

**DEVELOPMENT WORKSHOP NAMIBIA: POVERTY-ORIENTED  
 DEVELOPMENT OF INFRASTRUCTURE IN URBAN AREAS OF  
 NAMIBIA:**

**GRIEVANCE REDRESS MECHANISM (GRM) (2023-2025)**

POVERTY - ORIENTED DEVELOPMENT OF INFRASTRUCTURE IN URBAN AREAS OF NAMIBIA GRIEVANCE REDRESSAL MECHANISM (GRM)		
KfW PROJECT NUMBER:		
PREPARED:	October 2023	
EFFECTIVE DATE:	December 2023	
VERSION:	10.01.24-V002	
SIGNATURE:	Tendai E Kasinganeti Environmental, and Social Sustainability Advisor – GFA Consulting	
	Salmi Neshila Technical Manager	
REVISED DATE:	01 January 2024	

## **TABLE OF CONTENTS**

<b>TABLE OF CONTENTS</b> .....	ii
<b>LIST OF FIGURES</b> .....	iv
<b>LIST OF TABLES</b> .....	v
<b>LIST OF ABBREVIATIONS</b> .....	vi
<b>TERMINOLOGY</b> .....	vii
<b>1 INTRODUCTION</b> .....	8
1.1 Project Overview.....	8
1.2 Project Objectives .....	9
1.3 Rationale for the GRM.....	9
1.4 Project Beneficiaries.....	9
<b>2 Grievance Redress Mechanism</b> .....	10
2.1 Objectives .....	10
2.2 Scope of Grievance Redress Mechanism.....	10
2.3 Principles of the GRM.....	11
2.4 The GRM Structure.....	11
2.4.1 Mode of receipt and recording of Complaints.....	11
2.4.2 Timeline .....	12
2.5 Second Level of Redress: Project Implementation Unit Level (DWN, Local Authorities, Stakeholders, and Implementing Partners) .....	12
2.5.1 Mode of receipt and recording of Complaints.....	12
2.5.2 Timeline .....	12
2.6 GRM Membership Criteria.....	12
2.7 Roles and Responsibilities .....	13
<b>3 Grievance Redress Mechanism (GRM) Process</b> .....	14
3.1 Grievance Reception/Receive.....	15
3.2 Assess and Assign.....	16
3.3 Acknowledge and follow up .....	16
3.4 Investigate .....	16
3.5 Response .....	17

3.6	Resolution.....	17
3.7	Appeal .....	17
3.8	Close Out .....	17
4	Communication plan for the GRM.....	18
4.1	Communication plan objectives .....	18
4.2	Target audiences.....	19
5	GRM Communication Structure and Channels.....	19
5.1	GRM communication structure .....	19
5.1.1	First tier of the GRM communication structure.....	19
5.1.2	Second tier of the GRM communication structure .....	19
5.1.3	Third tier of the GRM communication structure .....	20
5.2	GRM communication channels.....	20
5.3	GRM Communication matrices.....	21
6	Confidentiality .....	21
6.1	Duty of Confidentiality .....	21
6.2	Personal Data.....	22
6.3	Conflicts of Interest.....	22
7	Protection from Retaliation .....	22
8	Online Grievance Mechanism System .....	22
9	Performance Monitoring and Reporting.....	23
	DWN-GRM ANNEXES .....	24
1	Annex I: Complaint Register/Log (DWN-GRM/001).....	25
2	Annex II. Complaint Receiving Form(DWN-GRM/002).....	26
3	Annex III. Acknowledgement Receipt (DWN-GRM/003).....	27
4	Annex IV. Meeting Record Structure (Grievance Redress Committee & Other Meetings) (DWN-GRM/004) .....	28
5	Annex V. Disclosure Form (DWN-GRM/005).....	29
6	Annex VI. Quarterly Report of Registered Complaints (DWN-GRM/006).....	30

**LIST OF FIGURES**

Figure 1: GRM Process Flow..... 14  
Figure 2: Procedure for Resolving Complaints..... 15

**LIST OF TABLES**

Table 1: GRM Responsibilities..... 13

**LIST OF ABBREVIATIONS**

<b>ABBREVIATION</b>	<b>MEANING</b>
<b>DEAF</b>	Department of Environmental Affairs and Forestry
<b>EAP</b>	Environmental Assessment Practitioner
<b>ECB</b>	Electricity Control Board of Namibia
<b>ECC</b>	Environmental Clearance Certificate
<b>ECO</b>	Environmental Control Officer
<b>EHS</b>	Environment, Health and Safety
<b>EMA and ESMP</b>	Environmental Management Act and Environmental and Social Management Plan
<b>EPS / EPFIs</b>	Equator Principles / Equator Principles Financial Institutions
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESSs</b>	Environmental and Social Standards
<b>GDP</b>	Gross Domestic Product
<b>GIIP</b>	Good International Industry Practice
<b>GN and GG</b>	Government Notice and Government Gazette
<b>GRM</b>	Grievance Redress Mechanism
<b>GRN</b>	Government of the Republic of Namibia
<b>HSE</b>	Health, Safety and Environment
<b>ICT</b>	Information and Communication Technology
<b>IFC</b>	International Finance Corporation
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MEFT</b>	Ministry of Environment, Forestry and Tourism
<b>MIGA</b>	Multilateral Investment Guarantee Agency of the World Bank Group
<b>NHC</b>	National Heritage Council of Namibia
<b>PDO</b>	Project Development Objective

## TERMINOLOGY

Terminologies used in this procedure have the following meaning:

TERM	DEFINITION
<b>Appeals Committee</b>	Will comprise the select committee of the Project Implementation Unit to review the complaint and make recommendations to Project Steering Committee.
<b>Complainant</b>	An individual, group or organization who submits a complaint to DWN.
<b>Complaint Register/ Log</b>	A database for maintaining information about complaints received.
<b>Complaint/ grievance</b>	A concern, grievance or an expression of dissatisfaction with the A+F measure or Beneficiary Activities associated with projects, typically referring to a specific source of concern and/or seeking a specific solution. For the purposes of this Procedure, a question or request may also be treated as a complaint.
<b>Complaints File</b>	A file used to store all complaint investigation related documents
<b>Contractor/ Consultant</b>	An individual or firm that has entered into a contract to provide goods or services to the project. The term covers parties directly contracted by the project and those contracted by a contractor company, also referred to as subcontractors.
<b>Registration Form</b>	A form used to capture information about an incoming complaint.
<b>Stakeholder</b>	Project beneficiary or any other party interested directly or indirectly involved in or influenced by A+F operations.

## 1 INTRODUCTION

### 1.1 Project Overview

The German Government is supporting Namibia to upgrade and formalise its informal settlements and develop new residential settlements in and around urban areas to create inclusive urban spaces and adequate housing for all Namibians. The German Federal Ministry for Economic Cooperation and Development identified Development Workshop Namibia's "Poverty-oriented Development of Infrastructure in Urban Areas" Programme and will provide Financial Cooperation (FC) through the KfW Development Bank (KfW).

Through the Programme, Development Workshop Namibia (DWN) aims to make a significant contribution towards more sustainable and inclusive urban development in at least 15 towns across Namibia. The concept is to plan and develop low-cost residential settlements with title, to transform current informal settlements into formal urban growth. The Programme intends to change the way urban planning is undertaken for new residential areas. Through the introduction of urban design and participatory planning, the DWN aims to create socially and economically conducive living environments. The Program includes three components, aimed at sustainably improving the standard of living of the people residing in informal settlements. The planned interventions include:

Identification and acquisition of urban land, to be provided by the Local Authorities, for servicing at low cost (affordable housing areas) and allocation of formal land rights in the newly developed residential areas to poor residents;

- i. development of bulk infrastructure in four of the new residential areas, and;
- ii. raising of awareness of public hygiene and improvement of access to basic sanitation infrastructure in the newly developed, as well as existing informal, urban areas.

The Programme is anticipated to have an overall positive and beneficial impact on the natural environment and the socio-economic baseline of the targeted communities. However, individual interventions have risks and activities could potentially result in adverse impacts. As a responsible lender, KfW requires that the approach to the identification, appraisal, management and monitoring of potential adverse environmental and social risks and impacts of the Programme are in accordance with Namibian regulatory requirements and the World Bank's Environmental and Social Standards (ESS).

Given that the specific nature and location of interventions for the Programme will vary over time, it is not practicable to identify potential risks and impacts and specify management measures ahead of time. KfW thus commissioned the development of an Environmental and Social Management Framework (ESMF) to provide guidance to the Project Executing Agency on the approach to the management of environmental and social risks and impacts of the Programme.

The developed ESMF requires that DWN adopt a Grievance Redressal Mechanism (GRM) for all planned interventions, which would facilitate the management of environmental and social risks and impacts in line with KfW's Sustainability Guideline (2021), the Namibian regulatory requirements and the World Bank's ESS. The GRM will ensure public disclosure and facilitate the redressal of grievances during project implementation.



## **1.2 Project Objectives**

The Project Development Objective (PDO) is the development of land and bulk infrastructure in new residential areas, raising of awareness of public hygiene and improvement of access to basic sanitation infrastructure in the newly developed, as well as existing informal, urban areas.

## **1.3 Rationale for the GRM**

A Grievance Redress Mechanism (GRM) is an instrument through which dispute resolution is sought and provided. It involves the receipt and processing of complaints from individuals or groups negatively affected by the activities of a particular project. The GRM will assist DWN to ensure that deliberate processes and procedures are put in place to capture, assess and respond to concerns from project beneficiaries, project executors and the general public during the implementation of the project. This will ensure smooth implementation of the project and timely and effective addressing of the problems that would be encountered during implementation.

## **1.4 Project Beneficiaries**

To help the DWN meet its objectives, the Project's direct beneficiaries are selected urban authorities and residents within their jurisdiction, including regional and national stakeholders. DWN recognises that complaints about the programme may occur from time to time. The Grievance Redress Mechanism (GRM) Procedure allows stakeholders to raise questions or concerns with DWN and have them addressed in a prompt, respectful and responsive manner. DWN aims to address all Complaints received, regardless of whether they stem from real or perceived issues and whether the Complainant is named or anonymous.

All Interested and Affected Parties (I&APs) with concerns or affected by the project activities will not only have free access to this procedure, but they will be party to a process that is predictable, transparent, and credible. This must be fair, effective and lasting. The statutory rights of the Complainant to undertake legal proceedings remain unaffected by participation in this process.

DWN seeks to foster trust in the process and its outcomes. To this end, it will understandably communicate this Procedure to stakeholders. Confidentiality will be respected and DWN will take all reasonable steps to protect parties to the process from retaliation.

## **2 GRIEVANCE REDRESS MECHANISM**

### **2.1 Objectives**

The DWN GRM objectives are to:

- i. Establish a prompt, consistent and respectful mechanism for receiving, investigating, and responding to complaints and concerns raised in connection with activities.
- ii. Describe the scope and procedural steps for the complaint handling process and specify the roles and responsibilities of the parties involved.
- iii. Enable local communities, employees, SMEs, Innovators, and other affected stakeholders to raise grievances and seek redress when they perceive a negative impact arising from the project implementation activities and reduce the likeliness of escalation of disputes.
- iv. Ensure proper documentation of complaints and any corrective actions taken.
- v. Mitigate, manage, and resolve potential or realized negative impacts, as well as fulfil obligations under international human rights law and contribute to positive relations with communities and employees.
- vi. Enhance confidence among stakeholders on DWN's interest to address their concerns hence promoting a positive project image.
- vii. Contribute to continuous improvement in performance through the analysis of trends and lessons learnt.
- viii. Create awareness on GRM to stakeholders.

### **2.2 Scope of Grievance Redress Mechanism**

This GRM Procedure is open to all stakeholders who consider themselves affected by the project's activities. Complaints may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent that is reasonably possible.

There are no restrictions on the type of issue a stakeholder can raise under this procedure. However, when a complaint is received that is more appropriately handled under a separate Organizational process established for that purpose (such as employment or business integrity-related issues), it will be redirected to prevent parallel processes from being followed. All complaints received under this Procedure shall be tracked until completion regardless of the process under which they are handled.

DWN, upon consultation with KfW and GFA, reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable dissatisfaction with DWN, is otherwise malicious or vexatious or concerns a matter for which DWN has no formal responsibility (for example, a matter that the government controls or stakeholders control internally). The GRM complements but does not replace the legal channels and other mechanisms for addressing grievances.

DWN will create awareness of the GRM through various stakeholder forums. In addition, a complaint reporting facility will also be availed as an online grievance redress system.

The GRM will be revised and updated periodically based on experience and feedback from stakeholders.

### 2.3 Principles of the GRM

The effectiveness of this GRM will be guided by the following principles:

- i. **Accessibility:** The GRM should be accessible to everyone and at any time. It should take into consideration potential barriers such as language, literacy, awareness, cost or fear of reprisal and seek to address them.
- ii. **Predictability:** GRM should be time-bound at each stage, and have specified time frames for the responses
- iii. **Fairness:** All the procedures therein should be widely perceived as unbiased in regards to access of information and meaningful public participation.
- iv. **Rights compatibility:** The outcomes of the mechanism should be consistent with the international and national standards. It should also not restrict access to other redress mechanisms.
- v. **Transparency and accountability:** The entire GRM process should be done out of public interest.
- vi. **Capability:** Effective GRM, system needs to be endowed the necessary resources, that is, technical, financial and human resources.
- vii. **Feedback:** It should serve as a means to channel citizen feedback to improve project outcomes for the people.

### 2.4 The GRM Structure

The different levels of redress (Beneficiaries, stakeholders, Points of receipts of complaints), Establishment of the Grievance Redressal Committee (GRC) and criteria for membership in this committee)

A two-level Redress mechanism is planned to address all complaints during project implementation.

#### **First Level of Redress: Management Firm/Beneficiaries Level**

The main targets at this level are the project beneficiaries. All the appointed contractors and consultants will be required to adopt the grievance Redress Mechanism and shall appoint a GRM Focal person who will be trained to handle complaints. All project beneficiaries shall be informed of the appointed recipients of complaints. Once they receive a complaint, they shall be mandated to register the complaint, investigate and recommend an action. The received complaint shall be recorded on a standardized DWN-GRM/002 form as shown in Appendix 2.

If the complainant is not satisfied with the recommendation, they shall be advised to report to the second level of redress. The focal persons shall be obligated to submit a quarterly report using the standardized DWN- GRM/006 format as in Appendix 6.

#### **2.4.1 Mode of receipt and recording of Complaints**

The complaints can be made in writing, verbally, over the phone, by fax, email and online. The officer receiving the complaints should try to obtain relevant basic information regarding the grievance. As soon as a complaint is received, an acknowledgement form, DWN-GRM/003 as shown in Appendix 3 shall be issued.

After registering the complaint, the Grievance Handling Team shall set a date to investigate the matter, after which they shall provide a recommendation. If necessary, meetings must be held between the complainants and the complainant to find a solution to the problem and make arrangements for grievance

redress. The deliberations of the meetings and decisions taken are recorded in a standardized format as in DWN-GRM/004 (see Appendix 4).

#### **2.4.2 Timeline**

The resolution at the first level will be done within 10 working days and notified to the concerned through a standardized disclosure form, DWN-GRM/005 as shown in Appendix 5. Should the Grievance not be solved within this period it would be referred to the next level of Grievance Redress. However, if the complainant requests for an immediate transfer of the issue to the next level or is dissatisfied with the recommendation, the issue will be taken to the next level.

### **2.5 Second Level of Redress: Project Implementation Unit Level (DWN, Local Authorities, Stakeholders, and Implementing Partners)**

The main targets at this level are the project implementers, local authorities, support consultants, relevant line ministries and the bank. A grievance-handling committee shall be appointed and trained to handle complaints. This committee shall work under the supervision of the Project Coordinator. All stakeholders shall be informed of the existence of the grievance committee. This committee shall dedicate days when they are available to receive and resolve complaints. Once the committee receives a complaint it shall be mandated to register the complaint, investigate and recommend an action. If the complainant is not satisfied with the recommendation, they shall be advised to report to the third level of redress. This committee shall be obligated to do a quarterly report following the DWN-GRM/006 format.

#### **2.5.1 Mode of receipt and recording of Complaints**

The complaints can be made in writing, verbally, over the phone, by fax, emails and online. The officer receiving the complaints should try to obtain relevant basic information regarding the grievance.

The points of receiving complaints as illustrated above shall be in possession of a DWN-GRM/002 form which must be filled in by every complaint.

As soon as a complaint is received, an acknowledgement, DWN-GRM/003 is issued.

After registering the complaint, the Grievance Handling Team under the guidance of the Project Coordinator shall set a date to investigate the matter, after which they shall provide a recommendation.

If necessary, meetings have to be held between the complainants and the concerned officers to find a solution to the problem and make arrangements for grievance redress. The deliberations of the meetings and decisions taken are recorded on a DWN-GRM/004 form.

#### **2.5.2 Timeline**

At the second level, the resolution period will also take a maximum of 10 working days and the concerned shall be notified through a DWN-GRM/003 form. Should the Grievance not be solved within this period, this would be referred to the next level of Grievance Redress. However, if the complainant requests for an immediate transfer of the issue to the next level or is dissatisfied with the recommendation, the issue will be taken to the next level.

### **2.6 GRM Membership Criteria**

The project members involved in the project management will take on grievance handling as a responsibility. The GRM members should be qualified, experienced, and competent personnel who can win

the respect and confidence of the affected beneficiaries. It is also important to maintain a gender balance within the GRMs. Criteria for selecting members of GRMs include the following:

- a) Knowledge of the project, its objectives, and outcomes;
- b) Technical knowledge and expertise, e.g., environmental standards, technical standards, legal; understanding of the social, economic, and cultural environments and the dynamics of the innovation ecosystem players;
- c) capacity to absorb the issues dealt with and to contribute actively to decision-making processes;
- d) social recognition and standing; and
- e) an equitable representation of males and females.

## 2.7 Roles and Responsibilities

Roles and responsibilities under this GRM Procedure are as follows:

Table 1: GRM Responsibilities

Role	Responsibility
Project Coordinator (DWN Director or delegated personnel)	Responsible for the overall implementation of this procedure. This includes serving as custodian of the complaints process, monitoring the handling of complaints, and suggesting changes to policies or practices based on lessons learnt.  The Project Coordinator also serves as the Complaint owner (but can delegate to an appropriate alternate) and also as the main point of contact with the Complainant.
Project Manager (Project Engineer and Environmental and Social Safeguards Officer)	Responsible for coordinating the response to a Complaint. This includes receiving and reporting Complaints, maintaining the Complaints Log, supporting the resolution of Complaints; and liaison with the Complainant.
Complaint Owner (DWN Field Officer)	Responsible for investigating and resolving a Complaint. This includes conducting investigations, proposing resolutions, implementing corrective actions and coordinating with the Complainant and other parties. This includes the implementing agencies
Appeals Committee (DWN, GFA, Local Authority, Community Representative)	Responsible for reviewing escalated complaints and authorising additional actions to be taken. This includes reviewing overdue or escalated complaints, authorising additional actions, and approving the close-out of complaints where it is not reasonably possible to reach an agreed resolution with the Complainant.

### 3 GRIEVANCE REDRESS MECHANISM (GRM) PROCESS

This section sets out the process to be followed for receiving, investigating, and resolving Complaints. The timelines for key steps are as outlined in the process flow chart below.

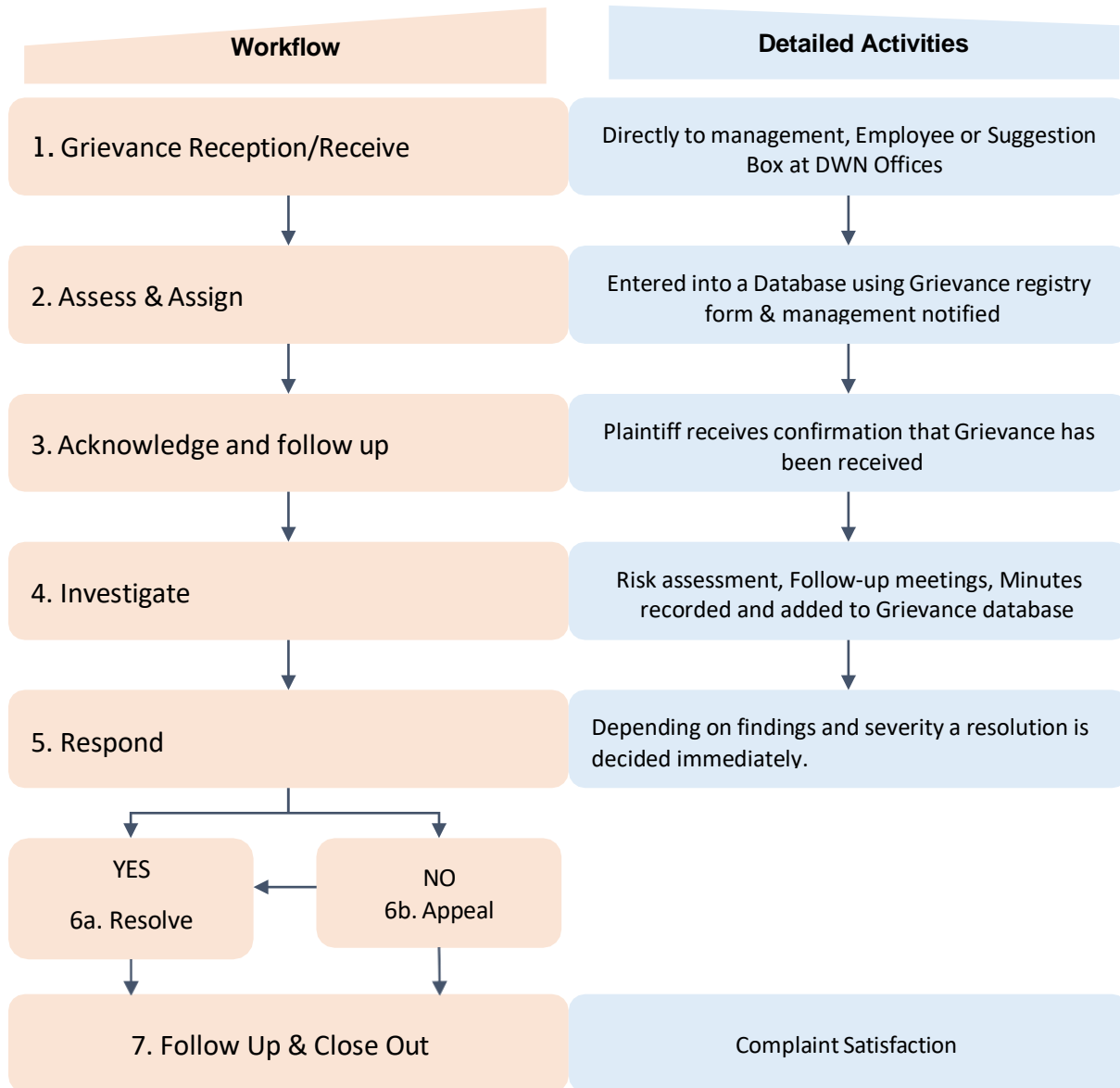
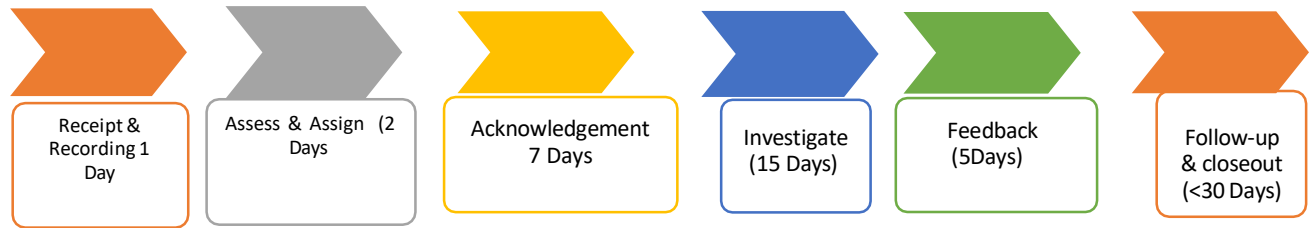


Figure 1: GRM Process Flow



**Figure 2: Procedure for Resolving Complaints**

### 3.1 Grievance Reception/Receive

The Procedure is initiated when a Complaint is received by a DWN field officer or contractor and referred to the Project Coordinator (PC)/Project Manager (PM). The complaints can be forwarded to DWN through various approved methods. However, if there is an issue of concern published in social media, print and electronic media such an issue should be directly taken up and treated as anonymous reporting.

DWN will have a grievance log that records:

- i. the number of complaints received,
- ii. receipt/acknowledgement details,
- iii. describes the issues,
- iv. location of each complaint,
- v. number of complaints resolved and
- vi. the number of complaints that have gone to mediation.

If the Complaint is readily resolvable and can be dealt with immediately, the PC takes action to address the issue directly and records the details in the Complaints Register. If the Complaint is not readily resolvable, create a record of the Complaint in the Complaint Register. When of particularly high risk, a grievance can be fast-tracked to ensure the involvement of the Grievance Committee at an early stage.

### **Contact Details**

*Technical Manager (Infrastructure, Environment and Social Impact)*

*Development Workshop Namibia*

*20 Nachtigal Street, PO Box 40723*

*Ausspannplatz, Windhoek, Namibia*

*Email: [s.neshila@dw-namibia.org](mailto:s.neshila@dw-namibia.org)*

*Telephone No: +264 61 240 140*

### **3.2 Assess and Assign**

- The PC and PM make an initial assessment of severity and assign the Complaint to a Complaint Owner.
- The PC/PM and the Complaint Owner agree on the timelines for an investigation and any follow-up actions.
- The PC provides access to all relevant documentation to the Complaint Owner. If the complaint is against the PC/PM, it should be directed to the Grievance Redressal Committee.

For Complaints regarding issues for which a more appropriate separate Organizational process already exists, the PC shall refer the matter to the appropriate process owner for further action. This will typically be the case for Complaints related to contractual or commercial issues; industrial relations and employee relations; business integrity or criminal matters; and issues subject to current or pending litigation. The PM updates the Grievance registry form /Complaint Record as appropriate.

### **3.3 Acknowledge and follow up**

Once a Complaint has been assessed and a Complaint Owner assigned, the PM sends a written acknowledgement to the Complainant. The acknowledgement can be in the form of a letter or email depending on practicality and appropriateness. The letter should normally be sent within Seven (7) calendar days of receiving the Complaint. The PM documents the acknowledgement in the Complaints Register as well as details of follow-up steps and sets timelines for follow-up activities to seek verification or investigation if need be and communication of outcomes and next steps based on the outcomes.

### **3.4 Investigate**

The appropriate investigation is decided at the assessment stage. The Complaint Owner investigates the factual basis for the Complaint and proposes options to resolve the issue. If deemed necessary, the investigation will include a risk assessment. The investigation may include follow-up meetings between stakeholders and the project, where an impartial party is present. Minutes are recorded and added to the grievance database.

The Complaint Owner may involve third parties in the fact-finding process as required. The identity of the Complainant should only be disclosed to the extent necessary to resolve the issue or as required by law. If the Complainant has specifically requested that his or her identity not be disclosed, their personal information may not be shared with third parties unless required by law.



DWN generally seeks to resolve complaints within Thirty (30) days. The maximum resolution period should not normally exceed Ninety (90) days. The PM is responsible for providing regular progress reports to the Complainant, including a verbal update every fifteen (15) days and a written update after thirty (30) days. If additional time is needed to complete an investigation, the Complaint Owner will notify the PC/PM, who will inform the Complainant of the reason for the delay.

When the investigation is complete, the Complaint Owner documents the findings and proposes options for resolving the Complaint as appropriate.

### **3.5 Response**

The Complaint Owner and PC agree on a response to the Complainant. The response should communicate the findings of the investigation, set out the proposed solution and timelines, and seek feedback from the Complainant.

The Complaint Owner and PC determine next steps based on feedback from the Complainant. If the Complainant accepts the resolution, DWN will proceed to implement (Section 6. b). If the Complainant does not accept the resolution, the Complaint will be escalated to the Appeals Committee (Section 6. c). The Complainant's response will be documented in the Complaint Log.

### **3.6 Resolution**

If the Complainant accepts the proposed resolution, the mutually agreed actions are implemented.

The Complaint Owner is responsible for assigning action parties, actions and deadlines to implement the resolution. These are recorded in the Complaint Log with any supporting documentation. Monitoring arrangements may need to be put in place to verify implementation.

### **3.7 Appeal**

DWN will seek to resolve with the Complainant that is satisfactory to both sides. If DWN and the Complainant are unable to agree on a solution, the Complaint may be escalated to the Appeals Committee for review and final decision.

The Appeals Committee reviews the case and determines if further reasonable action is possible. If no reasonable action is possible, the Appeals Committee authorises the closeout of the Complaint. A close-out letter will be sent to the Complainant explaining the DWN position.

Cases where the Complainant disputes or declines to acknowledge the implementation of a previously agreed resolution, may also be referred to the Appeals Committee for review.

### **3.8 Close Out**

A Complaint is closed out when no further action can be or needs to be taken. Closure status will be classified in the Complaints Register as follows:

- **Resolved:** Complaints where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.
- **Unresolved:** Complaints where it has not been possible to reach an agreed resolution and the case has been authorised for close out by the Appeals Committee.
- **Abandoned:** Complaints where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts have been unsuccessful.

The PC/PM is responsible for updating the Complaints Register and the logistics associated with closing out the case.

At the end of a case, regardless of whether agreement was achieved, the PM will seek feedback from the Complainant on their level of satisfaction with the complaint handling process and its outcome.

If the complainant is not satisfied with the resolution made, they have a right to go to a court of law for further redress of their complaint.

#### **4 COMMUNICATION PLAN FOR THE GRM**

This Communication plan describes the approach to be taken by DWN in communicating and collaborating with its relevant stakeholders on the Grievance Redress Mechanism. This plan will facilitate effective and coordinated communication between the DWN, KfW, project beneficiaries and the general public on standard procedures of the GRM before and during programme implementation.

##### **4.1 Communication plan objectives**

The primary objective of the GRM communication plan is to: Outline the strategy and methodologies to be used for GRM communication, GRM information distribution, feedback, and stakeholder engagement, and how these will be managed during DWN implementation.

Other objectives include;

- i. Share information on GRM procedures to the relevant stakeholders before and during project implementation.
- ii. Develop a detailed communication methodology of disseminating GRM information to the target audience.
- iii. Foster collaboration with the project executors, project beneficiaries and the public for successful grievance handling throughout the implementation of DWN.
- iv. Assign responsibilities for the DWN, and GRM committee, regarding GRM procedures and structure

#### **4.2 Target audiences**

The targeted audiences for this plan are namely:

- i. I&APs – e.g. Local authorities, community members and regional councils.
- ii. DWN Project implementation team
- iii. Consultant Management firms
- iv. KfW
- v. Government of the Republic of Namibia

### **5 GRM COMMUNICATION STRUCTURE AND CHANNELS**

#### **5.1 GRM communication structure**

This is a three-tier structure that outlines the types of information that the DWN implementers will pass down to the targeted audience.

##### **5.1.1 First tier of the GRM communication structure**

The targeted audiences for this tier are the project beneficiaries, local authorities and the general public.

This audience will be informed about:

- GRM goals, objectives and procedures
- GRM planned activities and deliverables, including start and end dates
- Criteria for selecting community representatives who will act as recipients of complaints
- Details about GRM committee officials, DWN project implementation (GFA, Programme Coordinator) who are involved in the GRM procedures
- Contact details, including how people can seek redress if aggrieved by programme activities
- Community members' right to provide feedback on the DWN implementation and make grievances
- When and how complaints will be handled

##### **5.1.2 Second tier of the GRM communication structure**

The targeted audiences for this tier are the project implementers, Consultant management firms, Selected Parastatals and Associations and their related institutions. These stakeholders were informed about:

- All first-tier level information
- Criteria of appointing members to the GRM committee

- How people can participate in the GRM procedures
- Points of receipt of grievances at the national level
- Mode of receipt and recording of grievances
- When and how complaints will be handled
- Alternative redress mechanisms open to the public in case their grievances are not handled

### **5.1.3 Third tier of the GRM communication structure**

The targeted audiences for this tier are the funding agencies, project implementers, executing entities, general public, project beneficiaries and their related institutions are informed about:

- All First and Second tier information
- Progress of the Grievance Handling performance in relation to its goals and activities
- How input from GRM progress reports has contributed to decisions
- Key staff, GRM committee roles and responsibilities in relation to GRM procedures

## **5.2 GRM communication channels**

To communicate all information regarding the GRM to the targeted audience, DWN will need to have platforms and utilize already existing avenues to reach their stakeholders at the different tiers. It is noteworthy that the communication channels will vary for each target audience due to group dynamics and the accessibility of such platforms especially to the project beneficiaries. DWN will use the communication channels listed depending on its target audience:

- a) Print media, e.g. posters, flyers, booklets, notices
- b) Social media; that is Facebook, Twitter, WhatsApp
- c) Use of alternative ICT options.
- d) Radio stations
- e) Television stations
- f) In addition, the following communication activities and methods will be conducted to promote two-way communication between DWN and all its relevant stakeholders, that is,
  - f-i. Setting up the Programme's Intranet
  - f-ii. Information sessions and workshops on GRM
  - f-iii. Training on GRM procedures and structure at the project beneficiaries' level



**5.3 GRM Communication matrices**

The following pages are matrices for the GRM committee, Project officers and Management firms to assemble target audiences, messages, and delivery channels in line with the GRM communication plan.

<b>AUDIENCE</b>	<b>INTEREST</b>	<b>MESSAGE</b>	<b>CHANNEL</b>	<b>WHO</b>	<b>WHEN</b>
<i>Name the stakeholders here</i>	<i>Identify the key information needs</i>	<i>Identify the primary message for this group.  All future messages to this group should be ties to the initial theme.</i>	<i>Describe the communication channels to be used to reach to the targeted audience.</i>	<i>Identify responsible officer</i>	<i>Describe the time frame and frequency of communication</i>
<i>Additional resources here</i>					

**6 CONFIDENTIALITY**

**6.1 Duty of Confidentiality**

DWN is committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements. This duty extends to all employees or representatives of DWN or its Contractors who participate in the complaint-handling process.

Information about a Complaint will be shared within DWN on a need-to-know basis and only to the extent necessary to complete a step under this Procedure. DWN will not share personal information with third parties unless required by law or authorised by the Complainant.



## **6.2 Personal Data**

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period under the DWN Data Privacy Policy.

## **6.3 Conflicts of Interest**

A conflict of interest exists where there is a divergence between the interests of an employee or Contractor and his or her responsibilities under this Procedure, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her interests.

This procedure seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the complaint-handling process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a Complaint relates to a specific DWN or Contractor employee, that person shall not play a role in the complaint-handling process.

## **7 PROTECTION FROM RETALIATION**

Retaliation is any adverse action taken against a Complainant, employee or Contractor whose purpose is to frustrate the operation of this Procedure. DWN will not tolerate such conduct. When concerns about retaliation or victimisation are raised, they will be fairly investigated under applicable legal procedures.

## **8 ONLINE GRIEVANCE MECHANISM SYSTEM**

Given the nature of the Project and its stakeholders, most of whom use online and social media to communicate and engage with their audiences, DWN will set up an online grievance redress system to be displayed on the DWN website.

The system will work similarly to the World Bank's Grievance Redress Service (GRS), to enable submission of grievances by the aggrieved stakeholders anywhere and anytime (24x7). The DWN communication leads and forwards the grievances received to a GRM panel to scrutinize and take action for speedy and favourable redress of these grievances.

Tracking grievances will also be facilitated on the portal through the system-generated unique registration number. This grievance administration system will enable effective monitoring and submission of online monthly status reports regarding the number of grievances received, resolved, and the ones pending.

## **9 PERFORMANCE MONITORING AND REPORTING**

The DWN Environmental Social, Health and Safety expert is responsible for gathering and reporting performance monitoring data under this Procedure. Key performance indicators (KPIs) will be collected to enable DWN to analyse trends in complaints received and identify underlying systemic issues. PM is responsible for making recommendations for changes to DWN policies or practices based on on-going learning from Complaints.

Every half year, DWN will evaluate the GRM by analysing grievance data to reveal trends and patterns through taking stock of all complaints that have been received, how they have been handled and determine what lessons emanate from such complaints. Furthermore, from the lessons learnt it will be determined what actions or decisions are necessary to forestall similar complaints in the future.

A grievance report will be submitted to the KfW in every mission. This report will present;

- i. the grievance log;
- ii. an analysis of the grievance reported and closed for the time leading to the mission ie every six months.

DWN will also provide feedback to GRM users and the public at large about why the GRM is important, enhance the visibility of the GRM among the project beneficiaries and increase users trust in the grievance redress mechanism under the project.

## **DWN-GRM ANNEXES**





## 1 ANNEX I: COMPLAINT REGISTER/LOG (DWN-GRM/001)

No	Date Received/Recorded/Time		Complainant Name/ Anonymous	Nature of Complaint (Brief Description)	Registration Form Number	Complainant Owner	Investigation kick-off date	Investigation Closure date	Resolution
	Date	Time							



**2 ANNEX II. COMPLAINT RECEIVING FORM(DWN-GRM/002)**

Date: ..... (dd/mm/yyyy) Place of issuing complaint ..... Complaint no.: .....

**Mode of Receipt (please tick where applicable):**

Writing	<input type="checkbox"/>	Verbal	<input type="checkbox"/>	Phone	<input type="checkbox"/>	Fax	<input type="checkbox"/>	Email	<input type="checkbox"/>
---------	--------------------------	--------	--------------------------	-------	--------------------------	-----	--------------------------	-------	--------------------------

**Details of the Complainant:**

Name (optional): ..... Gender: .....

Address: ..... Email address: ..... Phone no.: .....

**Location of complaint/concern:**

Village/Town/City/Area: ..... County: .....

**Category of Complainant (please tick where applicable):**

- i. Project Beneficiaries
- ii. Project implementers
- iii. Funding agencies
- iv. Other interested party (Please specify) ...

**Category of Grievances (please circle where applicable):**

- i. Project implementation related
- ii. Social
- iii. Environment

**Brief Description of the Grievance:**

.....

*(Attach letter/petition/documents detailing grievance information as submitted)*

**Attachments:** (1) \_\_\_\_\_ (2) \_\_\_\_\_

(3) \_\_\_\_\_

Received/prepared by: .....

Date: (dd/mm/yyyy)

Signature: .....



**3 ANNEX III. ACKNOWLEDGEMENT RECEIPT (DWN-GRM/003)**

Complaint no.: .....

Date of issuing complaint.....(dd/mm/yyyy)

**Place of issuing complaint:**

Village/Town/City/Area: .....

County: .....

**Details of the Complainant:**

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

Address: .....Gender: .....

Email address: .....Phone no.: .....

**Supporting documents submitted:**

- i. ....
- ii. ....
- iii. ....
- iv. ....
- v. ....

**Summary of complaint:**

.....

.....

.....

.....

Name of Officer receiving

Complaint:.....

Signature of Officer receiving

Complaint:.....

## 4 ANNEX IV. MEETING RECORD STRUCTURE (GRIEVANCE REDRESS COMMITTEE & OTHER MEETINGS) (DWN-GRM/004)

Date of Meeting: ..... Complaint no.: ..... Venue of Meeting: .....

**List of participants:**

Complainant Side	DWN & Grievance Redress Committee Members
1)	1)
2)	2)
	3)

**Summary of Grievance:**

.....  
 .....

**Key discussions:**

- 1)
- 2)
- 3)

**Decisions Made/Recommendations by the Grievance Redress Committee:**

- 1)
- 2)
- 3)

**Status of Grievance (tick where applicable):**

Solved	<input type="checkbox"/>	Unsolved	<input type="checkbox"/>
--------	--------------------------	----------	--------------------------

Chair person's name.....

Chair person's signature.....

Date (dd/mm/yyyy): .....

**5 ANNEX V. DISCLOSURE FORM (DWN-GRM/005)**

Village/Town/City/Area ..... County .....

**Result of Grievance Redress**

- 1) Complaint no.
- 2) Name of Complainant:
- 3) Date of Complaint:
- 4) Summary of the Complaint:

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

- 1) Summary of Resolution:

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

- 2) Level of Redress (please tick where applicable)

<b>First/Community</b>		<b>Second/County</b>		<b>Third/National</b>	
------------------------	--	----------------------	--	-----------------------	--

Date of grievance redress (dd/mm/yyyy): .....

Name of complainant: .....

Signature of the Complainant, indicating acceptance of the solution to his/her grievance:

.....

Name of Grievance Handling Officer: .....

Signature of Grievance Handling Officer.....

Date (dd/mm/yyyy): .....

*(Note: Copy to be sent to the complainant and the GRM Committee)*



**6 ANNEX VI. QUARTERLY REPORT OF REGISTERED COMPLAINTS (DWN-GRM/006)**

Location ..... Date (dd/mm/yyyy) ..... Period (Quarter ending) .....

**Details of Complaints Received:**

Place of issuing a complaint	Name & Address of complainant	Location of complaint/concern	Date of Receipt	Complaint no.

**Details of Grievance Redress Meetings:**

Date of meeting	Venue of meeting	Names of participants	Decisions/Recommendations made

**Details of Grievances addressed:**

Date of issuing a complaint	Category of complaint	Category of grievance	Brief description of the grievance	Date of complete resolution

*(Note: Copy to be submitted to the GRM Committee)*