



# **GRIEVANCE REDRESS MECHANISM MANUAL**



**REPUBLIC OF SIERRA LEONE  
MINISTRY OF FINANCE**

**SIERRA LEONE SECOND FINANCIAL  
INCLUSION PROJECT**



**REPUBLIC OF SIERRA LEONE**

**MINISTRY OF FINANCE**

**BANK OF SIERRA LEONE**

**GRIEVANCE REDRESS MECHANISM MANUAL**

**FOR THE**

**SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (P177947)**

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## **LIST OF ABBREVIATIONS**

ACC	Anti-Corruption Commission
BSL	Bank of Sierra Leone
CID	Central Intelligent Division
CERC	Contingent Emergency Response Component
E&S	Environmental and Social
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FSU	Family Support Unit (of the Sierra Leone Police Force)
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanisms
GoSL	Government of Sierra Leone
GRC	Grievance Redress Committee
GRS	Grievance System
M&E	Monitoring and Evaluation
MFIs	Micro Finance Institutions
MMOs	Mobile Money Operators (MMOs)
MoF	Ministry of Finance of Sierra Leone
MSMEs	Micro Small and Medium Scale Enterprises



MTNDP	Medium-Term National Development Plan
NBFIs	Non-Bank Financial Institutions
NCPWD	National Commission for Persons with Disability
NSFI	National Strategy for Financial Inclusion
PAP	Project Affected Persons
PDO	Project Development Objective
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PSC	Project Steering Committee (PSC)
PWD	Persons with Disabilities
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SL	Sierra Leone
SLUDI	Sierra Leone Union on Disability Issues
SLSFIP	Sierra Leone Second Financial Inclusion Project
SMEDA	Sierra Leone Small and Medium Enterprises Development Agency
SOP	Standard Operating Procedure
TA	Technical Advisor
Telecoms	Telecommunication Companies
USD	United States Dollars
WHO	World Health Organisation



## **A. INTRODUCTION**

### **1. BACKGROUND**

The Government of Sierra Leone has received a grant of US\$40 million to implement the Sierra Leone Second Financial Inclusion Project (SLSFIP) which aims to support the development of an inclusive financial system in line with the strategic objectives of Sierra Leone's Medium-Term National Development Plan (MTNDP) 2024 – 2030 and the National Strategy for Financial Inclusion (NSFI) 2022–2026. The Project Development Objective (PDO) of the SLSFIP is to promote a more inclusive and resilient financial sector for individuals and micro, small, and medium-sized enterprises (MSMEs).

The scope of the project is specifically geared towards building resilience to economic, financial, and climate-related shocks with DFS access to finance interventions and strengthening institutional capacity and systems of the BSL.

The project's beneficiaries are Sierra Leoneans and MSMEs who are currently not financially included and will benefit from an improved payment and credit infrastructure, financial education, and consumer protection. However, some individuals may be adversely affected (or about to be affected) by development projects. These individuals should be able to raise their grievances and dissatisfactions about actual or perceived impacts to find a satisfactory solution. Not only should Project Affected Persons (PAPs) and other stakeholders be able to raise their grievances and be given an adequate hearing but also satisfactory resolution should be found that mutually benefit both the complainant and the project.

It is equally important that aggrieved persons have access to legitimate, reliable, transparent, and efficient institutional mechanisms like a Grievance Redress Mechanism (GRM) that are responsive to their complaints. It is within this context and in line with the World Bank Environmental and Social Framework (ESF) requirement that the Grievance Redress Mechanism (GRM) will be established to guide the resolution of complaints in a timely and consistent manner to prevent conflicts and tensions and litigation as well as build strong and effective long-term relationships with stakeholders in the financial sector, affected persons and communities.



## **2. PROJECT COMPONENTS**

The project will finance activities to support financial inclusion in Sierra Leone over five years with investments and TA. The project's scope is specifically geared toward building resilience to economic, financial, and climate-related shocks with DFS access to finance interventions, and strengthening institutional capacity and systems of the BSL. Under Component 1, the project will support activities to facilitate the adoption and usage of transaction accounts, expand digital financial access points, and further develop the National Payment System (NPS) infrastructure. Under Component 2, the project supports establishing a subsidized line of credit (for no more than two years) and, if macroeconomic conditions improve, a more sustainable line of credit for MSMEs. Component 3 supports project management and monitoring and evaluation (M&E); Component 4 is the Contingent Emergency Response Component (CERC).

## **3. PROJECT BENEFICIARIES**

The main project beneficiaries are Sierra Leoneans and businesses currently not financially included. A specific focus is on targeting women and women-owned enterprises to reduce disparities in access to finance for women and Persons with Disabilities (PWD

S). Direct beneficiaries of the project will include:

- i.** Individuals and businesses that will benefit from an improved payment and credit infrastructure, financial education, and consumer protection.
- ii.** Individuals and businesses that will benefit from the new products and services available under the project including residents of rural areas, through facilitating expansions of financial access points.
- iii.** Sierra Leonean MSMEs owners who will benefit from increased access to credit.
- iv.** Financial institutions that will utilize the improved payments and credit infrastructure, and those that benefit from the LOC and strengthened lending capabilities. Mobile money operators will benefit from increased use of their e-money services and expansion of their agent network.
- v.** BSL and the Ministry of Finance will benefit from progress on their financial inclusion targets, better cash management through digitalization of government payments, and institutional capacity building





## **B. GENERAL BACKGROUND AND CONTEXT**

Based on initial stakeholder engagement and consultation done during the development of the Environmental and Social Management Plan (ESMP) for the project

People adversely affected (or about to be affected) by a development project will raise their grievances and dissatisfactions about actual or perceived impacts to find a satisfactory solution. These grievances, influenced by their physical, situational (e.g., employment), and/or social losses, can surface at different stages of a project cycle. Some grievances may arise during the project design and planning stage, while others may come up during project implementation. Not only should Project Affected Persons (PAPs) and other interested parties be able to raise their grievances and be given an adequate hearing but also satisfactory solutions should be found that mutually benefit both the complainant and the project. It is equally important that aggrieved persons have access to legitimate, reliable, transparent, and efficient institutional mechanisms that are responsive to their complaints. It is against this background, and in line with the World Bank Safeguard Policy requirement the Grievance Redress Mechanism (GRM) is established to guide the resolution of complaints in a timely and consistent manner to prevent conflicts tensions, and litigation at the law court; as well as build strong and effective long-term relationships with affected persons and communities.

Essentially, the Grievance Mechanism (GM) will assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. It will ensure a transparent and credible process for fair, effective resolution of grievances thereby building trust and cooperation among stakeholders.

Specifically, the GM will:

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Avoids the need to resort to judicial proceedings as a way of seeking redress; and
- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during project implementation.



## 1. INTRODUCTION

This document guides the management of complaints and grievances under the Sierra Leone Second Financial Inclusion Project (SLSFIP). The purpose is to provide a suitable and accessible grievance redress mechanism (GRM) for the SLSFIP that can be applied to meet the World Bank's ESF and national requirements. In specific, the purpose of this GRM includes the following:

- To give guidance to the Sierra Leone Second Financial Inclusion Project (SLSFIP) about the establishment and management of the GRM system effectively and efficiently.
- To help stakeholders and the affected communities understand what they should expect from the SLSFIP
- To educate project-affected people and other stakeholders on how to lodge their complaints.
- To promote a mutually constructive relationship between local communities, Bank of Sierra Leone (BSL) facilitating partners, and SLSFIP.
- To provide clarity and predictability on how complaints are received, sorted/segregated assessed, resolved, and monitored.
- To help project staff to assess the more current complaints and inform the project design and implementation process.

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.<sup>1</sup> This Project's GRM should facilitate the SLSFIP 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 GRM makes the following distinctions:

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<sup>1</sup> World Bank, Environmental and Social Framework, 2018, p. 131



- Project-related complaints and grievances: It focuses on project-related complaints and grievances and defines the different steps of handling such;
- 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 referred directly to the service provider. This counts for complaints and grievances from PAPs, as well as workers deployed by the project;
- Second tier/escalated complaints and grievances: This concerns complaints and grievances that cannot be solved by the first tier or have been escalated by users dissatisfied with the resolutions from the first tier. This GRM describes procedures for addressing these grievances through an appeal mechanism.

This document provides a manual for the SLSFIP GRM. It lays out clear processes and procedures (including resolution processes and timelines), defines the grievance uptake, sorting and processing, acknowledgment and follow-up, categorization, verification and investigation, monitoring and evaluation, and feedback. It focuses on solving grievances at the project implementing level where possible and escalating them to the appropriate higher levels.

## **2. UNDERSTANDING GRM TERMINOLOGIES**

**Definition of Grievance:** Grievance may refer to any complaint, concern, injustice, wrongdoing, or accusation related to the project implementation. It also includes queries, suggestions, and comments.

**Grievance Redress Mechanism (GRM):** is a set of specified procedures for revealing, assessing, and methodically addressing grievances or complaints and resolving disputes and monitoring. It is a mechanism whereby queries or clarification about a project are responded to systematically, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively.

### **Concerns or issues**

Concerns or issues are questions, requests for information, or general perceptions that may or may not be related to a specific impact or incident. If not addressed satisfactorily, concerns may become



complaints. Although concerns do not have to be registered as formal complaints if raised, they should be noted in an appropriate management system such that emerging trends can be identified and addressed through community engagement before they escalate.

### **Complaint or Grievance**

Complaints or grievances refer to allegations of specific incidents and of any damage, impact, or dissatisfaction resulting from the project or service provider's actions, whether perceived or actual. An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve. Throughout this document, the terms 'complaint' and 'grievance' are used interchangeably, without presuming differences in scale, complexity, or seriousness.

**Complainant:** A person/party filing a complaint.

**Grievance Log:** A database for maintaining information about complaints received.

### **Feedback Mechanism**

The feedback mechanism is sometimes used to collectively describe the response of the way is received from the project proponent and the complainant.

**Project Affected Person:** A project-affected person is a person who is adversely affected temporarily or permanently as a result of sub-project works under SLSFIP.

## **C. WHAT IS THE GRIEVANCE REDRESS MECHANISM**

A Grievance Redress Mechanism (GRM) is a locally based, formalized way to accept, assess, and resolve community feedback or complaints emanating from or as a result of project activities. They are institutions, methods, and processes by which a resolution to a grievance is sought and provided. It creates a platform and procedure for the effective handling of complaints and grievances that are aimed at avoiding lengthy litigation which may mar or delay project implementation and achievement of its objectives.

A well-designed and implemented GRM can help project management significantly enhance operational efficiency in a variety of ways, such as generating public awareness about the project



and its objectives; deterring fraud and corruption; mitigating risk; providing project staff with practical suggestions/feedback that allows them to be more accountable, transparent, and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the project. An effective GRM can help address problems before they become more serious and/or widespread, thereby preserving the project's funds and reputation.

Developing an Effective GRM requires the following steps:

- Survey formal and informal GRM and the Client's existing capacity for grievance redress (if any) in the area of concentration and build on it
- Assess potential users and likely grievances that may arise during project preparation and implementation
- Create a Standard Operating Procedure (SOP)/Flowchart
- Develop and publicize GR Policies that best suit the project
- Assign GR tasks to staff with the right attitude and train staff
- Develop an action plan that identifies priority areas for strengthening grievance capacity.

GRMs are generally designed to be the first line of contact or response to beneficiaries' concerns, especially those unforeseen concerns that could not be prevented by awareness campaigns and proactive stakeholder engagement. They are intended to be accessible, collaborative, prompt, and effective in resolving concerns through dialogue, joint fact-findings, and negotiation.

## **1. OBJECTIVES**

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's team's ability to identify, track, resolve, and refer eligible grievances; and to enhance the Project's development results and outcomes.



## **2. SPECIFIC OBJECTIVES**

The specific objectives of the Grievance Redress Mechanism (GRM)/complaints handling system include the following:

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- Avoids the need to resort to judicial proceedings to seek redress.
- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of project implementation.
- Register and track these complaints to their resolution, and ensure that all complaints including Gender Based Violence-related are resolved within (30) days of recording.

## **3. BENEFITS OF THE GRM TO THE SLSFIP**

The GRM will:

- Provide information about the project objectives and implementation structure;
- Provide an avenue to comply with government policies and international best practices;
- Provide an avenue to resolve grievances and disputes quickly and at the lowest cost before they escalate to an unmanageable level;
- Provide project with practical feedback and suggestions to be more accountable and transparent and responsive to the needs of beneficiaries;
- Facilitate effective communication and productive relationships between the project and affected persons, businesses and communities
- Deter fraud and corrupt practices to enhance project reputation.
- Help avoid project delays and cost overruns.
- The GRM is expected to contribute to continuous improvement in the performance of the SLSFIP 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 can respond to all needs and concerns of project-affected parties

#### **4. BENEFITS OF GRM TO PROJECT AFFECTED PERSONS (PAPS) AND OTHER STAKEHOLDERS**

- Provides a cost-effective method to report their grievances and complaints and receive resolution;
- Establishes a forum and a structure to report their grievances with dignity and access to a fair hearing and remedy;
- Provides access to negotiate and influence decisions and policies of the project that might adversely affect them; and
- Facilitates access to information.

#### **5. JUSTIFICATION OF SLSFIP GRIEVANCES REDRESS MECHANISM**

The project implementation will involve various stakeholders including financial institutions, firms, lead coordinating agencies, MDAs, MSMEs, communities, local councils, and individuals (outlined in the Stakeholder Engagement Plan). Citizens' engagement will be at the core of the project with communities engaged at all stages of preparation and implementation. This is to facilitate public access to information on the project and its activities. It includes those who are aggrieved or believe they have been adversely affected by the project and may submit complaints and have their complaints addressed.

Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA), and Sexual Harassment affects women and girls in Sierra Leone and it is envisaged that these and other issues may arise during project implementation. This concern led the Government of Sierra Leone to declare SEA/SH as a national emergency and stipulated that all government and government-assisted hospitals and medical centers should provide care free of charge to any SEA survivor.

The complexity of the project, and the number of people who are expected to be part of the implementation process, have necessitated the establishment of a Grievance Redress Mechanism (GRM). The Grievance Redress Mechanism enables project beneficiaries and the citizens of Sierra Leone to provide feedback on the project in general and on its specific activities. It is a process of



receiving prompt, objective information, evaluation, and consideration of appeals (claims, suggestions, complaints, requests, feedback) related to all SLSFIP project activities.

The SLSFIP requires a comprehensive project-wide GRM available for use by all project stakeholders including those, directly and indirectly, impacted, positively or negatively. The purpose of the GRM is to provide the project-affected persons the opportunity of a step-by-step process to seek redress. It will enable a broad range of stakeholders to channel their concerns, questions, and complaints to the various implementation agencies, through multiple grievance uptake channels. Essentially, the GRM will assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. It outlines a transparent and credible process for fair, effective, and lasting outcomes. Similarly, it builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions.

## **D. THE GRM PREPARATION STAGES**

Four Stages have been identified:

- Stage 1 - Setting up and Mobilization
- Stage 2 - Capacity Building Support
- Stage 3 - Monitoring the GRM process
- Stage 4 - The Exit Stage

### **1. STAGE 1- SETTING UP AND MOBILIZATION**

- Setting up of Grievance Redress committee with received mandate;
- Prepare GRM Manual
- Develop an online Platform and availability of toll-free line
- Suggestion boxes made available at SLSFIP and other project locations
- Provision of logistics (material and Finance) setting up of GRM

### **2. STAGE 2- CAPACITY BUILDING SUPPORT**

- Orientate key MDAs on GRM





- Conduct training for GRM Operatives at SLSFIP
- Orientation for Grievance Redress committee on their role in GRM;
- Train stakeholders and beneficiaries on the use of the GRM

### **3. STAGE 3 - MONITORING THE GRM PROCESS**

- Monitoring the implementation of the GRM to track compliance with the process and timelines in the grievance handling procedures
- Monthly follow-ups are done to track the progress of various complaints received through the online platform and by the use of the form
- Identify emerging challenges and engage the SLSFIP, Bank of Sierra Leone, and World Bank to provide the required administrative support for the effective functionality of the GRM system;
- Share report with the GRM committee which will be used to provide regular updates to the Bank of Sierra Leone and World Bank

### **4. STAGE 4 - THE EXIT STAGE**

- The exit phase is designed to put adequate mechanisms in place for the sustainability of the process after funding
- A wrap-up session bringing together various stakeholders which will serve as a reflection forum;
- Interface meetings with the Bank Governors and Officials of the Bank of Sierra Leone to give updates on progress and challenges;
- The Bank of Sierra Leone Governors and Steering Committee should monitor and ensure the sustainability of the process

## **E. PRINCIPLES OF THE GRM**

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



- Accessibility: The GRM should be accessible to everyone including staff, enumerators, and community stakeholders at any time. It should take into consideration potential barriers such as language, literacy, awareness, cost, or fear of reprisal and seek to address them.
- Predictability: GRM should be time-bound at each stage, and have specified time frames for the responses, and should offer a clear consistency of the system, processes, procedure with the time frame for each stage and clarity on the types of result it can deliver
- Fairness: All the procedures therein should be widely perceived as unbiased regarding access to information and meaningful public participation. It will avoid favoritism and also consistent grievance resolution outcomes
- Rights compatibility: The outcomes of the mechanism should be consistent with the international and national standards. It should also not restrict access to other redress mechanisms.
- Clarity of structure: The GRM should have a reasonable design that unequivocally explains how it works; the jobs and responsibilities assigned to its different unit personnel and the agents responsible for handling different aspects of the grievance resolution process such as receiving, recording, and sorting complaints; conducting assessments and resolution process; leading appraisal and goal measures.
- Transparency and accountability: The entire GRM process should be done in the public interest.
- Capability: For an effective GRM, the system needs to be endowed with the necessary resources, that is technical, financial, and human resources.
- Feedback: It should serve as a means to channel citizen feedback, to improve project outcomes for the people.
- Confidentiality: The project GRM will follow the principles of confidentiality to protect complainants' identity; and accept anonymous grievances from complainants who may not want to be identified.
- Right to appeal: The complainants will be given explanations of and have the right to appeal against the decision made on their grievance.



## 1. PROCEDURES

A two-tier GRM system will be operated with an online platform developed and a toll-free line, to pick up and sort all complaints based on the type and nature to ensure immediate response and fairness in the resolution process no matter the location that the complaint is being received from. Corruption-related complaints will be flagged and escalated directly to the Sierra Leone Anti-Corruption Commission. The Anti-corruption Commission and the Ombudsman will serve as an alternative tier in the GRM tree for the escalation of cases that are specific to each institution. The two tiers will include:

- a) The Project Implementing Unit level
- b) The Steering Committee Level

**Project Implementing Unit:** at the Project Implementing Unit otherwise known as PIU where a GRM Committee will be established, membership of the Committee will be a multi-disciplinary team as follows:

- Project Coordinator - Chairperson
- M & E Specialist - Member
- Environmental and Social Safeguards Specialist - Secretary
- Head of PIU - Deputy Chairperson
- Head of FSDU - Member

### **Roles and Responsibilities**

The PIU GRM Committee members will act as the first tier and will perform the following tasks as part of their work at the PIU

- Supervise, receive, and review reports from the GRM officer/intern (ESS)
- Work with the ESS in planning, carrying out sensitization on the GRM, and building the capacity of project beneficiaries and the BSL staff
- Investigate and resolve all cases reported to the PCU Committee



- Refer unresolved cases to the Steering Committee and follow up on action taken
- Monitors the overall implementation of the GRM, particularly the grievance resolution status at all levels
- Follow-up with complainants on the resolution and outcomes;
- Submit the consolidated grievance data to the national level on a monthly basis;
- Receives and reviews the reports of the GRM officer/intern (ESS)
- Support in the preparation of national GRM report/intern (lead ESS);
- Maintains a consolidated GRM database for all levels.
- Reports on grievances received to the Project Coordinator for the attention and action of the Project implementing unit on a quarterly basis.
- Establish and maintain communication with all project beneficiaries and stakeholders

**The Steering Committee:** The Project Steering Committee will include high-level officials from key MDAs involved in the project implementation and will be chaired by the Deputy Governor (Financial Stability). The Governor will be responsible for providing policy guidance and oversight during project implementation. They will additionally act as the second tier where issues that cannot be resolved by the PIU committee will be escalated to them for their immediate action. It is expected that the Steering Committee will meet twice a year. However, the PIU may convene a meeting with the steering committee if the need arises. Complainants are also free to send in their complaints directly to the steering committee if that is what they wish to do.

**Roles and Responsibilities:**

- Participate in the GRM sensitization activities nationwide; Disseminate project-related information (brochures, leaflets, etc.)
- Review grievance details and appropriate background information, including notes/minutes of meeting of resolution at the PIU level concerning the specific grievance case
- Meet monthly or more frequently when needed to handle cases escalated by the PIU or cases received directly;



- Escalate cases out of the mandate of this GRM to the ACC, and Ombudsman for investigation and appropriate action
- Tracks the resolution progress and follow-up with ACC/Ombudsman in the event of delays (beyond the stipulated process period of 21 days) in handling corruption/civil complaints received to provide the necessary support to ensure prompt action
- Prepare and submit monthly reports/updates on GRM activities to Management for the attention of the PIU
- Resolution outcomes at the Steering Committee level are communicated to the PIU committee and the complainant. The complainant can reply to ascertain satisfaction or not. Corruption-related and High-level crimes are escalated to the Anti-Corruption Commission and Office of the Ombudsman. The Steering Committee level has the sole mandate to refer complaints to external institutions Like the Anti-Corruption Commission and Office of the Ombudsman in the case of corruption-related offenses or gross administrative offenses respectively. Every Corruption complaint will be directly referred to the Steering Committee for their immediate action and referral to the anti-corruption commission
- The anti-corruption commission and the office of the ombudsman serve as alternative tiers for referrals by the PIU and Steering Committee

**Anti-corruption Commission:** It was established by an act of parliament in 2008 and provides for the establishment of an independent commission for the prevention, investigation, prosecution, and punishment of corruption and corrupt practices and also for other related matters. For the SLSFIP, corruption-related cases to the project will be directly investigated by the commission.

### **Roles and Responsibilities**

- To investigate corruption-related cases that are escalated by the SLSFIP steering committee
- To notify SLSFIP of corruption-related cases that are reported directly to them relating to the project for investigation.
- To follow up on the SLSFIP online platform and directly pick up corruption-related cases for investigation
- To provide genuine resolution and guidance to the complainant



- Report back to the PIU/Steering Committee on action taken
- Follow up to determine the level of satisfaction of the complainant

**Ombudsman:** The office of the Ombudsman was set up by the Government of Sierra Leone to handle complaints and grievances for all ministries, agencies, and departments for remedial actions to be taken. For the SLSFIP, project-related civil cases that cannot be handled by the PIU or Steering Committee will be escalated to the office of the Ombudsman for further investigation and resolution.

### **Roles and Responsibilities**

- To investigate cases that are escalated by the SLSFIP steering committee
- To provide genuine resolution and guidance to the complainant
- Report back to the PIU/Steering Committee on action taken
- Follow up to determine the level of satisfaction of the complainant

The SLSFIP project is charged with the responsibility to ensure that the necessary resources are provided to the committees and Environmental and Social Safeguards Specialist involved in the GRM process for its effective functioning;

**Environmental and Social Safeguards Specialist:** The Environmental and Social Safeguards Specialist at the PIU is the focal point for receiving and resolving grievances with the support and oversight of the PIU Grievance Redress Mechanism Committee, thus the Institutional home of the GRM system.

### **Roles and Responsibilities**

- To sort complaints received and assess if the complaint raised falls within the scope of the GRM.
- Coordinate the activities of the GRM committee (PIU Committee and Steering Committee)
- Work with PIU staff to create awareness and popularize the GRM system of the SLSFIP project



- Manage the GRM Suggestion Boxes and the Grievance Forms
- Ensure provision of feedback to complainants within the agreed timeframe
- Document the grievances and track the status of grievance resolution in the GRM database

**Project Coordinator:** The Project Coordinator is the Chairperson of the PIU committee and his responsibility is to ensure that complaints/concerns received are resolved in a timely and efficient manner. The PC will also update the Steering Committee on complaints received and resolved and challenges including outstanding issues. Such engagements will take place on a quarterly basis even though requests from the Project Coordinator on an emergency basis will be honored. Before any session, the PC will prepare written reader-friendly updates and submit them to the SC members at least three days before the scheduled meeting.

**Project Implementing Unit (PIU):** The PIU will receive reports on GRM activities from the Project Coordinator on a quarterly basis, to keep them fully updated on GRM.

## **F. CHANNELS TO MAKE COMPLAINT**

Channels that stakeholders, beneficiaries /citizens would use to make complaints include

- Telephone Hotline: Complainants can report their grievances verbally to a dedicated telephone hotline which will be set up to receive complaints.
- Telephone Message: A Complainant can send a text message of his/her grievance to a dedicated phone number. (that will be set up).
- Petition: A Complainant can submit his/her written petition directly to a specified address. (5th Floor, Sam Bangura Building Gloucester Street Freetown)
- Complaint boxes (Suggestion Boxes) placed at the PIU (Upcountry to access the toll-free line)
- Email: Complainants who have access to the Internet can send their grievances to the email addresses that will be provided.



- Project website (the online platform will be hosted on the Bank of Sierra Leone website page)
- Verbal or written complaint to the project (which will be processed through the same channel)
- Project grievance committee
- Personal Visit: The Complainant can personally submit his/her grievance/suggestion to one of the relevant parties.
- The SLSFIP will ensure flexibility in the uptake of complaints to ensure that different contact points are available for a person to make a verbal complaint and are redirected to the different channels as appropriate.

## **G. CONFIDENTIALITY AND CONFLICT OF INTEREST**

Confidentiality will be ensured in all instances even when the complainant is known and complaint can be made anonymously also. To avoid conflict of interest, complaints about staff and committee members will be handled discretely without the involvement of the staff or committee member and will be reviewed by the steering committee before final action is taken.

The Web Portal will ensure that all information collected about complaints is secure and encrypted to prevent unauthorized access. Confidentiality will also be maintained on a role-based access on a need-to-know bases.

## **H. THE GRIEVANCE HANDLING PROCESS**

This section provides step-by-step guidance on the processes and procedures of grievance collection and resolution through the SLSFIP GRM System.

### **1. UPTAKE OF COMPLAINTS**

Grievance Uptake Channels

Uptake Channel	Coverage and Availability of Grievance Forms
• Mobile Phone	<i>Coverage:</i>





Uptake Channel	Coverage and Availability of Grievance Forms
<ul style="list-style-type: none"> <li>• Toll-free line</li> </ul>	<p>At all levels which covers all project target locations</p> <p><i>Grievance Forms:</i></p> <p>For the online platform, the grievance information will go directly into the system for processing</p> <p>Grievance forms can also be downloaded from the Web Platform for manual entry and uploaded to the system</p> <p>The grievance information will be documented in the grievance forms by the GRM Officer (ESS) (for grievances received in the field) and entered into the online platform</p> <p>A case number will be generated (part of the grievance form) and the relevant complainant will be informed of the number</p>
<p>Walk-ins and verbal narration</p>	<p><i>Coverage:</i></p> <p>Financial Institution</p> <p>MSMEs, NGOs, CSOs</p> <p>PIU and Steering committee Level GRM</p> <p><i>Grievance Forms:</i></p> <p>The grievance information is documented on the grievance form by the ESS</p> <p>A case number will be generated (part of the grievance form) and the relevant complainant will be informed of the number</p>
<p>GRM Suggestion Boxes</p>	<p><i>Coverage:</i></p> <p>Suggestion box at the PIU entrance</p> <p><i>Grievance Forms:</i></p>



Uptake Channel	Coverage and Availability of Grievance Forms
	<p>The grievance forms will be made available to complainants at the GRM Suggestion Box location.</p> <p>If letters are dropped in the suggestion box, then the required information will be extracted from letter and entered into GRM Forms by GRM ESS</p> <p>A case number will be generated (part of the grievance form) and the relevant complainant will be informed of the number</p>
Posters and Brochures	<p><i>Coverage:</i></p> <p>Bank of Sierra Leone</p> <p>All Financial Institution, MSMEs, NGOs, CSOs etc</p> <p><i>Grievance Forms</i></p> <p><i>No Grievance form</i></p>
Letters, and Social Media Platforms	<p><i>Coverage:</i></p> <p>Bank of Sierra Leone</p> <p>Financial Institution, MSMEs, NGOs, CSOs</p> <p>PIU and Steering GRM Levels</p> <p><i>Grievance Forms</i></p> <p>No grievance form</p>

*Table 1. Grievance uptake channels*

## 2. THE GRM PROCESSES

This is where staff, enumerators, data collectors, cartographers, communities, and individuals who believe they have been adversely affected by the Project may submit complaints.



The GRM allows for questions, concerns, complaints, and grievances to be received by the project team, investigated, recorded, and resolved. In its simplest form, grievance mechanisms can be broken down into the following primary actions:



*Figure 1. GRM Process*

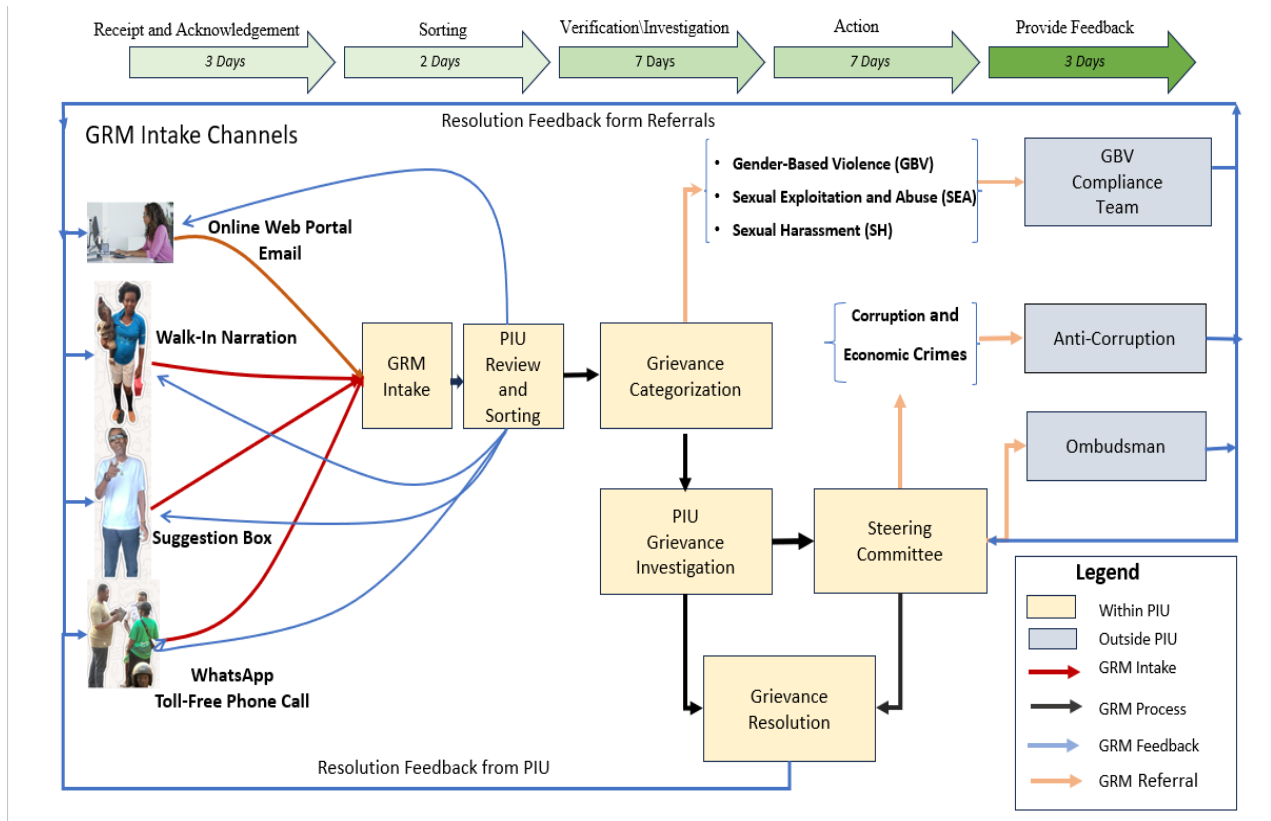
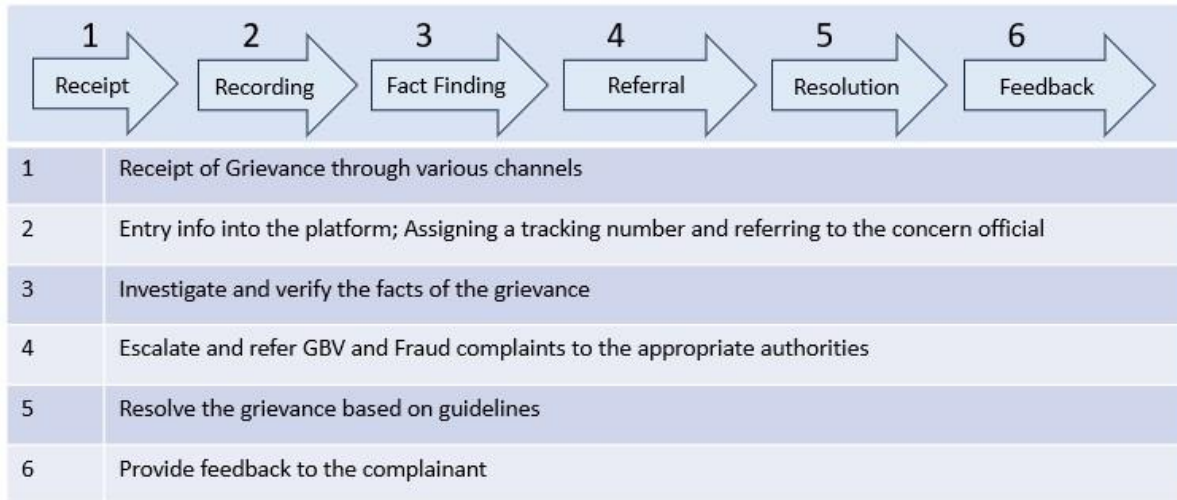


Figure 2: GRM Process Workflow



*Figure 3. GRM Social Transfer*

### 3. GRIEVANCE REDRESS TIMELINES

NO.	ACTION	TIMELINES
1.1	Receipt and Acknowledgement of Complaint	Maximum 3 days (online platform-automatic response)
1.2	SORTING	Maximum 2 days
1.3	Verification /investigation of Complaint	Maximum 7 days
1.4	Action	Maximum 7 days after investigation
1.5	Provide Feedback	within 3 days after action taken

*Table 2. Grievance Redress Timelines*

#### **Receipt and Acknowledgement of Complaint (Maximum 3 days)**



- Complaints, queries, or comments received through any of the uptake channels;
- ESS Specialist or relevant focal persons/staff completes GRM Reporting Form for complaints received during field trips and in suggestion boxes
- ESS Specialist assigns a reference/serial number/ complaint case number
- Complainants receive an acknowledgment of their grievance submission regardless of project-related grievances or not.

### **SORTING (Maximum 2 days)**

After the compilation of the complaints/feedback, they will then be sorted out in the order below

<b>NO.</b>	<b>CLASSIFICATION OF GRIEVANCE</b>	<b>CATEGORIES OF GRIEVANCE</b>
1.	Basic information	<ul style="list-style-type: none"> <li>- Access to information</li> <li>- Correction and deletion of untrue or misleading information that affects the person</li> </ul>
2.	Ethics and Conduct	<ul style="list-style-type: none"> <li>- Government entities and staff</li> <li>- Implementing Partner staff</li> </ul>
3.	Violation and breach of Codes of Conduct	<ul style="list-style-type: none"> <li>- Violation of codes of ethics;</li> <li>- Breach of the code of ethics by government officers;</li> <li>- Breach of Code of Conduct and Ethics by the staff of Implementing Partners</li> </ul>



4.	Violation of human rights and fundamental freedoms	<ul style="list-style-type: none"> <li>- Gender equality and general equality matter.</li> <li>- Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural, and social)</li> <li>- Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe, and adequate water, social security, education, emergency medical treatment)</li> <li>- Non-discrimination of special needs groups</li> </ul>
5.	Corruption and Economic crimes	<ul style="list-style-type: none"> <li>- Unethical conduct</li> <li>- Grievance regarding the misuse of funds or other financial management concerns and lack of transparency</li> </ul>
6.	Labor and working conditions	<ul style="list-style-type: none"> <li>- Termination/Summary Dismissal,</li> <li>- Breach of Employment Contract Terms/ contract violation</li> <li>- Conflicts with Trade Unions</li> <li>- Work Injury</li> <li>- Discrimination</li> <li>- Sexual Harassment</li> <li>- Remuneration</li> <li>- Wrongful termination</li> <li>- Suspension</li> <li>- Waiver of Claims</li> </ul>



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)	<ul style="list-style-type: none"> <li>- Gender-based violence committed by project personnel or any worker on the Project, or GB in relation to the Project</li> <li>- Sexual Exploitation and Abuse committed by Project staff or any worker of an implementing partner associated with the Project</li> <li>- Sexual Harassment committed by Project staff or any worker of contractor's staff associated with the Project</li> </ul>

*Table 3. Sorting of complaints*

**Verification /Investigation of Complaint (Maximum 7 days)**

- Set up a team to validate the claims of the complainant;
- Conduct of field investigation to confirm the complaint/report is true;
- The investigating Team should report their findings to the GRM Committee (PIU or Steering committee)
- ESS or GRM focal persons use excerpts of reports on findings of field investigation to complete GRM Form

**Action (Maximum 7 days after investigation)**

- Findings be submitted to GRM Committee (PIU Level/Steering Committee Level);
- Feedback provided to complainants;





- Action will be taken by the committee;
- GRM Officer completes the Grievance resolution form
- GRM Officer updates details into the online GRM database
- Complaints or concerns etc. not been resolved by the PIU GRM Committee will be escalated to the Steering Committee;
- For Complaints on corruption or gross administrative injustice, the Steering GRM Committee will escalate them to the Anti-Corruption Commission or the Ombudsman respectively;

**Feedback (provided within 3 days after action taken)**

- ESS provides feedback to the complainant.
- Complainant will indicate satisfaction with the process and sign off
- ESS completes Grievance close forms if satisfied
- ESS uses information in the Grievance closeout form to update the GRM database
- For the online platform system an email will be sent to notify the complainant of the resolution (i.e. a standard closure message) and the complainant will then send a reply to agree/satisfied with the process

**Follow up/Close Out:**

- A grievance is closed out when no further action can be or needs to be taken.
- All grievances would be closed out within the initial 30 days or as soon as possible thereafter and after all reasonable attempts to resolve the grievance have been made.
- The response should communicate findings of the investigation and resolution, and seek approval from the complainant.
- If the Complainant is satisfied with the outcome, then the grievance is closed out and they provide their signature (or fingerprint) on the agreement as confirmation



## **I. GRIEVANCE MECHANISMS FOR GENDER-BASED VIOLENCE**

GBV is also part of the Bank's commitment to gender issues and the prioritization of the Gender Strategy for 2016-2023. Increasing World Bank funding for projects aimed at eliminating GBV as a barrier to women's empowerment.

The incident of rape, defilement, and other forms of gender-based violence are related significantly, short-term, and localized. The component of the SLSFIP projects which has to do with recruiting MSMEs may have the propensity for Financial Institutions to sexually exploit businesses, loan seekers, job seekers, or recruiters.

The GRM will develop a survivor-centered approach that will create survivor's safety, confidentiality, supportive, protective, and enabling environment for the survivor's rights. Staff will be trained on how to report sexual Gender violence cases and how to use the channels of complaining, a sensitization will be conducted, and a code of conduct developed on sexual exploitation abuse, and sexual harassment on all staff, acknowledging the fact that it prohibited to any World Bank supporting projects.

The Government of Sierra Leone is very concerned about Gender Based Violence. The Ministry of Social Welfare and the Family Support Unit are engaged in providing technical support and capacity building for all staff and this unit will be involved in Gender Based Violence and Sexual Exploitation and Abuse trainings that will be conducted by the project.

The GBV complaints will be investigated by professional service providers like the Family Support Unit at the Police Headquarters in the Central Intelligent Division (CID), the Rainbow Initiative, and the Aberdeen Women's Clinic.

If GBV issues are not addressed during the implementation stage of the project it will bring disruption and delay in the process, this is why in the SLSFIP GRM the issues of GBV, SEA/SH will be a priority for the project.

Taking into consideration the stigmatization, rejection, and reprisal of GBV survivors the project will engage service providers in the Project Implementation Unit on the right GRM procedures, protocols, and tools needed to ensure the confidentiality and survivor-centred approach in the



GRM setup. The GRM will ensure that there are multiple channels through which complaints can be registered safely and confidentially. The information in the GRM relating to the complainant's identity will be handled confidentially.



## 1. SIERRA LEONE GBV SERVICE PROVIDERS - MAIN ACTORS IN THE GRIEVANCE MECHANISM FOR SEA/SH

A Service Provider in this manual refers to any local organization or individual that provides support in the form of medical, psychosocial, and legal service to survivors of GBV/SEA/SH. The organizations that have been identified as service providers that the project will establish good working relationships with are listed below. The Service Provider (see Table 4) will have representatives within the GBV-Compliance Team (GBV-CT) and will be involved in resolving complaints related to GBV/SEA/SH

Sector	Type of Service	Address	Contact
Rainbow Center Initiatives	Medical, psychosocial, and protection	PCM Hospital, Cottage – Fourah Bay Road, Freetown.  Kono, Bo, Kenema, Makeni and Tokolili	076900611  077553141
One Stop Center — Ministry of Gender and Children Affairs	All GBV-related Issues as legal, medical, protection, psychosocial and medical response	Pujehun, Moyamba, Kenema, Port Loko, Kono	078257228
Police via Family Support Units	Civil and legal assistance to victims	Nearest Police Station	078305125  076926214
International Rescue Committee (IRC)	Protection, psychosocial and medical response	Aberdeen Road	077553141



Sector	Type of Service	Address	Contact
Ministry of Gender and Children Affairs and Ministry of Education	Enforce policy and policy advice	New England Vile	78257228
Legal Aid Board	Legal service	3 Percival Street	079244446
King Harman Road Hospital	HIV/Aids testing and counselling	King Harman Road	076736346
GBV and VAC Compliance Team (GBV-CT)	Receive and resolve complaints and refer them appropriately	In communities	076900611
	Coordinate support	PIU	076463850

*Table 4. Information on service providers*

*Source: Ministry of Gender and Children's Affairs*

## **J. GRIEVANCE PREVENTION**

There are several ways to actively solve issues before they can be considered as a very serious grievance. The SLSFIP project team should be aware of the fact that grievances most times occur, and that dealing and solving them is part of the work and should be incorporated into our annual work plan.

Build capacity for project staff at the Bank of Sierra Leone, provide adequate information on the project such as project design, activities, implementing schedules, and institutional arrangements as well as enhanced skills in effective communication, stakeholders and community dynamics and processes, negotiation and conflict resolution, It is also important that project staff be provided



with regular trainings on how to receive feedback from their enumerators, data collectors and all stakeholders.

Provision of timely data/information to stakeholders: many grievances arise because of lack of knowledge; delay in information, or insufficient information. A developed project plan should be communicated to stakeholders. Precise and satisfactory data about an undertaking and its exercises should be provided through the right channels and methods for correspondence.

Conduct significant local area consultations: Project implementers should proceed with the cycle of discourse all through the execution of the project. Sharing data/information, covering project progress, furnishing local area individuals with a chance to communicate their interests, explaining and reacting to their issues, inspiring communities, and getting criticism on intercessions will profit the networks and the project management.

## **1. POSSIBILITY TO APPEAL**

The complainant is not prevented from appealing outside the SLSFIP GRM if he/she is not satisfied with the response given. ONCE ALL OPTIONS HAVE BEEN WORN OUT INCLUDING THE SIERRA LEONE JUDICIAL SYSTEM AND THE COMPLAINANT IS NOT SATISFIED WITH THE OUTCOME, REFERRAL TO THE GRIEVANCE REDRESS SYSTEM AT THE WORLD BANK IS THE LAST RESORT.

## **2. WORLD BANK GRIEVANCE REDRESS SERVICE**

Financial Institutions 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 to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred or could occur, as a result of WB's 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 allowed 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](http://www.inspectionpanel.org)



### **3. MONITORING AND EVALUATION INDICATORS**

The grievance redress mechanism is an integral part of the knowledge management machinery of any project and helps in measuring the efficiency and achievement of the entire project's objectives. All the data on the grievances received will be provided to the M&E Specialist for evaluation. This will help the project make necessary adjustments to operational procedures. The data emerging from the report on grievance redress can also help the project evaluate the efficiency of the implementation of safeguard instruments.

The project will include GRM-related updates including types of grievances, frequencies, and measures taken in the quarterly Environmental and Social Implementation Reports that will be collated from the project. The monitoring and evaluation indicators will include:

- Number of grievances addressed within the set time frame
- Number of grievances handled with simple conflict resolution techniques (consensus, disciplinary, explanations, etc.)
- Number of grievances handled with more complex procedure
- Number of positive feedback

### **4. POPULARIZATION OF THE GRM**

The Grievance Redress Mechanism will be distributed to all project-affected persons and beneficiaries including ordinary citizens through various information channels frequently used by the SLSFIP project. This may range from

- Public meetings during project implementation
- Meeting with project staff team members
- Brochures/pamphlets
- Posting on notice boards
- The project website and social media platforms (WhatsApp)



- The use of local media (e.g. TV, Newspaper, radio)

The PIU will provide information on the scope of the GRM process, the complaint procedures (when where, and how), the eligibility of the complaint, the investigation process, and the time frame. Particular attention will be paid to the confidentiality and transparency of the process. Special attention will be given to ensure that Persons with disability are able to access the GRM of the SLSFIP project.

Proactive advertisement and campaigns of the GRM will be done by the PIU and biannual information provided on the complaint received and resolved. The PIU will discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it biannually. Special efforts shall be made to reach vulnerable groups during the campaign.





## ANNEX 1

Tel: (+232-)74-228-600/+232 78-984-202/ 079-844-747  
Email: slsfip02@gmail.com  
mohamedlwurie@gmail.com

Project Implementation Unit-PIU  
Bank of Sierra Leone (BSL)  
5th Floor, Sam Bangura Building  
Gloucester Street  
Freetown

---

**SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (SLSFIP)**

**Grievance Reporting Form**

Date  Time  Complaint ID

☐ **Anonymous**

First Name  Occupation   
 Middle Name  Phone Number   
 Last Name  Gender

**Location**

District  City/Town   
 Uptake Channel

**Summary of Grievance**

**Category of grievance (Tick as appropriate)**

Information Request	Concerns/ Complaints						Suggestions	Positive Feedback	Others (Specify)
	PCU staff	Contract Violation	GBV Related	Project GRM	Abuse of Power	Financial Management Transparency			

For official use only

Sector

**SLSFIP Related**

Sub-component ☐ Yes\No

Agribusiness ☐ Yes\No

SMEs ☐ Yes\No

**Non-SLSFIP Related**

Name of Officer referring case

Date of Referral

Figure 4. Grievance Reporting Form



## ANNEX 2

<p>Tel: (+232-)74-228-600/+232 78-984-202/ 079-844-747 Email: slsfip02@gmail.com mohamedlwurie@gmail.com</p>		<p>Project Implementation Unit-PIU Bank of Sierra Leone (BSL) 5th Floor, Sam Bangura Building Gloucester Street Freetown</p>
<b>SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (SLSFIP)</b>		
<b><u>Grievance Resolution Form</u></b>		
Date Received <input style="width: 100px;" type="text"/>	<b><u>Complaint ID</u></b> <input style="width: 100px;" type="text"/>	
<b><u>Investigation</u></b>		
Date of Investigation <input style="width: 100px;" type="text"/>		
<b><u>Findings</u></b>		
<b><u>Resolution Action Taken</u></b>		
Date of Resolution <input style="width: 100px;" type="text"/>		
<b><u>Type of Action Taken</u></b>		
By whom action was taken <input style="width: 150px;" type="text"/>		
<b><u>Feedback to complainant</u></b>		
Date(s) of feedback <input style="width: 100px;" type="text"/>		
Complainant satisfaction in handling/resolution <input type="checkbox"/> Yes \ <input type="checkbox"/> No		
<b><u>Case Status: (Tick as appropriate)</u></b>		
Case closed <input type="checkbox"/> Yes \ <input type="checkbox"/> No    Ongoing <input type="checkbox"/> Yes \ <input type="checkbox"/> No    Referred <input type="checkbox"/> Yes \ <input type="checkbox"/> No		
<b><u>Name \ Signature of GRM Office</u></b>		
Name of GRM Officer <input style="width: 150px;" type="text"/>		
Signature <input style="width: 100px;" type="text"/>	Date <input style="width: 50px;" type="text"/>	
<b><u>Referral to Steering Committee or anti-corruption/ombudsman</u></b>		
Date of Referral <input style="width: 80px;" type="text"/>		
Name of Referring Officer <input style="width: 150px;" type="text"/>		
Signature <input style="width: 100px;" type="text"/>		

Figure 5. Grievance Resolution Form



## ANNEX 3:

<p>Tel: (+232-)74-228-600/+232 78-984-202/ 079-844-747 Email: slsfip02@gmail.com mohamedlwurie@gmail.com</p>		<p>Project Implementation Unit-PIU Bank of Sierra Leone (BSL) 5th Floor, Sam Bangura Building Gloucester Street Freetown</p>
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**SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (SLSFIP)**  
**Letter of Complaint Acknowledgement**

Date  **Complaint ID**

☐ **Anonymous**

Name

**Location**

District

City/Town

Submitted By

Dear Mr./Mrs/Ms

Name of Complaint

I write to confirm that the SLSFIP has received your complaint dated

The SLSFIP takes concerns relating to the project seriously and the PIU will ensure your concerns are investigated fairly as soon as possible.

The SLSFIP grievance redress mechanism will be followed to consider your complaint and determine whether it will be resolved through the SLSFIP grievance resolution process and the next steps will be communicated to you

Thank you for letting us know of your concerns and for your patience while we respond within fifteen (15) working days of receiving this letter.

Attached to this letter is the SLSFIP grievance redress mechanism procedure to learn what can be expected as we address your complaint

Yours Sincerely

Environmental and Social Safeguards Specialist  
Sierra Leone Second Financial Inclusion Project

*Figure 6: Acknowledgment Letter*



## ANNEX 4:

<p>Tel: (+232-)74-228-600/+232 78-984-202/ 079-844-747          Email:slsfip02@gmail.com          mohamedlwurie@gmail.com</p>		<p>Project Implementation Unit-PIU          Bank of Sierra Leone (BSL)          5th Floor, Sam Bangura Building          Gloucester Street          Freetown</p>
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SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (SLSFIP)

Grievance Log

Registered By	Type of Grievance	Date	Contact Number	Name of Complainant
Grievance				
Suggested Action				
Status				

*Figure 7: Grievance Redress Mechanism Logbook*

## ANNEX 5:



Tel: (+232-)74-228-600/+232 78-984-202/ 079-844-747  
Email:slsfip02@gmail.com  
mohamedlwurie@gmail.com



Project Implementation Unit-PIU  
Bank of Sierra Leone (BSL)  
5th Floor, Sam Bangura Building  
Gloucester Street  
Freetown

## SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT (SLSFIP)

### Grievance Disclosure

Province\District

Country

#### Result of Grievance Redress

Complaint ID #

Complainant Nam

Date of Complaint

Summary of Complaint

Summary of Resolution

Level of Redress

PUI

Steering Committee

Anti-Corruption

Ombudsman

Date of Grievance Redress

Name of Complainant

Signature of the complaint, indicating acceptance of the result to his/her grievance

Name of grievance handling person

Signature of grievance handling officer

Date

*Figure 8: GRM Disclosure*

(Note: copy to be sent to the complainant)

## ANNEX 6

### 1. INCIDENT CLASSIFICATION GUIDE



## World Bank Incident Classification Guide:

### Indicative

- Relatively minor and small-scale localized incident that negatively impacts 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

- 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 complex 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

- 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 potentially cause severe impacts Is complex 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.