ii) Where the complaint covers Environmental and Social matters, the SRO will forward these to the Chief Investments Officer (CIO).
- iv) The Environmental and Social Task Unit within the Investments Department will provide feedback to the complainant.

### **4.5 Site Inspection and Resolution**

For the purpose of verifying and resolving the grievances received, site inspection may not be required in all the cases. Depending upon the sensitivity of the issue, requirement of a site inspection will be identified.

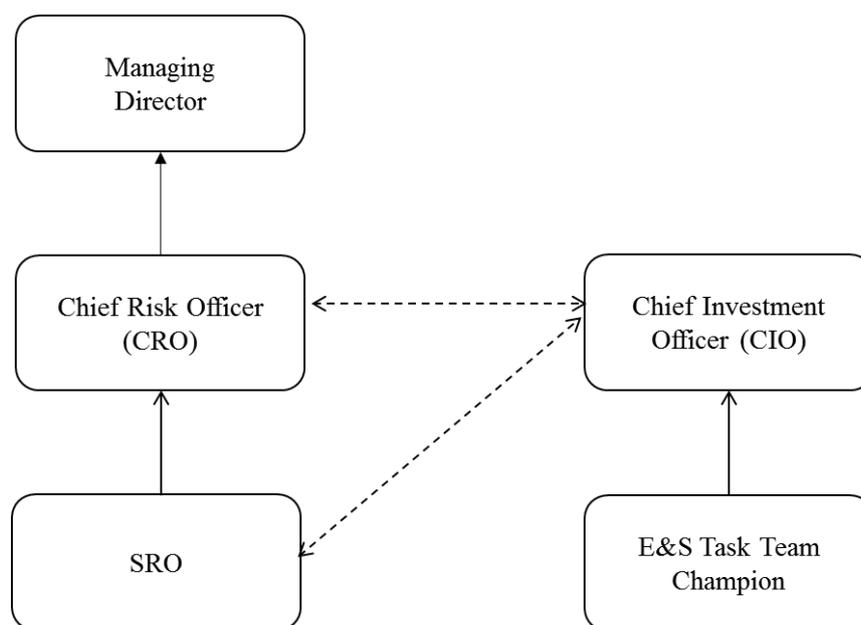
### **4.6 Resolution, Escalation, and Closure**

- i) The SRO, in consultation with the concerned departments, shall identify a suitable resolution to the issue.
- ii) This could involve provision of information to clarify the situation and introduction of mitigation measures to prevent recurrence of the problem in the future.
- iii) This resolution shall be accordingly communicated to the grievant within 10 working days of completing any site investigation.
- iv) Should the feedback not be satisfactory, the complainant can escalate the concerns to the Office of the Chief Risk Officer (CRO). The preferred course of action will be discussed with the affected person to ensure consensus in the resolution of the grievance.

- v) In case the grievance remains unsettled, CIO/CRO will forward the case to the Managing Director who will identify an adequate resolution or provide an alternative resolution to the grievance.

The figure below describes the Grievance Redress hierarchy.

**Figure 2: Grievance Redress hierarchy**



#### **4.7 Update of Records**

- i) The records of the grievance register shall be updated
- ii) Once the grievance is resolved, and the same has been communicated to the grievant, the grievance shall be closed in the grievance register.
- iii) The grievance register should also provide an understanding of the manner in which the grievance was resolved. These instances shall then serve as references for any future grievances of similar nature.

### **5. MONITORING AND EVALUATION**

All grievances and complaints including suggestions/comments on the GRM will be monitored on a quarterly basis or as may be deemed necessary depending on prevailing circumstances. Monitoring and evaluation criteria will include the following:

- Number and description of the grievances registered over a specified time frame
- Percentage of complaints resolved, and percentage that resorted to legal route
- Time taken to resolve the complaints against the GRM time stipulations

- Number of complainants by gender
- Percentage resolutions,
- Ongoing efforts at resolutions
- Status of implementation of ongoing resolutions.

Annually, the report describing the work of the GRM will be published in the Bank's Website and Annual Report. The level of detail provided with regards to any individual grievance will depend on the sensitivity of the issues and stakeholder concerns about confidentiality, while providing appropriate transparency about the activities of the GRM. The report will also highlight key trends in emerging conflicts, grievances and dispute resolution.

## **6. EXECUTING ENTITIES**

The Bank shall expect that all of its executing entities include GRM in projects financed and overseen by DBZ. The Executing Entity will be responsible for informing project-affected parties about its Accountability and Grievance Mechanisms as it will be the first point of contact. The executing entity should therefore be able to provide a copy of grievance and response to the Bank which response should propose a process for resolving the conflict.

Affected Communities and other interested stakeholders may raise a grievance at any time to the Executing Entity or directly to the Bank. The Bank reserves the right to review the executing entities GRM.

## ANNEX 1: Grievance Redress Form

<b>GRIEVANCE RECORDING FORM</b> (Email Form to <a href="mailto:dbz@dbzmail.co.zm">dbz@dbzmail.co.zm</a> )			
Project Reference Name (Client/Borrower):			
<b>Section 1: Complainant Details</b>			
Grievance Ref. No:	Date received:	Submitted by:	Grievance Recorded by:
Name of Complainant / Organisation registering complaint (or write Anonymous):			
Address:	Telephone Number:	Email address:	Grievance lodged:
			<input type="checkbox"/> In person <input type="checkbox"/> By Phone <input type="checkbox"/> At Community Meeting <input type="checkbox"/> By Mail <input type="checkbox"/> By Email
Signature of Complainant:	Grievance acknowledged and a copy of this form provided to the complainant?		
	<input type="checkbox"/> Yes	Date:	
<b>Section 2: Details about the Grievance</b>			
Description of Grievance:			
<b>Section 3: Action Taken / Required</b>			
Date set for resolution of Complaint:		Grievance Log in Date:	
Grievance classification:	Reason(s) why:	Officer responsible for grievance:	
<input type="checkbox"/> Critical priority <input type="checkbox"/> Medium priority <input type="checkbox"/> Low priority			
Description of action required (to be updated as needed):			
Action carried out by:	Date of Completion:	Method of feedback to Complainant:	
Complainant response to action:			
<b>Section 4: Effectiveness Review</b>			
Status of Grievance:		Date:	
To what extent has the grievance been addressed to the satisfaction of the complainant:			
Grievance Closed:	Date:	Signed off: [PIO/CIO/CRO/MD]	

**ANNEX 2: Grievance Register**

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No.	Date	GRM No.	Complainant Name	Grievance Details	Concerned Department	Recorded By	Status/Remarks