

GRIEVANCE REDRESS MECHANISM

VOLUME I: MR14

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ABBREVIATIONS

AfDB	African Development Bank
AIDS	Acquired Immune Deficiency Syndrome
ART	Anti-Retroviral Treatment
CLO	Community Liaison Officer
DPMO	Deputy Prime Minister's Office
ECO	Environmental Compliance Officer
EEA	Eswatini Environmental Authority
ENTC	Eswatini National Trust Commission
ESIA	Environmental and Social Impact Assessment
GAP	Gender Action Plan
GBV	Gender Based Violence
GoE	Government of Eswatini
GRM	Grievance Redress Mechanism
HIV	Human Immune Deficiency
IRM	Independent Recourse Mechanism
ISS	Integrated Safeguard System
MEPD	Ministry of Economic Planning and Development
MNRE	Ministry of Natural Resources and Energy
MoF	Ministry of Finance
MoH	Ministry of Health
MoPWT	Ministry of Public Works and Transportation
MP	Member of Parliament
NDP	National Development Plan
NERCHA	National Emergency Response Council on HIV and AIDS
NGO	Non-Governmental Organization
OS	Operational safeguards
PAC	Project Affected Communities
PAP	Project Affected Persons
PIU	Project Implementation Unit
RAO	Regional Administrator Offices
RAP	Resettlement Action Plan
RPF	Resettlement Plan Framework
REPS	Royal Eswatini Police Service
ROW	Right of Way
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SNL	Swazi Nation Land
STI	Sexually Transmitted Infections
STMP	Swaziland Transport Master Plan
SWAGAA	Swatini Action Group Against Abuse
VCT	Voluntary Counselling and Treatment
VGP	Vulnerable Groups Plan
WLSA	Women and Law in Southern Africa-Swaziland

1. INTRODUCTION

The Grievance Redress Mechanism (GRM) aims to provide project-affected parties with accessible and inclusive means to raise issues and grievances. It also outlines how the feedback mechanisms from the project proponent and contractors will work specific to this project. project-affected parties with accessible and inclusive means to raise issues and grievances regarding project activities in the pre-construction and construction stages. Grievance may arise among affected households and communities on variety of issues ranging from compensation rates and eligibility criteria to compensation, as well as contractor's approach to the community's culture. Workers' related grievance mechanisms are addressed in the Labour Management Procedure (LMP) and Resettlement related grievances are address in the Resettlement Policy Framework (RPF).

The design of the GRM shall take into consideration the views of affected communities expressed during the project implementation process. This document will serve as guidance for the project implementation team on how to handle grievances. The project implementation team will ensure that the mechanism is accessible and available through its introduction and disclosure to the project affected communities, accessible to all at no cost for all possible grievances with particular attention given to its accessibility to disadvantaged and vulnerable groups. The GRM shall be adequately registered, tracked and its resolutions affirmed as effectively as possible to the satisfaction of the complainant in as far as the national laws, AfDB operational safeguards and as feasible as possible for optimal project outcomes.

1.1.Importance of Grievance Redress Mechanism

A grievance redress mechanism (GRM) is a critical component in ensuring accountability and transparency. It serves as a structured process for addressing concerns and complaints from project-affected communities, thereby fostering trust and engagement between stakeholders and project implementers. The importance of GRMs is further underscored by their role in safeguarding against offensive behaviors and unfair treatment in projects. A well-implemented grievance redress mechanism is essential for maintaining accountability, fostering community trust, and ensuring the protection of vulnerable groups in development projects. The AfDB's focus on integrating these mechanisms within its operational safeguards highlights the importance of addressing grievances effectively to achieve sustainable and inclusive development outcomes.

A GRM plays a pivotal role in fostering trust between communities and organizations by providing a structured avenue for addressing concerns and complaints. These mechanisms are essential for individuals and communities to voice their issues, seek redress, and hold institutions accountable for their actions, thereby enhancing transparency and accountability.

1.2. Components of an effective GRM

An effective GRM is one that possesses the following qualities:

- i. It is well known, trusted and accessible to the affected communities. This involves proactive awareness-raising, user-friendly design, and ensuring confidentiality to build the necessary trust and means for communities to access remedies.
- ii. A strong and trusted GRM can address problems proactively as they arise, preventing them from escalating and eroding community trust.
- iii. It can be used as an early warning indicator/system for potential issues and gather information to address human right issues.
- iv. Provides an opportunity for redress and fosters collaboration between the contractor, project proponent and the community to find solutions, thereby developing better relationships. Complaints often indicate community trust in the company's ability to resolve issues, highlighting the importance of a trusted mechanism. Trust is further reinforced when community members are assured that lodging a complaint will not result in negative repercussions.

1.3. Objectives of the Grievance Redress Mechanism

The primary objectives of the GRM are as follows:

- i. Establishing a timely, consistent, and structured procedure: It aims to create a reliable and trusted process for receiving and addressing community concerns and complaints. This involves setting up a system that ensures complaints are handled promptly and consistently, thereby fostering trust and reliability in the mechanism.
- ii. Maintaining positive relationships with communities: To develop and sustain positive relationships with communities affected by the project's activities. This involves a consistent demonstration of a commitment to understanding and responding to grievances, which helps in building and maintaining trust between the company and the community.
- iii. Proactive problem-solving: To address issues proactively as they arise, preventing them from escalating into more significant problems. This proactive approach will help in maintaining community trust and avoiding potential impacts from the project's operations.
- iv. Continuous improvement: to analyze trends in the grievances received in order to extract valuable insights for continuous performance improvement. By identifying patterns and recurring issues, companies can make informed decisions to enhance their operations and reduce the likelihood of repeat grievances
- v. Continuous improvement: to analyze trends in the grievances received in order to extract valuable insights for continuous performance improvement. By identifying patterns and recurring issues,

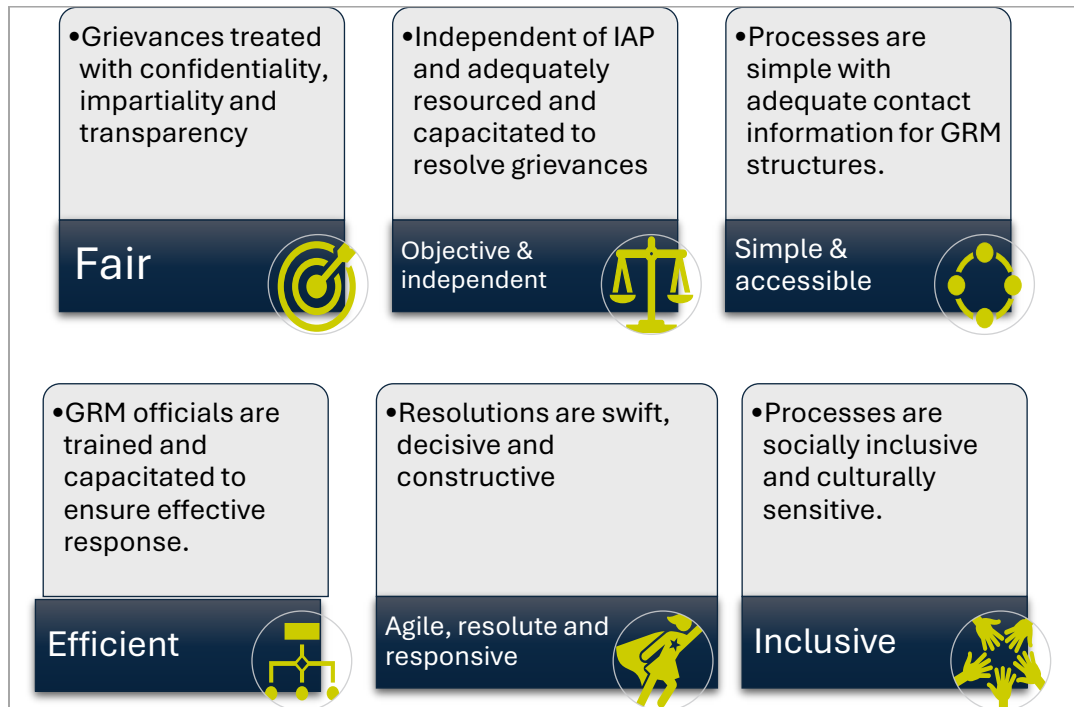
the PIU can make informed decisions to enhance the operations of the project and reduce the likelihood of repeat grievances.

- vi. Ensuring respect and proper documentation: To ensure that complainants are treated with respect and that all complaints and resulting corrective actions are properly documented and disclosed.
- vii. Accessibility and inclusivity: to be accessible, culturally appropriate, and transparent, ensuring that all stakeholders, including marginalized groups, can raise their concerns without fear of retribution. This inclusivity is essential for addressing the needs of all community members, including those who might face barriers to access.
- viii. Enhance stakeholder engagement: By identifying areas of stakeholder interest and concerns, this GRM will enhance engagement and inform business decisions. This will ensure that the project’s operations are aligned with the interests and needs of the community.

1.4. Grievance Redress Mechanism Design

The design of the GRM takes into consideration the views of affected communities expressed during the planning stage of the project. It also takes into consideration the location of the intended information consumers, their language use and level of education. It is for this reason that simple forms written in both English and Siswati will be placed within communities with the main logbook placed at Constituency level within all project Constituencies. Flowing from its set objectives, the GRM shall follow the principles presented in figure 1-1.

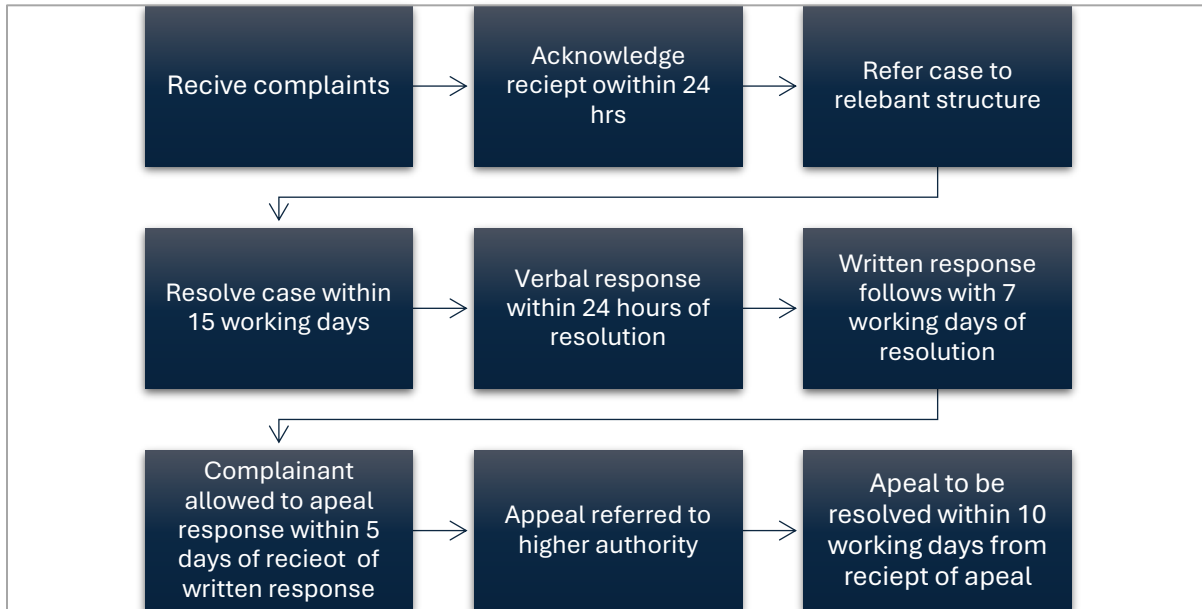
Figure 1-1: Principles of the GRM



1.5. Guiding procedure of the GRM

As alluded in the principles above, the GRM shall be available at no cost, and it is important that it be easily accessible, with special attention paid to accessibility for disadvantaged and vulnerable individuals or groups. Additionally, the PIU will ensure that the grievance procedure is accessible, adequately registered and tracked, and resolution is affirmed within one month of registration as outlines in the figure below.

Figure 1-2: GRM Process Flow



The following procedures shall be followed while filing and processing complaints through the process described in figure 1-2.

- i. Grievance Register Book/Logbook - A grievance register book shall be opened and kept in the office of resident engineer, Community Liaison officer and at the Inkhundla. All grievances shall be registered when and upon the receipt of complaints from the aggrieved. The book shall have: i) case reference number, ii) the aggrieved name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column. The logbook shall be accessible to the public.
- ii. Responsibility for Registering Complains - The Resident Engineer, CLO, and Indvuna yeNkhundla in the project area shall register in the Grievance Register Book all complaints received.
- iii. Case Receipt - Within 24 hours of receiving complaints, the monitoring consultant shall issue a letter to the aggrieved acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue.

- iv. SEA/SH - SEA/SH grievances will not be documented in the public accessible book. However, a SEA/SH action Plan has been prepared to manage related risks, and a specialized NGO will be engaged for awareness and will develop a system that will capture SEA/SH and HIV/AIDS related issues. It is attached in this section below.
- v. PAPs - All PAPs who have issues with their compensation and assistances are required to submit written complaints to the appropriate level of GRMs.
- vi. Recording and filing - Mediation meetings and outcomes will be recorded and kept in safe places at each of the Grievance Redress Mechanism Committee's locations.

2. POTENTIAL ISSUES AND COMPLAINT FILING

2.1. Potential Issues

Within the context of the Project, grievances are understood to be issues, concerns, problems or claims (perceived or actual) that an individual or a community group wants addressed or resolved. Grievances are expected to arise from:

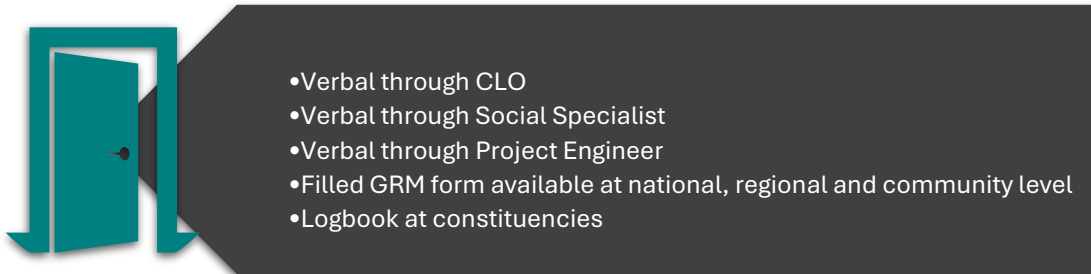
- i. The directly affected property owners which were identified at Maloma and Nsoko both on Title Deed Land (TDL).
- ii. Users of the current roads with the amenities and access points to feeder roads that lead to other community who may be indirectly affected as the MR14 has many feeder roads even to business sites such as the AT&T Quarry Mine.
- iii. Users of communal assets such as churches, sports grounds, health facilities and schools which can be found along the project corridor.
- iv. Excessive noises and dust from construction activities particularly from noise and dust sensitive facilities such as schools and health facilities.
- v. Community's exclusion from economic opportunities during project implementation.
- vi. Loss of market access, income, and/or vending space for vendors along the route. These are found at Sithobela.
- vii. Construction worker harmful behaviour such as GBV/SEAH and other conduct breaching employer code of conduct.
- viii. Possible increase in travelling times if traffic management is poor. Particularly at the busy economic nodes at Sithobela.

2.2. Complaint Filing

The aggrieved persons will be directed to report their case to the project area's CLO. The CLO shall forward the grievance to the Resident Engineer who will address the grievance and give feedback to the CLO within 5 working days. The Project Engineer will systematically monitor grievances related to Project implementation and maintain a separate record for any grievances that arise during the resettlement and compensation process. The tracking system will ensure that grievances are categorized at the point of registration to specifically address concerns related to compensation, relocation, or livelihood restoration in a timely manner. Access points for lodging grievances will be communicated during consultations with all PAPs and through broader community consultations. CLOs and the Social Specialist will act as the primary points of registration for any resettlement-related complaints, with their terms of reference reflecting this responsibility. They will also oversee the process to ensure resolutions are reached.

Grievances can be submitted anonymously if desired. Below is a non-exhaustive list of potential access points for grievances related to the project, which will be updated as new outlets are identified.

Figure 2-1: Grievance Access Points



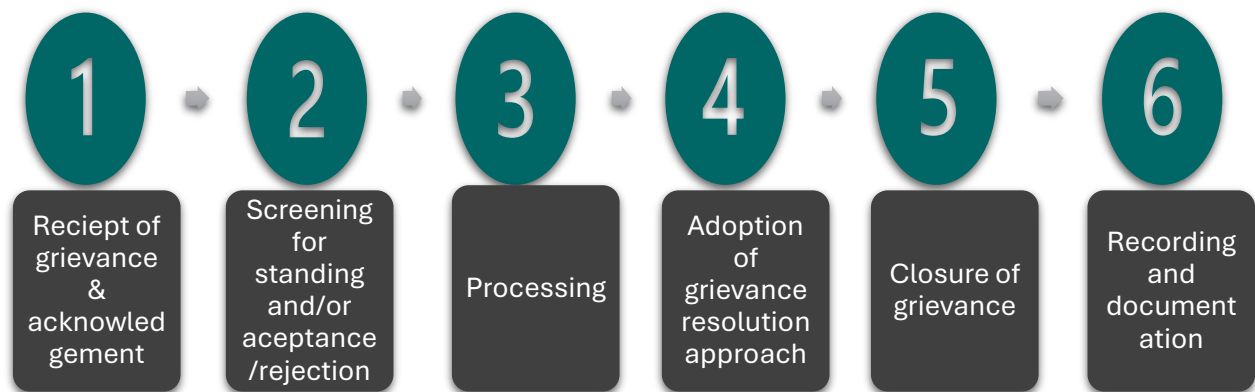
The Resident Engineer, upon receiving a grievance, will collaborate with other members of the PIU to find a solution. The Resident Engineer will acknowledge receipt of the grievance, except in cases where it is submitted anonymously. Anonymous grievances are directly forwarded to the head of the PIU. Following registration, the Resident Engineer will delegate the grievance to the appropriate officials for resolution or mediation. The goal is to address all grievances within a four-week period. Any grievance that remains unresolved beyond this period will be thoroughly documented in the monthly report of the PIU and in the quarterly reports submitted to the AfDB. All other grievances will be compiled to identify patterns that require management attention. In cases where the grievance pertains to Swazi Nation Land, the Resident Engineer will attempt to mediate the issue through the Traditional structures. For grievances concerning deeded land or land, the Resident Engineer will consult with the MoPWT to work out a suitable resolution.

3. GRM STRUCTURE

3.1. Overview of GRM process

Grievances will be handled following a hierarchical structure of dealing with all complaints received. The entry level structure is the Community Level GRM, this level is followed the Project Level GRM where cases not solved at first entry are taken to this level. Regional Level structure is also another structure which shall solve cases not solved at Project Level and cases not solved here shall be taken to the MoPWT Level structure. The final structure in the hierarchy is the National Level GRM structure which shall have all cases resolved at this level as the final structure in resolving grievances related to the project. The GRM grievance resolution process involves the following main steps at each level:

Figure 3-1: GRM Resolution Process



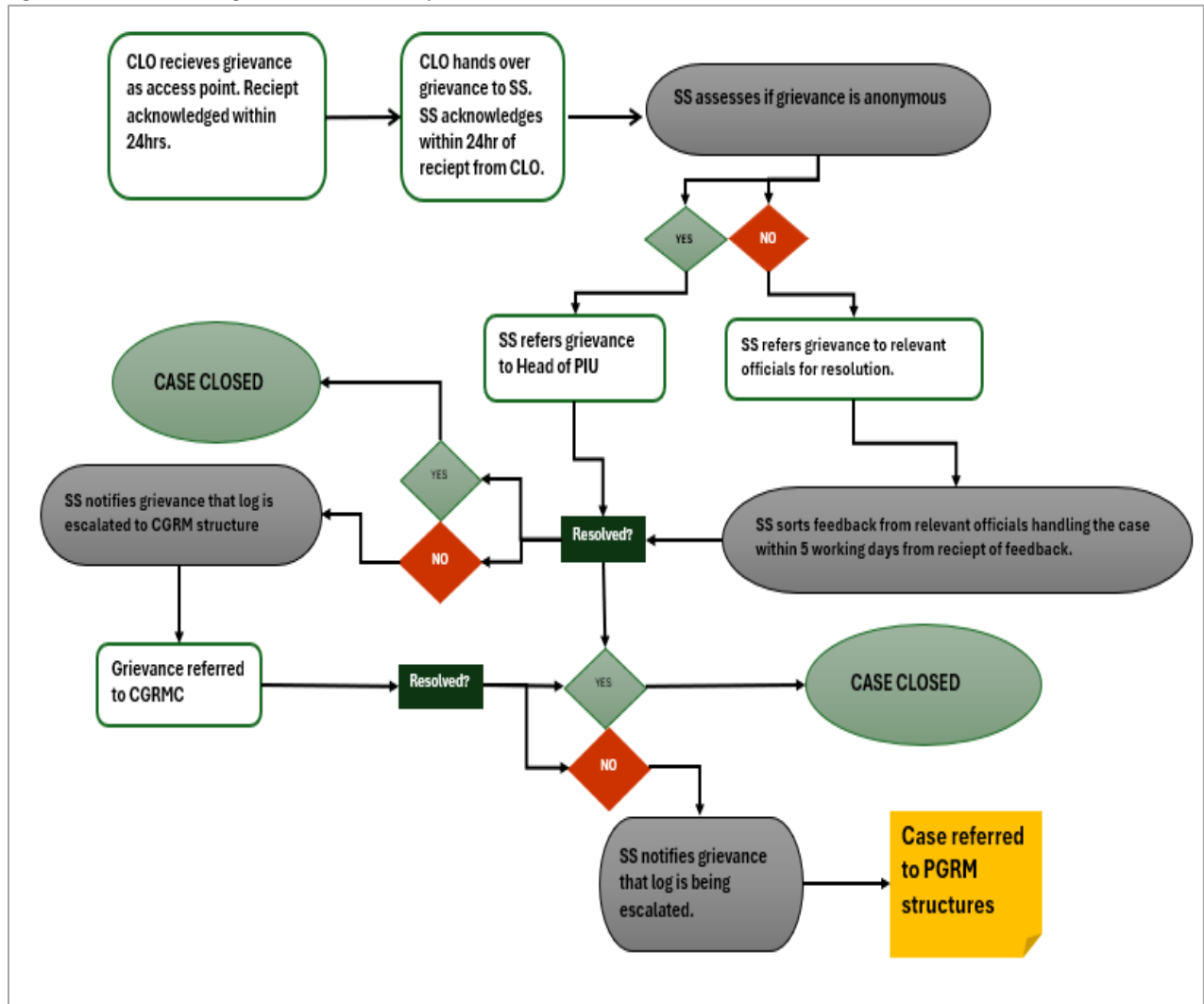
3.1.1. Community Level Grievance Redress Mechanism (CGRM)

It is recognised that local communities have existing traditional and cultural grievance redress mechanisms. Therefore, it is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of MoPWT, contractor(s), and or Government representatives at local and national level. PAPs may complain or raise grievances over a variety of reasons associated with resettlement impact and compensation as well as working conditions, including but not limited to:

- i. Identification of affected land and associated assets within the Project area.
- ii. Ownership/responsibility for the land and associated assets.
- iii. Valuation of land or associated assets.
- iv. Quality of replacement assets.
- v. Other compensation allowances.
- vi. The timing or manner of compensation payments.
- vii. Conduct of Project staff/representatives, or their methods in dealing with compensation.
- viii. Poor working conditions.

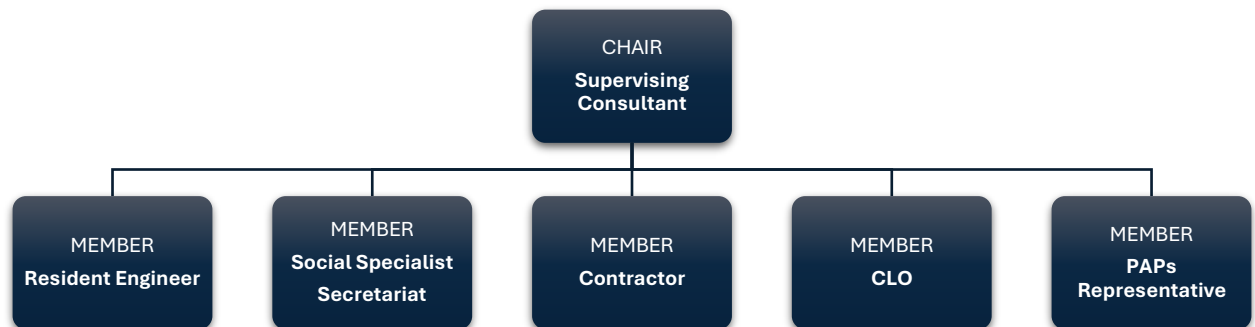
It is expected that most issues may arise around land issues at this level and to shall involve the SNL traditional leadership while those under TDL respective regional administrator (Lubombo or Shiselweni) shall be involved in resolving the dispute.

Figure 3-2: GRM Handling Process- Community Level



*CGRMC – Community-level Grievance Redress Mechanism Committee. PGRM- Project-level Grievance Redress Mechanism.

Figure 3-3: Community level GRM Committee

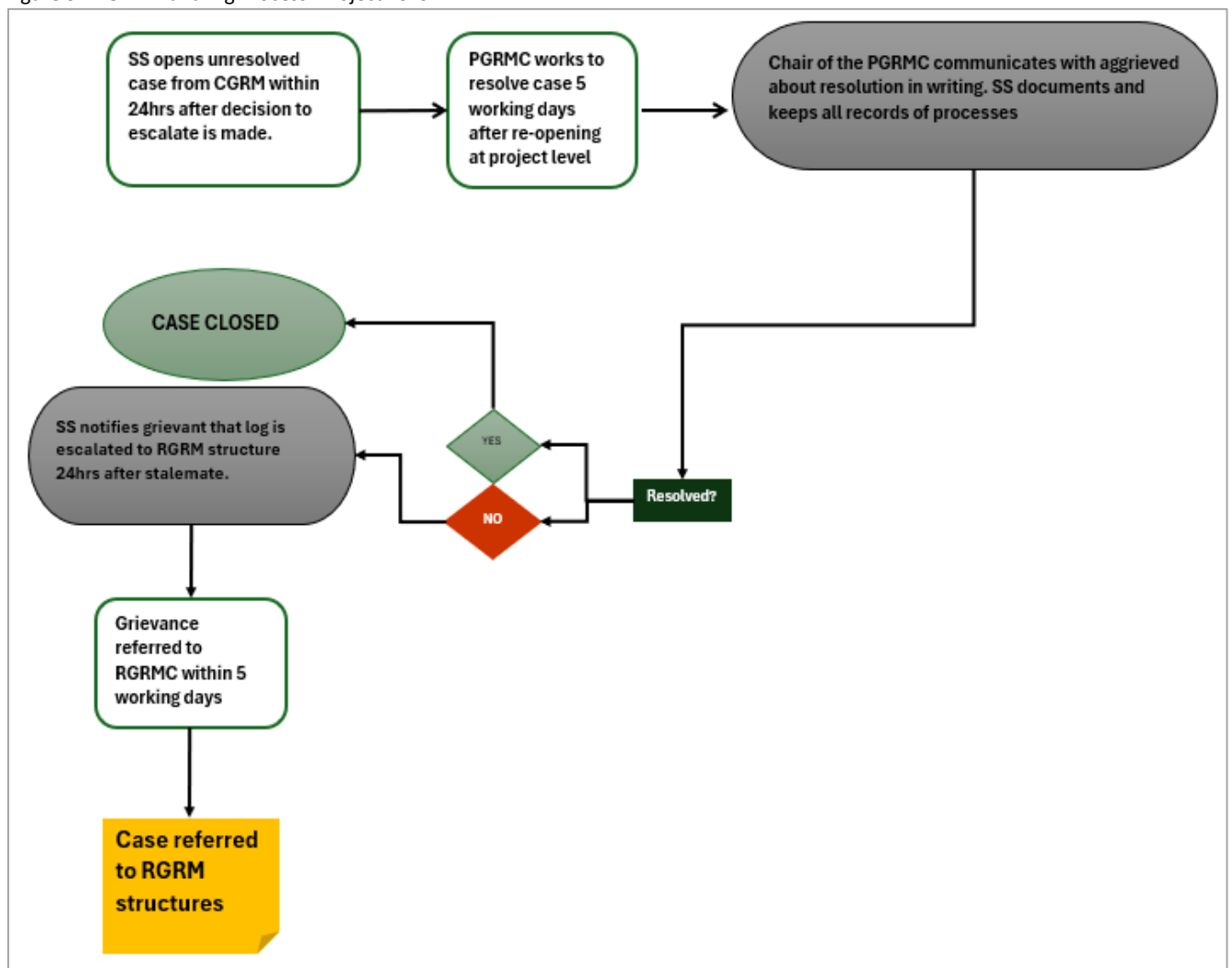


To abide by its principle of being accessible, the CGRM has multiple access points. Other than the CLO, other access points include Bucopho and the Community’s Transport Committee. The Social Specialist (SS) shall serve as the overall point of contact for registrations regarding resettlement related grievances from each Chiefdom’s access points. The SS shall oversee the process to resolution stage. The SS shall also view and verify contents of the log-books bi-weekly during the initial stages of the project (first 6 months) and then monthly thereafter.

3.2. Project Level Grievance Redress Mechanism (PGRM)

A project-level (PGRM) is a unified system designed to address and resolve all project-related disputes. Its goal is to make the GRM accessible to all stakeholders at different stages of project implementation. If issues are not resolved at the initial level, they will be escalated to the next level. Every effort will be made to resolve issues at the first instance.

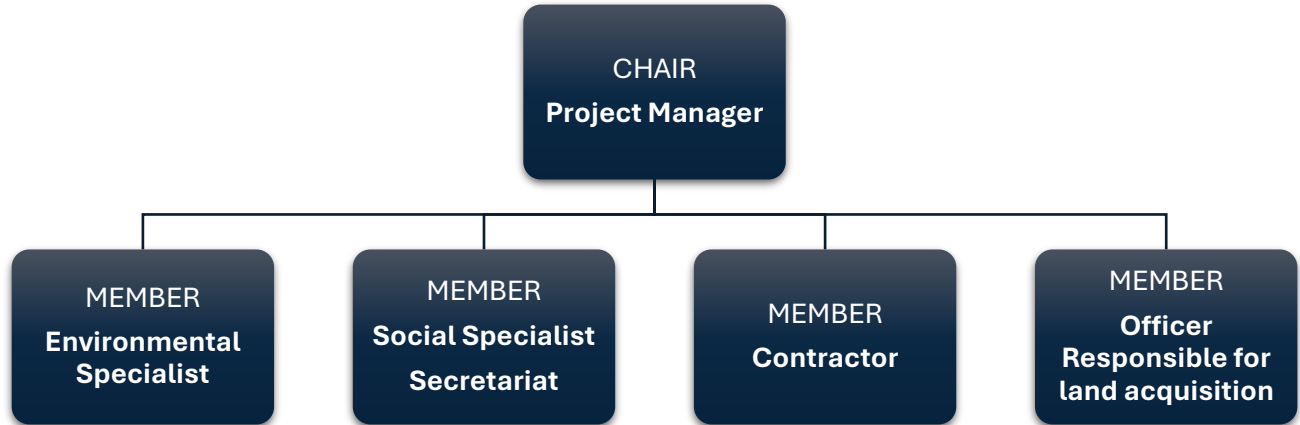
Figure 3-4: GRM Handling Process- Project Level



*PGRMC – Project-level Grievance Redress Mechanism Committee. NGRM-National-level Grievance Redress Mechanism.

At the project level, the GRMC shall be composed as illustrated in figure 3-5.

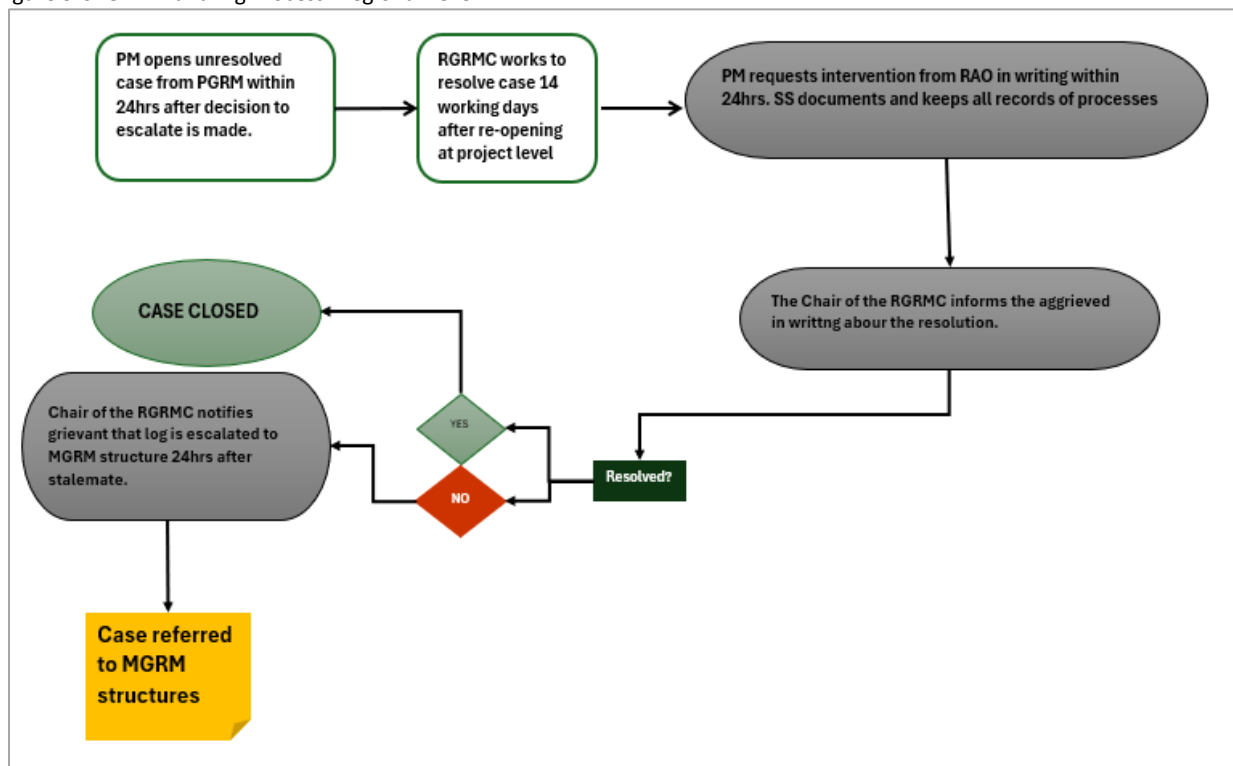
Figure 3-5: Project level GRM Committee



3.3. Regional Level Grievance Redress Mechanism (RGRM)

The RGRM is the third level of the GRM. Its mandate is to resolve cases that were not resolved at the second level of the GRM i.e. at the PGRM level. The grievance process at the regional level is shown in figure 3-6.

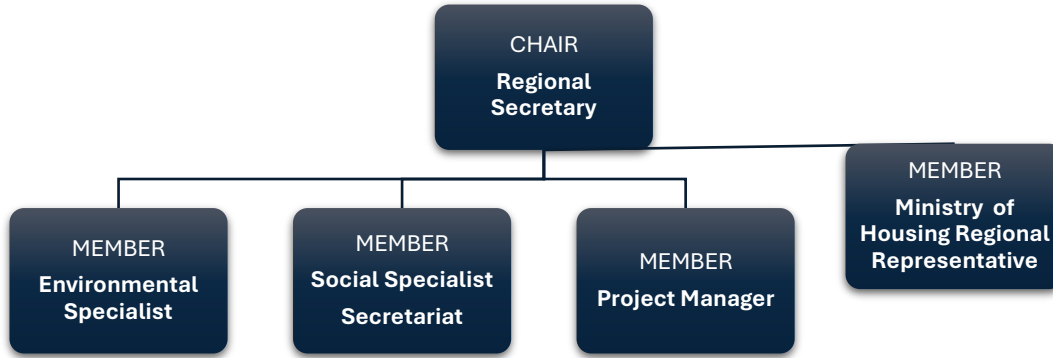
Figure 3-6: GRM Handling Process- Regional Level



*RGRMC – Regional-level Grievance Redress Mechanism Committee. NGRM-National-level Grievance Redress Mechanism. RAO – Regional Administration Officer.

The RGRMC structure is a multi-party committee composed as shown in figure 3-7 below.

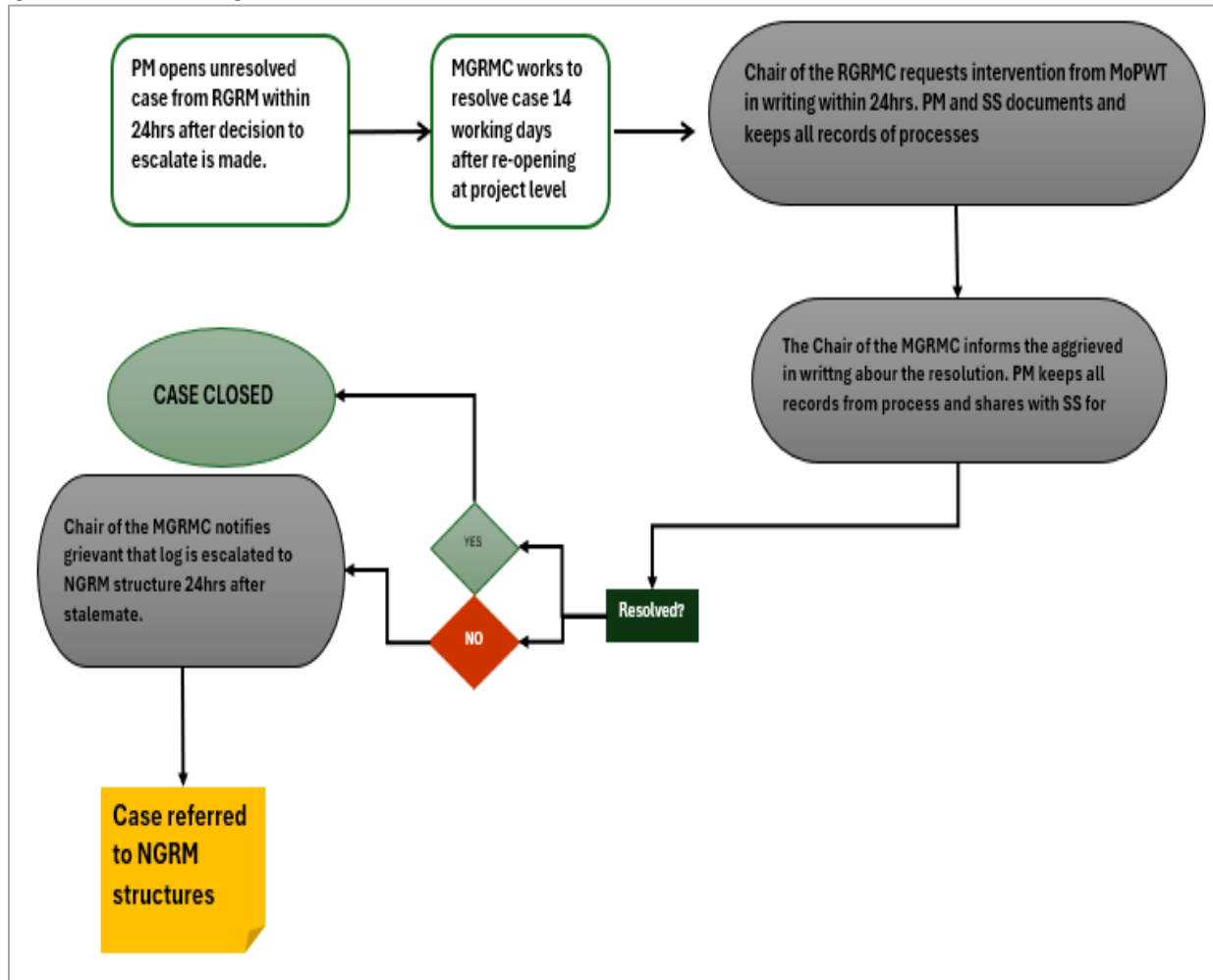
Figure 3-7: Regional level GRM Committee



3.4. MoPWT Level Grievance Redress Mechanism (MGRM)

At this level, relevant personnel from the MoPWT and other Government departments experienced in dispute resolution shall form a resolution structure beyond the regional level.

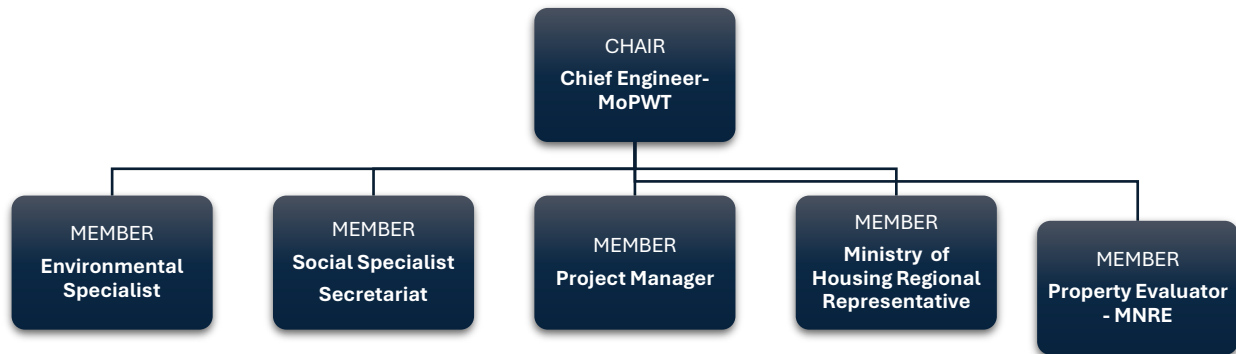
Figure 3-8: GRM Handling Process- MoPWT Level



*MGRMC – MoPWT-level Grievance Redress Mechanism Committee. NGRM-National-level Grievance Redress Mechanism. RAO – Regional Administration Officer.

The structure of the MGRMC is as follows.

Figure 3-9: MoPWT level GRM Committee



3.5. National Level Grievance Redress Mechanism (NGRM)

The NGRM is the final level of the GRM process. Its mandate is to resolve cases after deadlocks were encountered in the first two levels. It involves utilizing the National courts to resolve grievances if all levels of the GRM structure fail. At this level, the court in which the matter is heard is dependent on the nature of the matter. If it is a labour dispute, the matter is heard in the labour courts from which judgement is final. The time frame of resolving disputes at this level are exogenous to the project and its proponent. Time frames are allocated by the courts in the Judiciary process. Decisions from this level are final for all cases brought through this project.

3.6. Independence Recourse Mechanism of the African Development Bank

The Independent Recourse Mechanism (IRM) of the AfDB provides recourse for individuals, workers and communities who may be negatively impacted due to an AfDB financed project. This avenue may be explored after all GRM levels reached a deadlock. The IRM is activated when a complaint is received through submission of a complaint form. The form is available at <https://irm.afdb.org/en>.

3.7. GRM Forms and Logbook

The GRM logbook and forms will be placed at the Tinkhundla centers and respective Umphakatsi for easy access for the potentially aggrieved. The CLOs are tasked with recording all GRM forms submitted to the logbook for transparent handling of grievances, however for those recorded anonymously shall be submitted straight to the Social Specialist. The GRM form to use at community level to report grievances related to the project can be found in the annex.

4. CAPACITY BUILDING

The implementors of the GRM will require capacitating to effectively support the GRM. Capacitating will involve orientation for the contractor, workers, security personnel, committee members. Provisions for GRM committee members and external consultancy and support staff to strengthen organizational capacity. An external consultant shall be identified to support these training prerogatives at the different phases of the project. The training will aim to:

- i. Raise the PIUs' awareness on the importance of GRMs in development projects.
- ii. Build PIUs capacity in grievance management, resolution and feedback as well as reporting and analysis of grievances to improve project implementation.
- iii. Assess existing project GRMs and identify corrective measures through a participatory process to build PIUs ownership of corrective measures.
- iv. Help the PIU team formulate for each component of the project a GRM actionable plan/activities for an effective implementation of the corrective measures identified during the GRM assessments.

The training requirements for the GRM are multifaceted, diverse and layered through the orientation and implementation phases. The training requirements during the GRM introduction/orientation phases are:

- i. Orientation and training workshop for GRMC members.
- ii. Preliminary training and capacity building for GRM managers and implementors to launch GRM.
- iii. Training on GRM implementation and participation for other stakeholders, including contractor staff and other identified field workers.

The training requirements during the implementation phases are:

- i. Continued training for beneficiaries and GRM users in the implementation phase.
- ii. Training and retraining of mediators of the GRM managers, implementors, workers and community.

Table 4-1: Roles and Responsibilities in the Implementation of the GRM

Person's	Role	Responsibility
CLO's	<ul style="list-style-type: none"> ▪ Receive complaint on the ground ▪ Ensure timely resolve of cases ▪ Advice in some cases resolution (GRM Committee) 	<ul style="list-style-type: none"> ▪ Report and Record complaint within 24hrs after receipt ▪ Feedback Complainant ▪ Keep Complainant updated ▪ Keep cases records up to date
Social Specialist	<ul style="list-style-type: none"> ▪ Receive cases from CLO ▪ Refer cases to relevant authorities ▪ Report to the Bank monthly on cases received including their status. ▪ Assess effectiveness of the GRM including revising tools as and when needed 	<ul style="list-style-type: none"> ▪ Refer cases received to relevant authority within the project GRM Committee. ▪ Ensure cases are resolved within 15 days through liaising with the relevant GRM Committee solving that case. ▪ Ensure verbal and written feedback to all complainants ▪ Keep records of all solved cases
Project Coordinator	<ul style="list-style-type: none"> ▪ Ensure all cases are resolved timely ▪ Resolve cases ▪ Identify recurring cases for higher level intervention to source of problem 	<ul style="list-style-type: none"> ▪ Ensure written communication is sent to all complainants. ▪ Ensure Contractors solve cases directly related to construction impacts.
Public Affairs and Customer Experience Manager	<ul style="list-style-type: none"> ▪ Ensure all cases are resolved ▪ Ensure active feedback communication of cases 	<ul style="list-style-type: none"> ▪ Communicate in writing feedback to all complainants
Environmental Specialist	<ul style="list-style-type: none"> ▪ Assist in handling cases related to environmental complaints 	<ul style="list-style-type: none"> ▪ Part of GRM Committee
GRM Committees	<ul style="list-style-type: none"> ▪ Resolve cases directed to Committee ▪ Advice in cases through written feedback on complaints submitted to the committee 	<ul style="list-style-type: none"> ▪ Resolve cases timeously

5. AWARENESS RAISING AND GRM DISCLOSURE

An integral component of an efficacious GRM is the comprehensive dissemination of its processes and procedures to all project stakeholders across various levels. To guarantee the effectiveness of the GRM and its full disclosure, the Consultant has formulated the subsequent action plan, which delineates the strategies for augmenting awareness regarding the existence of the GRM and instructions for its use.

Table 5-1: Awareness Raising and GRM Disclosure Action Plan

ACTION	RISKS	MITIGATION	RESPONSIBILITY /ADDITIONAL HUMAN RESOURCE (AHR)	TARGET AUDIENCE	TIME FRAME
ACTIVITY 1: Awareness raising on the GRM. PHASE: Throughout project lifecycle					
Prior Action 1: Raising awareness (staggered training) at Regional Level (targeting local NGOs, IAPs, local GRM Committee)	Low attendance of target audience	CLOs to extend invite for trainings in local constituencies	<i>Responsibility:</i> Contractor, MoPWT/PM <i>AHR:</i> Conflict Resolution Consultant	Social Specialist Community Liaison Officers GRM managers and implementors	Before resumption of GRM duties
	Unavailability of GRM Managers and Implementors.	Early notice of intent to host awareness talks			
Prior Action 2: Raising awareness at National level (targeting NGOs at a higher level, Project Interested Parties).	Low attendance of target audience	Notices through community meetings, posters at Tinkhundla centres for at least 3 weeks			
	Engaging a group that is too diverse	Streamline invites by grouping similar participants.			
	Unavailability of Project Implementation Unit	Early engagement and regular check-ins to ensure availability. Make training pre-requisite to assumption of duties.			
	Unavailability of GRM managers and implementors				
ACTIVITY 2: Trainings on the GRM process and procedure. PHASE: Throughout project lifecycle					
Prior Action 1: Training of GRM Committees	Unavailability of actors	Early engagement and regular check-ins to ensure availability.	<i>Responsibility:</i> Contractor, MoPWT/PM, Social Specialist <i>AHR:</i> Conflict Resolution Consultant		
ACTIVITY 3: GBV/SEA/SH Plan. PHASE: Throughout project lifecycle					
Prior Action 1: Sensitize communities on prevention and management of HIV/AIDS.	Low participation of target audience	+ Spread campaigns across the year and taking advantage of universal days	<i>Responsibility:</i> Contractor, Social Specialist <i>AHR:</i> NERCHA	PACs	Annually

ACTION	RISKS	MITIGATION	RESPONSIBILITY /ADDITIONAL HUMAN RESOURCE (AHR)	TARGET AUDIENCE	TIME FRAME
Sensitize workers on prevention and management of HIV/AIDS.		such as World AIDS Awareness Day. + Schedule campaigns during staff meetings. + GRM training can be made part of induction for new workers.		Workers	Bi-annually
Provide an on-site clinic to provide Voluntary Counselling and Testing (VCT) services to construction crew.			<i>Responsibility:</i> Contractor, Social Specialist, Environment Specialist. <i>AHR:</i> SWAGAA, WILSA-E	Contractors, PACs, Workers.	
Prior Action 2: Awareness raising at Regional Level of GBV grievance process including training of Contractors and project area citizens.					

*SWAGAA- Swatini Action Group Against Abuse. WILSA-E – Women in Law Southern Africa-Eswatini. NERCHA- National Emergency Response Council on HIV/AIDS. GBV-Gender Based Violence. SEA/SH – Sexual Exploitation and Abuse/Sexual Harassment.

6. GENDER BASED VIOLENCE ACTION PLAN

6.1. Identified impacts on gender, GBV and HIV/AIDS

During the compilation of the ESMP of the project, the following risks were identified accompanied by mitigation measures in as far as health and safety of citizens is within the project area.

Table 6-1: Identified Impacts and Mitigation

IMPACT	IMPACT DESCRIPTION	MITIGATION
HIV & AIDS Impacts	<ul style="list-style-type: none"> In migration of people from different regions may lead to behavioral influences which may increase the spread of diseases such as Human Immuno-Deficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS) and other Sexually Transmitted Infections (STIs). 	<ul style="list-style-type: none"> Sensitize workers and the surrounding communities on awareness, prevention and management of HIV/AIDS through staff training, awareness campaigns, multimedia and workshops or during community barazas. Provide an on-site clinic to provide Voluntary Counselling and Testing (VCT) services to construction crew.
Gender Equity, Sexual Harassment	<ul style="list-style-type: none"> Construction workers are predominantly younger males. Those who are away from home on the construction job are typically separated from their family and act outside their normal sphere of social control. This can lead to inappropriate and criminal behavior, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community. Influx of male labor may also lead to an increase in exploitative sexual relationships and human trafficking whereby women and girls are forced into sex work. 	<ul style="list-style-type: none"> Ensure all workers sign code of conduct. Training on Gender Based Violence (GBV) Prepare GBV/SEA Action Plan

As a result of the above, this action plan is adopted by the project as Gender Based Violence (GBV) including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) grievances will not be documented in the public accessible book provided by the project's Grievance Redress Mechanism (GRM) including HIV/AIDS related issues.

The Consultant proposes that the GBV action plan should be implemented by the Swatini Action Group Against Abuse (SWAGAA) and monitored by the Social Specialist. SWAAGA is a non-governmental organization that has been working tirelessly for almost 30 years to eradicate gender-based violence (GBV), child sexual abuse and human trafficking in eSwatini.

The organization is the lead organization framing the national agenda on GBV, and it has partners with multi-sectoral stakeholders to provide technical expertise on best practices in GBV prevention and response. SWAGAA has adopted an integrated approach to addressing GBV and sexual abuse through the following three key areas: Prevention, Care and Support and Access to Justice. Consequently, the organization should be engaged by the Social Specialist of the project to handle all GBV related cases of the project. All GBV related cases will be referred to SWAAGA with a clear and active feedback on progress

to MoPWT. SWAAGA partners with different stakeholders to manage and address GBV in the country such as Hospitals, Police Stations, Psychologist and Social Workers.

6.2. Process/procedure

The process/procedure is highlighted below:

- A GBV logbook will be used to record all cases received related to GBV which will be kept and monitored by the Social Specialist. This logbook will record the case numbers, who received the case, who made the referral and the person who received it from SWAAGA including a status column which will show pending or closed case.
- To make referral for a GBV case received by the project through any GRM outlet, the case shall be referred to SWAAGA.
- Upon receiving cases, SWAAGA shall make contact to the victim within 5 days of cases being submitted and they do physical contact hence the need for a 5-day period (especially for sexual assaults cases).
- The Social Specialist shall then await feedback from SWAAGA on the proceeding of the case (in some cases it will not be the full details of the case as some are kept highly confidential) in the form of either case is pending or case has been resolved.
- The logbook shall make it easier to track all cases. Case numbers and status on them will be the only reported component of GBV cases to the MoPWT.

Table 6-2: GBV/SEA/SH Framework

STEPS	RESPONSIBILITY	ACTION	FEEDBACK/FOLLOW UP	TIMELINES
Receiving GBV Complaint	CLO Social Specialist, Contractors	Logging case in logbook.	Acknowledge receipt of complaint and advice that case will be referred to SWAAGA (via phone).	Within 48hrs
Make referral	Social Specialist	Use national referral form and submit with SWAAGA	Record in logbook that case has been referred so easy follow up/tracking.	Within 48hrs
Receive referral	SWAAGA	Contact the person/victim reporting a case and submit to SS Form 2 which is Receipt of referral form for Client requiring care and protection	Acknowledge receipt from SS through signing in Logbook. Victim given a feedback slip/receipt.	5 days
Case handing	SWAAGA	Fact finding, counselling and protection, if need be, court proceedings, if need be, till case is resolved	Victim shall be communicated to through-out and at every step. SS shall be feedback only on status of the case (for confidentiality issues).	Dependent on the type of case (e.g. sexual vs emotional or financial abuse)

STEPS	RESPONSIBILITY	ACTION	FEEDBACK/FOLLOW UP	TIMELINES
Solved Case	SWAAGA Social Specialist	SWAAGA to feedback victim on resolved case including the resolutions taken and assessment of if such solutions are satisfactory and do not impose any future danger to victim.	SWAAGA to notify SS on case resolved and SS to update logbook accordingly.	Within 24hrs
Record keeping of case	EWSC Social Specialist	Log all cases received, update status on cases as they are being resolved.	SS and SWAAGA social team to discuss logbook and consolidate accordingly.	Monthly

6.3. GBV/SEA/SH Reporting

The reporting outlet for GBV/SEA/SH are varied to allow for anonymity reporting. The following will be used to report all GBV cases within the project:

- i. Physical reporting – Aggrieved persons/victim may physically report to Resident Engineer, CLO or physical visit SWAAGA offices in Hlathikhulu which operate Tuesday’s and Thursday with designated case worker. SWAAGA’s main offices are in the Manzini Region and can be accessed on all weekdays.
- ii. Toll free line – SWAAGA has toll free line for reporting any form of abuse or assault anonymously as no number shows on their side until victim is willing and free to share their number for further fact finding or protection of needed on the case reported. The number is 951 which is a 24hr help line.
- iii. Toll free SMS - SWAAGA has toll free SMS line for reporting any form of abuse or assault anonymously as no number shows on their side until victim is willing and free to share their number for further fact finding or protection of needed on the case reported. Victims may SMS SWAAGA to the number 500 which is also a 24hr help line. With the SMS, it works as an active conversation between case worker and the aggrieved anonymously until victim is willing to share real names and details. This means that such conversations can be on-going without persons revealing their name until a time such a court case needed (where applicable).
- iv. National Reporting tool – SWAAGA has a national tool used to report/capture all GBV cases in Eswatini. The Social Specialist shall use this form to report/refer all GBV/SEA/SH cases received by the project.

It worth noting that in the steps discussed above, some cases will not necessarily follow step for step. For instance, some victims may choose to directly call the free line (951) for anonymity purposes to which then the Social Specialist may not be aware of the case at first instance, hence there must be a mirror

logbook managed by SWAGAA, so they record all cases there for tracking against the project logbook, so no case goes untraced or unknown by the Social Specialist. A monthly review of both logbooks shall be done to be able to report on all cases despite the channel used to report them. This is due to the sensitivity of the issues related to SEA/SH.

Table 6-3: Training and Awareness on GBV/HIB/SEA/SH Action Plan

Activity	Timeline	Responsible persons	Implementing Organization
Sensitizing workers and the surrounding communities on awareness, prevention and management of HIV/AIDS through staff training, awareness campaigns, multimedia and workshops or during community meetings.	Every 6 months during construction.	Social Specialist/ Environmental Specialist	NERCHA/ FLAS
Provide an on-site clinic to provide Voluntary Counselling and Testing (VCT) services to construction crew	Every 6 months during construction	Social Specialist	NERCHA/ FLAS
Awareness raising at Regional Level of GBV Complaint/grievance process including training of Contractors and project area citizens.	Every 6 months	Social Specialist	SWAAGA

*NERCHA – National Emergency Response Council on HIV/AIDS. FLAS – Family Life Association of Swaziland.

7. MONITORING AND REPORTING

7.1. Monitoring

The main purpose of monitoring is to record information for tracking purposes to inform a continuous improvement in the mechanism. Monitoring is critical for identifying gaps and assimilating the project community's culture, challenges and other characteristics into the mechanism to achieve outcomes that are optimal and sensitive to the community's social environment. Monitoring is imperative to track the performance of the system by comparing its outcomes against benchmark indicators established for project management requirements. This means that accurate and continuously updated records must be maintained and available to the project management, complainants and stakeholders.

In addition to meeting reporting needs of the project, results of the monitoring exercise could and do inform management decision leading to amendment of plans and programs of the project. Therefore, systems must be put in place to ensure that the project's environmental and social performance are regularly reported to the project implementation unit through periodic monitoring reports.

Based on the monitoring results and performance of the mechanism, a decision shall be made at the project's highest levels to take necessary action to correct, re-align and/or improve the social and environmental performance of the project and ensure the GRM is appropriate and responsive to the needs of the community. The Project Engineer/Manager from the project proponent (MoPWT) shall monitor grievances routinely as part of the broader management of the project.

7.2. Reporting

A monthly reporting format shall be developed to include in the monthly reporting of the project. The developed report format shall include but not be limited to the following:

- i. The number of grievances logged in the reporting period by type and by access point
- ii. The number of complainants that have given feedback stating their dissatisfaction with the resolution. The number of appeals could also be used as a proxy for this indicator.
- iii. The number of grievances escalated from one level to the next.
- iv. The number of grievances resolved at the first level of the GRM.
- v. The Grievance Committee's responses to concerns
- vi. The type of grievances brought to the GRM
- vii. The number of grievances unresolved and resolved in the reporting period
- viii. Measures taken to incorporate solutions into project design and implementation.
- ix. The number of grievances reported by gender, community and age.
- x. The number of cases where feedback to the complainant exceeded the budgeted timeframe.

ANNEX 1- GRIEVANCE LOG FORMS

A. GRIEVANCE LOG FORM

DATE SUBMITTED (Lusuku lwekubika)	
GRIEVANT (Lobika sikhalo)	
LOCATION (indzawo)	
ISSUE (Chaza sikhalo)	
RESOLUTION/ACTION REQUIRED (Sinyatselo ngobe sincumo)	

Submitted by	Date	Signature	Reference No.
Received by	Date	Signature	
Approved by	Date	Signature	

B. REFERRAL OF CASES FORM

<input type="checkbox"/> Community level GRM	<input type="checkbox"/> Project level GRM	<input type="checkbox"/> Regional level GRM	<input type="checkbox"/> MoPWT level GRM
Date of Referral	Follow up/Investigation		
	Date	Person/Official Assigned	Designation of Assigned

C. RECEIPT: SUBMISSION OF GRM FORM

Reference No.		
GRM Form Recipient Name		Signature
Case status	<input type="checkbox"/> open <input type="checkbox"/> referral <input type="checkbox"/> withdrawal	

ANNEX 2- FACILITATION LETTER



MINISTRY OF PUBLIC WORKS & TRANSPORT Roads Department

P.O. Box 58
Mbabane
Eswatini
Tel: +268 2409 9105

November 16, 2023

To Whom It May Concern

Dear Sir/Madam

RE: Update of Feasibility Study & Detailed Designs for Siphofaneni-Sithobela-Maloma-Nsoko (MR14) and Maloma-Siphambanweni (MR21) Roads of The Development of Manzini Golf Course Interchange Project

This is to confirm that LEA Associates South Asia Pvt. Ltd, has requested to conduct a pre-engineering activity on the above-mentioned road for the consultant's information gathering purposes.

I trust that you will find the above in order.

Yours faithfully,


BUHLE V. DLAMINI
CHIEF ROADS ENGINEER



To provide, maintain and improve a safe reliable and environmentally sustainable road network that will stimulate socio-economic development, job creation and reduce road user costs.