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Council for Development and Reconstruction
(CDR)
Project Coordination Unit
(PCU)

Green Agri-food Transformation for Economic Recovery
(GATE)
World Bank Funded Project
(P180334)

Grievance Mechanism (GM)

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Abbreviation:

CBO	Community Based Organization
CBO	Community Based Organization
CCOS	Communication & Community Outreach Specialist
CDR	Counsel for Reconstruction and Development
CSO	Civil Society Organization
E&SS	Environmental and Social Specialist
ES	Environment Specialist
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
FP	Focal Point
GBV	Gender Based Violence
GoL	Government of Lebanon
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GP	Green Plan
ISF	Internal Security Forces
LAC	Labor Arbitration Council
LMP	Labor Management Procedure
MEL	Monitoring, Evaluation and Learning
ML	Ministry Of Labor
MoE	Ministry of Environment
MoA	Ministry of Agriculture

NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PCU	Project Coordination Unit
PMU	Project Management Unit
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Stakeholder Management Plan
SGS	Social and Gender Specialist
ToR	Terms of References
UPEL	Union pour la Protection de l'Enfance au Liban

Part 1: Background and Framework

1. Introduction and Project Context

The Republic of Lebanon, represented by the Council for Development and Reconstruction (CDR) through the PCU, in close coordination and cooperation with Green Plan (GP) and Kafalat, is implementing the Green Agri-Food Transformation for Economic Recovery ("GATE" or "Project"), which is funded by the International Bank for Reconstruction and Development (IBRD, also known as the World Bank). The total cost of the project is Two Hundred Million United States Dollars (US\$ 200,000,000).

The GATE Project aims to improve the resilience of farmers and small and medium enterprises (SMEs) in the Lebanese agri-food sector. It is designed to facilitate access to finance, support climate-smart investments, and restore critical infrastructure services to sustain and enhance the agricultural value chain. Through targeted interventions, the project seeks to increase agricultural productivity, strengthen food security, and promote sustainable economic growth. The project comprises key components focusing on value chain investments, infrastructure development, regulatory improvements, and knowledge management, all aimed at bolstering the resilience of Lebanon's agri-food sector and supporting farmers and SMEs.

The project is committed to establishing and maintaining an effective Grievance Redress Mechanism (GRM) to ensure transparency, accountability, and responsiveness in its operations. The GRM provides project-affected persons and stakeholders with accessible and reliable channels for submitting complaints, queries, suggestions, positive feedback, or concerns related to project activities.

2. Purpose, Objectives and outcomes of the GRM

2.1 Purpose:

The Grievance Redress Mechanism (GRM) aims to provide individuals and communities aggrieved by project activities with accessible, timely, effective, and culturally appropriate opportunities to raise their complaints, concerns, or positive impressions about the project. It also aims to identify, propose, and implement fair and appropriate solutions in response to the complaints and concerns raised.

2.2 The specific objectives are to:

- Establish a system for receiving, recording, and processing complaints and concerns promptly, with particular attention to vulnerable groups.
- Provide an effective, transparent, timely, fair, and non-discriminatory system that allows aggrieved persons to complain and avoid litigation.
- Ensure the sustainability of project interventions and promote ownership among stakeholders.
- Minimize negative publicity and delays in project implementation.
- Provide clarifications in response to requests for information.
- Facilitate project progress by addressing concerns before they escalate.

- Reduce the risk of implementation delays caused by unresolved grievances.
- Minimize the likelihood of lengthy court procedures.
- Help avoid adverse public attention by demonstrating transparency and accountability.
- Encourage the amicable settlement of complaints and avoid, whenever possible, recourse to the courts.

2.3: The outcomes of the GRM:

- **Promote Transparency and Accountability:** Ensure all complaints from direct and indirect affected groups are received, acknowledged, documented, and addressed in a timely and transparent manner.
- **Prevent and Resolve Disputes Early:** Offer accessible, culturally appropriate, and confidential channels for expressing concerns to prevent the escalation of conflicts.
- **Ensure Compliance:** Adhere to World Bank Environmental and Social Standards (ESSs) and national regulations.
- **Minimize Risk:** Reduce the risk of project delays, legal disputes, and reputational harm.
- **Facilitate Continuous Improvement:** Incorporate feedback loops and adaptive management practices to strengthen compliance and enhance responsiveness.

3. Legal and Policy Framework

This Grievance Mechanism (GM) procedure has been developed in alignment with the Environmental and Social Framework (ESF) of the World Bank, national regulations, and GATE-specific instruments.

3.1. Alignment with World Bank Environmental and Social Standards (ESS)

3.1.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts: Manages grievances related to environmental and social impacts, adopting a mitigation hierarchy approach to avoid, minimize, mitigate, and compensate for risks. This includes measures to reduce the scale, intensity, or duration of unavoidable impacts (e.g., dust suppression, noise reduction, and prevention of land degradation).

3.1.2 ESS2: Labor and Working Conditions: Establishes a grievance mechanism for all project workers (direct, contracted, and community workers) to address Occupational Health and Safety (OHS), unpaid wages, contract violations, discrimination, labor rights issues, and SEA/SH. It ensures workers' ability to lodge complaints in a safe, non-retaliatory environment.

3.1.3 ESS3: Resource Efficiency and Pollution Prevention: Addresses concerns related to minimizing pollution (air, water, and land) and promoting efficient use of energy and water.

3.1.4 ESS4: Community Health and Safety: Manages grievances related to the health, safety, and security risks and impacts on project-affected communities, with particular attention to vulnerable people.

3.1.5 ESS5: Land acquisition, Restrictions on Land Use and Involuntary Resettlement: The standard calls for avoiding displacement when possible, reducing impacts, and fairly compensating affected people by preparing and carrying out Resettlement Action Plans (RAPs) when needed.

3.1.6 ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources: Promotes the protection of biodiversity and the sustainable use of living natural resources, requiring implementing agencies to protect and conserve biodiversity and habitats.

3.1.7 ESS10: Stakeholder Engagement and Information Disclosure: Requires an accessible, inclusive, and culturally appropriate grievance mechanism for all project-affected people, ensuring inclusive consultation, transparent communication, and accessible grievance channels.

SEA/SH Good Practice Note (2020): The GM adheres to World Bank guidelines on handling Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) through a survivor-centered approach, including trained focal points, confidentiality, safe reporting channels, and referral to specialized GBV service providers.

3.2. Alignment with Lebanese National Laws

3.2.1 Law No. 205 (December 2020): A landmark legislation that criminalizes sexual harassment and focuses on the rehabilitation of victims. It defines harassment as unwanted, recurring behavior with sexual connotations, including verbal, physical, or electronic actions. The law provides for penalties, including prison sentences and fines, with stricter punishments for supervisors and incidents involving minors.

3.2.2 Law No. 192 (October 2020): Known as the New Water Law or Water Code, it reforms Lebanon's water sector by promoting integrated resource management and regulating usage and pollution.

3.2.3 Decree No. 8633 (2012) on EIA: Provides complementary bases for ensuring environmental integrity.

3.2.4 Law No. 444 (July 2002) on Environmental Protection: Recognizes the right of citizens to a healthy environment, promotes public participation and the right to access environmental information, and supports mechanisms for preventing and resolving environmental conflicts.

3.2.5 Law No. 80 (2018) on Integrated Solid Waste Management: Aims to ensure an integrated framework for solid waste management based on sustainability, awareness, and transparency.

3.2.6 Law No. 558 (1996) on Protected Species: Safeguards specific species like cedar, fir, and juniper, protecting them from cutting.

3.2.7 Decree No. 8735 (1974): Establishes rules for waste disposal, sewage control, and municipal responsibilities to safeguard public health and preserve urban cleanliness.

3.2.8 The Forest Code of 1949 and Law 85 (1991): Provides the basis for the management and protection of forests by the Ministry of Agriculture.

3.2.9 Labor Code of Lebanon (1946 and amendments): Guarantees the right of workers to safe and fair working conditions, prohibits discrimination and harassment in the workplace, and recognizes workers' rights to raise grievances and be protected from retaliation.

3.3. Alignment with Project-Specific Instruments

3.3.1 Environmental and Social Commitment Plan (ESCP, February 2026): Commits the CDR and implementing entities to establish, maintain, and operationalize grievance mechanisms for environmental risk management, workers, and stakeholders throughout the project lifecycle, reiterating the need for SEA/SH-sensitive protocols in line with ESS1, ESS2, ESS4, ESS6, and ESS10. The CDR has hired a Social and Gender Specialist for the Grievance Mechanism to ensure its effective operation.

3.3.2 Labor Management Procedures (LMP, April 2023): Defines the grievance system for direct and contracted worker categories and specifies procedures for GBV case management, worker safety, work conditions, workers' rights and duties, and child labor and gender discrimination. Contractors must comply with ESS2 requirements, prepare an OHS plan, and report incidents to the PCU.

3.3.3 Stakeholder Engagement Plan (SEP, April 2023): Emphasizes community engagement, disclosure, and inclusive feedback channels, outlining the grievance flow, including verbal, written, and digital pathways. GMs constitute a channel for two-way communication between the implementer and stakeholders.

3.3.4 Environmental and Social Management Framework (ESMF, April 2023): Recommends grievance management as a key mitigation and risk management tool while identifying responsibilities for grievance tracking and resolution.

This strong alignment ensures that the GM is not only compliant but also contextually relevant, enforceable, and responsive to the unique sensitivities of the Lebanon GATE Project.

Part 2: GM, Structure and Scope

4. Structure of the Grievance Mechanism

The CDR PCU GM focal Points (Social and Gender Specialist in addition to Environmental Specialist will carry out regular follow-ups throughout the entire project life cycle with all implementing partners such as Kafalat and Green Plan, to ensure that grievances are properly documented in line with ESCP.

To reinforce both internal accountability and external responsiveness, the PCU-CDR Gate Project, in coordination with project Management Units at Green Plan and Kafalat in addition to the Ministry of Agriculture, has established a dual grievance mechanism for workers and stakeholders with special attention to the sensitive cases related to ESA/SH and GVB. This system introduces two distinct yet interconnected grievance channels designed in alignment with World Bank's Environmental and Social Standards, Particularly ESS2, ESS5 and ESS10, it also address all environmental and social impacts or risks from the project's implementation according to ESS1.

4.1. Workers' Grievance Mechanism (ESS2) will cover:

4.1.1. Project Workers: All project-related personnel, including PCU team members, staff from MoA, Green Plan, and Kafalat, consultants, contractors' and sub-contractors' employees, labors, temporary or community-based workers and Incidents of minor child labor and abuse.

4.1.2 Types of Grievances Covered

The Workers' GM under ESS2 is designed to address a comprehensive range of employment-related grievances that may arise throughout the life cycle of the GATE Project. It ensures that all complaints are treated with seriousness, confidentiality, and in line with applicable laws and Social and Environmental standards. Below is a breakdown of the primary categories of grievances that fall within the scope of the GM taking into consideration that the listed issues are not exhaustive, and workers are encouraged to lodge any other type of complaint or concern they may have, even if it is not explicitly mentioned here:

a) Occupational Health and Safety (OHS) Concerns

Occupational Health and Safety (OHS) concerns are among the most critical grievance categories within the GATE Project. These concerns relate to all aspects of a safe and healthy working environment and must be managed in full alignment with both World Bank ESS2 and national labor and safety legislation.

b) Nature of OHS Grievances: The following are examples of OHS-related grievances that workers may raise under the GM:

1. Lack or Inadequacy of Personal Protective Equipment (PPE):

- o laborers, or field personnel not provided with appropriate gear (e.g., gloves, helmets, boots, clothing, eye protection).

- o PPE provided but damaged, expired, or not replaced when needed.
- 2. **Unsafe Working Conditions:**
 - o Workers required to operate in areas with excessive climate and poor air quality without proper risk assessment or mitigation.
 - o Hazardous equipment used without proper training.
 - o Inadequate site safety protocols during works prevention or land management tasks.
- 3. **Lack of Emergency Preparedness:**
 - o Absence of First Aid kits or trained personnel on site.
 - o No emergency response tools.
 - o Workers not trained in emergency safety, first response, or evacuation procedures.
- 4. **Inadequate Supervision or Safety Oversight:**
 - o Supervisors failing to enforce safety rules.
 - o Unsafe practices tolerated or encouraged in order to save time or reduce cost.
- 5. **Exposure to Harmful Substances or Environments:**
 - o Contact with harmful pesticides or chemicals used in vegetation clearing.
 - o Lack of protection from biological risks (e.g., smoke inhalation, tick bites, snake encounters in forested areas).
- 6. **Injuries and Lack of Medical Attention:**
 - o Work-related injuries not reported or recorded.
 - o Delays or refusal in granting medical leave or compensation for work-related incidents.

4.1.3 Confidentiality, Non-Retaliation, and Protection

- Workers raising OHS grievances are protected against retaliation. Supervisors or contractors attempting to silence or punish workers will be subject to disciplinary or legal actions under project rules.
- Workers can submit anonymous complaints through grievance boxes, third-party representative (if applicable), or phone/email.
- If an unresolved grievance or if a grievance relates to gross negligence or life-threatening practices, the case may be escalated directly to the PCU management and, if needed.

4.1.4 Training and Awareness:

To ensure effective implementation:

- All workers (including temporary laborers) will receive OHS training and orientation on how to use the GM.
- Visual materials (infographics, posters in Arabic) will be posted at all work locations to explain:
 - o Their right to a safe work environment.
 - o The procedure to report unsafe conditions.

- o Contact information for the OHS focal point and grievance entry channels.

Terms and Conditions of Employment including Unpaid Wages, Contracts, or Working Hours:

This category addresses all grievances related to **working conditions**, including compensation, working hours, contract enforcement, and associated financial obligations. Such grievances are frequent in project-based employment contexts, especially involving contractors, consultants, or representative workers. Ensuring prompt and fair resolution is vital to prevent labor rights violations and uphold World Bank **ESS2** standards and Lebanese labor law.

4.1.5 Common Types of grievance

1. Delayed or Non-Payment of Wages:

- o Workers not paid on scheduled dates as per their contract or labor laws.
- o Deductions from salaries without explanation or justification.

2. Wage Disputes or Underpayment:

- o Salaries paid lower than agreed upon or advertised in job terms.
- o Inaccurate calculation of daily/weekly/monthly wages, including overtime.

3. Unclear or Missing Employment Contracts:

- o Workers employed verbally or without proper documentation.
- o Contracts lacking clear information on duties, duration, salary, benefits, or termination conditions.

4. Excessive or Unrecorded Working Hours:

- o Workers asked to work beyond legal daily or weekly limits without rest or overtime pay.
- o Required to work on holidays or rest days without prior consent or additional compensation.

5. Violation of Leave and Rest Provisions:

- o Denial of annual, sick, or emergency leave rights.
- o No rest periods or breaks during extended workdays in the field.

5. Alignment with legal and policy framework

- Lebanese Labor Law sets clear regulations on:
 - o Minimum wage (adjusted periodically by the Council of Ministers).
 - o Maximum working hours (typically 8/day or 48/week).
 - o Overtime compensation (at least 50% above standard rate).
- The **Labor Management Procedures (LMP)** for this project require:
 - o Written contracts for all workers and code of conduct.
 - o Transparent payroll systems.

- o Monitoring of contractor labor practices by the CDR, and its consultants and contractors.

6. Preventive measures

- Before contract execution, all contractors must:
 - o Submit proof of wage systems and payment procedures.
 - o Attend orientation on labor compliance and grievance handling.
- Periodic spot-checks will be conducted by the PCU's E&S specialists and the lawyer to:
 - o Review payroll records.
 - o Verify random worker testimonies.
 - o Ensure accurate timekeeping and wage payments.

7. Discrimination, Sexual Exploitation, abuse and harassment SEA/SH and GBV

SEA/SH: Any form of Sexual Exploitation, Abuse, or Harassment by project workers or related to project activities, including Gender-Based Violence (GBV) incidents.

Discrimination and harassment in the workplace violate the core principles of **World Bank ESS2**, Lebanese labor law, and international labor standards. This grievance category ensures protection for all workers, regardless of status, gender, age, ethnicity, religion, disability, or background, and establishes clear, confidential, and survivor-centered mechanisms for reporting.

a. Target Group:

- Contracted workers
- Direct workers (including consultants)
- Women workers
- Migrant workers
- Contractors' and sub-contractors' employees

b. Objectives:

- Ensure that workers can voice concerns or complaints without fear of retaliation.
- Provide a safe and confidential platform for reporting grievances related to employment conditions, occupational health and safety, incidents of sexual exploitation and abuse/sexual harassment (SEA/SH), and labor rights violations.
- Promote compliance with Lebanese labor law and World Bank ESS2 standards.

c. Operational Features:

- Managed by designated grievance mechanism (GM) focal points within the Council for Development and Reconstruction (CDR), , and the Ministry of Agriculture (MoA).
- Workers may submit grievances anonymously, verbally, or in writing through various channels, such as phone, email, or in person.
- All grievances will be logged into a confidential registry, assigned a tracking code, and followed up within a standard resolution timeframe (typically 15 working days).
- SEA/SH-related cases will be referred immediately to trained gender-based violence (GBV) service providers under a survivor-centered protocol and will not be investigated internally.
- Appeals or unresolved grievances may be escalated to a neutral third party.

8. Workers' Grievance Mechanism (GM) Flow

This Worker Grievance Mechanism WGM must be managed separately from the stakeholders' level mechanism as follows:

1. Intake

- Workers can submit grievances through:
 - Suggestion boxes at worksites
 - The Social and Environmental Specialists assigned by Consultants and site Supervisors' firm.
 - Dedicated hotline/email/letter
 - Worker representatives or unions (if applicable)

2. Receipt & Registration

- The complaint is recorded immediately in the Grievance Register at the CDR, as well as in the onsite log (both digital and paper formats)
- Each grievance assigned a unique ID.
- Acknowledgment sent to the worker within 2 days from registration of complaint.

3. Screening & Categorization

- The Grievance Focal Point (Social and Environmental Specialists) at the contractor and consultant level is responsible for screening and classified the complaint as follows:
 - Category A: Minor issues (pay slips, overtime records, leave requests).
 - Category B: Serious issues (harassment, discrimination, unsafe conditions).
 - Category C: Urgent issues (safety hazards, violence and humiliation).

4. Investigation

- Category A: Complaints resolved promptly by the consultant or supervisor onsite, with written acknowledgment signed by the complainant.

- Category B/C: A formal investigation team, led by the S&GS, is established by the Social and Environmental Specialists at the consultant, supervisor, and PCU levels, with the inclusion of worker representatives where applicable
- Confidentiality maintained to protect complainant.

5. Resolution & Response within 15-20 working days

- Proposed resolution shared with worker.
- Worker can accept or appeal.
- If accepted → resolution implemented.
- If appealed → escalated to the PCU-GRM Committee and CDR Board or external mediation, in accordance with the kind of Appeal.

6. Closure

- Resolution documented in Grievance Register.
- Worker signs off (or notes disagreement).
- Case officially closed or escalated to higher levels (e.g., higher authorities, independent review, or external mediation such the Labor Arbitration Council LAC)

7. Monitoring & Reporting

- Quarterly reports on:
 - Number of grievances
 - Resolution timeframes
 - Trends and recurring issues (e.g., consistently delayed payments and shortage of safety equipment. Etc.)
 - Reports sharing with relevant grieved parties.
 - Lessons learned and recommendations

8.1. How Anonymous Grievances Are Managed

1. Intake

- Anonymous complaints are accepted through channels such as suggestion boxes, hotlines, or digital forms that do not require personal details.
- Each case is recorded in the Grievance Register with a coded ID and marked as “anonymous.”

2. Assessment

- Anonymous submissions are treated as valid grievances, even without a named complainant.
- They are categorized by type (e.g., environmental, labor, SEA/SH/GBV, resettlement).
- Severity is assessed based on the content of the complaint, not the identity of the complainant.

3. Resolution

- Investigations proceed as they would for any grievance.
- Corrective measures are taken if the issue is substantiated (e.g., addressing unsafe conditions, tackling harassment patterns).
- SEA/SH/GBV cases are handled with extra caution, recognizing that survivors may remain anonymous due to fear of retaliation.

4. Monitoring & Reporting

- Anonymous grievances are included in monitoring reports.
- They are reported as “anonymous cases,” with issue details and resolutions, but without personal identifiers.
- Trends are analyzed; repeated anonymous complaints on the same issue may indicate systemic problems.

5. Closure

- A case is closed once corrective action is taken and documented.
- Since no complainant is identified, there is no sign-off step.
- Closure is confirmed by management and verified through monitoring follow-up.

8.2 Key Principles

- **Accessibility:** Stakeholders must feel safe to report without fear of retaliation.
- **Confidentiality:** Even anonymous complaints are protected.
- **Equal treatment:** Anonymous grievances are investigated with the same seriousness as named ones.
- **Learning focus:** Anonymous complaints often highlight sensitive issues (e.g., harassment, corruption) that people may fear to report openly.

In summary: Anonymous grievances are accepted, logged, investigated, and reported just like any other complaint—but without personal identifiers or sign-off from a complainant. They are especially important for sensitive issues where individuals may fear retaliation.

9. Stakeholders' Grievance Mechanism (ESS10) will cover:

1. *Project-Affected Parties:* Any individual, group, or community experiencing actual or potential adverse impacts from the project, including local communities, habitants, affected individuals, civil society organizations, local authorities, and vulnerable groups.

2. *Authorized Representatives:* Representatives, such as NGOs, community leaders, can file Complaints on behalf of affected people or legal counsel, provided there is written proof of authority.

a. Target Group:

- Local communities, targeted individuals, and households

- Municipalities and community-based organizations (CBOs)
- Environmental NGOs, civil society organizations, and local activists
- Affected individuals or households (e.g., farmers, landowners)
- Vulnerable or marginalized populations (e.g., women, youth, elderly, refugees)
- Other individuals or institutions impacted by project activities.

b. Objectives:

- Provide transparent and accessible channels for individuals and groups to raise concerns related to the project's design, consultation, implementation, environmental and social impacts, exclusion risks, or SEA/SH incidents.
- Foster trust, accountability, and early dispute resolution between project stakeholders and implementers.
- Ensure responsiveness to feedback and enhance project legitimacy and sustainability.

c. Operational Features:

- Overseeing the Grievance Mechanism is the Social & Gender Expert from the CDR Project Coordination Unit (PCU). In this role, they coordinate closely with the PCU Environmental Specialist and the Communications and Community Outreach Specialist, as well as the social and environmental teams at both Green Plan and Kafalat.
- Complaints can be submitted through written complaints template via supervisors/consultants, workers groups, women associations, email or mail, in person or indirectly through partner civil society actors.
- A Grievance Logbook will be maintained at the PCU Level, Project Management Units (PMU) of Green Plan, Kafalat, by environmental and social (E&S) specialists/GM-trained personal to document all complaints, actions taken, timelines, and outcomes. This log will be centralized and archived at the CDR-PCU folders.
- Grievances must be acknowledged within (2) two working days from registration date and ideally resolved within 15 working days and official response send within 20 working days.
- SEA/SH-related complaints will follow confidential, survivor-led referral protocols and will be managed separately by trained female personnel (Environmental Specialist in closed coordination with Social and Gender Specialist).

9.1. Stakeholders Grievance Mechanism Flow

1. Intake

- Multiple accessible channels: hotline, email, grievance boxes, community focal points, in-person.
- Grievance logged in Grievance Register with coded ID (to protect confidentiality).
- Categories include:
 - Land acquisition/resettlement
 - Compensation and RAP implementation
 - Environmental impacts (pollution, waste, noise, dust, vibrations etc..)

- Labor issues (wages, safety, working conditions, equipment etc...)
- Discrimination: (women, displaced people, refugees etc...)
- Harassment/abuse (verbal, physical, sexual)
- SEA/SH/GBV

2. Acknowledgment

- Complainant receives confirmation of receipt within 2 working days from registration.
- Timeline for resolution communicated within 15-20 working days.
- For SEA/SH/GBV: acknowledgment is confidential and survivor-centered though a special protocol.

3. Assessment & Categorization

- Grievance classified by severity:
 - Minor (routine issues, quick fixes)
 - Moderate (systemic issues, require management action)
 - Critical (SEA/SH/GBV, land disputes, safety hazards)
 - Assigned to relevant Focal Point or escalated immediately if critical.

4. Resolution Process

- Investigation conducted.
- Options for resolution identified and discussed with complainant.
- Corrective actions implemented (e.g., compensation, disciplinary measures, environmental mitigation).
- SEA/SH/GBV cases handled confidentially, with referral to survivor support services.

5. Monitoring & Reporting

- Quarterly reports prepared, covering:
 - Number of grievances received
 - Resolution timeframes vs. service standards
 - Trends and recurring issues (patterns across cases)
 - Perspectives and recommendations
 - Reports shared with management, worker representatives, and relevant grieved parties (with confidentiality safeguards).

6. Closure

- Resolution documented in Grievance Register.
- Complainant signs off (or notes disagreement).
- Case marked as closed or escalated if unresolved.
- SEA/SH/GBV cases closed only after survivor's needs are addressed.

7. Feedback & Learning

- Closed cases feed into monitoring reports.
- Lessons learned used to improve RAPs, environmental management, labor practices, and codes of conduct
- Continuous improvement loop established.

10. Scope and Applicability of GM:

The Grievance Mechanism (GM) mainly applies to two groups with special attention to sensitive people.

10.1 Workers:

a) Occupational Health and Safety (OHS) risks, payment delays, unpaid wages and overtime, contract disputes, discrimination, unfair termination contract without a fair reason and following proper procedures, and violations of employment terms and conditions.

b) Unsafe exposure to dust or noise, air/water pollution, improper waste disposal, vibrations and any relevant negative impacts on the workers during work

c) Verbal harassment (insults, threats), physical abuse (violence, intimidation), and sexual harassment or abuse towards women and children. These cases are considered high severity and must be addressed urgently, with clear escalation pathways.

10.2 Stakeholders:

Project-Affected Parties: Any individual, group, or community experiencing actual or potential adverse impacts from the project, including local communities, habitants, affected individuals, civil society organizations, local authorities, and vulnerable groups.

a) Exclusion from consultations, lack of project information, inadequate consultation processes, marginalization from project benefits, project workers' behavior towards local communities.

b) Air/water pollution, improper waste disposal, noise, dust, vibrations, logging, and land access, impacts on biodiversity, damage of roads and to cultural resources, community health and safety concerns, unauthorized private land usage.

c) Redress, adopt and implement the respective RAPs and land use restriction prior to taking possession of the land and related assets, full compensation has been provided and [as applicable] displaced people have been resettled, and moving allowances have been provided.

10.3: SEA/SH Grievance Protocol for workers and stakeholders:

The SEA/SH (Sexual Exploitation, Abuse, and Harassment) Grievance Protocol is a dedicated, survivor-focused system required under World Bank ESS2 (for workers) and ESS10 (for communities and stakeholders). Unlike standard grievance procedures, it emphasizes immediate safety and referral to specialized support rather than lengthy internal investigations.

At the PCU-CDR level, the Environmental Specialist (female), who manages SEA, SH, and GBV-related grievances oversee this process. **The protocol requires:**

- Separate intake channel and register
- SEA/SH/GBV complaints must be received through a confidential, dedicated channel (e.g., hotline, focal point, sealed box).
- They are recorded separately from routine grievances to ensure privacy and specialized handling.
- Confidentiality
- Survivor identities are protected at all times.
- Names and personal details are never disclosed in reports or registers; cases are anonymized or coded to prevent stigma or retaliation.
- Survivor-centered approach
- The survivor's safety, dignity, and choices guide the process.
- Survivors decide whether to pursue investigation, referral, or closure.
- Immediate access to medical, psychosocial, and legal support is prioritized.
- Zero tolerance
- SEA/SH/GBV cases are treated as serious violations requiring urgent action.
- Complaints are escalated immediately to the PCU-GRM Committee and, if necessary, external authorities or mediators.
- Strict disciplinary measures must be enforced against perpetrators.
- Transparency with discretion
- Monitoring reports include the number of SEA/SH/GBV cases and actions taken.
- No identifying information is shared, ensuring accountability while protecting survivors.

Part 3: Operational Procedures

11. Core Attributes of an Effective GRM

The GATE Project GRM is designed to be:

Accessible: Easily available to all stakeholders, with clear procedures and multiple channels for submitting grievances, including for vulnerable groups.

Collaborative: Encouraging dialogue and joint engagement between complainants, project staff, and relevant institutions.

Expeditious: Ensuring timely acknowledgment, investigation, and resolution of grievances to maintain trust and credibility.

Effective: Providing fair and meaningful solutions through joint fact-finding, negotiation, and problem-solving.

Confidential: Ensuring the protection and dignity of all complainants, especially in sensitive cases, treating all submissions with respect.

Inclusive: Enabling all stakeholders—particularly vulnerable groups—to raise concerns without fear of retaliation.

12. Grievance Eligibility Process and responsibilities

12.1 Complaint Eligibility

To be eligible, a complaint must demonstrate the following:

- a. **Environmental and Social Impacts:** Concerns about land use, pollution, community health, or environmental damage caused by project activities.
- b. **Project Implementation Issues:** Delays, poor quality of works, or failure to deliver promised services.
- c. **Access and Inclusion:** Complaints about exclusion of eligible beneficiaries or unfair targeting in project-supported programs.
- d. **Compliance with Safeguards:** Violations of the Environmental and Social Management System (ESMS) or World Bank Environmental and Social Standards (ESS).
- e. **Community Concerns:** Grievances raised by individuals or groups directly affected by GATE interventions (e.g., farmers, cooperatives, local residents). Complainants allege they have been or will be adversely affected by the Operation.

12.2 Exclusions:

Certain types of complaints are not eligible under the GATE grievance mechanism and are redirected elsewhere:

- a. Projects not financed by the World Bank;
- b. Fraud and Corruption: These are referred to the World Bank’s Institutional Integrity Vice Presidency (INT).
- c. Staff Grievances: Employment or HR-related matters (e.g., salaries, promotions, and workplace disputes) are handled internally by HR units.
- d. Procurement Appeals: Complaints about bidding or contract awards follow the World Bank’s procurement complaint mechanism, not the GRM.
- e. Insignificant Complaints: While such grievances may be considered insignificant, specific issues raised in anonymous submissions can still be referred to the GRM Focal Points for follow-up if they highlight concrete concerns.
- f. Complaints Unrelated to GATE: Any grievance not connected to the project’s activities, impacts, or commitments.

13. Procedure Grievance Management

Step 1: Submission and Receipt

The Social and Gender Specialist(SGS) will be in charge to ensure that the key principles of the project GM are adequately implemented and documented through establishing a separate grievance mechanism for Sexual Exploitation Abuse /Sexual Harassment sensitive complaints, managing the SEA/SH GM and report on its implementation that will be handled by the Environmental Specialist at PCU with separate channel and follow the related Protocol. For other type of Grievances, the SGS will be receiving those Grievances first, and then will refer the complainant to the relevant focal point (consultant, site engineer, lawyer or and external competent agency as per the consent of the complainant.

The grievance shall be investigated, and an Investigation Report shall be prepared and issued by the CDR PCU Social and Gender Specialist (SGS) after coordinating with relevant people, within 15 working days from registration of the grievance. The SGS is responsible to delegate the investigation to relevant team member, consultant or supervisor based on the type of grievance received except the sensitive complaint that should be handled secretly, following its private and special intake channel, protocol and register, and coding as well.

To this end, grievance may be submitted through multiple channels. All complaints—whether received verbally via hotline, through template and in-person visits, meetings, or as comments on Websites, Media and Social Media—must be promptly recorded using the official template. To this end, every complaint should adhere to the specific intake channels as mentioned below to meet the following requirements:

- All verbal complaints must be documented using the official template available on the CDR, Green Plan, and Kafalat websites or created Social Media accounts or that will be created.
- The hotline cellphone number should be maintained separately to avoid congestion at CDR central.
- The Grievance Mechanism allows not only grievances but also open to receive queries, suggestions, positive feedback, and concerns.

The **Communications and Community Outreach Specialist** is authorized to monitor social media platforms and press coverage, and may establish official project social media accounts to enhance visibility. In addition, the Specialist will be responsible for monitoring the online grievance and feedback system in collaboration with the Social and Gender Specialist.

Step 2: Acknowledgment and Screening

- The complainant receives from the Social Gender Specialist and the Environmental Specialist for the sensitive case, acknowledgment of receipt within two (2) working days and (24) hours Max for survivor.
- The grievance is verified by the SGS and ES for special cases and with the help of the Lawyer at PCU team to confirm details and eligibility.
- It is recorded in the logbook to ensure proper tracking. For this purpose, both the Social & Gender Specialist and Environmental Specialist will maintain a dedicated record register, along with the CDR Secretariat. The matter may be referred to relevant and competent entities for clarification.

- The grievance is screened to assess its relevance and categorized (e.g., minor, complex, sensitive, SEA/SH).
- Complainants can submit grievances without disclosing their identity.
- The GRM Unit records and processes these grievances while protecting confidentiality.

Step 3: Investigation and Addressing the Grievance

The Social and Gender Specialist take action by:

- Conducting an investigation into the issue.
- Contacting relevant stakeholders and official entities to obtain feedback.
- Requesting clarification or additional information from the complainant if needed.
- Except workers grievances that have its proper procedure as well as for SEA/SH cases, a separate, confidential protocol is followed immediately (see Part 4).

Step 4: Decision and Response

- A written response with the findings and proposed resolution is formulated and sent to the complainant within 20 days.
- Any decision should give special attention to vulnerable people such as women, children, youth groups, persons with special needs, and refugees.
- The target for resolution is within 15 working days of receipt.

Step 5: Complainant Feedback and Follow-up

- The complainant's satisfaction with the resolution is required immediately after the response.
- The implementation of the agreed-upon resolution is monitored and followed up by the Social Gender Specialist.

Step 6: Escalation

- If the grievance is not resolved at the complainant, community, or sensitive group's level; It can be escalated to higher authorities or oversight bodies with the help of a lawyer member of the PCU-GRM Committee.
- This step guarantees accountability and a second layer of review, as following:
 - **Missing Information (Intake):**
 - Focal Point must make two (2) separate requests for information if the initial filing is incomplete.
 - **Final Deadline:** If no response is received within 15 working days of the second request, the case is automatically closed.
 - **Complainant Review (Solution Seeking):**
 - The Complainant has 10 working days to accept or reject a Proposed Response Plan.
 - **Definition of "Day":**
 - All timelines refer to Working Days (Monday–Friday), excluding public holidays.
 - **Documentation:**
 - No case can be closed without a signed Closure Statement or a formal Final Decision Letter.

Step 7: Documentation and Learning

- Documentation and preparation of a lesson learned case that outlines the steps taken to avoid similar grievances or queries.
- Inspirational success stories will be shared and published in partnership with the Communication and Community Outreach Specialist, once recruited.

14. GRM procedure: Roles, and Timeframes

Role	Key Responsibilities	Primary GRM Stage(s)
GRM Focal Point (Social and Gender Specialist and Environmental Specialist, Lawyer)	Primary point of contact; receives, logs, and acknowledges complaints; tracks timelines; maintains the GRM Registry.	Intake, Monitoring, Closure
Social, Environmental and Legal Specialists	Investigates complex technical issues; provides expert input for the Proposed Response Plan.	Evaluation, Solution Seeking
Grievance Redress Committee (GRC)	Reviews escalated or high-risk cases; makes final determinations; ensures impartial outcomes.	Evaluation, Solution Seeking
Monitoring & Evaluation (MEL) Specialist	Audits the GRM process for compliance; analyzes trends in complaints for systemic improvement.	Monitoring Corrective Action
Project Manager	Ultimate coordination for the system; approves major remedies and coordinates with other agencies under GATE Project	Closure

Part 4: Special Protocols for SEA/SH

15. Protocol for Sexual Exploitation, Abuse, and Harassment (SEA/SH)

This protocol ensures all SEA/SH, complaints are handled with highest sensitivity, confidentiality, and a survivor-centered approach. Both grievance tracks are equipped with dedicated, confidential, and secure reporting channels.

15.1. Key Principles of a SEA/SH GM

Accessibility, Transparency, and Non-Discrimination: A SEA/SH GM must be accessible to all potential complainants and its operation should be transparent. Accessibility should be sensitive to gender, age, disability, and other potential contextual barriers. The principle of non-discrimination should be respected when receiving, processing, and referring the allegation.

Survivor-Centered Approach: All prevention and response actions must balance respect for due process with the requirements of a survivor-centered approach under which the survivor's safety, confidentiality, choices, needs, and well-being remain central. The SEA/SH GM should also include processes that protect the rights of the alleged perpetrator, including confidentiality.

Safety: The survivor's physical and psychological safety, as well as that of their family, remains a priority at all times.

Confidentiality: Confidentiality should cover all information in a complaint that may lead to the identification of a specific incident or those affected. This applies to the survivor, witnesses, and the identity of the alleged perpetrator. Information gathered about the allegation should not be shared without the complainant's explicit permission and only on a strict need-to-know basis. Reports to the Bank and PCU shall only include an anonymized summary.

Considerations Regarding Children and Persons with Special Needs: When the survivor is a child (under 18), the best interests of the child is the governing principle. Children are considered incapable of providing consent. Similar additional safeguards may apply where the complainant or survivor is a person with intellectual disabilities.

15.2. Roles and Responsibilities for SEA/SH Cases

The GM Responsible (mainly the Environmental Specialist in coordination with Social & Gender Specialist) is accountable for:

- a. Receiving, sorting, and logging allegations (anonymously).
- b. Referring all survivors who come to the GM to relevant GBV service providers or partner.
- c. Notifying the CDR-PCU and the World Bank of the allegation in line with pre-established information-sharing protocols.

The SEA/SH trained people (the Environmental Specialist) in close coordination with the Social Gender Specialist are responsible for determining whether the allegation:

- Falls within the definition of SEA/SH.
- Whether the alleged perpetrator is associated with the Project.
- Where they determine that the allegation amounts to SEA/SH and the alleged perpetrator is associated with the Project, with the survivor's consent, they shall refer the allegation to PCU-CDR, copying the World Bank, and the competent authorities if required by domestic law.

Trained Focal Points: A designated and trained Female Environmental Specialist at the PCU will serve as the primary intake point for SEA/SH complaints. She will collaborate closely with the Female Social and Environmental Specialists at Green Plan and Kafalat. All related logs will be maintained and handled with strict confidentiality.

15.3. Reporting Protocol for SEA/SH Incidents

Receipt: Complaint is received by a trained SEA/SH focal point.

Immediate Support: The survivor is offered immediate referral to specialized, confidential medical, psychosocial, and legal services. Their consent is required for any information sharing (see Annex 2: Consent Form).

Internal Reporting: An anonymized summary of the allegation is reported to the PCU and the World Bank within 48 hours, followed by a detailed report within 10 working days outlining the case status, survivor support measures, and mitigation actions taken.

Determination: The focal points determine if the allegation falls under the definition of SEA/SH and if the alleged perpetrator is associated with the project.

Referral for Action: With the survivor's consent, the case is referred to the PCU and competent authorities for appropriate action against the alleged perpetrator.

Follow-up: The S&GS follows up to ensure the survivor has access to services and monitors the overall situation while maintaining confidentiality.

Part 5: Tools, Templates, and Implementation Aids

16. Grievance Submission Channels

A grievance can be raised in the following ways:

- **Hotline:** one dedicated to stakeholders another to workers, including SMS and WhatsApp: To be launched and announced later.
- Another Hotline devoted only to SEA/SH grievances to be launched and communicated later
- **Phone Call:** +9611980096 Ext: 443 for stakeholders and workers from 9:00 am to 3:00 pm
- **Phone Call:** +9611980096 Ext: 258 dedicated for SEA/SH grievances
- **Fax:** 01981255
- **Email:** grm.gate@cdr.gov.lb for stakeholders.
- **Email:** worker.GM.GATE@cdr.gov.lb for workers.
- **Email:** SEASH.GM@cdr.gov.lb for SEA/SH and GBV grievances.
- **Letter or Petition:** Send to CDR physical address: Tallet al Serail - Riad el Solh, Beirut, Lebanon or by Post: PO Box: 3170/11
- **In-Person Visit:** Field visits and follow-up meetings with beneficiaries.

- Through Communities: Relevant municipalities, unions, and directly affected people.
- Via Women's Groups and Relevant Specialized Associations.
- Associations that defend Children's Rights.
- Through representatives of Persons with Special Needs.
- Press: Newspapers and TV. (through the Communications and Community Outreach Specialist)
- Social Media: By launching a hashtag #GATE (since the Ministry and Green Plan have Facebook Accounts).
- Community Focal Points: Local NGOs, municipalities, and religious institutions trusted by communities.
- Project Website: <https://www.cdr.gov.lb/en-US/Studies-and-reports/GATE-2025.aspx>

17. Grievance Log

In line with the Terms of Reference (ToRs), the Social & Gender Specialist at the PCU-CDR will be responsible for maintaining a centralized Grievance Log. Each implementing partner (Green Plan, Kafalat, and MoA) will maintain its own grievance log, which will be regularly consolidated into the central registry managed by the PCU. This process will be overseen and handled jointly by the Social Specialist at PCU-CDR, Green Plan, Kafalat, and MoA

Field	Description
<i>Case Number</i>	<i>Unique identification number</i>
<i>Date Received</i>	<i>The date the complaint was officially received</i>
<i>Receiver</i>	<i>Name of the person or staff member who accepted the complaint</i>
<i>Channel</i>	<i>Where/how the complaint was received (e.g., telephone, email, in-person etc..)</i>
<i>Complainant Details</i>	<i>Name and contact information (if provided/not anonymous)</i>
<i>Content of the Claim</i>	<i>Detailed description of the grievance, suggestion, or inquiry</i>
<i>Acknowledgment</i>	<i>Whether the complaint was acknowledged (Y/N), Date of acknowledgment, and Method</i>

Field	Description
<i>Expected Decision Date</i>	<i>A deadline for resolution</i>
<i>Decision Outcome</i>	<i>Details on the resolution, including names of participants in the decision</i>
<i>Communication of Decision</i>	<i>Date, method, and to whom the decision was communicated</i>
<i>Satisfaction Status</i>	<i>Whether the complainant was satisfied (Y/N). If no, notes on appeals</i>
<i>Follow-up Actions</i>	<i>Any further actions required, by whom, and by when</i>

18. Intake and Reporting Templates

18.1. Quick Grievance Intake Form (over the phone/Hotline)

(This short form is for initial intake by S&G specialist)

Case Number: _____ Date Received: _____

Received By: _____

Complainant Name/ID (if willing): _____ Role/Status: _____

Nature of Complaint: SEA/SH Labor Environmental Community Other: _____

Brief Description of Incident:

Immediate Needs: Medical Psychosocial Protection Other: specify

Next Steps: Referred to: _____ | Confidentiality explained: Yes

Staff Signature: _____

18.2. Printable Intake Form for Grievance Redress Mechanism (GRM)

Grievant Information:

Name: _____

Contact Information (Phone/Email): _____

Preferred Language: _____

Date of Submission: _____

Grievance Details: _____

Project Name/ID: _____

Description of Grievance: _____

Date of Incident: _____

Location of Incident: _____

Supporting Documents Attached (Yes/No): _____

Sensitive Group Status: (determined by the Specialist)

Person belongs to any vulnerable or sensitive group? (Yes/No): _____

If yes, please specify _____

Preferred Resolution: _____

What outcome are you seeking? _____

Acknowledgment:

I confirm that the information provided is accurate to the best of my knowledge.

Signature: _____

Date: _____

18.3. Grievance Resolution Template

Case Number: _____

Date Filed: _____

Complainant Name/ID: _____

Role/Status (beneficiary, community member): _____

1. Background

Outline of the situation leading to the complaint. _____

Relevant program, department, or activity. _____

2. Allegation

Nature of the complaint (SEA, SH, misuse of resources, retaliation). _____

Date and location of alleged incident(s). _____

Parties involved and Role of each _____

3. Investigation

Steps taken to verify the complaint (interviews, document review, site visits..).

Findings and evidence collected.

Confidentiality measures applied.

4. Resolution

Actions taken (disciplinary measures, corrective actions, reassignment, suspension, etc.).

Support provided to complainant (psychosocial, medical, legal etc..).

Communication of outcome to complainant while maintaining confidentiality.

5. Follow-up

Monitoring measures to prevent replication.

Training or awareness sessions conducted.

Policy or procedural changes implemented.

6. Sign-off

Specialist Name & Signature: _____

Date: _____

Specialist/Manager Approval: _____

18.4. Grievance Reporting Template (Workers)

Category of grievances	Number of grievances received in the reporting period (eg. Jan – June)		Number of grievances closed in the stipulated timeframe in the reporting period	Total number of grievances received since the beginning of the project	Number of grievances closed in the stipulated timeframe since the beginning of the project	Total number of open grievances	Number of grievances Open more than 30 days
TOTAL							
	W	M					
Channels most often used (gender disaggregated)	•			• # women / # men			
	•			• # women / # men			
	•			• # women / # men			
	•			• # women / # men			

18.5. Grievance Reporting Template (Stakeholders)

Category of grievances	Number of grievances received in the reporting period (eg. Jan – June)		Number of grievances closed in the stipulated timeframe in the reporting period	Total number of grievances received since the beginning of the project	Number of grievances closed in the stipulated timeframe since the beginning of the project	Total number of open grievances	Number of grievances Open more than 30 days
TOTAL							
	W	M					
Channels most often used (gender disaggregated)	•			• # women / # men			
	•			• # women / # men			
	•			• # women / # men			
	•			• # women / # men			

19. Conclusion:

The Grievance Mechanism (GM) incorporates several measures to ensure the confidentiality and protection of complainants, particularly in sensitive cases such as sexual exploitation and abuse:

1. **Anonymous Reporting Options:** The GM provides channels for anonymous complaints, allowing individuals to report incidents without revealing their identities. This is crucial for encouraging victims to come forward without fear of retribution.
2. **Confidentiality Protocols:** Strict protocols are in place to safeguard personal information shared by complainants. Only designated personnel involved in the resolution of complaints have access to this information, and all case details are handled discreetly to maintain confidentiality.
3. **Training and Capacity Building:** Social and Gender Specialist in addition to the Environmental one are responsible for managing grievances receive specialized training on sensitive topics, including sexual exploitation and abuse. They are guided on how to handle complaints with sensitivity and respect, ensuring that complainants feel safe and supported throughout the process. The Grievance Mechanism may also include training and capacity-building initiatives for stakeholders, helping them better understand their rights and the grievance process, thereby enhancing their engagement. This approach not only empowers stakeholders but also fosters a sense of ownership among affected communities.
4. **Protection Against Retaliation:** The GM includes measures to protect complainants from retaliation or harassment as a result of their complaint. Clear policies are established to address any retaliatory actions and to safeguard the rights of those who report misconduct.
5. **Support Services:** The GM may also facilitate access to support services for complainants, such as counseling or legal assistance. This ensures that individuals are supported throughout the grievance process, which is especially important in cases of sexual exploitation and abuse.
6. **Awareness and Outreach:** The GM includes initiatives to raise awareness among stakeholders about their rights and the mechanisms available for filing grievances. This helps build trust and encourages broader participation from the community.
7. **Collaboration with Local Organizations:** Collaborating with local NGOs and community organizations can help in reaching out to various community members, ensuring that the process is community-driven and more inclusive.
8. **Regular Monitoring and Review:** The GM may be subject to regular reviews and audits to ensure that confidentiality protocols are being followed and that the safety of complainants is being prioritized. This ongoing assessment helps to identify and mitigate any potential risks to complainants and raise success stories and lessons learned as well.

20. Annexes

Annex 1: Key Definitions

Community: might be a geographically defined group, such as a village or a neighborhood that receives block grants to design and implement its own local development plans. It also can range from a groups of people is simply informed about a project (Indirect Affected community) to a collective that actively makes decisions and manages project activities (Direct Affected).

Children: In line with Article 1 of the United Nations Convention on the Rights of the Child, any person under the age of 18. Allegations involving a child must be addressed with additional safeguards.

Complainant: Any individual, group of individuals, or community that believes they have been or will be adversely affected by a World Bank-financed project, or their authorized representative.

Project-Affected Parties: Individuals, groups, or communities experiencing actual or potential adverse impacts, including environmental, social, health, safety, or economic harms.

Authorized Representatives: Representatives (NGOs, community leaders, legal counsel) filing complaints on behalf of affected people with written proof of authority.

Workers: Project workers, including direct and contract employees, with grievances related to labor management, working conditions, or sexual exploitation/abuse.

Gender-based Violence (GBV): An umbrella term for any harmful act perpetrated against a person's will based on socially ascribed gender differences. It includes acts inflicting physical, sexual, or mental harm, threats, coercion, and other deprivations of liberty.

Sexual Exploitation and Abuse (SEA): Any actual or attempted abuse of a position of vulnerability, power imbalance, or trust for sexual purposes. Sexual abuse entails actual or threatened physical acts of a sexual nature by force or in unequal power dynamics.

Sexual Harassment (SH): Any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

Survivor: A person who has experienced the SEA/SH incident.

Individuals Associated with a World Bank Project: Includes any worker employed with World Bank funding, consultants, security personnel, PIU/PCU staff, contractors, and anyone to whom the project's GBV requirements apply.

Annex 2: Specific Grievance Template for ESA/SH

CONFIDENTIAL SEA/SH INCIDENT REPORTING FORM

Project: Green Agri-food Transformation for Economic Recovery (GATE)

Strictly Confidential – Restricted Access

1. ADMINISTRATIVE INFORMATION (To be completed by the Specialist)

Case Reference Code: [SEA-GATE-XXX] (Do not use the survivor's name in the public log)

Date Received: [DD/MM/YYYY]

Reporting Channel: Hotline Female Focal Point Anonymous Box Other: _____

2. SURVIVOR INFORMATION (Only if provided voluntarily)

Age of Survivor: Under 18 (Minor) Over 18 (Adult)

Gender: Female Male Other

Is the survivor a: Project Worker Community Member Other: _____

Contact Method (Secure): _____

(Ask: "How can we safely reach you without putting you at risk?")

3. NATURE OF THE ALLEGATION (Check only what applies)

Sexual Exploitation: (Exchange of money, goods, or services for sex/favors)

Sexual Abuse: (Non-consensual physical sexual act or threat)

Sexual Harassment: (Unwelcome sexual advances, comments, or physical touch in the workplace)

4. PROJECT LINK

Is the alleged perpetrator linked to the GATE Project?

Yes (Contractor, Staff, Consultant, or Partner Agency)

No / Unknown

If yes, provide name/employer (if known safely): _____

5. IMMEDIATE REFERRAL (Mandatory Step)

Has the survivor been informed of available services (Medical, Legal, Psychosocial)? Yes No

Did the survivor consent to a referral? Yes No

Referral made to ABAAD KAFA RDFL Medical Center other: _____

Date Referral Completed: [DD/MM/YYYY]

6. INFORMED CONSENT & SIGNATURE

I authorize the GATE Project GRM to use this anonymous information for reporting to the World Bank and to take administrative action against the perpetrator (if linked to the project).

I do not want my name shared with any third party, including the employer of the perpetrator.

Signature / Thumbprint (Optional): _____ Date: _____

Grievance Focal Point Signature: _____ Date: _____

Handling Instructions for Staff:

- **Immediate Notification:** Notify the PMU Social Specialist and the World Bank within 24 hours max using only the Case Reference Code.
- **Storage:** Keep this paper form in a locked cabinet. Do not scan it into a shared digital folder.
- **No Investigation:** Your role is to Refer, not to Investigate. Professional service providers (like ABAAD or KAFA) handle the investigation/support.

Annex 3: Consent Form for Release of Information (SEA/SH)

Consent for Release of Information

This form should be read to the complainant (if other than the alleged survivor) in her/his first language and clearly explained that she/he has the right to choose between the given options.

I, the undersigned, _____, hereby authorize the Project Coordination Unit for GATE at CDR to disclose information related to the incident I have reported. This authorization permits the exchange of information among the Internal Security Forces, the Ministry of Labor (Labor Inspection Unit), the Ministry of Health, the Ministry of Social Affairs, the Union pour la Protection de l'Enfance au Liban (UPEL), KAFA, and the Project Coordination Unit (PCU-CDR), and/or the Project Implementation Units (Green Plan, Kafalat), with the victim assistance service provider organization(s) of my choice. The purpose of this information sharing is to facilitate my access to support services, including those related to safety, health, psychosocial well-being, and/or legal matters.

I understand that all shared information will be treated with confidentiality and respect, and will only be disclosed as necessary to provide the assistance I request.

I also acknowledge that I retain the right to withdraw or change my consent regarding information sharing with the designated agency or focal point listed below at any time.

I would like information to be released to the following: (please tick all that apply):

Type of intervention	Yes	No
Police	<input type="checkbox"/>	<input type="checkbox"/>
Health/Medical Services (specify): _____	<input type="checkbox"/>	<input type="checkbox"/>
Psychological aid (specify): _____	<input type="checkbox"/>	<input type="checkbox"/>
Shelter (specify): _____	<input type="checkbox"/>	<input type="checkbox"/>
Legal Aid (specify): _____	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify type of service and name of agency): _____	<input type="checkbox"/>	<input type="checkbox"/>

1. Authorization to be marked by complainant: Yes No
(or parent/guardian if complainant is under 18)

Furthermore, I give my permission to share information about the incident I have reported with the Project SEA/SH Specialist to determine if the case relates to the project.

2. Authorization to be marked by complainant: Yes No

(or parent/guardian if complainant is under 18)

I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared.

3. Authorization to be marked by complainant: Yes No

(or parent/guardian if complainant is under 18)

Signature of complainant: _____

Name of caregiver if Complainant is minor: _____

Contact Number: _____

Address: _____

SEA/SH Complaint Intake Focal Point/Specialist Code: _____ Date: _____

Annex 4: Worker Grievance Template (GATE)

Complaint ID (Internal Use Only): _____

1. Worker Information

Full Name: _____

Worker Type:

Direct Worker (PCU/Agency Staff)

Contracted Worker (Employed by Contractor/Subcontractor)

Community Worker:

Job Title/Position: _____

Employer Name: _____

Contact Details (Phone/Email/Address): _____

Preferred Method of Contact: _____

2. Confidentiality & Safety

Confidentiality: Do you wish for your identity to remain confidential?

Yes [] No []

Retaliation Concerns: Do you have any fear of retaliation for filing this complaint?

Yes [] No (If yes, please specify your concerns: _____)

3. Grievance Details

Type of Issue (Check all that apply):

Unpaid wages or benefits

Occupational Health & Safety (OHS) / Working conditions

Discrimination or unfair treatment

Sexual Exploitation, Abuse, or Sexual Harassment (SEA/SH)

Breach of Code of Conduct

Other: _____

Description of the Event: Provide dates, locations, and a clear summary of the issue.

Evidence: List any supporting documents or witnesses (if any).

4. Desired Outcome

How would you like to see this issue resolved?

Signature: _____ Date: _____

Submission & Next Steps

- Submitting: The form may be submitted through the CDR Website under GATE Project GRM Services, via the Social Specialist at the contractor or site supervisor level at the project office onsite, or through the dedicated hotline, email, in person at the CDR Secretariat, by dedicated mail to CDR P.O. BOX 3170/11, or through the worker suggestion box and the Consultant and site Supervisor
- Acknowledgment: You will receive a formal receipt and a case number within 2 working days.
- Response: within 20 working days
- Appeals: If you are unsatisfied with the project-level resolution, you have the right to submit an appeal directly to the PCU CDR.
- **Note on SEA/SH Complaints:** For grievances involving sexual exploitation, abuse, or harassment, the system is designed to be survivor-centered and strictly confidential and will be referred to specialized support services immediately.

Annex 5: Code of Conduct for Contractor’s Worker (GATE)

Preamble:

Within the framework of the GATE Project, funded by the World Bank, implemented by the Council for Development and Reconstruction (CDR), we, the Contractor [insert Contractor’s name], have entered into an agreement with [insert Employer/Worker’s name] for [insert description of the Works/Projects]. These Works will be carried out at [insert Site and other relevant locations].

Our contract obliges us to implement measures to address environmental and social risks associated with the Works, including risks of sexual exploitation, sexual abuse, and sexual harassment. This Code of Conduct forms part of our risk-management measures and the Labor Management Plan (LMP).

It applies to all our staff, laborers, and employees at the Works Sites or any other locations where the Works are undertaken. It also extends to subcontractor worker and any other individuals assisting in the execution of the Works. All such individuals are referred to as “Contractor’s Workers” and are bound by this Code of Conduct.

This Code of Conduct outlines the standards of behavior expected from all Contractor’s Workers. Our workplace must remain free from unsafe, offensive, abusive, or violent behavior. Every individual should feel secure and empowered to raise concerns or issues without fear of retaliation.

Required Conduct:

Contractor’s Workers shall:

1. Carry out his/her duties competently and diligently;
2. Comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of the Contractor’s Worker and employee;
3. Maintain a safe working environment, according to ESS2 requirement of the World Bank framework, including by:
 - a) Ensuring that workplaces, machinery, equipment and processes under each worker’s
 - b) Control is safe and without risk to health;
 - c) Wearing required personal protective equipment (PPE);
 - d) Using appropriate measures relating to chemical, physical and biological substances and; and
 - f) Following applicable emergency operating procedures.
4. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. Treat other people with respect and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;

6. Not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Worker;
7. Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation according Labor Management Procedures (LMP)
8. Not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;
9. Not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. Complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. Report Code of Conduct violations and file grievances through the proper channels;
12. Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

Raising Concerns: if any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her; he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact the focal point designated by CDR-PCU [enter the name] with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases,) in writing at this address[] or by telephone [] or in person at []; or
2. Call [] to reach the focal point hotline and leave a message. The complainant's identity will be kept confidential. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the persons who experience the alleged incident, as appropriate. The contractor will guarantee no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. The retaliation would be a violation of this Code of Conduct.

Consequences of Violating the Code of Conduct: Any violation of this Code of Conduct by Contractor's Worker may result in serious consequences, up to and including termination and possible referral to legal suite or case.

For Contractor's Worker: I have received a copy of this Code of Conduct written in Arabic language that I comprehend. I understand that if I have any Grievance about this Code of Conduct, I can contact [enter name of Contractor's contact person(s)/site supervisor/Focal Point (CDR) who can handling those types of cases.

Name of Contractor's Worker: [insert name]

Signature: _____ Date

(day/month/year/): _____

Countersignature of authorized representative of the Contractor: Signature:

_____ Date

(day/month/year/): _____

Annex 6: Grievance Template for Stakeholders:

Green Agri-Food Transformation for Economic Recovery Project (**GATE**)
Implementing Agency: Council for Development and Reconstruction (CDR)

1. COMPLAINANT CONTACT INFORMATION

Full Name: _____

ID or Passport Number: _____

Gender: Male Female Other

Address / Community: _____

Phone Number: _____

Email: _____

Preferred Method of Contact: Phone Email WhatsApp Mail

Note on Anonymity: You have the right to remain anonymous. If you choose not to provide your name, please ensure you provide at least one secure way for the project team to send you a response (e.g., a generic email or phone number).

2. REPRESENTATIVE DETAILS (If applicable)

If you are submitting this on behalf of someone else or a community.

Representative Name: _____

Relationship to Complainant: _____

Contact Details: _____

Please attach a signed Letter of Authorization if possible.

3. DETAILS OF THE GRIEVANCE

Date of Incident: _____

Location: _____

Type of Grievance (Tick all that apply):

Environmental (Dust, noise, water, waste..etc)

Social (Land access, property damage, community health)

Labor (Wages, safety, working conditions)

SEA/SH (Sensitive: Sexual Exploitation, Abuse, or Harassment)

Other: _____

Description of the Issue, Please explain

- what happened
- Who was involved?
- Any harm caused or expected?

4. DESIRED OUTCOME

How would you like to see this issue resolved?

5. PREVIOUS EFFORTS TO RESOLVE

Have you raised this with anyone else (contractor, local authority, Green Plan, Kafalat, Ministry of agriculture, Cooperative Directorate)? Yes No

If yes, please specify and what was the result _____

6. CONFIDENTIALITY & SIGNATURE

Keep my identity confidential from third parties (Contractors, etc.).

I fear retaliation for making this complaint.

Signature: _____ Date: _____

SUBMISSION CHANNELS

Complaints for the GATE Project can be submitted through the following official channels:

Email: GRM.GATE@cdr.gov.lb

In-Person: Register a letter at the CDR Offices, Tallet al Serail, Beirut, Lebanon.

Phone: 01-980096 Ext: 334 (Monday to Friday, 9:00 AM – 3:00 PM).

Hotline:

Online: Use the CDR Grievance Form available on their website link: <https://www.cdr.gov.lb/en-US/Studies-and-reports/GATE-2025.aspx>

Attached Documents: (photos, documents, designs, petition...etc.)

Next Step: Once submitted, you will receive an Acknowledgment of Receipt within 2 working days, and a proposed resolution within 15-20 working days.

Annex 7: Sample Grievance Scenarios and Resolutions (GATE)

Scenario 1: Allegation of Sexual Exploitation and Abuse (SEA)

Grievance: A community member reports that a staff member offered aid in exchange for sexual favors.

Resolution Approach:

- Immediately acknowledge and register the complaint confidentially.
- Refer the case to the safeguarding focal point for investigation.
- Provide psychosocial support and protection to the survivor.
- Suspend the accused staff member pending investigation.
- Conclude with disciplinary action if allegations are substantiated, and communicate outcome to complainant while maintaining confidentiality.

Scenario 2: Workplace Harassment (SH)

Grievance: An employee reports repeated inappropriate comments from a supervisor.

Resolution Approach:

- Document the complaint through the grievance mechanism.
- Conduct a neutral investigation with HR and safeguarding officers.
- Offer counseling and ensure the complainant is not retaliated against.
- Provide training to the supervisors and issue formal warning or disciplinary measures.
- Monitor workplace environment to prevent recurrence.

Scenario 3: Misuse of Aid Resources

Grievance: A beneficiary alleges that aid distribution staff are favoring relatives.

Resolution Approach:

- Investigate distribution records and interview witnesses.
- If favoritism is confirmed, reassign staff and correct distribution lists.
- Communicate transparently with the community about corrective measures.
- Strengthen monitoring and accountability systems.

Scenario 4: Child Protection Concern

Grievance: A child reports being pressured to perform tasks beyond their capacity in exchange for school supplies.

Resolution Approach:

- Treat the complaint with heightened safeguards under child protection protocols.
- Ensure immediate safety of the child and provide psychosocial support.
- Investigate the allegation discreetly.
- Take corrective action against responsible staff or volunteers.

- Reinforce child-safeguarding training across the program.

Scenario 5: Retaliation against a Complainant

Grievance: A staff member who filed a complaint reports being excluded from meetings and denied opportunities.

Resolution Approach:

- Investigate retaliation claims separately from the original grievance.
- Reinforce anti-retaliation policies with management.
- Restore the staff member's access to opportunities.
- Apply disciplinary measures against those engaging in retaliation.

Annex 8: Sample Grievance Case Studies (GATE)

Case Study 1: Allegation of Sexual Exploitation and Abuse (SEA)

Background: A community member reports that a staff member offered food assistance in exchange for sexual favors.

Allegation: Sexual exploitation by a staff member during aid distribution.

Investigation: Complaint documented confidentially; safeguarding focal point initiated inquiry; survivor provided psychosocial support.

Resolution: Staff member suspended pending investigation; allegations substantiated; disciplinary action taken including termination; survivor protection measures reinforced.

Follow-up: Community informed of corrective measures; safeguarding training strengthened.

Case Study 2: Workplace Harassment (SH)

Background: An employee reports repeated inappropriate comments and jokes from a supervisor.

Allegation: Sexual harassment in the workplace.

Investigation: HR and safeguarding officers conducted interviews; evidence corroborated by colleagues.

Resolution: Supervisor issued formal warning and required to attend mandatory training; complainant offered counseling and reassured against retaliation.

Follow-up: Workplace monitored for compliance; grievance mechanism reinforced.

Case Study 3: Misuse of Aid Resources

Background: A beneficiary alleges that aid distribution staff are prioritizing relatives over others in need.

Allegation: Favoritism and misuse of aid resources.

Investigation: Distribution records reviewed; interviews conducted; favoritism confirmed.

Resolution: Staff reassigned; distribution lists corrected; transparent communication with community.

Follow-up: Monitoring systems strengthened; accountability procedures updated.

Case Study 4: Child Protection Concern

Background: A child reports being pressured to perform tasks beyond their capacity in exchange for school supplies.

Allegation: Exploitation of a child in aid program.

Investigation: Safeguarding protocols activated; child provided immediate protection and psychosocial support; discreet inquiry conducted.

Resolution: Responsible volunteer removed; corrective measures implemented.

Follow-up: Child safeguarding training reinforced across program staff.

Case Study 5: Retaliation Against a Complainant

Background: A staff member who filed a complaint reports being excluded from meetings and denied opportunities.

Allegation: Retaliation following grievance submission.

Investigation: Separate inquiry conducted; exclusion confirmed.

Resolution: Anti-retaliation policies enforced; staff member's access restored; disciplinary measures applied to those responsible.

Follow-up: Awareness sessions held on non-retaliation, grievance mechanism reviewed for effectiveness.

Annex 9: GM Procedures Leaflet

Grievance Mechanism Procedures in a Glance

Green Agri-Food Transformation for Economic Recovery (GATE)

(P180334)

A project financed by the World Bank, Managed by the CDR in Coordination with
MoA-Green Plan and KAFALAT

Objective:

A Grievance Mechanism is a structured framework that provides project-affected parties with accessible channels to submit grievances, queries, suggestions, positive feedback, and concerns regarding any aspect of a project, including its environmental and social performance. All submissions are received through designated channels and addressed in a timely and transparent manner.

Keys Principal:

- Protect the Confidentiality. Anonymity and Non-Retaliation of complaints and treat them with dignity and respect for their needs or concerns.
- Adopt accessible, collaborative, expeditious, and effective approaches in resolving complaints and challenges through dialogue, joint fact –finding, negotiation, and problem solving.
- A leaflet or and Presentation will be consistently publicized during all stakeholder engagement activities (consultation and follow up meetings, focus group discussions, field visits...etc)
- The grievance should be filled in by using the relevant template published on the CDR website in AR and EN.

Eligible types of complaints:

- Complaints related to a) **Workers' Grievance** b) **Stakeholders' Grievance**.
- Complaints related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).
- Complaints related to labor conditions, child labor, minor child abuse, and gender discrimination.
- Complaints related to injuries or fatalities from major accidents.
- Environmental impacts (air pollution, water pollution, logging, etc.).
- Nuisance factor (noise, dust, vibrations, etc.).
- Complaints related to restricted use of land (in or near landfills, waste facilities, etc.).
- Any other suggestion or complaint within the Project scope is also gladly welcomed.

N.B: All complaints that do not pertain to GATE Projects and are not financed by the World Bank shall be excluded.

How do I submit a Grievance?

A grievance can be raised in the following channels:

- Exclusive hotline, WhatsApp, email contacts, and customized templates intended for:
 - ESA/SH and GBV
 - Workers
 - Stakeholders
- Email for ESA/SH and GBV: SEASH.GM.GATE@cdr.gov.lb
- Email for workers: : worker.GM.GATE@cdr.gov.lb
- Email for stakeholders: grm.gate@cdr.gov.lb
- Phone call (CDR) (01980096 Ext :
 - (334) Social and Gender Specialist or,
 - (258) Environmental Specialist and SEA/SH, and
 - (382) Legal Specialist.
- Fax (CDR): 01981255
- In person: Letter or/and petition registered officially at the CDR Secretariat (Tallet al Serail - Riad el Solh, Beirut, Lebanon)
- CDR website : <https://www.cdr.gov.lb/en-US/Studies-and-reports/GATE-2025.aspx>
- Through grievance boxes at workplaces

Grievance Handling Process: within 15-20 working days

- Receive and register grievance/complain/suggestion and positive feedback.
- Acknowledge receipt and inform the complainant about the process within two (2) working days.
- Inform the World Bank Team regarding major accidents or and incidents cases within two (2) working days.
- Clarify or and request more information from the complainant within 2 working days if needed.
- Screen and assess the relevance of claim and investigation.
- Contact the concern stakeholders and officials entities to get the feedback and relevant answer within 10 working days.
- Formulation and send written response within 20 working days.
- Get feedback on the response and resolution from the complainant.
- Suggestions and follow up on the implementation of resolution by the Social and Gender or Environmental Specialists and the Legal Specialist.
- Unresolved grievances can be escalated via the PCU-GRM Committee at CDR to higher authorities or oversight bodies, using the same channels.