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MINISTRY OF AGRICULTURE AND FOOD SECURITY
SIERRA LEONE RICE AGRO-PROCESSING ZONE PROJECT (SAPZ)



FINAL
GRIEVANCE REDRESS MECHANISM (GRM)

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ISSUE, REVISION RECORD & DISCLAIMER

Information class: **Standard**

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ACRONYMS

AfDB	African Development Bank
AP	Affected Person
CGRC	Community-Level Grievance Redress Committee
CSO	Civil Society Organization
DGRC	District-Level Grievance Redress Committee
EPA	Environment Protection Agency
ESIA	Environmental and Social Impact Assessment
FSU	Family Support Unit
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
IA	Implementation Agency
MAFS	Ministry of Agriculture and Food Security
MDA	Ministry Department and Agency
MSW	Ministry of Social Welfare and Children's Affairs
NGO	Non-Governmental Organization
OS	Operational Safeguard
PAP	Project Affected Persons
PIU	Project Implementation Unit
PWD	Persons With Disability
RAP	Resettlement Action Plan
SAPZ	Sierra Leone Rice Special Agro-Industrial Processing Zone (SAPZ) Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SME	Small and Medium Sized Enterprise

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1. BACKGROUND

1.1. Introduction

This Grievance Redress Mechanism (GRM) provides a formalized approach for addressing complaints and concerns arising from the implementation of the Sierra Leone Rice Special Agro-Industrial Processing Zone (SAPZ) Project. It reflects the commitment to transparency, accountability, inclusiveness, and responsiveness in project delivery. The mechanism ensures that all stakeholders, particularly affected persons, have access to a safe and accessible process to voice their concerns and seek redress.

The African Development Bank is supporting the Government of Sierra Leone with 40.56 Million Units of Account (UA) for the implementation of the Sierra Leone Rice Special Agro-Industrial Processing Zone (SAPZ) Project in Kambia and Port Loko Districts. The project development objective is to contribute to inclusive and sustainable agro-industrial development in Sierra Leone, to reduce rice imports, create jobs, and alleviate poverty. This will be achieved through enhancing the enabling environment to support the development of a private sector-led, Government-enabled modern rice sector through strengthening production and productivity, modern processing, and the marketing of ‘import grade’ milled rice to national production per annum towards domestic rice self-sufficiency.

The project has the following Four (4) components:

Component 1: Enhancement of agricultural productivity and production systems

- a) The project will seek to improve rice competitiveness and profitability by improving field-level productivity and the quality of milled rice. It will therefore support farmers to do double cropping, increase crop yields, and improve grain quality.
- b) Promote new improved climate-smart rice varieties tolerant to soil salinity and floods and adapted to the target ecologies in the Port Loko and Kambia districts.
- c) Forge linkages with Fertilizer Companies to ensure farmers have access to the appropriate blend of fertilizers
- d) Provide support for land development, preparation and paddy harvesting via mechanization services provided through partnerships with the private sector.

Component 2: Development of The Agro-Industrial Hub and Agricultural Transformation Centres

- A. Provide the enabling economic infrastructure (roads, water and sewage system, energy, communication (ICT), etc.) for the zones, ready for the private sector businesses to acquire plots and operate their specific processing facilities. This includes the construction and/or upgrading of Agro-Industrial Hub infrastructure, including office buildings, training centres, general services layout (fencing, internal and access roads/parking, drainage, power supply, water, sewerage, effluent management, health-and-safety), specialized services, labs/certification centers, etc), business support services (administrative, knowledge/ICT/

employment centers), and activities to implement the Environmental and Social Management Plans (ESMP).

- B. The development of Agricultural Transformation Centers (ATCs) and Aggregation Centers (ACs). These ATCs and ACs will be part of the SAPZ Master Plan and will be strategically located within the farming communities around the AIH and will be used for the facilitation of farmers' access to essential inputs such as quality seeds, agro-chemicals, farm mechanization/digitalization and primary handling facilities. The ATCs will include an ATC in the Kychum and Mambolo areas of Kambia District, where a provision will be made for water transportation facilities to complement land transportation of harvested rice paddy. Provisions will be made for additional ATC including one in Port Loko District.

Component 3: Market development and capacity building

The project will support the development and strengthening of market access and value addition across the rice value chain. The project will take a market-oriented approach by linking farmers to master farmers (anchor farms), and aggregators, through off-taker arrangements and other standard requirements.

Component 4: Project management and monitoring and evaluation

The component will focus on the planning, coordination and management, and delivery of project activities within the scope and of high quality cost-effectively and efficiently.

1.1. Project Categorization

The proposed activities under the SAPZ pose high potential environmental and social risks and generally fall under the First Schedule of the SLEPA Act (No. 15 of 2022) necessitating a full Environmental, Social and Health Impact Assessment (ESHIA) in compliance with the SLEPA's 2023 Agricultural and Agro-based Industrial Activities Regulations and the 2022 Agricultural Sector Specific Environmental, Social and Health Impact Assessment (ESHIA) Guidelines. This national categorization is also matched by the Category 1 (High Risk) categorisation assigned to the project by the African Development Bank due to its potential for dispersed environmental and social impacts in the riverine communities of Port Loko and Kambia Districts which will form the core of the cultivated areas under the project.

The risks and potential impacts of the SAPZ Project can be broken down into project phases namely which will be discussed briefly to provide context to this document and project categorization.

Preconstruction Phase

During the Preconstruction Phase, the main activities involve land identification, stakeholder engagement, and the site selection and design of Agricultural Transformation Centres (ATCs) and Aggregation Centres (ACs). The principal environmental and social risks at this stage are largely social in nature.

Negative impacts could include the risk of land disputes, particularly if customary land rights are not adequately recognized or if stakeholder engagement processes are not inclusive. There is also a risk of marginalization of vulnerable groups such as women, youth, and minority communities if they are not actively engaged in land registration and project participation processes. The

dynamic between owners and ‘renters’ of farmland must also be taken into account to ensure that economic displacement does not occur due to project activities. The interest of renters should be recognized for the duration of their rental agreement with the landowner. Land registration (farming operations) and donation (ATC & AC) must respect customary laws, national legislation and AfDB safeguards. Choices for locations of farms and the ATC must be made to limit environmental harm by avoiding ecologically sensitive areas.

On the positive side, proactive and inclusive stakeholder engagement can significantly enhance social acceptance, build trust, and foster a strong foundation for project success. Informed site selection, incorporating environmental and social screening, can also prevent future environmental harm by avoiding ecologically sensitive areas.

Construction Phase

The Construction Phase entails significant on-ground activities: land development, land preparation, feeder road construction, and the construction of ATCs and ACs.

Environmental impacts are expected to include vegetation clearance, soil disturbance, alteration of drainage patterns, air and noise pollution from machinery, and sedimentation of nearby water bodies if erosion control measures are not implemented. The construction of feeder roads may cause minor habitat fragmentation and increase dust levels, especially during the dry season. Open construction sites also raise the risk of accidents to both workers and nearby communities if occupational health and safety standards are not enforced.

Social impacts include employment opportunities for local communities, which can be a significant positive effect if local hiring and skill development are prioritized. However, construction may also cause temporary traffic disruptions and nuisance impacts such as noise and dust affecting nearby residents. Social issues will also include gender-based violence and child labour. The influx of workers especially men will increase the possibility of violence against women and girls; also, the contractors may be influenced to employ children below the age of 18. Other issues include the use of community WASH facilities by workers and the possibility of an increase in sexually transmitted diseases, the use of drugs including ‘kush’¹, cannabis, etc., and theft within the community and the project area.

Without mitigation, the solid waste generated by construction activities, including packaging, plastics, and debris, can contribute to local environmental degradation.

Operation and Maintenance Phase

The Operation and Maintenance Phase marks the core functional life of the project and introduces a wide array of potential environmental and social impacts.

¹ Chemical testing of kush found that over 50 per cent of samples contain nitazenes, a very addictive and deadly synthetic opioid comparable to fentanyl, while the other half contains synthetic cannabinoids.

Agricultural activities, such as rice planting and harvesting, may lead to soil degradation if intensive monocropping or unsustainable farming practices are adopted. The use of agrochemicals (pesticides, herbicides, and fertilizers) poses risks of surface water and groundwater pollution, bioaccumulation in aquatic systems, and health risks to farmers and nearby residents if proper application and storage measures are not enforced.

Small-scale irrigation schemes, while beneficial in extending production cycles, may lead to over-abstraction of water resources, waterlogging, or salinization if water use is not properly monitored and regulated.

Operations at ATCs and ACs will generate agro-processing residues, packaging waste, and emissions from energy consumption. Inadequate waste management could attract vermin, contaminate soil and water, and cause localized health risks. Transportation of produce increases vehicular emissions and road accident risks, particularly when traffic volumes spike during harvest seasons.

Socially, this phase will generate important positive impacts, including improved farmer incomes, value addition in the agricultural chain, rural employment, and strengthening of cooperatives and farmer organizations.

Decommissioning and Restoration Phase

When facilities such as the ATC and AC reach the end of their useful life or in the event of premature closure, the Decommissioning Phase will be triggered.

Environmental risks include dust emissions, noise, and soil contamination from demolition debris if materials are not properly handled. Improper disposal of demolition waste can degrade soil and water quality. There is also the potential for temporary disruption to communities living nearby due to demolition activities.

Positive impacts are associated with site restoration, which offers an opportunity to rehabilitate soils, replant native vegetation, and enhance biodiversity. If managed well, restoration can contribute to reversing some of the environmental impacts accrued during the operational life of the project.

1.2. Purpose of the Manual

Past project experience indicates that stakeholders may raise justified complaints or grievances, which can be directly, indirectly, or entirely unrelated to project implementation.. Some may be captured by the regular monitoring and evaluation (M&E) system of the project while others may not. In a bid to ensure that complaints and grievances are addressed effectively and efficiently during project implementation, the project has developed an inclusive and well-structured Grievance Redress Mechanism (GRM). This GRM Manual therefore provides a set of guidelines for affected stakeholders to channel complaints that are related to the implementation of the Sierra Leone Rice Agro-Processing Zone (SAPZ) in Sierra Leone.

A complaint can be filed against any project stakeholders, including field staff, PIU staff, government workers directly or indirectly associated with the project, individual/group beneficiaries, private individuals that interfere in project implementation, and other parties, etc. These grievances which may range from social losses, dissatisfactions, physical, situational (employment-related) environmental, among others, might be reported at different stages of the projects. This will provide guidelines that allow the affected persons (AP) to not only submit their grievances but also find satisfactory, reliable, transparent, and timely resolutions without incurring extract financial costs.

The Manual lays out the principles and processes and structure of the SAPZ Project's Grievance Handling System to guide the project implementation. The project's safeguards team including a Gender Specialist, an Environmental Safeguards Specialist and a Social Safeguards Specialist will oversee the implementation of the manual. The manual outlines the activities of key actors in the GRM committees and provides step-by-step guidelines on how they can address grievances relating to project activities at the community, district, and national levels.

The GRM is also a channel for project staff and non-staff (from supporting and collaborating partners, contractors, consultants and other stakeholders of the project to report project-related grievances. This can be but not limited to malpractices in the areas of recruitment, procurement, fund disbursement, farm inputs distribution, environmental and social issues Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Gender Based Violence (GBV). If the project fails to resolve a grievance satisfactorily, affected parties still retain the right to seek justice through courts or government agencies.

1.3. Background of the Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) is an instrument through which dispute resolution is sought and provided in a transparent, credible, and predictable manner. It involves the provision of a formal platform for the receipt and timely processing of complaints from individuals or groups negatively affected by activities of a particular project to reach a resolution that is fair, lasting, and acceptable to all parties. The management of grievances is therefore an important element of stakeholder management and an important aspect of risk management for the proposed SAPZ Project. This Manual provides a step-by-step guide for grievance redress which is very important in strengthening good governance in the administration and management of all activities finance under the SAPZ project.

Project-level GRM, that deals with project-specific concerns is to be provided to affected communities at no cost to communities, without retribution/payback/revenge and that will not impede access to judicial and administrative remedies, especially complaints/cases/concerns relating to sexual exploitation and abuse.

For the SAPZ Project, a fully functional four-tier GRM system is required, starting from the community level that escalates to the chiefdom, district and finally nation level. This would ensure that implementing partners (IPs) have GRM systems at their implementation sites that would provide the space for complaints to be submitted and addressed in a timely and satisfactory manner.

These processes can also build trust and peaceful co-existence within affected communities which enhances sustainable development.

It is on the strength of the above exigencies and the fact that the implementation space will involve varied stakeholders with diverse interests and expectations likely to precipitate concerns and grievances that this GRM is developed as an integral component of the SAPZ Project.

This GRM manual is presented in the following main sections. These include: 1) Background to the SAPZ Project, 2) aim and objectives of GRM, 3) Key Terms used, 4) Guiding Principles, 5) Managing Grievances: Procedures & Steps, 6) Overview of the Case Management Process, 7) Expected Complaints / Grievances and their descriptions, 8) End-Users and their expected roles, 9) Languages, format, scope and admission of a grievance, 10) Implementation of the SAPZ GRM, 11) Grievance Mechanism for Gender Based Violence / Sexual Exploitation & Abuse and Sexual Harassment, 12) Time frames for resolution of cases, 13) social accountability and information dissemination, 13) Grievance Monitoring and Reporting, 14) Grievance Database, Storage and Tracking of Information, etc.

1.4. Legal & Policy Context

1.4.1. African Development Bank

African Development Bank Group's ISS and best practices require that projects' have a GRM in place that would promptly address concerns using a transparent process that is culturally and socially appropriate and readily accessible to all segments of affected communities. This is in compliance with the E&S Operational Safeguards 1 (OS1): Assessment and Management of Environmental and Social Risks and Impacts; E&S Operational Safeguard 5 (OS5): Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement; E&S Operational Safeguard 7 (OS7): Vulnerable Groups and E&S Operational Safeguard 10 (OS10): Stakeholder Engagement and Information Disclosure.

OS1 especially require requires Borrowers to establish and maintain a Grievance Redress Mechanism (GRM) as part of the Environmental and Social Management System (ESMS). The purpose of which is to ensure that individuals or communities who believe they are adversely affected by a project can submit complaints and have them addressed in a timely and effective manner.

The GRM must meet the following requirements:

- The GRM must be accessible, culturally appropriate, and inclusive, especially for vulnerable and marginalized groups.
- It must be established early in project preparation and be functional throughout the project cycle.
- The borrower must document grievances received and actions taken, and report regularly to the AfDB.

1.4.2. National Context

In Sierra Leone, grievance redress is not governed by a single, standalone law but is addressed across several sectoral laws, regulations, and administrative procedures, especially in the context of land, labor, environment, and public participation. The following are key legal and regulatory instruments that include provisions related to grievance redress mechanisms (GRMs):

1. Environment Protection Agency Act, 2022

Relevance: Establishes the legal framework for environmental governance in Sierra Leone, including Environmental Impact Assessments (EIAs), licensing, compliance monitoring, and enforcement.

GRM Link: Provides mechanisms through which individuals, communities, and organizations can raise complaints or objections to environmentally harmful activities or decisions made by the Agency. These provisions are particularly relevant during the EIA process, licensing decisions, and compliance enforcement.

Key Grievance Redress Provisions:

- Section 44: Mandates public participation in the EIA process, allowing stakeholders to review environmental reports and submit comments or objections on proposed projects.
- Section 45: Grants any person the right to make representations to the EPA concerning a project undergoing environmental assessment. These must be considered prior to a decision on whether or not to grant an EIA license.
- Section 55: Provides for legal redress by allowing any aggrieved party to appeal decisions of the EPA (e.g. refusal or issuance of an environmental licence) to the High Court.
- Sections 6 & 25: Authorize the Agency to receive and investigate complaints about environmental violations and enforce compliance.
- Section 13: Requires the establishment of regional and district EPA offices, facilitating local access to grievance channels.
- Section 54: Allows the Environmental Protection Fund to be used for community-level environmental remediation, particularly where grievances relate to harm caused by project activities.

Overall Role in GRM: The Act supports grievance redress both administratively (through public consultations and agency engagement) and judicially (through appeal rights), while enabling community access to justice via decentralized EPA structures.

2. The Land Commission Act, 2022

- **Relevance:** Provides a legal framework for land administration and dispute resolution.
- **GRM Link:** Establishes District Land Committees and Customary Land Committees, which are tasked with handling land-related disputes at local levels, including grievances related to land acquisition and compensation. In the event that these statutory committees have been established the Project will make use of them for land related disputes.

3. The Customary Land Rights Act, 2022

- Relevance: Protects the land rights of rural and customary communities.
- GRM Link: Ensures that affected persons can challenge decisions around land transfers or use through Customary Land Committees and Community Land Oversight Committees, offering a tiered grievance resolution structure.

4. The Labour Act, 2023

- Relevance: Governs employment terms, dispute resolution, and worker protections.
- GRM Link: Establishes procedures for grievance redress between employees and employers, including the role of labour officers, conciliation, and labour tribunals.

5. Local Government Act, 2022

- Relevance: Empowers local councils in governance and service delivery.
- GRM Link: Local councils are expected to receive and mediate community complaints relating to local development projects or service delivery.

6. Sierra Leone Gender Equality and Women's Empowerment Act, 2022

- Relevance: Promotes gender-responsive programming and protection.
- GRM Link: Encourages the establishment of sensitive and accessible reporting mechanisms for gender-based grievances, including those related to workplace discrimination or sexual harassment.

7. Constitution of Sierra Leone, 1991 (Section 18 and 33)

- Relevance: Protects citizens' rights to access justice, participate in public affairs, and seek redress through the courts or administrative means.

1.5. Aim and Objectives of the Grievance Redress Mechanism

The main objective of this Grievance Redress Mechanism is to create a formal effective platform through which SAPZ Project beneficiaries' and stakeholders' concerns and complaints relating to the project-funded activities are submitted and addressed, in an efficient, transparent, and timely manner to enable positive social change. The specific objectives are to:

- Establish a mechanism that will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive.
- Establish a mechanism that is expected to address concerns promptly, effectively, transparently, and in a manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution.
- Establish a procedure for receiving, recording, documenting, investigating and addressing complaints, be it gender, social or environmental;
- Build trust between staff of the project and project-affected communities, aiming at promoting transparency and accountability;

- Promote transparency in dealing with targeted beneficiaries through a proper communication system;
- Ensure compliance with national laws and international standards;
- Prevent corruption and mitigate project risks;
- Ensure full participation of men, women, youths and vulnerable populations; and
- Prevent (respond to) and deal with SGBV, SH and SEA cases related to the project.

1.6. Composition of the SAPZ GRM Committees

Grievance Redress Committees (GRCs) shall either be established and/or strengthened (where already established) at community, chiefdom, district and national levels to ensure that SAPZ Project-related complaints are submitted and addressed in a timely and satisfactory manner. Please note that the same structure will apply to both Kambia and Port Loko Districts

At the ²Community/Sectional level, the following will be the members of the GRC Committee:

- Section Chief - Chair
- Town Chief of the Affected Communities
- Religious Leader/Representative
- Farmer Representative
- Landowner Representative
- Women's Leader / Representative
- Youth's Leader / Representative
- Persons With Disability Representative
- Implementing Partners' Representatives
- District Council Environmental/Gender Officer (Optional)

At the Chiefdom-Level Committee, the GRC will comprise the following:

- Paramount Chief – Chair
- Section Chief of the affected place
- Ward Councillor of the affected place
- Chiefdom Clerk – Registrar/Secretary
- Chiefdom Imam/Pastor
- Women's Leader (Mammy Queen)
- Youth Leader
- District Council Environmental/Gender Officer
- Farmers Organisation Representative
- Project Representative

At the District-Level Committee, the GRC shall comprise the following:

² It should be noted that in the even

- District Agriculture Officer/Representative - Chair
- District Council Representative
- Paramount Chief(s) of the Affected Communities
- District Imam/Pastor
- Representatives of Local Government and Rural Development Ministry,
- Youth Representative of the Affected Communities
- Women's Representative of the Affected Communities
- Project Environmental and Social Safeguards Specialist
- District Council Environmental/Gender Officer (Optional)
- Gender-Based Violence Specialist (Optional)

The national / project-level GRC shall consist of the following:

- Ministry of Agriculture and Food Security Representative – Chair
- Project Manager SAPZ Project
- Local Government and Rural Development Ministry's Representative
- The Social Safeguard Specialist SAPZ Project
- Three members of the steering committee

Each committee has the discretion of including a maximum of two additional members on a case by case basis in the event technical knowledge is required. For example if a labour dispute is escalated to the district level the committee can add the district level representative of the Ministry of Employment, Labour and Social Security to handle that particular matter.

At each level of the GRC, there shall be a registrar as the focal person for receiving and registering complaints from Affected Persons (APs), tracking and following up on issues and complaints raised. At the project level, the Social Safeguards Specialist will serve as registrar to document all complaints from affected persons. A monthly or quarterly report on the number of grievances and complaints raised and status will be produced by the project safeguards unit to ensure the transparency and accountability of the GRM of the project.

2 KEY TERMS

2.1. Grievance

A Grievance is a statement about an action, impact, or effect arising from a project that adversely affects the environment, rights, health, and/or well-being of an affected person or people to the extent that it may form legitimate grounds for compensation, legal action or a change to the sub-project to resolve the grievance. A grievance may also be any suggestion(s) about the way a project is being implemented to the dissatisfaction of the project beneficiaries.

2.2. Grievance Redress Mechanism

The Grievance Redress Mechanism is a set of formal arrangements that ensures project staff, beneficiaries, stakeholders including direct and indirect beneficiaries, and community dwellers in project implementation areas to make complaints related to the project(s) and seek redress when they perceive activities deemed negative³. GRM provides channels where cases can be reported, investigated, mitigated, managed and resolved amicably through the system, in a timely and satisfactory manner. There are several mechanisms available to aggrieved persons related to the project to seek redress, but the GRM is the project's avenue where stakeholders can channel grievances for resolution of project-related conflicts and other misunderstandings. Information sought by the public on the project can also be obtained through the GRM, especially during periodic communication and sensitization outreach programs.

2.2. Project Affected Persons (PAPs)

An Affected Person (AP) is a person who is adversely affected temporarily or permanently as a result of sub-project implementations or works under the SAPZ Project. This is the group that is directly at risk of being adversely affected by the project Implementation. Grievances from individual farmers, Farmer Organizations, Farmer Groups, and Cooperatives among others must be given priority, and remedial actions must be taken promptly.

2.2. Beneficiaries

These will include farming/agriculture groups, individual farmers, land owners, and others in the sector that will benefit from the project. They must be consulted, and their views and concerns incorporated into the project implementation.

2.3. Community Representatives

The farming communities can receive inconvenience from the operations of the SAPZ Project. Special consideration should be given to making a harmonious relationship with them to enhance the outcomes of development output.

³ Center for Poverty Analysis (CEPA). 2009. A Review of the Southern Transport Development Project (STDP) Grievance Redress Mechanisms, Consolidated Final Report (ADM/80-046: RSC No. C80610), Colombo. <http://www.adb.org/Documents/SPF/Consolidated-Final-Report-05182009.pdf>

2.4. Staff and Administration

The staff of the SAPZ PIU, implementing partners/service providers, affected communities, at all levels can have complaints on different issues. The grievance resolution will help in the efficient and smooth operations of the administration.

2.5. Institutions

There are multiple agriculture, gender and other stakeholder institutions in Sierra Leone that can file complaints and suggestions or queries on matters of common interest. There will be the need to tackle these to build trust and cooperation.

2.6. Workers

Workers on the SAPZ Project or related stakeholders may be sensitive to violations by administrative and other malpractices, Sexual and Gender-Based Violence (SGBV)-related and safety/incidents issues. Their rights must be protected and secured.

2.7. Resolution

A Resolution means that a complaint related to this Project has been investigated and a decision reached, or action taken by the appropriate official and feedback provided to the complainant. It also means that a non-related Project issue has been referred to the relevant institution to be handled and the complainant informed.

2.8. Complaint

A Complaint is a statement (verbal or written) expressing displeasure that an impact or effect arising from a project is unsatisfactory or unacceptable to the complainant. In nature, it is a concern about a minor impact or effect that is short-term, low in risk, and often temporary, that typically does not require a rigorous investigation but does require a specific response to remove or remediate the unsatisfactory or unacceptable impact or effect. Unresolved complaints may become grievances if not dealt with appropriately and timely.

2.9. Gender-based Violence

Gender-based violence (GBV) is violence committed against a person because of his or her sex or gender.

2.10. Sexual and Gender-Based Violence

Sexual and gender-based violence (SGBV), which is violence committed against a person because of his or her sex or gender involves forcing another person to do something against his or her will through violence, coercion, threats, deception, cultural expectations, or economic means.

2.11. Sexual Exploitation and Abuse

Sexual exploitation and abuse is any actual or attempted abuse of someone's 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.

2.12. Sexual Harassment

Sexual harassment is any unwelcome behaviour of a sexual nature or unwanted actions (verbal or physical) toward someone that makes someone feel upset, scared, offended, or humiliated without consent.

2.13. Code of Conduct

A code of conduct is a defined set of guidelines regarding rules, ethical principles, values, and standards of behaviour and relationships expected of an employee or professional person of an organization/company or project.

2.13. Violence Against Children

Violence against children is a human rights violation and takes many forms that involve child maltreatment, either physical, emotional, or sexual abuse, and neglect or deprivation at the hands of parents or any other person.

3 GUIDING PRINCIPLES

The under-listed principles will guide the effective operationalization of this SAPZ Project-level GRM:

The following principles shall guide the design, implementation, and continuous improvement of the SAPZ Project-level Grievance Redress Mechanism:

a) Accessibility

The GRM shall be available and accessible to all stakeholders, including project-affected persons, community members, project staff, and especially vulnerable groups. It will be designed to eliminate barriers related to distance, literacy, language, cost, and fear of retaliation.

b) Inclusiveness and Equity

Special attention will be given to recognizing and addressing structural barriers that may limit the ability of certain groups (e.g., women, youth, elderly, persons with disabilities) to engage with the GRM.

c) Fairness

All grievance procedures will be impartial and perceived as fair. The process will be guided by consistency, adherence to agreed protocols, and the avoidance of bias or favoritism in resolution outcomes.

d) Transparency and Accountability

The GRM shall operate transparently, ensuring that all stakeholders are informed of its procedures and outcomes. Periodic reporting and public disclosure of grievance trends (while protecting privacy) will strengthen accountability.

e) Clarity of Structure

The GRM will have a clearly defined structure outlining its operations, roles, and responsibilities at each level—community, chiefdom, district, and national. This structure will be communicated widely and in accessible formats.

f) Rights Compatibility

The mechanism shall be consistent with national laws and international human rights standards. It shall not restrict access to judicial or other formal avenues of redress and shall instead complement them.

g) Predictability

The GRM will follow clear, time-bound procedures with defined steps, responsibilities, and expected outcomes. Each stage of the process will have a prescribed timeframe for resolution and communication.

h) Right to Appeal

Complainants will be informed of their rights and the reasons for grievance outcomes. They will be provided the opportunity to appeal decisions to higher levels within the mechanism.

i) Capability

The GRM will be supported by adequate financial, human, and technical resources to ensure timely and effective handling of grievances at all levels.

j) Confidentiality and Protection

The mechanism will respect the confidentiality of complainants and accept anonymous submissions. Appropriate safeguards will be put in place to protect individuals from retaliation or harm.

k) Feedback and Learning

The GRM will serve not only as a channel for complaints but also as a valuable feedback mechanism. Lessons learned from grievance trends will be used to improve project performance, stakeholder engagement, and future grievance handling procedures.

3.1 Constraints to Implementing the GRM

Implementing a Grievance Redress Mechanism (GRM) in a rural environment faces several constraints, both systemic and practical. Below is a structured presentation of key constraints at each level of escalation:

➤ Community-Level Constraints

- **Low Awareness and Literacy:** Many community members may lack knowledge of their rights, the existence of the GRM, or how to file grievances—particularly where literacy is low.
- **Cultural Norms and Power Dynamics:** Social hierarchies and traditional norms may discourage individuals, especially women or marginalized groups, from voicing grievances against influential actors.
- **Lack of Documentation:** Grievances are often verbal and undocumented, making it difficult to track, escalate, or verify issues.
- **Trust Deficit:** Skepticism about the fairness or effectiveness of the process may lead to underreporting or informal dispute resolution outside the GRM.

➤ Chiefdom-Level Constraints

- **Traditional Authority Bias:** Paramount and section chiefs may have conflicting interests, particularly where grievances involve land or community development benefits.

- **Informal Systems:** Dispute resolution at this level is often informal and may not align with formal GRM procedures or human rights standards.
- **Lack of Training:** Traditional leaders may not be trained in grievance documentation, impartial mediation, or escalation procedures.
- **Limited Accountability:** There is often no formal oversight of decisions made at the chiefdom level, leading to potential impunity or inconsistency.

➤ District-Level Constraints

- **Coordination Challenges:** Weak linkages between chiefdom and district structures may cause delays or failures in grievance escalation.
- **Resource Constraints:** District institutions often lack the staff, transport, and operational budgets needed to respond to grievances from remote communities.
- **Limited Record-Keeping:** Even where grievances are referred, absence of standard forms and data management systems impedes monitoring and follow-up.

➤ National-Level Constraints

- **Overcentralisation:** Offices may be overwhelmed or too distant from the field to understand local dynamics, leading to delays or disconnects.
- **Institutional Silos:** Fragmented responsibilities across ministries and agencies can result in overlapping jurisdictions or lack of ownership for certain grievances.
- **Limited Feedback Mechanisms:** There may be no systematic way of communicating grievance outcomes back down to the complainant or lower levels.
- **Political Interference:** National-level interventions can be influenced by political considerations, especially for sensitive grievances involving land or compensation.

➤ Cross-Cutting Constraints

- **Language Barriers:** Grievance procedures may not be available in local languages, limiting accessibility.
- **ICT Limitations:** Digital GRM platforms are often ineffective in areas without mobile coverage or digital literacy.
- **Insecurity or Intimidation:** Complainants may fear retaliation, especially in cases involving elite capture or corruption.

To address these constraints, this GRM has been prepared to achieve the following:

- Build on customary institutions while aligning with formal legal standards;
- Provide extensive training and outreach;
- Establish documentation and feedback systems;
- Ensure independent oversight and audit mechanisms at each level.

3.2 Benefits of Implementing a GRM

1. Enhances Social Accountability

- **Transparency and Responsiveness:** A well-functioning GRM promotes transparent decision-making and helps institutions respond effectively to community concerns.

- **Reduces Power Imbalances:** By formalizing the process, it empowers marginalized voices and balances traditional authority structures with accountable governance.

2. Prevents Conflict Escalation

- **Early Resolution of Disputes:** Timely handling of grievances prevents minor issues especially around land, compensation, or social services from escalating into major conflicts.
- **Reduces Reliance on Courts or Violence:** GRMs provide non-violent, accessible alternatives to formal litigation or retaliatory actions.

3. Strengthens Community Trust and Legitimacy

- **Builds Institutional Trust:** Communities are more likely to support the project and institutions when they feel their complaints are heard and addressed fairly.
- **Legitimizes Project Activities:** A transparent GRM reinforces the social license to operate for development projects, especially those involving land acquisition or resettlement.

4. Improves Project Design and Implementation

- **Feedback Loop for Adaptive Management:** Recurrent grievances can reveal systemic issues, allowing implementing agencies to adjust practices, improve service delivery, or refine stakeholder engagement strategies.
- **Risk Mitigation:** Identifying and addressing issues early reduces reputational, legal, and financial risks for donors, implementers, and governments.

5. Fulfills Legal and Donor Requirements

- **Compliance with National Law and Donor Policies:** A GRM helps meet the standards of institutions like the African Development Bank (AfDB ISS 2023) and Sierra Leone EPA Act 2022, both of which require accessible and effective grievance procedures.

6. Encourages Inclusivity and Participation

- **Increases Access to Justice:** Provides a structured platform for women, youth, the elderly, and persons with disabilities to voice concerns without intimidation.
- **Strengthens Civic Engagement:** Encourages citizens to actively participate in monitoring and holding institutions accountable for development outcomes.

The effective implementation of a Grievance Redress Mechanism (GRM) for the SAPZ Project must be grounded in a clear set of guiding principles, while acknowledging both its advantages and the constraints inherent in rural, multi-tiered governance contexts. Anchored in principles such as accessibility, fairness, transparency, and rights compatibility, the GRM serves as a structured platform for stakeholders, especially vulnerable groups to voice concerns and seek redress without

fear of reprisal. Its advantages include preventing conflict escalation, fostering institutional trust, enhancing accountability, and providing critical feedback to improve project outcomes. However, the success of the GRM depends on its ability to navigate common rural challenges such as low literacy, traditional power dynamics, limited institutional capacity, and inadequate coordination across community, chiefdom, district, and national levels. Addressing these constraints through adequate resourcing, capacity-building, and community sensitization will be essential to ensure the GRM is not only functional but also credible, inclusive, and responsive throughout the project lifecycle.

4 MANAGING GRIEVANCES: PROCEDURES AND STEPS

Step 1: Receiving Grievances

Grievances may be submitted through multiple channels to maximize accessibility for all stakeholders, including vulnerable groups. These channels take into consideration the constraints facing the project in terms of implementing a GRM for SAPZ project areas as detailed in section 3.1 Constraints to Implementing the GRM. These channels include:

- Direct submission at community grievance desks or project field offices
- Written complaints submitted to chiefdom or district authorities
- Verbal complaints recorded by trained field staff, member of grievance committee or community facilitators
- Phone calls, SMS, or WhatsApp (including voice notes) where available. Dedicated toll-free GRM phone lines will be provided to facilitate prompt submission of grievances. These numbers will be shared with all stakeholders, including affected communities.
- Anonymous submissions via suggestion boxes or third parties
- Email or formal letter to the Project Implementation Unit (PIU)

Key Actions:

- Acknowledge receipt of the grievance immediately or within 48 hours.
- Issue a Grievance ID and log the complaint into the Grievance Register.
- Assign the grievance to the relevant GRM Officer or Focal Point for review.
- If the grievance is made verbally or anonymously, ensure it is clearly recorded using the standard Grievance Receipt Form. (See Annex 1: Grievance Complaint Drop-Off Form)
- Provide the complainant (if known) with a copy of the signed grievance receipt form as confirmation of submission.

Step 2: Digitization, Screening and Classification of Grievances

Once a grievance is received, it must be promptly reviewed and classified to determine the appropriate response pathway and resolution mechanism.

Key Actions:

1. Initial Review

- The GRM Focal Point or designated officer conducts a preliminary check to ensure the complaint falls within the scope of the project.

- If the grievance is unrelated to SAPZ project activities, the complainant (if known) is notified and referred to the appropriate institution.

2. Grievance Categorization

Each valid grievance is categorized by type, severity, and urgency:

- Type: e.g., land, compensation, environment, labor, safety, social conflict, etc.
- Severity: minor (resolvable at community level), moderate (requires chieftdom or district involvement), or major (requires national-level intervention or legal recourse).
- Urgency: issues requiring immediate action (e.g., safety hazards) versus those suitable for standard resolution timelines.

3. Digital Recording

- All grievances, whether written or verbal are entered into a centralized GRM database, using a standardized digital entry format.
- The Social Safeguards Specialist is responsible for maintaining and regularly updating the database, ensuring accuracy, data security, and traceability.

4. Assignment for Resolution

- Based on the categorization, the grievance is assigned to the appropriate authority (community, chieftdom, district, or PIU) for resolution.
- A unique generated for each grievance to facilitate monitoring.

5. Communication with Complainant

- The complainant (if known) is informed of the grievance category, expected resolution timeline, and next steps.
- They are also reminded of their right to confidentiality and appeal.

Step 3: Investigation & Resolution

This step involves gathering relevant facts, engaging stakeholders, and determining an appropriate, fair, and timely resolution based on the grievance type and level of complexity.

Key Actions:

1. Investigation Planning

- The assigned grievance officer or resolution committee (depending on the level—community, chieftdom, or district) initiates an investigation within 5 working days of grievance categorization.

- For complex grievances, a Grievance Resolution Panel may be constituted, involving local leaders, project staff, and where necessary, external specialists or mediators.

2. Information Gathering

- Site visits, interviews with the complainant and other affected parties, document reviews, and verification of facts are undertaken.
- The investigation process prioritizes fairness, cultural sensitivity, and non-retaliation, particularly for grievances from vulnerable or marginalized groups.

3. Resolution Development

- A resolution plan is developed in consultation with the complainant and other relevant stakeholders.
- The proposed solution is based on project guidelines, legal standards, and community norms (where appropriate), and must not be discriminatory.

4. Decision and Communication

- A formal decision is made and recorded in the GRM database.
- The complainant is informed of the outcome both verbally and in writing, using their preferred language and communication method.
- If the grievance is resolved, the complainant is asked to sign a Grievance Closure Acknowledgement Form.

5. Documentation

- All investigation records, evidence, meeting notes, and outcomes are archived in both hard copy (where feasible) and the digital GRM database by the Social Safeguards Specialist.
- The grievance status is updated to “Resolved” or “Pending Appeal” in the database.

Step 4: Appeals and Escalation

If a complainant is dissatisfied with the outcome of the investigation or believes the resolution was unfair or inadequate, they have the right to appeal and escalate the grievance through higher levels of the mechanism.

Key Actions:

1. Right to Appeal Notification

- Upon communication of the initial resolution, the complainant is formally informed of their right to appeal, the steps involved, and the applicable timeline (typically within 10 working days of receiving the outcome).

2. Submission of Appeal

- Appeals may be submitted verbally or in writing to the next level of the grievance ladder:
 - From community to chiefdom level
 - From chiefdom to district level
 - From district to national (PIU) level
- The appeal is logged into the GRM database as a continuation of the original grievance, with updated status and timelines.

3. Re-evaluation

- The appeal is reviewed by an independent GRC not involved in the original resolution process to ensure impartiality.

4. Decision on Appeal

- A decision is made and communicated to the complainant within a predefined timeline (usually within 15 working days).
- The outcome may uphold, revise, or overturn the original decision, and must be clearly justified.

5. Referral to External Mechanisms

- If the complainant remains unsatisfied, they may be referred to national regulatory bodies, such as the EPA, Human Rights Commission, or the judicial system, without restriction.

6. Documentation and Closure

- The appeal outcome and all related documentation are archived.
- The final status is updated in the GRM database as “Appeal Resolved”, “Referred Externally”, or “Closed”.
- Feedback is provided to the complainant and lessons learned are integrated into future grievance handling procedures.

Step 5: Monitoring, Reporting, and Feedback Integration

This step ensures that the GRM remains responsive, transparent, and adaptive through regular monitoring of grievance trends, evaluation of resolution effectiveness, and systematic incorporation of feedback into project implementation.

Key Actions:

1. Ongoing Monitoring of Grievances

- The Social Safeguards Specialist, in coordination with GRM focal points at all levels, monitors the status of all grievances entered in the GRM database, tracking resolution timelines, recurrence patterns, and compliance with resolution commitments.
- Priority is given to grievances that remain unresolved beyond prescribed timeframes or that show signs of escalation.

2. Periodic Reporting

- Monthly, quarterly, and annual GRM performance reports are generated, detailing:
 - Number and types of grievances received
 - Resolution rates and timelines
 - Appeals and escalations
 - Key trends and recurring issues
 - Lessons learned and recommendations
- Reports are submitted to the Project Implementation Unit (PIU) and shared with relevant stakeholders, including community representatives and the AfDB (as required).

3. Community Feedback and Learning

- Community forums and engagement meetings are held periodically to:
 - Share updates on grievance trends and resolutions
 - Gather feedback on GRM accessibility, fairness, and effectiveness
 - Build community trust and ownership of the grievance process

4. System Improvement and Adaptive Management

- Feedback from GRM users and performance monitoring or independent audits is used to:
 - Update training materials and protocols for grievance officers

- Adjust communication strategies to improve awareness and accessibility
- Improve grievance categorization or escalation pathways where gaps are identified

5. Data Management and Safeguarding

- All data in the GRM system is managed in accordance with data protection standards to ensure confidentiality and integrity.
- The Social Safeguards Specialist oversees regular backups, access controls, and updates to the GRM database.

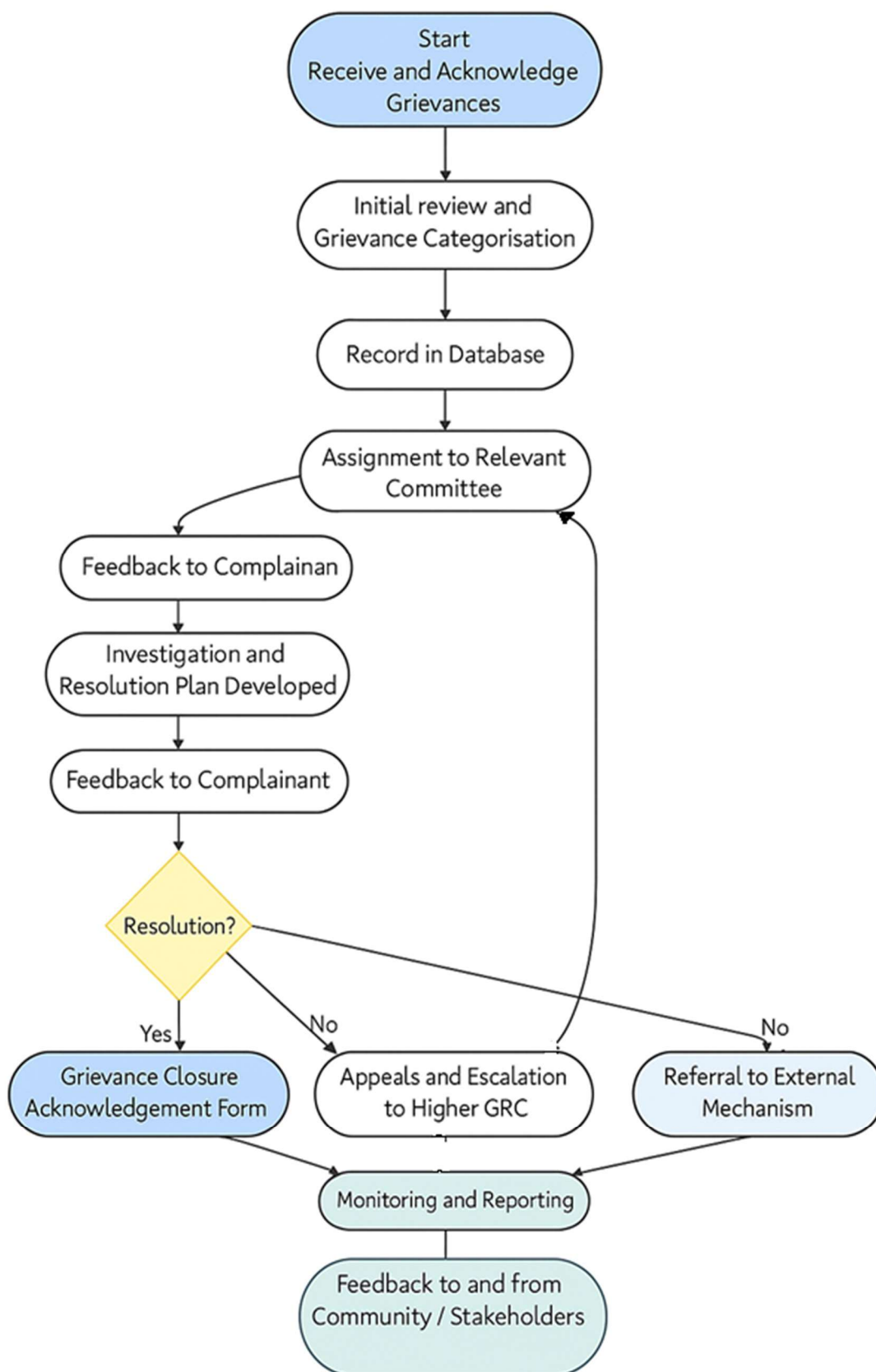


Figure 1: Flowchart of GRM Process

5 OVERVIEW OF CASE MANAGEMENT PROCESS

The SAPZ Project's Grievance Redress Mechanism (GRM) follows a structured case management approach to ensure that complaints are handled in a timely, fair, and transparent manner. The process begins with receipt and registration and concludes with resolution, communication, and closure or appeal.

Upon receipt of a grievance:

- A Grievance ID is issued and the complaint is logged into the Grievance Register.
- The grievance is assigned to the relevant GRM Focal Point (FP) at the appropriate level—community, chiefdom, district, or national.
- If the grievance is made verbally or anonymously, ensure it is clearly recorded using the standard Grievance Receipt Form. (See Annex 1: Grievance Complaint Drop-Off Form)
- If the complainant is known, a signed copy of the grievance receipt form will be provided as confirmation of submission.

Table 1: Case Management Process

Process	Actions	Responsible	Timeline
1. Receive and Acknowledge Grievance	Issue Grievance ID and log into GRM Register	Social Safeguards Specialist	Within 24 hours of receipt
	Acknowledge receipt of grievance (if not anonymous)	Social Safeguards Specialist	Within 2 working days
	Assign grievance to relevant GRM focal point (community, chiefdom, district, or PIU)	SAPZ Safeguards Team / GRM Focal Point	Within 2 working days after registration
	Conduct preliminary inquiry to determine validity of case	GRM Committee Member and SAPZ Safeguards Team with Community Liaison Facilitator (CLF)	Maximum 2 weeks
2. Investigation and Resolution of Cases	Form an investigation team to gather facts and assess the grievance (without determining outcomes)	GRM Focal Point, GRM Committee, and SAPZ Safeguards Team	Within 2 weeks (or more depending on case complexity)

	Determine appropriate resolution, provide explanation, justification, and corrective actions	GRM Committee and SAPZ Safeguards Team with CLFs/CFPs	Dependent on nature of case (total period should not exceed 2 months)
3. Communication of Outcome	Notify complainant of resolution and provide explanation of findings	SAPZ Safeguards Team / GRM Committee through CLFs/CFPs	Within 5 working days
4. Implementation of Resolution	Implement resolution and confirm complainant feedback	SAPZ Safeguards Team, GRM Committee, CLFs/CFPs	Within 5 working days (unless referred to legal system)
5. Grievance Closure	Inform complainant of final outcome and obtain signed acknowledgment of satisfaction; advise on right to further recourse beyond SAPZ GRM	SAPZ Safeguards Team / GRM Committee / CLFs/CFPs	Within 8 working days
6. Appeal Process	Appeal may be submitted by complainant if dissatisfied with outcome or corrective action	Complainant	Within 14 days of receiving outcome

6 EXPECTED COMPLAINTS / GRIEVANCES AND THEIR DESCRIPTIONS

This section describes the various types of cases that can arise during the implementation of the different phases of the project cycle (i.e., inclusion, targeting, enrollment, corruption, and delays (project related), and quality of service.

Inclusion/Social			
Nature of Case	Description	Case Type	Party Responsible for Resolution
Exclusion of female-headed households or any group/cooperative (exclusion error)	Exclusion of any group/individual and households headed by women. In most rural areas, social and religious norms require females to obtain funding/grants through their husbands or a male relative, who may be excluded from receiving the grant.	Complaint	Community GRM Committees with support from The SAPZ SAFEGUARDS Team and PIU GRM Committee
Inclusion of “non-farmers/agri-actors” (inclusion Error)	Inclusion of persons/groups that are not actual farmers or not what they claim to be.	Complaint	Community GRM Committees with support from the SAPZ SAFEGUARDS Team and Agronomist
Environmental violations	Beneficiaries that may be violating E&S guidelines (like not using PPEs, cutting off trees from the forest, etc	Complainant	Community GRM Committees with support from the SAPZ SAFEGUARDS Team
SH/SEA/SGBV-related violations	Stakeholders and beneficiaries involved in SEA/SHG/SGBV-related	Complaint	Community GRM Committees with support from the SAPZ SAFEGUARDS T Team
Land-ownership-related cases	Beneficiaries not meeting requirements for land use and ownership	Complaint	Community GRM Committees with support from the SAPZ SAFEGUARDS Team
Corruption			

Extortion	Staff and other stakeholders extorting money or other resources/services from potential beneficiaries	Complaint	Community GRM Committees with support from the SAPZ SAFEGUARDS Team
Criminal Fraud or Corruption	Stakeholders/staff of SAPZ /MAFS are involved in acts that will bring the project into disrepute or which will cast doubts on a person's honesty, integrity, or suitability to work for the project.	Claim	Community/PIU GRM Committees with support from the Minister of Agriculture/the PIU Management and the SAPZ SAFEGUARDS TEAM Teams
Delays			
The time frame given for beneficiaries to receive grants is not conducive/ Delays in receiving inputs	Receipt of grants/inputs is delayed thereby causing beneficiaries to miss the planting season and other farming activities that are time-related	Claim	Community GRM Committees with support from the SAPZ SAFEGUARDS team and the agronomist
Quality of Service			
Nature of Case	Description	Case Type	
Unprofessional conduct	Instances of unprofessional behavior/foul language/misconduct by Project Staff	Complaint	Community GRM Committees with support from the SAPZ SAFEGUARDS TEAM Team

Additionally, the following types of grievances may be envisaged on the SAPZ Project at different stages (design and planning; implementation/operation and other activities):

- Grievances/complaints on perceived lack or inadequate information on the project context and implementation updates.
- Grievances on perceived non or inadequate involvement of stakeholders, partners, and beneficiaries, especially persons with disabilities and other vulnerable populations in project decisions and implementation.
- Complaints surrounding the operations of Participating Financial Institutions that will be involved in the disbursement of cash for work and transfers to vulnerable households.
- Complaints/grievances arise from occasional misunderstandings regarding the roles and responsibilities of some project stakeholders.

- Complaints resulting from the identification and selection of sites for project activities in communities may be related to potential cases of bias, inadequate community participation, and lack of consensus.
- Unauthorized entry into sites of cultural or historical significance including cemeteries, secret society shrines, and ancestral grooves
- Grievances/complaints about the unfair distribution of project benefits among beneficiaries.
- Complaints emanating from potential cases of certain communities/cooperatives perceiving bias in the distribution of farm inputs and implements.
- Complaints/grievances bordering on real or perceived non or delayed response by the project to communities and individuals affected by emergencies during the project implementation period
- Complaints bordering on the quality and quantity of food provided under the school feeding support to the basic education sector.
- Grievances regarding environmental issues such as pollution and degradation due to physical work under the project
- Encroachment of project activities on other community land uses and livelihoods.
- Grievance/complaints related to project resources (financial, material, and human) management (misapplication, misuse, diversion, and short-changes/allocations).
- Complaints/grievances related to perceived maleficence, fraud, and corruption in recruitment, procurement, and general contract administration.
- Concerns related to delays and, or non-payment of remunerations of project staff and service providers.
- Issues on the unsafe working environment, unfair wage payment, and general staff welfare.
- Issues pertinent to the quality of consultancy services, supplies, and engineering works delivered to project stakeholders, partners, and beneficiaries.
- Gender-based violence, sexual exploitation and abuse and sexual harassment issues - by SAPZ staff, GBV Focal points, and service providers.
- Solicitation of financial and material favour in return for project benefits by project staff, implementing partners (MDAs) and service providers.
- Use of harmful gender norms and stereotypes offensive jokes, slurs, name-calling, physical assaults or threats, intimidation, ridicule, insults, and offensive conduct by project staff, MDAs, and service providers against each other.
- Non-respect and or promotion of children's rights, discrimination against persons with disabilities, the youth, women and the vulnerable.

7 INSTITUTIONAL STAKEHOLDERS AND THEIR ROLE

While the GRM is open for use by the public, there exist identified key end-users and stakeholder that the project anticipates will interact with or use this GRM frequently. These users exist across the four levels of the project implementation - national, district, chiefdom and community. The GRM for the SAPZ will be available for use by all project stakeholders including those directly and indirectly impacted, positively or negatively, allowing them to submit questions, concerns/complaints, comments, and suggestions and obtain resolution or feedback. Below is the list of persons and institutions the project's GRM will be targeting, presented based on the different levels of users:

National Level:

- Ministry of Agriculture and Food Security which provides an institutional host for oversight, management and accountability of the project including the GRM.
- The African Development Bank and other Development Partners who may co-fund or be interested in the effective, transparent, and accountable application of project resources, and will provide guidelines as well as monitor the GRM.
- The SAPZ PIU's Social Safeguard Specialist has the responsibility of effectively coordinating the technical implementation, monitoring, evaluation, and reporting on the project including the implementation of the GRM.
- Project staff and service providers who will be providing their services and other resources for the implementation of the project including GRM actions.
- National Federation of Farmers in Sierra Leone which is the umbrella body for promoting the interest and development of farmers' associations will support national level GR activities.
- Environment Protection Agency which will provide guidance and quality assurance on environmental issues and support the determination of environment-related complaints.
- Ministry of Gender which provides policy and programmatic guidance to promote gender, and child rights issues under the project as well as support psychosocial services to be provided to survivors of GBV/SEA/SH.
- Sierra Leone Met Agency which will provide data on weather conditions and support agricultural research.
- Ministry of Lands and Country Planning whose interest is in the effective land use in consonance with land use policies and plans in the country.
- Sierra Leone Local Content Agency to promote the development of SMEs and link them to markets.
- Ministry of Lands and Country Planning which will provide policy guidelines on the effective access and use of land as well as participating in the resolution of land-related complaints.
- Ministry of Trade and Industry will provide policy support for accessing regional markets, developing SMEs development, and providing insight during GR sessions.

- Office of National Security and National Disaster Management Authority which may be collaborating with the project addressing possible emergencies that may be triggered during project implementation.
- National Water Resources Management Agency which has the regulatory mandate for the use of water resources for diverse livelihoods, will be co-opted for the national level GRC to help address water resource-related complaints.

District Level

- Kambia and Port Loko District Councils which are responsible for the overall local development at the district level will provide an institutional receptacle for project activities including GRM structures and complaints redress.
- The print and electronic media houses which will be covering or monitoring project implementation processes, and to which some aggrieved persons may possibly report their grievances or complaints will serve as third-party monitors in the GRM.
- Private Sector Consultants, Suppliers and Contractors whose businesses and incomes will be promoted through their participation in the project may have complaints for attention.
- Civil Society Organisations/Non-Governmental and Community-Based Organisations that will be associated with, or be interested in various aspects of the project delivery including monitoring and reporting on the effectiveness of the GRM;
- The District Agriculture Officers of Kambia and Port Loko Districts.

8 LANGUAGES, FORMAT, SCOPE & ADMISSION OF A COMPLAINT / GRIEVANCE

8.1 Language

The SAPZ Project GRM is committed to ensuring linguistic accessibility and inclusion across all grievance channels. Complaints may be submitted in any local language spoken within the project area, including Temne, Limba, Susu, Mende, or Krio. To facilitate meaningful engagement with communities, all grievance-related interactions—including receipt, clarification, investigation, and feedback will be conducted in the complainant’s preferred language to the extent possible.

While the official record of all complaints will be logged in English in the GRM Register and digital database, verbal submissions in local languages will be accurately translated and documented by trained GRM focal points or Community Liaison Facilitators (CLFs). This approach recognizes the high levels of illiteracy in rural areas and prioritizes inclusive communication throughout the grievance lifecycle.

8.2 Format

Complaints may be submitted in **multiple formats**, reflecting the need for flexibility and accessibility:

- **Verbal submissions** (in person or by phone), to be documented by GRM focal points
- **Written submissions**, including letters or completed grievance forms
- **Anonymous complaints**, via suggestion boxes or trusted intermediaries
- **Electronic formats**, including SMS, WhatsApp, or email (where available)

Standardized grievance forms (see *Annex 1: Grievance Complaint Drop-Off Form*) will be made available in simple English and explained in local languages during community sensitization efforts.

8.3 Scope and Admission

The GRM is open to all stakeholders directly or indirectly affected by SAPZ project activities, including:

- Project-affected persons (PAPs)
- Community members
- Workers (including contractors and service providers)
- Civil society organizations
- Traditional leaders and government institutions

Complaints will be **admitted** into the GRM process if they relate to:

- Environmental or social impacts
- Land acquisition or use
- Labour and working conditions
- Health and safety
- Community relations
- Gender-based concerns or discrimination
- Misconduct by project personnel

Grievances that are outside the scope of the SAPZ Project will be referred to the relevant external authority, and the complainant will be duly informed.

9 IMPLEMENTATION OF THE SAPZ GRM

The effective implementation of the SAPZ Project's Grievance Redress Mechanism (GRM) will rely on a multi-pronged approach that ensures visibility, inclusiveness, responsiveness, and accountability across all levels of project activity. Key implementation elements include stakeholder awareness, establishment of functional structures, operational capacity-building, preventive measures, and the full application of the grievance redress process (from intake to resolution and reporting). The GRM will operate in a manner that promotes fairness, confidentiality, and protection against retaliation, while providing timely feedback to complainants and stakeholders.

9.1. Information Dissemination and Outreach

To promote awareness and uptake of the GRM, the SAPZ project will implement targeted Information, Education, and Communication (IEC) strategies. Materials such as posters, brochures, voice messages, and video content will be developed and disseminated in appropriate languages. Communication channels will include stakeholder meetings, community gatherings, sensitization campaigns, radio and television broadcasts, the project website, and the display of posters in strategic locations including project offices, district councils, chiefdom and ward administration centers, and construction sites. Sample grievance forms will be made available alongside other relevant project information. These efforts aim to enhance stakeholder understanding of the project and reduce the escalation of minor complaints into grievances.

9.2. Institutional Structures and Stakeholder Roles

The GRM will be implemented through a structured, tiered approach that corresponds with the project's implementation at the community, chiefdom, district, and national levels. Grievance Redress Committees (GRCs) will be established at each level with clearly defined roles:

- **Community Level GRC** – This committee will be chaired by the local SAPZ Focal Person and composed of traditional leaders, women and youth representatives, CBO representatives, PWD advocates, and local supervisors. It will serve as the first point of contact for grievances, responsible for intake, registration, preliminary resolution, and referral of complex cases.
- **Chiefdom-Level GRC** – Chaired by the Paramount Chief or a delegated representative, this level will mediate grievances beyond the scope of the community committee. It will engage in fact-finding, facilitate resolution, and escalate unresolved issues to the district level.
- **District-Level GRC** – Led by the District Agriculture Officer, with representation from sectoral MDAs, this committee will resolve district-level grievances and interface with the PIU. It will handle inter-chiefdom issues, monitor grievance trends, and ensure consistency in grievance handling.
- **National/PIU-Level GRC** – The PIU, led by the SAPZ Project Manager and supported by the Social Safeguards Specialists, will provide strategic oversight, ensure database management, and report grievances to the African Development Bank. This level will also manage appeals and unresolved cases, especially those involving GBV/SEA/SH.

9.3. Capacity Building Support

To ensure effective performance, all GRM stakeholders particularly GRC members will receive structured training on topics such as communication, conflict resolution, community engagement, GBV/SEA/SH referral, and grievance investigation. The training will also target traditional leaders and local influencers to enhance their role in informal resolution. Specialized sessions will be conducted for GBV focal points, with emphasis on confidentiality and survivor-centered referral pathways.

9.4. Allocation of Resources for GRM Implementation

The PIU will allocate adequate financial, material, and human resources to support GRM implementation. Budgeted activities include capacity-building workshops, awareness campaigns, committee stipends, communication tools, stationery, grievance database management, and transport logistics. These investments will enable timely, effective, and professional grievance handling at all levels.

Table 2: Indicative GRM Budget

Description	Timeline	Unit Cost (USD)	Total Cost (USD)
Initial Sensitization Campaigns (radio, posters, community meetings)	Year 1	\$15,000.00	\$15,000.00
Formation and induction of GRM Committees (all levels)	Year 1	\$8,000.00	\$8,000.00
Procurement of materials and supplies (forms, stationery, banners)	Year 1	\$5,000.00	\$5,000.00
Set-up of GRM database system and equipment	Year 1	\$10,000.00	\$10,000.00
Quarterly community sensitization campaigns (2 districts x 4 per year)	Yearly	\$3,000.00	\$15,000.00
Training and refresher courses for GRM Committee members	Yearly	\$5,000.00	\$25,000.00

Description	Timeline	Unit Cost (USD)	Total Cost (USD)
Stipends/transport for community-level focal persons (20 persons x \$20 x 12 months)	Yearly	\$4,800.00	\$24,000.00
District Council logistics support (fuel, communication, coordination)	Yearly	\$4,000.00	\$20,000.00
Printing of GRM materials (grievance forms, brochures, visibility materials)	Yearly	\$2,000.00	\$10,000.00
Annual GRM monitoring and supervision missions	Yearly	\$6,000.00	\$30,000.00
Contingency reserve (unforeseen grievances/logistics needs)	Yearly	\$2,500.00	\$12,500.00

Total 5-Year Budget: \$174,500

9.5. Publication and Reporting

A centralized grievance database will be maintained by dedicated staff at the PIU. It will serve as the basis for monthly, quarterly, and annual reports that analyze trends, status of complaints, and resolution outcomes. These reports will inform project performance reviews and will be shared with the African Development Bank and relevant stakeholders to enhance transparency.

9.6. Sustainability Measures

To ensure the GRM's sustainability beyond the SAPZ project lifecycle, the PIU will work with MDAs, district councils, and chiefdom structures to institutionalize the system. Strategies include continued stakeholder engagement, refresher training, documentation of lessons learned, and advocacy for policy adoption by implementing agencies. The aim is to mainstream the GRM into national development frameworks and local governance systems.

Table 3: Role & Responsibilities of Grievance Redress Committees

Level	Grievance Redress Role / Responsibility
Community-Level Grievance Committee	<ul style="list-style-type: none"> • Support sensitization, information, education, and communication (IEC) activities to promote awareness and use of the GRM at the local level. • Receive, document, and acknowledge complaints submitted by community members. • Conduct initial inquiries, resolve minor complaints where possible, and report on all grievances received. • Refer all cases of GBV/SEA/SH to appropriate service providers while ensuring confidentiality and survivor consent. • Forward grievances related to fraud, corruption, or contractual non-compliance to the PIU Safeguards Team.
Chiefdom-Level Grievance Committee	<ul style="list-style-type: none"> • Support information dissemination and reinforce community-level awareness of the GRM. • Receive grievances escalated from the Community-Level Committee or directly assigned by the Social Safeguards Specialist. • Conduct fact-finding and verification exercises, especially in relation to land ownership, social tension, or traditional governance disputes. • Facilitate resolution of grievances not settled at community level through consensus-building and traditional dispute resolution. • Refer unresolved, high-risk, or policy-sensitive cases to the District-Level Committee. • Ensure documentation and secure transfer of GBV/SEA/SH cases to designated referral pathways.
District-Level Grievance Redress Committee	<ul style="list-style-type: none"> • Coordinate IEC campaigns and reinforce GRM processes across multiple chiefdoms. • Receive, investigate, and resolve cases escalated from the chiefdom or assigned by the social safeguards specialist. • Lead multi-stakeholder mediation for inter-chiefdom, contractor-related, or district-level disputes. • Refer GBV/SEA/SH complaints to specialized service providers and coordinate with national-level focal points where appropriate. • Maintain grievance records • Report trends and unresolved issues to the PIU for further action.
National Committee (MAFS/PIU)	<ul style="list-style-type: none"> • Institutionalize the GRM across national, district, and community structures within the SAPZ framework. • Develop and disseminate GRM guidelines, protocols, and tools. • Ensure the availability of financial, material, and human resources to support GRM functioning at all levels. • Manage and maintain a central, secure digital database for grievance tracking and reporting.

Level	Grievance Redress Role / Responsibility
	<ul style="list-style-type: none"> • Provide oversight, coordination, and quality control of all grievance redress processes. • Participate in the appeals process and review high-risk or unresolved grievances. • Ensure timely referral of GBV/SEA/SH complaints to service providers, maintaining survivor confidentiality. • Submit periodic GRM reports to the African Development Bank and relevant stakeholders. • Use lessons learned to inform adaptive management and improve project accountability. • Investigated and resolve complaints escalated or assigned to nation level committee.

10 GRIEVANCE MECHANISM FOR GENDER-BASED VIOLENCE / SEXUAL EXPLOITATION & ABUSE & SEXUAL HARASSMENT

10.1 Introduction

Gender-Based Violence (GBV), including Sexual Exploitation, Abuse, and Harassment (SEA/SH), is a critical protection concern. The SAPZ Project recognizes the need for a structured, survivor-centered referral pathway to ensure that survivors in Kambia and Port Loko districts have access to timely, confidential, and comprehensive support services. This chapter outlines the adapted GBV referral pathway, aligning with the National GBV Referral Protocol, while accounting for the local context and available services in the project areas.

10.2 Guiding Principles

- **Survivor-Centered Approach:** The survivor's rights, wishes, and well-being will guide all responses.
- **Confidentiality:** Information will be shared only with consent and on a need-to-know basis.
- **Safety:** Protection of the survivor from further harm or retaliation.
- **Non-Discrimination:** All survivors will receive equal treatment regardless of gender, age, disability, ethnicity, or status.

10.3 Entry Points and First Responders

Survivors may disclose GBV to a variety of actors within the community or project structure. The following are recognized as entry points:

- SAPZ Community Liaison Facilitators (CLFs)
- GRM Focal Points at the community level
- Health Workers at PHUs or hospitals
- Family Support Unit (FSU) of the Sierra Leone Police
- Teachers, religious leaders, traditional authorities

Upon disclosure, the first responder must:

- Listen without judgment
- Ensure the survivor is safe

- Explain available services
- Seek informed consent before referral

10.4 Referral Pathway

The following pathway outlines the steps and responsible actors for handling GBV cases in Kambia and Port Loko:

Step 1: Immediate Safety and Support

- **Action:** Ensure the survivor is not in immediate danger. Refer to safe house if needed.
- **Responsible:** CLF, GRM Focal Point, Police FSU, NGO partner

Step 2: Medical Care

- **Action:** Provide or facilitate access to medical services, including emergency treatment, PEP, and documentation.
- **Facilities:** District Hospitals in Kambia and Port Loko; Rainbo Centres (Bo, Makeni, Freetown)
- **Responsible:** Health worker, CLF, NGO escort

Step 3: Psychosocial Support

- **Action:** Provide counselling or refer to professional psychosocial service provider
- **Responsible:** MoGCA representative, Rainbo Initiative, District Social Worker

Step 4: Police and Legal Action

- **Action:** Record statement, initiate investigation (only if survivor consents)
- **Responsible:** FSU of the Sierra Leone Police, Legal Aid Board (if required)

Step 5: Monitoring and Follow-Up

- **Action:** Ensure continuous psychosocial support, legal assistance, and case updates.
- **Responsible:** GRM Focal Point, MoGCA, NGO caseworker

10.5 Coordination and Oversight

- The Ministry of Gender and Children's Affairs (MoGCA) will provide district-level oversight and ensure coordination with national GBV mechanisms.
- The SAPZ PIU will maintain records of GBV referrals (without personal identifiers) and report cases to the AfDB through anonymized channels.
- All actors involved in GBV response will be trained in ethical case handling, survivor consent, and data protection.

10.6 Key Contacts in Kambia and Port Loko

(Names and phone numbers of referral actors to be inserted and updated quarterly)

Referral Actor	Contact Number
District Gender Officer (MoGCA) Kambia (Bah)	+232 78 300832
Family Support Unit (Sierra Leone Police) Line Manager Kambia District	+232 30 083759
District Gender Officer (MoGCA) Port Loko (Chernor Timbo)	+232 76 920529
Rainbo Initiative Contact	+232 76 900611
Medical Emergency	117

10.7 Prohibited Actions

- No mediation or negotiation with perpetrators
- No disclosure without survivor's informed consent
- No delays in referral beyond 24 hours for medical care

10.8 Community Awareness

The GBV referral pathway will be communicated through community sensitizations, IEC materials, and integration into broader GRM awareness campaigns.

ANNEXES

Annex 1: Grievance Complaint Drop-Off Form

Official SAPZ Project Letter Head

COMPLAINT: General INFORMATION	
The telephone number of the complainant	Email of the complainant
Project	SAPZ (Please circle the project complaint is addressed to)

Annex 2: Grievance Complaint Registration Form

COMMUNITY:

PROJECT:.....

Grievance ID No......

Date:

.....

Priority:

☐ Low

☐

Medium ☐ High

How to use this Form: This form should be completed for each grievance that is related to the SAPZ Project Please consider which category/sub-category/issues fit best for a grievance. Be sure to explain the problem as clearly as possible.

General Information:

Given Name		Family Name		Gender:	Male	Female	
Tel: No:		Email Address:		Town/Village			
District:		Individual/Group		Grievance Against		Filled By	
<i>Position of Complainant</i>	<input type="checkbox"/> Farmer (Individual/group/Coop) <input type="checkbox"/> Community Member <input type="checkbox"/> Government official <input type="checkbox"/> Other (SPECIFY)						
<i>Channel of Complaint</i>	<input type="checkbox"/> Physical Submission <input type="checkbox"/> Email <input type="checkbox"/> Hotline <input type="checkbox"/> WhatsApp <input type="checkbox"/> Letter <input type="checkbox"/> Other (SPECIFY)						

Grievance Description:	
Grievance Categories:	
1. Corruption	
<input type="checkbox"/> Misuse of FUNDS <input type="checkbox"/> Influence Peddling <input type="checkbox"/> Theft <input type="checkbox"/> Request for Bribes <input type="checkbox"/> Abuse of discretion <input type="checkbox"/> Others (Explain	
2. SAPZ Package	
<input type="checkbox"/> Late Distribution <input type="checkbox"/> Package Quality <input type="checkbox"/> Project Coverage <input type="checkbox"/> Not Benefitted from the package (Inclusion/Exclusion Error Registration Problems <input type="checkbox"/> Package distribution delay	
3. Misbehavior of Project Staff, Stakeholders & other Development Actors	
<input type="checkbox"/> Awareness <input type="checkbox"/> Punctuality <input type="checkbox"/> Staff/Stakeholder behaviors/Attitude <input type="checkbox"/> Other (EXPLAIN)	
4. Gender, Environment and Social Safeguard-related issues	
<input type="checkbox"/> SH/Sexual Exploitation & Abuse <input type="checkbox"/> SGBV <input type="checkbox"/> Child Labor <input type="checkbox"/> Land issues <input type="checkbox"/> Environmental issues <input type="checkbox"/> Other (EXPLAIN)	
Supporting Documents (Attach Copies)	

2.

.....

Annex 3: Acknowledgement of Receipt Form

Case number.....

Date of issuing complaint:.....(date.....) Place of issuing complaint:

Community/District/PIU.....

Details of complaint:

Name...

Address...

Email address...

Supporting documents submitted: 1.....

2..... 3.....

Summary of complaint:

Name of person receiving complaint

Signature of the person receiving complaint

Country.....

Age: Gender...

Phone number...

.....

Annex 4: SGBV / SEA/SH Complaint Submission Form

Instructions

- 1- This form must be filled out by the person providing services to the survivor
- 2- Remind information will be kept confidential, and that they may choose not to answer any of the following questions.

Report Date*

**Incident
Date***

**Staff Code
(if
available)**

Report by Survivor*?

☐ Yes ☐ No

Survivor Information

**Sex
of
survivor***

☐

Female

☐

Male

Specific Needs / Vulnerabilities* (check all that apply)

☐ No

☐ Physical Disability

☐ Mental Disability

☐ Unaccompanied
Minor

☐ Separated Child

☐ Other
Vulnerable

Child

Details of the Incident

Area* ☐

Sub-Area* ☐

Village / Town

Type of incident/violence*

(Please select only ONE of the below.
Refer to the GBV GBV Classification
Tool for further clarification.)

**1. Did the reported incident involve
penetration?**

If yes ☐ classify the incident as "Rape".

If no ☐ proceed to the next incident type on the
list.

☐ **Rape**

(Includes gang rape, marital rape)

☐ **Sexual Assault**

(Includes attempted rape and all sexual violence/abuse without penetration, and female genital mutilation)

☐ **Physical Assault**

(Includes hitting, slapping, kicking, shoving, etc. that

are not sexual in nature)

☐ **Psychological / Emotional Abuse**

(Includes: threats of physical or sexual violence, forced isolation, harassment /intimidation, gestures, or written words of a sexual/menacing nature, etc.)

☐ **Non-GBV (specify)**

Did the reported incident involve
2. unwanted sexual
Contact?

If yes ☐ classify the incident as “Sexual Assault”. _____

If no ☐ proceed to the next incident type on the list.

Did the reported incident involve
3. physical assault?

If yes ☐ classify the incident as “Physical Assault”. _____

If no ☐ proceed to the next incident type on the list.

Was the incident an act of forced
4. marriage?

If yes ☐ classify the incident as “Forced Marriage”. _____

If no ☐ proceed to the next incident type on the list.

Did the reported incident involve the
5. denial of
resources, opportunities, or
services?

If yes ☐ classify the incident as Denial of
Resources, _____

“
Opportunities or Services”.

If no ☐ proceed to the next incident type on the list.

Did the reported incident
6. involve
psychological/emotional
abuse?

If yes ☐ classify the incident as “Psychological /
Emotional _____
Abuse”.

If no ☐ proceed to the next incident type on the list.

7. Is the reported incident a case of GBV?

If yes ☐ Start over at number 1 and try again to reclassify the
incident *(If you have tried to classify the incident multiple*

	<p><i>times, ask your supervisor to help you classify this incident).</i></p> <p>If no <input type="checkbox"/> classify the incident as “non-GBV” _____</p>
<p>Was money, goods, benefits, and/or services exchanged in relation to this incident*?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Has the survivor reported this incident anywhere else? * (If yes, select the type of service provider and write the name of the provider where the client reported).</p> <p><input type="checkbox"/> No <input type="checkbox"/> Yes (specify) :</p>	

<p>Alleged Perpetrator Information</p>

Number of alleged perpetrator (s)*	Alleged perpetrator sex*	The main occupation of the alleged perpetrator (if known)
1	<input type="checkbox"/> Male	<input type="checkbox"/> Farmer <input type="checkbox"/> Police <input type="checkbox"/> Soldier <input type="checkbox"/> Security
2	<input type="checkbox"/> Female	<input type="checkbox"/> Official <input type="checkbox"/> Teacher <input type="checkbox"/> Parent
3	<input type="checkbox"/> Both	<input type="checkbox"/> Religious / Community
More than 3	<input type="checkbox"/> Age*	<input type="checkbox"/> NGO Staff <input type="checkbox"/> Leader <input type="checkbox"/> Other /
Unknown	<input type="checkbox"/> Adult <input type="checkbox"/> Minor <input type="checkbox"/> Adult & Minor	<input type="checkbox"/> Unknown <input type="checkbox"/> Unemployed <input type="checkbox"/> Any other individual associated with the project

Planned Action / Action Taken: Any action/activity regarding this report

<p>Was the survivor referred to a safe house/shelter ? *</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No - Service provided by you.</p> <p><input type="checkbox"/> No - Service received prior to this visit.</p> <p><input type="checkbox"/> No - Service not applicable</p> <p><input type="checkbox"/> No - Referral declined by survivor.</p> <p><input type="checkbox"/> No - Service unavailable</p>	<p>Referral Details:</p>
<p>Was the survivor referred to medical services? *</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No - Service provided by you.</p> <p><input type="checkbox"/> No - Service received prior to this visit.</p> <p><input type="checkbox"/> No - Service not applicable</p> <p><input type="checkbox"/> No - Referral declined by survivor.</p> <p><input type="checkbox"/> No - Service unavailable</p>	<p>Referral Details:</p>
<p>Was the survivor referred to psychosocial services? *</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No - Service provided by you.</p> <p><input type="checkbox"/> No - Service received prior to this visit.</p> <p><input type="checkbox"/> No - Service not applicable</p> <p><input type="checkbox"/> No - Referral declined by survivor.</p> <p><input type="checkbox"/> No - Service unavailable</p>	<p>Referral Details:</p>
<p>Was the survivor referred to the security services ? *</p>	<p>Referral Details:</p>

<input type="checkbox"/> Yes <input type="checkbox"/> No - Service provided by you. <input type="checkbox"/> No - Service received prior to this visit. <input type="checkbox"/> No - Service not applicable <input type="checkbox"/> No - Referral declined by survivor. <input type="checkbox"/> No - Service unavailable	
---	--

Assessment Points	
Describe the survivor's emotional state at the beginning of the interview: Depressed	<input type="checkbox"/> Scared / Fearful <input type="checkbox"/> Sad /
<input type="checkbox"/> Anxious / Nervous <input type="checkbox"/> Angry <input type="checkbox"/> Calm <input type="checkbox"/> Other:	
Describe the survivor's emotional state at the end of the interview: Similar to that at the start of interview	<input type="checkbox"/> Calmer than at the start of interview <input type="checkbox"/> More upset than at the start of interview <input type="checkbox"/> Other

Annex 5: SGBV Complaint Handling Procedure

The SAPZ Safeguards Team, as part of the SGBV prevention measures in project-affected communities, will develop the following steps and process to enable the team and GRM Committees to effectively refer SGBV cases to the relevant referral pathways that handle such cases described below:

Step 1

When a GBV/SEA/SH case is reported to any of the project's grievance submission points or focal persons, he/she should first gather minimum referral information (especially in the absence of trained SGBV Agents, Coordinators and actors. These include information details of the alleged perpetrator and whether he/she is a beneficiary/staff/consultant of the project; and if possible, the survivor's immediate contacts (parent/guardian, relative, associate, etc), telephone contact, etc. Other details could be the exact location (community, town, and or village), Form of GBV (rape, sexual exploitation and abuses, etc.), sex, and age of the survivor.

IF THE CASE IS NOT RELATED TO THE PROJECT, IT SHOULD BE

IMMEDIATELY FORWARDED TO THE RELEVANT AUTHORITIES AND NOT RECORDED IN THE PROJECT'S GRM.

Step 2

Contact the SGBV coordinator in the community by placing a call or sending an email. If you cannot reach the coordinator through either means, contact the GRM hot Line, email the complaint, or call the designated official or safeguards team directly to report the case to relevant institutions/authorities based on the minimum information one may have.

Step 3

Upon receiving the information from the focal point, GRM Committee member, or SAPZ Safeguards team, the relevant party shall follow up on the details and engage the needed protocol to have the survivor agree for the case to be reported, and documented for he/she to receive justice, medical attention, care and/or any other support as per the desire of the survivor. **CONFIDENTIALITY SHOULD BE CONSIDERED AT ALL LEVELS.** If required anonymity measures should be put in place.

Step 4

The case shall also be recorded in the Project's GRM System as an open case with the minimum information that is gathered by the GRM focal point. The case recorded shall clearly state if the perpetrator is a project staff/beneficiary or stakeholder. Example: if any project staff is caught in breach of the code of conduct or any other act involving GBV, SEA, or SH, he/she shall be categorized as a project staff but if any other persons other than a project staff shall be caught it shall be categorized as a non-project staff. The SAPZ Safeguards team shall follow up with the referral pathways by contacting the Ministry of Gender and Children's Affairs staff in the committee to get feedback on the nature of the case. Depending on the outcome, the case shall remain open until the case is satisfactorily resolved.

Redress procedures for GBV cases usually take longer time than normal cases because of the referral pathways. Therefore, it should be noted at the beginning that the resolution of such cases is dependent on the justice system.

Annex 6: SGBV Community Preventive Protocol

The SAPZ Project's Safeguards Unit will develop Information, Education, and Communications (IEC) materials and collaborate with the Communications Specialist and the Communications for Development (C4D) team to sensitize communities and farming groups on Sexual Gender-Based Violence prevention and mitigation strategies. They will provide periodic refresher trainings on SGBV prevention and response to PIU and Community staff and other stakeholders.

The SAPZ Project's Gender Official will work in collaboration with the Ministry of Gender, and Children's Affairs and other relevant stakeholders to resolve SGBV cases as they have a better understanding of the referral pathways and will provide required information.

Annex 7: Code of Conduct (draft)

SLLAP Code of Conduct and to be used by the contractor signing and with generic code of conduct stipulations that should be included (or similar clauses to the effect) in the CoC developed by the contractor for the project

INDIVIDUAL CODE OF CONDUCT

This individual **Code of Conduct** applies to and binds every and all employees, seconded staff, consultants, interns or volunteers working for or with or providing services or technical assistance under the Sierra Leone Rice Special Agro-Industrial Processing Zone (SAPZ) Project at the Ministry of Agriculture and Food Security.

I

.....
....., an employee/seconed staff/consultant/intern/volunteer, acknowledge and commit to adhering to the environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and violence against children (VAC). All forms of GBV, SEA, SH or VAC are unacceptable, be it at the workplace/work site, the work site surroundings, at worker's camps, or the surrounding communities.

I accept to abide by the following terms and conditions in this code of conduct as long as I work for, with or on behalf of the Sierra Leone Land Administration Project:

Regarding ESHS and OHS

1. Will attend and actively partake in training sessions related to ESHS, OHS, Communicable Diseases and others as requested by my employer or service provider;
2. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related field activities;
3. Adhere to a zero-alcohol policy during my working times and will refrain from the use of narcotics or other substances which can impair my mental faculty and abilities at all times.

Regarding equality of opportunity and treatment

4. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or other status.

Regarding discrimination and violence based on gender or sexual exploitation and abuse/sexual harassment

5. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
6. Not engage in any activity that will encourage sexual exploitation and abuse of project beneficiaries and members of the surrounding communities;
7. Not engage in sexual harassment of work personnel and staff; for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature is prohibited, e.g., looking somebody up and down; kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts;
8. Not engage in sexual favours; for instance, making promises of favourable treatment (e.g. promotion), threats of unfavourable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts-or other forms of humiliating, degrading or exploitative behaviour;
9. Unless there is the full consent⁴ by all parties involved, not have sexual interactions with members of the surrounding communities or work colleagues. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of

⁴ **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child and national legislation consent cannot be given by children under the age of 18. Mistaken belief regarding the age of the child and consent from the child is not a defence.

this Code;

10. Not commit any act of sexual violence that could result in physical, sexual or psychological harm or suffering to any individual or individuals, especially women and children;
11. Understand that sexual offences of any type are prohibited and will not compromise with anybody on the act of GBV/SEA/SH nor support the act;
12. Understand that sexual offence acts which includes sexual harassment; sexual exploitation; rape including a minor are all unacceptable and prohibited by law;
13. Will support the investigation of GBV/SEA/SH cases and will report to my supervisor any suspected or actual GBV case of my knowledge;

Regarding children under the age of 18:

14. Not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child or his/her consent is not a defence or excuse.
15. Bring to the attention of my manager the presence of any children on the project sites or engaged in hazardous activities.
16. Wherever possible, ensure that another adult is present when working in the proximity of children.
17. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
18. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
19. Refrain from hiring children below the minimum age of 14 unless national law specifies a higher age in the context of the project, or any labour which places them at significant risk of injury.
20. Comply with all relevant local legislation, including labour laws in relation to child labour and minimum age.
21. Will take no naked picture of children.
22. When photographing or filming a child for work related purposes, I must:
 - a) Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
 - b) Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

- c) Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be adequately clothed and not in poses that could be sexually suggestive.
- d) Ensure images are honest representations of the context and the facts.
- e) Ensure file labels do not reveal identifying information about a child when sending images electronically.

SANCTIONS

Sanctions and classification of faults

The Ministry of Agriculture and Food Security shall be responsible for making decisions on the specific sanctions to be imposed on workers who fail to comply with this Code of Conduct. I understand that if I breach this Individual Code of Conduct, the Ministry of Agriculture and Food Security will take disciplinary actions according to the seriousness of the offense which could include:

- Reprimand (verbal or written).
- Precautionary notice
- Suspension and will forfeit one month's salary.
- Termination of contract or employment and summary dismissal
- If the context warrants, the Ministry shall report to the Police.

Infringements sanctioned with verbal notification.

Those behaviours that do not cause greater material or moral damage or harm to the Project, other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

Infringements sanctioned with written notification.

Those behaviours that cause slight material or moral damage or harm to the Project, other workers and/or its relationship with the communities and/or the environment.

Infringements with pecuniary notice

Applicable to recurrent offenders whose course of conduct or actions continue after being notified more than 2 times in writing. "Course of conduct" means a persistent pattern of conduct comprising two or more acts carried out over a period that shows a continuity of purpose aimed at a particular person who is a survivor of the offence. The amount of these penalties will be set by the Ministry.

Infringements sanctioned with dismissal.

The dismissal of personnel shall be immediate in the case of serious misconduct in accordance with this Code of Conduct, and possible legal, civil and/or criminal actions for non-compliance.

Misconduct committed by employees are classified according to the following criteria:

Minor causes. Those considered of minor material or moral damage to the Project, other workers and/or its relationship with the communities will be punished with a written warning. Repetition of the same behaviour will be sanctioned with a second written warning. Repetition of the same behaviour after a second written warning will be sanctioned with a dismissal notice.

Serious Causes. All types of violence against women and children identified in Domestic Violence Act, Sexual Offences Act and the Child Right Act, in addition to others sanctioned in this Code of Conduct, under subtitles: Regarding discrimination and violence based on gender and Regarding children under the age of 18 will be considered serious misconduct. For the investigation and sanction of serious misconduct, the case will be referred to the relevant legal instances and, if proven, depending on the type of misconduct, the Ministry, will proceed to immediate dismissal.

If proven cases of violation of the fundamental rights of persons, particularly women or children, are identified, they will be referred to formal case management institutions with their consent, as a complaint for processing and sanction by the corresponding entity in strict application of the established legal procedures.

*I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met; that I will adhere to the occupational health and safety management plan; and, that I will avoid actions or behaviours that could be construed as GBV. Any such actions will be a breach of this **Individual Code of Conduct**. I do hereby acknowledge that I have read the foregoing Code of Conduct, agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this **Individual Code of Conduct** or failure to act, may result in disciplinary action and may affect my ongoing employment.*

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Definition of GBV Concepts

GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (that is, gender) differences between male and female individuals. GBV includes acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV includes the following concepts:

- **Sexual Exploitation and Abuse (SEA):** Sexual exploitation is a facet of GBV that is defined as 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 harassment (SH):** occurs between personnel and staff on the project and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

Annex 8: GRM Committee Meeting Records Form

Community:		Case Number:	
District:		Community	
Date of the Meeting:	____/____/____ dd mm yyyy	Venue of Meeting	
Details of Participants:			
<i>Complainant side</i>			
No.	Name	Position	Signature
1			
2			
3			
4			
5			
<i>GRM Members</i>			
No.	Name	Position	Signature
1			

2			
3			
4			
5			
Summary of Grievance:			
Record Note On Discussions Held:			
Decisions taken in the Meeting/Recommendations of the GRM Committee			
Issue Solved/Unsolved	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Name of Chairperson		Chairperson Signature:	
Resolution Date:	<div> <div> <div></div> <div>dd</div> </div> <div> <div>/</div> </div> <div> <div></div> <div>mm</div> </div> <div> <div></div> <div>yyy</div> </div> </div>		

Annex 9: GRM Conflict Resolution Disclosure Form

Result of Grievance Redressed

Community:		District:		Community:	
Case Number		Name of Complainant:			
Date Complain was Registered	<div> <div> <div></div> <div>dd</div> </div> <div> <div>/</div> </div> <div> <div></div> <div>mm</div> </div> <div> <div></div> <div>yyyy</div> </div> </div>				
Summary of Complaint:					

Summary of Resolution:			
At what stage was the complaint Resolved:	<input type="checkbox"/> 1 st level	Date of Resolution of the Grievance:	____/____/____ - dd mm yyyy
	<input type="checkbox"/> 2nd level		
	<input type="checkbox"/> 3rd level		
Complainant Result Acceptance			
Did the Complainant Accept the Result?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Name of the Complainant	
Signature of Complainant			
Project Staff/GRM Member Presiding			
Name Chairperson	Position	Signature	Date

Annex 10: Survivor Consent Form

We invite you to be interviewed about a case reported to our office concerning you. We assure you that strict confidentiality is essential and MUST be maintained at all times, except when you as the (survivor) or the (caseworker) face an imminent risk to your well-being, safety and security. You are also assured that your anonymity will be maintained wherever possible. All written information about you the (survivor) would be kept locked and secure from others. Safety and Security At all times, your safety as a survivor must remain paramount in our work.

For confidentiality, your answers will not be associated with your name. Rather, you will be given an identification number on the interviewer's sheet. We will make sure all risk associated with your safety is eliminated or minimized at all costs. You may opt to answer questions that you wish to answer. If you have any concerns or you are dissatisfied with any aspect of this interview you may report the grievances anonymously if desired to the Grievance Mechanism Committee.

If you think you are not comfortable with the location where the interview is proposed to be conducted, please feel free to ask for a change of location as we want to ensure that you the (survivor) are not placed at risk of further harm by the aggressor, in all cases.

Freedom to Withdraw or Refuse Participation: I understand I have the right to stop the interview at any time or to refuse to answer any of the interviewer's questions without prejudice from the interviewer. Please feel free to ask the interviewer any questions before signing the consent form or at any time during or after the interview.

I understand that in giving my authorization below, I am giving (Name

of GRM Operator) permission to share the specific case information from my incident report for the only purpose of accessing the GM.

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the service/s I request. I understand that releasing this information means that a person from the verification committee may come to talk to me.

At any point, I have the right to change my mind about sharing information with the designated agency/focal point listed below.

Name:

Date:

Tel:

Signature (Complainant): -----

Signature of parent or guardian if the survivor is below 18: -----

We invite you to be interviewed about a case reported to our office concerning you. We assure you that strict confidentiality is essential and MUST be maintained at all times, except when you as the (survivor) or the (caseworker) face an imminent risk to your well-being, safety, and security. You are also assured that your anonymity will be maintained wherever possible. All written information about you the (survivor) would be kept locked and secure from others. Safety and Security At all times, your safety as a survivor must remain paramount in our work.

For confidentiality, your answers will not be associated with your name. Rather, you will be given an identification number on the interviewer's sheet. We will make sure all risk associated with your safety is eliminated or minimized at all costs. You may opt to answer questions that you wish to answer. If you have any concerns or you are dissatisfied with any aspect of this interview you may report the grievances anonymously if desired to the Grievance Mechanism Committee.

If you think you are not comfortable with the location where the interview is proposed to be conducted, please feel free to ask for a change of location as we want to ensure that you the (survivor) are not placed at risk of further harm by the aggressor, in all cases.

Freedom to Withdraw or Refuse Participation: I understand I have the right to stop the interview at any time or to refuse to answer any of the interviewer's questions without prejudice from the interviewer. Please feel free to ask the interviewer any questions before signing the consent form or at any time during or after the interview.

I understand that in giving my authorization below, I am giving
..... (Name
of GRM Operator) permission to share the specific case information from my incident report for the only purpose of accessing the GRM.

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the service/s I request. I understand that releasing this information means that a person from the verification committee may come to talk to me.

At any point, I have the right to change my mind about sharing information with the designated agency/focal point listed below.

Name:

Date:

Tel:

Signature (Complainant): -----

Signature of parent or guardian if the survivor is below 18: -----

Annex 11: Grievance Monitoring Matrix

Grievance ID	Date Received	Complainant Name / ID	Nature of Grievance	Location / Community	Means of Submission	Initial Level Received	Responsible Focal Point	Action Taken	Date Resolved / Escalated	Resolution Status	Remarks / Follow-Up Required

Key Terms in the Matrix

- Grievance ID: Unique tracking number for each complaint
- Means of Submission: E.g., hotline, complaint box, in-person, letter, email
- Initial Level Received: Level 1–4 (Community to National)
- Resolution Status: Pending / In Progress / Resolved / Escalated
- Remarks: Follow-up actions, ongoing monitoring, or referral notes

