

GOVERNMENT OF SOMALILAND



Ministry of Education and Science (MoES)

**Somaliland Empowering Women Through
Education and Skills
(Raja Kaaba) (P176898)**

Grievance Mechanism (GM) Manual

28th February 2025

Table of Contents

1.	Introduction	1
2.	Objectives	1
3.	Institutional Arrangements	2
4.	Core Principles	3
5.	Categorization of Grievances	3
6.	GRM Value Chain	4
6.1.	Step 1: Grievance Uptake	4
6.2.	Step 2: Sort and Process	8
6.3.	Step 3: Acknowledgement and Follow-Up	9
6.4.	Step 4: Verify, Investigate and Act	11
6.5.	Step 5: Monitor, Evaluate and Provide Feedback	13
7.	GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	14
7.1.	Survivor-centred approach	14
7.2.	Who is Catered For?	14
7.3.	Training	14
8.	Workers' Grievance Redress Procedure	15
8.1.	Objectives of the Procedure	15
8.2.	Procedure	15
9.	Process for Escalation of Grievances / Appeals	16
10.	World Bank Grievance Redress Service	16
	Annexes	18
	Annex 1: Online GRM Form	18
	Annex 2: Grievance Register	21
	Annex 3: Raja Kaaba Grievance Redress Mechanisms Flowchart (see more details in the ESMF)	22
	Annex 4: Incident Classification Guide	23
	Annex 6: Guidelines for Hotline Operators	26
	Annex 7: Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint.	27
	Annex 8: Informed Consent Process	28
	Annex 9: GBV/SEA/SH Case registration form	30

List of Tables

<i>Table 1: Categorization of grievances</i>	3
<i>Table 2: Details of the grievance log</i>	6
<i>Table 3: Responses according to type of case</i>	9
<i>Table 4: Categorization of grievances according to eligibility</i>	11

Abbreviations

CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESA	Environmental and Social Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
IP	Implementing Partner
GS	Government of Somaliland
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRS	Grievance Redress System
LMP	Labor Management Plan
NGO	Non-Governmental Organization
PIU	Project Implementation Unit
PMU	Project Management Unit
SEP	Stakeholder Engagement Plan
SEAH	Sexual Exploitation, Abuse and Harassment
WB	World Bank

Definition of Terms

Term	Definition
Complainant	An individual, group or organization that submits a complaint
Complaint	<p>A complaint is a statement (verbal or written) or expression of displeasure concerning an impact or effect arising from a sub-project as unsatisfactory or unacceptable to the complainant. For the purposes of the Raja Kaaba a complaint is a concern about a minor impact or effect that is short term, low in risk, often temporary, that typically does not require an investigation but does require a specific response to remove or remediate the unsatisfactory or unacceptable impact or effect.</p> <p>Complaints that are dealt with on the spot or resolved immediately can be referred to as minor complaints</p>
Grievance	<p>A grievance is statement about an action, impact or effect originating from a sub-project that adversely affects the rights, health and/or wellbeing of an affected person or group of people to the extent that it forms legitimate grounds for grievance and if upheld, may result in compensation, legal action or a change to the sub-project in order to resolve the grievance. For the purposes of the Raja Kaaba, a grievance will require specific response and potentially a formal intervention by the PIU for resolution and such resolution must be formally agreed and recorded.</p>
Grievance Log	A database for maintaining information about complaints received.
Project Affected Person (PAP)	A project affected person is a person that is adversely affected temporarily or permanently as a result of sub-project works under Raja Kaaba.
Severe Incident	An incident <i>that caused significant adverse effect on the environment, the affected communities, the public or workers</i> , e.g. fatality, GBV, forced or child labour.

1. Introduction

1. This document provides guidance for the management of complaints and grievances under the Somaliland Empowering Women through Education and Skills Project - "Raja Kaaba"). The purpose is to provide a suitable, centralized grievance mechanism (GM) for the project that can be applied to meet the World Bank's ESF and national requirements.

2. Under the World Bank Environmental and Social Standards (ESSs), Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances'.¹ Further details regarding how to respond to the concerns of those affected by the project activities have been articulated in the project's SEP document.² This Project GM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. As per World Bank standards, this GM makes the following distinctions:

- a) Project-related complaints and grievances: it focuses on Project-related complaints and grievances and defines the different steps of handling such;
- b) GBV/SEA/SH related complaints and grievances: complaints and grievances relating to Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH), given their sensitivities and considerations related to a survivor-based approach, are reported to the available GRM grievance recipients, but the grievances follow a different process. This counts for complaints and grievances from PAPs, as well as workers deployed by the project;
- c) Labour-related complaints and grievances: Complaints from project workers raising workplace concerns, terms of employment and other related concerns will be registered through the Workers' GRM, which is a separate GRM elaborated in this document;
- d) Second tier / escalated complaints and grievances: This concerns complaints and grievances that cannot be solved by the first tiers (Project-wide and workers' complaints and grievances) or have been escalated by users dissatisfied with the resolutions from the first tiers. This GRM describes procedures how these grievances shall be addressed through an appeals mechanism.

2. Objectives

3. This document provides a manual for the Raja Kaaba GRM. It lays out clear processes and procedures (including resolution processes and timelines), defines the grievance uptake, sorting and processing, acknowledgement and follow-up, categorization, verification and investigation, monitoring & evaluation, and feedback. It focuses on solving grievances at the community level where possible, and if necessary, escalating them to the appropriate higher levels. The key objective of the GRM is to establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project teams' ability to identify, track, resolve and refer eligible grievances; and to enhance the

¹ World Bank, Environmental and Social Framework, 2018, p. 131.

² <https://projects.worldbank.org/en/projects-operations/document-detail/P172434?type=projects>

Project's development results and outcomes. The GRM is expected to contribute to continuous improvement in performance of the Raja Kaaba through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

3. Institutional Arrangements

4. The Project will establish layers of GRM system that deal with the complaints depending on the nature and categorisation of grievances. The first layer of GRM procedure will be based on the women development centres and autonomous colleges, under component 1 and 2 respectively. The schools/ TVET centres and colleges are expected to establish GRC and in turn GRM Focal Point. This GRC will comprise the GRM focal point, Centre Manger, Trainee Representative, local MoES representative, TVET/ NFE/ University representative as the case might be. The second layer of GRM will be the PIU level led by the local Grievance Redress Committee (GRC) consisting of the PIU Coordinator, PIU Social Safeguard Officer, procurement specialist, MoES representative. These individuals will form the local GRC in each targeted district to resolve complaints that would have been received through Hotline Operator/Number and other channels. If the aggrieved individual is not satisfied with the outcome of the local GRC, the GRC will refer the case to the PIU social specialist. The Project expects from the education institutions and Civil Work Contractors to identify GRM Focal Point who should be part of and closely collaborate with PIU Coordinator for monitoring GRM implementation and data collection.

5. The day-to-day tasks that relate to all complaints except GBV will rest on the Social safeguard Specialist (SSS) whilst leaning on the PIU team for support. However, all the GBV-related grievances will be dealt with the PIU GBV specialist to provide tailored support to the relevant victims.

6. The SSS will be in charge of the channels that will receive grievances up until a grievance operator is recruited. He/She will also process grievances directed to the project, manage GRM appeal process, and monitor the implementation of the GRM. The PIU Coordinators located in all project sites will manage the Hotline Operator, lead local GRCs and partners' GRM Focal Points. In collaboration with Hotline Operator, the PIU social safeguard will register and file all GRM reports incoming from implementing partners, and share with the PIU Social safeguard Specialist to compile all relevant GRM data and include reports on the GRM in the regular reports to the WB. The SSS is further responsible for the monitoring of GRM implementation and the identification of trends and analysis of the GRM reports to be able to flag key issues with Project Management.

7. Each GRM Focal Point is responsible to create awareness of the GRM at its locality of operation; roll-out information dissemination; prepare and man help-desks at project sites; run a suggestion box at the project site (nearest office of administration); receive and handle grievances addressed at the implementing partners (through help-desks, suggestion boxes and directed by the Hotline Operator). The PIU's Social safeguard Specialist will be sharing all necessary information with the relevant partners, and monitor the partners' GRM awareness creation locally, the implementation of help-desks at project sites and the handling of grievances by the local GRCs.

8. As stated above each GRC in all project sites should nominate a dedicated person for the handling and reporting of grievances, the GRM Focal Point, which will compile the evidence in order for GRC to identify solutions for relevant grievances.

4. Core Principles

9. The GRM is based on six core principles:
10. **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently.
11. **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM committees and officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
12. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that PAPs can easily understand them. The PAPs have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.
13. **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff and/or committees handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.
14. **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
15. **Participation and social inclusion:** A wide range of PAPs, including community members, members of vulnerable groups, project implementers, civil society, and the media, are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

5. Categorization of Grievances

16. Grievances will be categorized using the guidance summarized below, including basic information communication; public administration ethics and conduct; governance; human rights; environmental compliance; corruption and economic crimes. Grievances outside the Raja Kaaba mandate will be referred to the appropriate statutory institution.

Table 1: Categorization of grievances

<i>Categories of Grievances</i>	
1. Basic information	
-	Access to information
-	Correction and deletion of untrue or misleading information that affects the person
2. Ethics and conduct	
-	Government entities and staff
-	Implementing Partner staff
3. Violation and breach of codes of ethics	
-	Violation of codes of ethics;
-	Breach of the code of ethics by government officers and consultants.
-	Breach of Code of Conduct and Ethics by staff of Implementing Partners
4. Violation of human rights and fundamental freedoms	
-	Gender equality and general equality matters.

Categories of Grievances	
-	Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities)
-	Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)
-	Non-discrimination of special needs groups
5. Corruption and Economic crimes	
-	Receiving of bribery and unlawful enrichment.
6. Labour and working conditions;	
-	Termination/Summary Dismissal,
-	Breach of Employment Contract Terms
-	Conflicts with Trade Unions
-	Work Injury
-	Remuneration
-	Wrongful termination
-	Suspension
-	Waiver of Claims
7. Environmental compliance violations	
-	Violation of environmental standards laid out in the ESIA's, ESMPs, and ESMF
8. Occupational Health and Safety (OHS)	
-	Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
9. Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)	
-	Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project
-	Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project
-	Sexual Harassment committed by Project staff or any worker of an IP associated to the Project

6. GRM Value Chain

6.1. Step 1: Grievance Uptake

17. Multiple channels will be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

18. There are five distinct means, at least two of which must be made available at the project locality for people to file a grievance:

1. A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator will be set up and available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator will be set up and managed by a dedicated resource or a social safeguard within the Project Implementation Unit (PIU). Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English. The Hotline Operator will register the grievance (see also annex 6 for more detailed information) in the grievance log (see below). This Hotline Operator will deal with all project-related complaints except GBV-related issues. The Hotline Operator will be initially trained by the PIU in a) the registration of a grievance; b) the interaction with complainants; c) workers' GRM; and d) Raja Kaaba project components and Implementing Partners (IP). After providing first appropriate responses to the complainant, and registering the grievance, the Hotline Operator will transfer the grievance to the relevant IP responsible for the grievance-related activity. The Hotline Operator will closely work with Grievance Redress Committee (GRC) that will be established in all project implementation sites.
2. A phone number for a GBV Hotline Operator: If the grievance is a GBV/SEA/SH related grievance, different referral channels including different Hotline Number will be used due to the sensitivity of the issue. The operator of this hotline will be the GBV providers or project's GBV specialist in the interim who will give appropriate support to the complainant and investigate the matter in a sensitive and effective manner.
3. A help-desk must be set up by the PIU during the implementation of sub-project activities in all sites.³ They should be manned by the PIU staff, and coordinate closely with the PIU coordinator. At the help-desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help-desk. The staff manning the desk will register the grievance in a GRM log book. The staff will be trained in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEA/SH related grievances and who to refer to; and d) workers' GRM. The help-desk can be open at hours decided on by the PIU team, which must be clearly indicated in a public space, and the Help-desk must be set up at a public space easily accessible and in close proximity of the sub-project activities. The PIU will train relevant personnels in the GRM procedures, including the implementation of Help-desks.
4. Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the PIU team, civil work contractor's Focal Point. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help-desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance. All relevant staff (including GRC and local government officials) will be trained by the PIU in: a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEA/SH related grievances; and d) workers' GRM. Each Civil Work Contractor and training centres will appoint a focal person for the GRM during project activities. This focal person will be trained by the PIU and will be in direct contact with the PIU for any assistance.

³The help-desk must be budgeted by the IP, the manning of the help-desk will depend on the nature of the activity

5. A suggestion box must be installed at the nearest project office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as Raja Kaaba-related feedback and grievance mechanism. The PIU/IP in the respective area is responsible for the setup and management of the box. The GRM focal person will man the box and hold the key. On the box, the IP has to clearly indicate the frequency at which the Box is emptied.
6. An Email System must be created in order for those who have means to communicate to the relevant IP and project stakeholders to raise their concerns, give feedback or register complaint. This email address will be an additional modality of submitting complaints even if the aggrieved person is not on the project activity locations.

Details of Grievance logged

19. While grievances can be submitted anonymously, the more information is made available, the better the Project can respond to the grievances, investigate the matter where necessary, or provide feedback to the aggrieved party. The minimum information that should be made available is the following (except for SGBV/SEA/SH cases, which follow a different process as described below):

Table 2: Details of the grievance log

1) Name of complainant
2) Information on whether the identity of the complainant should remain confidential or can be made available where necessary
3) Contact details: physical address, telephone number, email address
4) Details of the grievance:
- What happened
- Where did it happen
- Parties involved
- Time when it happened
- Supporting documents if available.

20. Submission of incomplete information for a grievance may not allow a case to be investigated or may delay investigations.

GBV/SEA/SH-related Grievance

21. Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and although GBV Specialist will manage all GBV/SEA/SH-related grievances, any other personnel directly receiving such grievances will be trained in

the handling and processing of them in a sensitive and confidential manner. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centred approach from mandatory reporting.

22. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor’s informed consent – report the case to one of the Raja Kaaba’s formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf. Although separate Hotline Number was allocated to the GBV/SEA/SH-related cases, they can still be reported through the general Project GRM – any project staff, staff manning help-desks, through the suggestion box, or through the general GRM Hotline Operator. In addition, the PIU GBV Specialist will dedicate SMS, email address and phone number, through which cases can be reported directly to the PIU.

23. The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a GBV/SEA/SH complaint. At the same time, however, the project can only respond to a GBV/SEA/SH complaint if it is directed into the designated GRM channels. All potential first recipients of GBV/SEA/SH cases will be trained in the guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint (see Annex 7 for guidelines).

24. **Confidentiality:** All grievance recipients and anyone handling the GBV/SEA/SH related grievances must maintain absolute confidentiality in regards to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child’s health and safety. The survivors needs to be informed about these exceptions.

25. **Informed Consent:** The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up (see Annex 8 for informed consent process). Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs), and/or to undertake any action (for instance investigation of the case).

26. Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she/he does not feel comfortable. A survivor can also at any time decide to stop consent.

27. Where possible, the consent form can be used (in cases of direct person-to-person reporting). By signing this form survivor can formally agree (or disagree) with the further processing of the case. The form will clearly state how information will be used, stored and disseminated.

28. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children.

29. **Severe Incident:** If severe incidents are reported through the described GRM pathway, the GRM Operator needs to report the case within 24 hours to the PIU with copy to the World Bank following informed agreement by the survivor.

30. **Third party reports:** In case of any reports of third parties on GBV/SEA/SH – related grievances to the Raja Kaaba’s GRM, the grievance recipient will register the case. The case will then be passed to the GRM focal point, who will make contact to the GBV Specialist, or an advocate that was appointed by the survivor, and will a) request for informed consent from the survivor to follow-up on the case; and b) offer any available referral services. In case the survivor does not provide consent for the case to proceed, the Raja Kaaba has to close the case.

6.2. Step 2: Sort and Process

31. All registered grievances will be transferred to the GRM Focal Point at the respective IP project site, at state level PIU or national level – either by the Hotline Operator, local personnel, or the Helpdesk Officer. The GRM focal point will categorize the complaint according to the table above (section on ‘Categorization of Grievance’). Worker-related grievances will be handed over to a workers’ GRM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the relevant partner has to handle the case appropriately and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be given to all GRM operators and relevant project staff (see below).

32. For grievances handled under the general Project GRM, the GRM Focal Point in collaboration with the local GRC will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

33. The GRM Focal Point will also transfer the grievance information into a more comprehensive grievance register (see annex 2). All contractors must maintain a grievance register. The format should be similar for ease of reporting to the PIU (see Step 5).

34. Where contractors have an existing GRM in place, the GRM will be assessed by the PIU as for its compliance with the Raja Kaaba GRM, and streamlining requested where necessary. The PIU Coordinator will maintain a central grievance register for the logging, management and monitoring of grievances. Where partners wish for complainants to remain confidential, they only have to share the nature of the case and the outcome/resolution with the PIU.

35. It is likely that at the local level, contractors will use books to maintain a record of grievances. The information will then be migrated to a digital platform by contractors or when reported to the PIU. The GRM will then be linked to the Project MIS. All cases will be treated confidentially.

Incident Reporting

36. Severe incidents (an incident that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g. fatality, GBV, forced or child labour) will be reported by the concerned partner - within 24 - to the PIU and the World Bank (see annex 4 for guidance). All staff involved including Civil Contractors will be trained in the detection of ‘incidents’ and in how to report an incident, including severe incidents (see annex 4 and 5).

GBV/SEA/SH

37. All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

38. Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor (see annex 9). If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded, and the case will be considered closed.

39. If the survivor provides informed consent, the grievance recipient should inform the GBV Focal Point / GBV Specialist at the PIU. The GBV Specialist at the PIU will inform the World Bank. The report will be on the anonymised incident as soon as it becomes known to the PIU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the Raja Kaaba; the survivor's age and sex and whether the survivor was referred to other services.

6.3. Step 3: Acknowledgement and Follow-Up

40. The respective GRC will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

41. At all times, the GRM Focal Point will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally. The responses will include the following elements:

Table 3: Responses according to type of case

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	minimal checks and consultations	Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if needed, and communicate outcomes and next steps based on outcomes. 1-3 days
Cases that require some minimal processes	Delete misleading information, collect information, analyse existing information, prepare communication	Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines. 7-14 days.

Type of Case	Actions Required	Response Required
	materials to disclose delayed information, clarify information, and correct misleading information	
Cases that require investigation	access and review of relevant documentation (Reports, policy documentation), field-based fact findings missions (Visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response. 14 - 21 days
Cases that require escalation to PIU SEHD implementation level	Transfer case to relevant higher level (e.g. PIU team)	Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response. 7-14 days
Cases that require referral to other institutions	Transfer case to relevant institution (National Police Service, World Bank)	Acknowledge reception of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress. 7 - 21days

42. All feedback is documented and categorized for reporting and/ or follow-up if necessary.

GBV/SEA/SH

43. Referrals are a process through which the survivors get in touch with professionals and institutions regarding their case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases, where the survivor opts to not pursue the case through the GRM or through legal channels.

44. The grievance recipient explains to the survivor his/her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his/her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

6.4. Step 4: Verify, Investigate and Act

45. The GRM Focal Point will then undertake activity-related steps in a timely manner. The activities will include verifying, investigating, and redress action plan.

Verification

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project. Refer to the Raja Kaaba's PAD, POM, EMSF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance.
- Escalate outright grievances that require high level interventions within the relevant partner.
- Refer outright grievances that are outside the implementing partners to the PIU team and other relevant external institution.
- Resolve: If the complaint is a straight forwards issue that does not require escalation, it is resolved.

46. Once eligibility is determined, the IP/PIU GRM focal person will categorize the complaint into the following categories:

Table 4: Categorization of grievances according to eligibility

Grievance Category	Required Action
Queries, comments and suggestions	Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff. Every project location/district should appoint a grievance redress committee, which includes relevant staff as indicated above (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that Require investigation or interventions of a different kind	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc... All partners should appoint a grievance redress committee, which includes relevant staff (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

Investigation:

- The GRC to appoint an independent investigator (Safeguards Experts, Professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence

- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings, determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the implicated partner has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant's GRM Team
- Provide users with a grievance redress status and update outcome at each stage of redress, (iii) update all relevant partners on grievance redress across the GRM value chain.
- Resolve the issue.

GBV/SEA/SH

47. The PIU GBV Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at other relevant partners in the implementation of the GBV/SEA/SH Action Plan, which contains all information on the GBV/SEA/SH referral system.

48. Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the project GBV Specialist. The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services, and will ensure that the survivor is in safety.

49. Where the GBV/SEA/SH grievance was allegedly committed by an project-related worker, the grievance will be reported to the respective employing agency (IP sub-contractor, PMU, government agency). The PMU GBV Specialist will follow up and determine jointly with the local GRC Focal Point of the respective partner the likelihood that the allegation is related to the Raja Kaaba. The GBV Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g. the worker is removed from his/her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labour legislation, the employment contract, and the code of conduct. The GBV Specialist will report back to the survivor on any step undertaken and the results.

50. Where the survivor has opted to take a formal legal route with the case, the PIU GBV Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

51. Since this Project assumes a fully survivor-centred approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GRM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

52. Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the

perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

53. If the survivor does not want to launch a complaint with the employer (e.g. contractor), the case is closed. If the complaint proceeds, the case is reviewed by GBV Specialist in the PIU and a course of action is agreed on with the respective employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

6.5. Step 5: Monitor, Evaluate and Provide Feedback

54. The local GRM Focal Point in each project location will provide feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

55. Every GRC will report on its GRM to the PIU/PMU team on a monthly basis. Monthly reporting to the PMU should provide information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary. The PIU will undertake the following monitoring actions:

- develop indicators for monitoring the steps of GRM value chain;
- track grievances and assess the extent to which progress is being made to resolve them;
- conduct a stakeholder satisfaction survey for the GRM services
- conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact.
- provide a report on grievance redress actions pertaining to the steps of GRM value chain

The PIU will evaluate the GRM by

- analyzing grievance data to reveal trends and patterns,
- sharing GRM analysis in management meetings; and
- taking corrective action on project implementation approaches to address the grievance

GBV/SEA/SH

56. All entities reporting on GBV/SEA/SH-related cases will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators).

57. Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to

determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

7. GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

58. Beneficiaries and communities should generally be encouraged to report all GBV/SEA/SH cases through the dedicated GBV/SEA/SH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information during stakeholder engagement processes.

59. The GRM Operator, and all other GRM case recipients (staff manning Help-desks, and local personnel) will ensure appropriate responses regarding the complainant/survivor by 1) providing a safe caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agrees, obtain informed consent and make referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

7.1. Survivor-centred approach

60. This Project assumes a strictly survivor-centred approach to GBV/SEA/SH cases. A survivor-centred approach aims to create a supportive environment in which a survivor's rights are respected and in which s/he is treated with dignity and respect. The approach helps to promote a survivor's recovery and his/her ability to identify and express needs and wishes, as well as to reinforce his/her capacity to make decisions about possible interventions.⁴ Key of the survivor-centred approach is that no steps can be taken without the survivor's informed consent.

7.2. Who is Catered For?

61. Regardless of whether the complaint/case is related to the project or not, the GRM operator and other grievance recipients will ensure survivors are informed of and referred to any necessary GBV response services, including at minimum health, psychosocial, and legal support services.

7.3. Training

62. In order to ensure safety, confidentiality and survivor-centred response to GBV/SEA/SH complaint, all relevant staff including local authority, Hotline Operator and contractors will receive training on receiving management of GBV/SEA/SH complaints and referral systems during the initiation phase of their sub-projects and as part of the staff welcome package. The GRM Hotline Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA/SH referral system.

⁴ Global Protection Cluster, Guidelines for Integrating Gender Based Violence Interventions in Humanitarian Action.

8. Workers' Grievance Redress Procedure

8.1. Objectives of the Procedure

63. The objective of this procedure is to settle the grievance between employer and employee or between employees bilaterally before the intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

8.2. Procedure

1. All implementing partners should contract sub- contractors with registered code of conduct or who sign an undertaking to comply with the provisions of the Labour Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
2. Contractors induct the employee on the applicable workers' grievance redress mechanism, and on all relevant workers' rights. All records of induction shall be kept and made available for inspection by the PMU/PIU or the World Bank.
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
4. The supervisor will verify the details and seek to address the matter within the shortest time up to 48 hours.
5. The supervisor will escalate the matter if not resolved within 48 hours until a resolution is found or not found.
6. Where no resolution is found, the employee can either escalate the matter to the 2nd Tier / Appeals mechanisms (see below), or to the sector specific institutions or courts to resolve the matter between employer and employee.
7. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to the 2nd Tier / Appeals mechanism described below.
8. The Contractor shall keep records of all proceedings of grievance redress that are within its jurisdiction and furnish the PMU as part of the periodic progress reporting to the PIU.
9. All grievances of sexual nature (GBV/SEA/SH) experienced by a worker should follow the referral pathways and complaints resolution mechanism laid out in the GBV/SEA/SH Prevention and Response Action Plan. A worker has the right to launch such complaint with any supervisor at any level, and can bypass alleged partner by directly reporting to the PIU. All personnel shall be trained appropriately in the reception of such cases and in providing appropriate referrals.
10. Upon the consent of the survivor, all GBV/SEA/SH cases must also be reported to the implementing partner's Project Manager or the PIU GBV Specialist to allow for appropriate follow-up of organizational SEA mechanisms and for follow-up on the potential violation of the CoC.

11. In case of risk of retribution, the employee may immediately escalate to the court system [6] or to the PMU as noted under [7]. If confidentiality is requested, the PIU will ensure it to avoid any risk of retribution, including in its follow-up actions.

9. Process for Escalation of Grievances / Appeals

64. Where affected parties are dissatisfied with the outcomes of the grievance process handled by the local GRC, or where workers are dissatisfied with the solutions provided by their employer, the parties have the right to escalate the matter directly to the PIU. For this purpose, a phone number, as well as an email address of the PIU are disseminated. Alternatively, aggrieved parties that are dissatisfied with the grievance handling by the employer can contact the Hotline Operator and request to file the grievance directly and explicitly with the PIU, indicating its previous history.

65. Where a negotiated grievance solution is required, the PIU will form a 2nd Tier Grievance Redress Committee, which will consist of one neutral external individual that commands legitimacy for the resolution of conflicts, the PIU Safeguards Specialists, and the Project Manager. The Committee will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

66. Where a grievance is escalated to another institution or level, the complainant will be provided with the appropriate information, including the date it has been escalated, and a decision is expected. Any complainant who is still not satisfied may resort to arbitration or mediation, or the court as last resort.

67. Where aggrieved parties are dissatisfied with the response of the 2nd Tier / Appeals mechanism, they can report cases directly to the World Bank (see below).

68. A grievance is considered closed after an amicable solution has been reached between the complainant and the responding party. However, in some situations the implementing partner or the PIU may 'close' a grievance, even if the complainant is not satisfied with the result. This is the case, for example, where the aggrieved party cannot substantiate the grievance, or where an obvious speculative or fraudulent attempt has been undertaken. In such a circumstance, all steps laid out above will be undertaken before reaching a conclusion. All information will be documented and communicated to the complainant without putting the lives of those who provided information in danger.

69. The implementing partners and the PIU should not dismiss any grievance based on a hasty review and closure of an investigation before the complainant has been notified and given an opportunity to provide additional information. The decision to close such grievances required the endorsement of the GRM Focal Point in the implementing organisation, or the Social Development Specialist in the PIU.

10. World Bank Grievance Redress Service

70. Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and

Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

Annexes

Annex 1: Online GRM Form

https://docs.google.com/forms/d/1mtlVt_Z6u6Fg5-ZlawlOETZld8axwNV2E_wgZVk82JE/viewform?edit_requested=true

Reference No: _____

Details of Complainant:

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Full name: _____

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent Contact

 By Mail: Please provide mailing address:

Gender of Complainant:

Age of Complainant:

Contact Information

Please tick how you wish to be contacted: - E-mail, Telephone, in Person

By Telephone: _____

By E-mail _____

Preferred Communication: Maay, Maxaa tiri, English

One time incident/grievance Date ____/____/____

Happened more than once (how many times) _____

On-going (currently experiencing problem)

Description of Incident or Grievance:

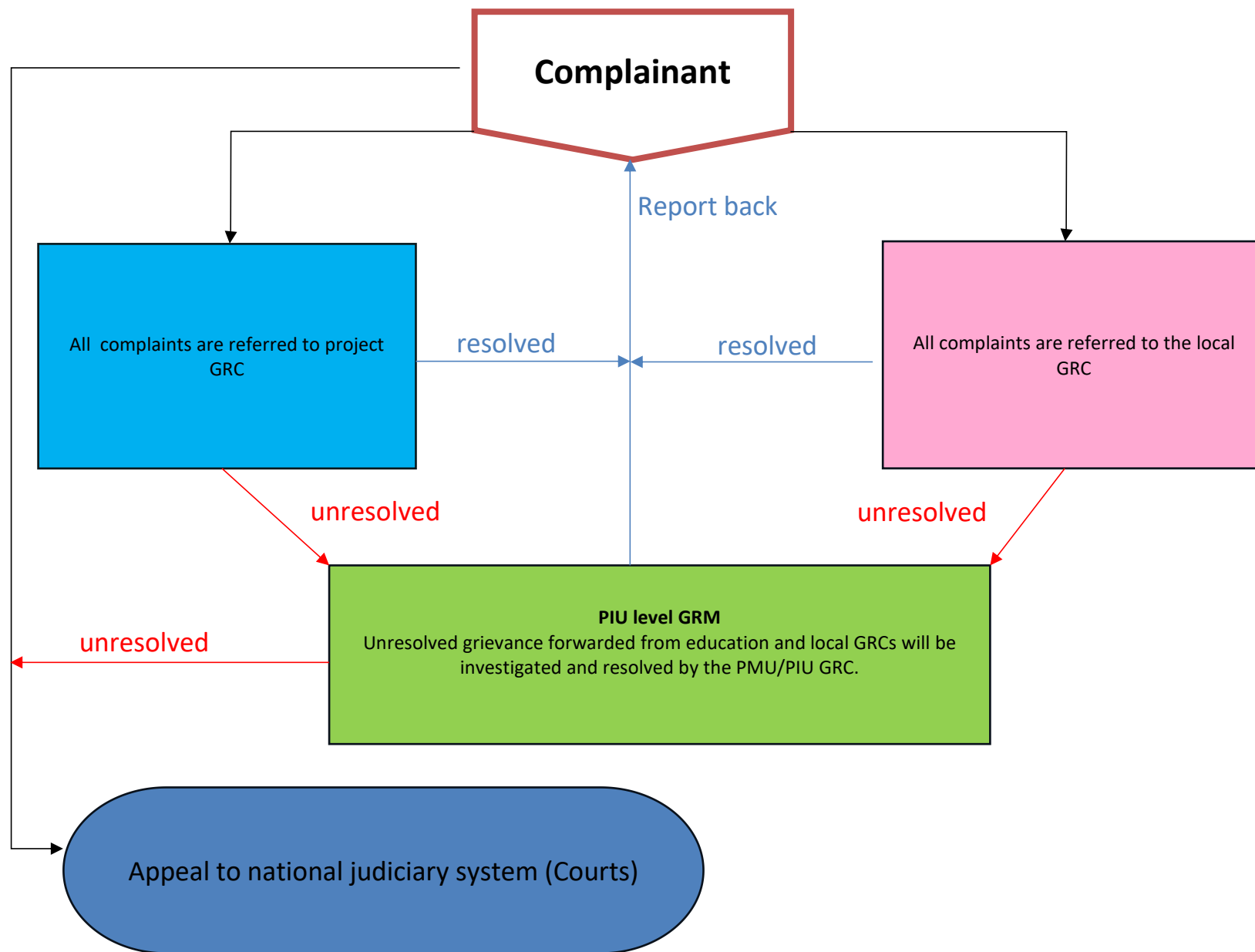
Location of grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Annex 2: Grievance Register

No.	Date grievance received	Ref no	How grievance received? (in person, call centre, implementing partner, staff members, email, complaints box etc.)	Short description of complaint	Who complaint referred to/resolved by	Resolution/Corrective action taken so far or plan (please specify)	Date closed (feedback and agreement from complainant)	Improvements to project made/ planned as a result of complaints received

Annex 3: Raja Kaaba Grievance Redress Mechanisms Flowchart (see more details in the ESMF)



Annex 4: Incident Classification Guide

World Bank Incident Classification Guide:

Indicative
<ul style="list-style-type: none"> • Relatively minor and small-scale localized incident that negatively impact a small geographical areas or small number of people • Does not result in significant or irreparable harm • Failure to implement agreed E&S measures with limited immediate impacts
Serious
<ul style="list-style-type: none"> • An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources • Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents • Failure to remedy indicative non-compliance that may potentially cause significant impacts • Is compel and/or costly to reverse • May result in some level of lasting damage or injury • Requires an urgent response • Could pose a significant reputational risk for the Bank
Severe
<ul style="list-style-type: none"> • Any fatality • Incidents that caused or may cause great harm to the environment, workers, communities or natural or cultural resources • Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed • Failure to remedy serious non-compliance that may cause significant impacts that and/or costly to reverse • May result in high levels of lasting damage or injury • Requires an urgent and immediate response • Poses a significant reputational risk to the Bank

Form

An incident report should contain the following information:

Incident Report Form

Please report any incident within 24 hours to the PIU

Implementing Partner	
Subproject / Activity	
Report Date	
Reported By (Name and Title)	

i. Details of Incident

Incident Date	
Incident Time	
Incident Place	

ii. Identification of Type of Incident and Immediate Cause

1. Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incident: (and incident can cover more than one type):			
Type of Incident – Health & Safety		Type of Incident – Social	Type of Incident - Environmental
Moving Machinery/vehicles at project site	Dust, Fumes, Vapours that impact the population and/or environment	Misuse of project property	Chemical/Oil Spill with impact on population and/or environment
Powered Hand tools	Noise	Damage to Cultural Heritage	Improper Waste Disposal
Hand Tools	Temperature or heat	Occurrence of infringement of labour rights	Disasters (Earthquake, Flood, etc)
Animals or insects	Overexertion	Occurrence of infringement of human rights	Water Pollution/ Sedimentation
Fire or Explosion at project site	Structural Failure	Strike, demonstration	Damage to ecosystems (e.g. damage to flora/fauna)

Trips & smaller falls	Chemical/biological	Other (please specify)	Odour air Emissions
Drowning	Stress	GBV/SEA or Child Risks	Dust, Fumes, Vapours, Air pollution with impact on population and/or environment
Borrow-pit Management	Other (please specify)		Other (please specify)

2. For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

iii. Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc:

iv. Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify:

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		

Improper motivation or attitude		
Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementers

Annex 6: Guidelines for Hotline Operators

The Hotline Operator has to be familiar with the Raja Kaaba Project as a whole; with all IPs implementing the project (including their key contact persons and contact details); the content of these GRM; and the GBV/SEA/SH referral pathways and required responses for such cases.

Furthermore, the Hotline Operators should understand that grievances relating to different risk levels may be treated differently; that GBV/SEA/SH cases have special procedures for redress and require a high level of sensitivity and confidentiality. Furthermore, Hotline Operators should be familiar with the incident reporting system laid out in the ESMF. A dedicated training will be provided initially to the Hotline Operators by the PMU/PIU. For more details see the 'GRM Value Chain' above.

Annex 7: Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint.

Call Answering Protocol for GBV/SEA/SH Cases	
1.	Answer call according to standard script
2.	Ensure confidentiality
3.	Collect intake information
4.	Provide emotional and psychological support
5.	Detect if there is immediate danger for the survivor
6.	Explain informed consent, obtain if survivor agrees
7.	Provide contacts for referral services and assistance to access them where required

Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint	
➤	Listen, inquire, validate, enhance safety and support
➤	Be patient and give compassionate responses to the caller, particularly because the caller is likely to be upset and in distress
➤	Responses should be dealt with in a calm way
➤	Do not make judgements or ask inappropriate questions
➤	Be sensitive to cues survivors may give

Annex 8: Informed Consent Process

Informed Consent Process/Questions for Hotline Operator	
1.	Tell a survivor what is going to happen to him/her.
2.	Explain to him/her the benefits and risks of an intervention (investigation)
3.	Explain that s/he has the right to decline or refuse any part of an intervention
4.	Explain that pressure will not be exerted in any form.
5.	Explain that if the survivor does not want to be interviewed about the event or does not agree to any further investigations, this will NOT affect access to health and other services and does not preclude participation in future proceedings related to legal justice.
6.	Inform the survivor that there is no mandatory reporting in the setting.
7.	Inform the survivor that information about him/her will be discussed in the team.
8.	Inform that the de-identified data for program information purposes
9.	Emphasize the security of client information
10.	Ensure that the survivor understands what you have told him/her.

Annex 9: GBV/SEA/SH Case registration form

GBV/SEA/SH Case Registration Form	
Administrative Information	
	Grievance ID
	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
	Date of grievance registration
	Date of Incident
	Reported by survivor or an escort of the survivor, in the presence of the survivor
	Reported by someone other than the survivor without survivor present
Survivor Information	
	Gender / age
	Location / Residence
	Current civil/marital status
	Occupation
	Location / Residence
	Current civil/marital status
	Occupation
	Is the survivor a person with mental or physical disabilities?
	Is the survivor an unaccompanied or separated child?
	Was the perpetrator related to the project?
	Has Informed consent been provided? yes/no?
	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?
Sub-Section for Child Survivor	
	If the survivor is a child (less than 18 years), does he or she live alone?
	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)
	What is the caretaker's current marital status?
Details of the Incident (in survivor's words)	
	Details of the incident

	<p>Incident location and time</p> <p>Were money, goods, benefits and/or services exchanged in relation to the incident?</p>	
Alleged Perpetrator Information		
	Number of alleged perpetrators	
	Sex of alleged perpetrators	
	Age group of alleged perpetrator(s)	
	Indicate relationship between perpetrator(s) and survivor	
	Main occupation of the alleged perpetrator(s) Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken		
	<p>Was the survivor referred by anyone?</p> <p>Was the survivor referred to a safe house / shelter?</p> <p>Which services does the survivor wish to be referred to?</p> <ul style="list-style-type: none"> - Psychosocial services - Legal services - Police - Health services - Livelihood program <p>What actions were taken to ensure the survivor's safety?</p> <p>Describe the emotional state of the client at the beginning of the report</p> <p>Other relevant information</p>	