



MANAGEMENT OF GRIEVANCES

TRADE/SECTOR SPECIFIC SKILLING (WOMEN in BUSINESS FACILITY) AND GROW FINANCING FACILITY

JULY 1, 2024

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ACRONYMS AND ABBREVIATIONS

ADR	-	Alternative Dispute Resolution
AHA	-	Anti -Homosexuality Act
BDS	-	Business Development Services
BOU	-	Bank of Uganda
CAO	-	Chief Administrative Officer
CEO	-	Chief Executive Officer
CSA	-	Survivor Centered Approach
CSO	-	Civil Society Organization
E&S	-	Environment and Social
ESMS	-	Environmental and Social Mmngement System
FI	-	Financial Institution
GBV	-	Gender Based Violence
GFF	-	GROW Financing Facility
GRC	-	Grievance Redress Committee
GRM	-	Grievance Redress Mechanism
LC	-	Local Council
MDA	-	Ministries, Departments and Agencies
MGLSD	-	Ministry of Gender, Labour and Social Development
PDM	-	Parish Development Model
PSC	-	Project Steering Committee
PSFU	-	Private Sector Foundation Uganda
PTC	-	Project Technical Committee
SEA	-	Sexual Exploitation and Abuse
SH	-	Sexual Harassment
UMRA	-	Uganda Microfinance Regulatory Authority
WiB	-	Women in Business

1. INTRODUCTION

1.1 About GROW Project

Generating Growth Opportunities & Productivity for Women Enterprises Project (GROW) is a Government of Uganda project funded by the World Bank through a grant of USD 217 Million. **The Project Development Objective (PDO) of GROW is “to increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises in targeted locations, including in host and refugee districts”** The project has four components namely, Component 1: Support for Women Empowerment and Enterprise Development Services. This component has 3 subcomponents. Subcomponent 1A: Supporting creation and strengthening of women platforms, community mobilization and mindset change, Subcomponent 1B: Support for core business development for micro and small enterprises, Subcomponent 1C: Support for trade/sector specific skills. Subcomponent 1D: Women entrepreneurship work placement program. Component 2: Access to Finance for Women Entrepreneurs. This component has 3 subcomponents namely, Subcomponent 2A: Grant support for micro enterprises through business competition, Sub-component 2B: Facilitating access to performance grants for Women entrepreneurs, Subcomponent 2C: Sustainable and affordable loan products and processes for women entrepreneurs. Component 3: Enabling Infrastructure and Facilities for Women Enterprise Growth and Transition. This component has 2 subcomponents namely, Subcomponent 3A: Multi-purpose service and production facilities to boost women enterprise productivity, Sub-component 3B: Enabling access to gender-inclusive workplace infrastructure. Component 4: Program management support, policy innovation and evidence generation. This component has 2 subcomponents namely, Subcomponent 4A: Project management support for high-quality implementation, Subcomponent 4B: Policy innovation and evidence generation. The MGLSD will be the overall coordinating ministry for the project in addition to being responsible for implementation of subcomponents 1A, 1B, 1C, 1D, 2A, 2B, 2C, 3A, 3B, 4A and 4B. The Private Sector Foundation Uganda (PSFU) is the implementing entity and will be responsible for implementing subcomponents 1C, 2B, 2C and part of 4A.

1.1.1 Trade / Sector Specific Skilling

Trade/Sector Specific Skilling (subcomponent 1C) also known as **Women in Business Facility (WiB Facility)** implemented by PSFU, seeks to equip women entrepreneurs with technical skills relevant to their business activities. It also seeks to provide Business Development Services (BDS) necessary for the growth of women enterprises. Technical Skilling Firms and Business Development Service providers have been prequalified by PSFU. Government Ministries, Departments and Agencies (MDAs) have also been engaged through Memoranda of Understanding (MOUs) to provide technical skilling and BDS to Women entrepreneurs. Women entrepreneurs will apply to the prequalified Technical Skilling Firms and BDS providers including MDAs, depending on their needs in technical skills and business development services.

1.1.2 Grow Financing Facility

Subcomponents 2B and 2C of GROW Project also known as **GROW Financing Facility (GFF)** also implemented by PSFU, will enable women entrepreneurs to access finance as performance grants and affordable loans. Funds under GFF will be accessed through Financial Institutions (FIs) which will be competitively contracted by PSFU. FIs will demonstrate that they have or will put in place products that are conducive to women entrepreneurs. In addition, the FIs must have or commit to put in place an Environmental and Social Management System (ESMS) that will be maintained for as long as they are financial intermediaries for GROW Project. The purpose of the ESMS is to ensure all loans and grants given out comply with environmental and social standards of the Government of Uganda and the World Bank.

WiB Facility and GFF may inevitably trigger grievances arising from commissions and omissions of project implementers and beneficiaries. In the following sections, the procedure for management of grievances associated with WiB Facility and GFF is presented. The MGLSD is working on the overall GRM for the entire GROW project .

2. THE GRM FOR WIB FACILITY AND GFF

2.1 What is a Grievance?

A grievance is a complaint, an issue, concern, problem, dispute, or claim (perceived or actual) related to the project that an individual, community, group, or institution wants the proponents and its implementers to address, redress, or resolve at any time of the project implementation or after project implementation. For World Bank funded projects such as GROW, grievances may be lodged up to one year after the project or sub-project closure.

A grievance should be differentiated from the general seeking of information about a project and follow up of applications or requests for different services.

2.2 What is a Grievance Redress Mechanism?

A Grievance Redress Mechanism (GRM) is a system or set of structures, procedures or processes by which complaints, queries or clarifications about a project are reported, received, attended to and feedback provided. Components of a GRM include:

- i. A Grievance Redress Committee (GRC) – a body that resolves grievances constituted at various levels starting from the lowest possible level affected by or hosting the project. It may be an existing structure that is assigned GRC roles and oriented on the project and grievance management or a new body set up specifically for the project and also oriented. The former is preferred for purposes of sustainability.
- ii. A Focal Person in the organization for supporting the process of grievance management
- iii. Avenues and an office or offices for reporting /receiving grievances including mechanisms for receiving and documenting anonymous grievances
- iv. Acknowledgement and recording of grievances received
- v. A process for investigating and resolving grievances depending on the complexity of the reported issue
- vi. Channels for giving feedback to the complainants
- vii. Agreed and documented timelines for resolving grievances and giving complainants feedback
- viii. Partnerships for resolving grievances
- ix. A referral pathway for grievances to be followed when one is not satisfied with the decision of the GRC at any level or when the GRC at any level is not able to handle some grievances received.
- x. A Survivor Centered Approach (SCA) for receiving and referral of GBV including SEA and SH grievances / survivors to providers of relevant services.
- xi. Disclosure of the GRM to stakeholders through different avenues namely, print and electronic media, awareness campaigns among others
- xii. A training plan for GRCs and other actors involved in or likely to play a role in grievance management
- xiii. A budget for executing tasks related to grievance management
- xiv. Monitoring and reporting on the GRM and reporting to different stakeholders based on agreed indicators.

2.3 Principles of the WiB Facility and GFF GRM

Some of the principles underpinning the WiB Facility and GFF GRM include:

- a) **Appropriateness and proportionality:** The GRM at all levels is commensurate with the level of environmental and social risks and impacts and the expected number and complexity of grievances.

- b) **Simplicity and Accessibility:** The offices for lodging grievances are easy to access and other avenues for submitting grievances are also easy to use.
- c) **Decentralization and working within existing structures:** Grievance resolution will, to the extent possible, be done as close as possible at the point where the complainant is located and through systems or structures that are already in place. The entity whose actions and inactions (commissions and omissions) triggered the grievance will have the first responsibility to resolve the grievance if this is within their mandate.
- d) **Alternative Dispute Resolution (ADR):** Where applicable, arbitration and other similar dispute resolution mechanisms will be promoted in grievance management, as opposed to seeking legal redress through courts of laws by aggrieved parties.
- e) **Confidentiality:** Information collected as part of the GRM shall be kept private and steps shall be taken to ensure this information is kept secure and protected from unauthorized or unintended users. This will apply particularly to complainants who will choose to remain anonymous for different reasons.
- f) **Responsiveness, Effectiveness and Efficiency:** Grievances are resolved to the satisfaction of parties involved in a timely manner or within the set time frames. **Justice delayed is justice denied.**
- g) **Feedback:** Complainants and other stakeholders are kept updated on progress in resolving their grievances
- h) **Transparency:** The process of grievance management is public information, that is disclosed to the public
- i) **Rights Based:** All aggrieved parties have a right to submit grievances and to have them resolved There shall be no retaliation for lodging grievances.
- j) **Inclusiveness:** The voiceless, vulnerable and marginalized groups (VMGs) will be supported using whatever means possible to report grievances, follow up the grievances and have the grievances resolved. This will include the illiterate submitting grievances verbally in a language they best understand. It is the duty of the entity receiving the grievance to have an interpreter if required and this will apply to all entities implementing GROW Project that will be involved in managing grievances
- k) **Partnerships:** Formal and informal mechanisms have been established with MDAs, CSOs, etc. for resolving grievances
- l) **Adherence to Principles of the Survivor Centered Approach (SCA)** in handling GBV including SEA and SH related grievances to ensure confidentiality, respect, non-stigmatization, access to services, informed choice and survivor self-determination of course of action as well as not blaming the survivor.
- m) **Monitoring and reporting:** A GRM is monitored and reported on by all entities involved in receiving and resolving grievances

2.4 Objectives of WiB Facility and GFF GRM

The objectives of WiB Facility and GFF grievance management are to:

- i. Receive, document and resolve WiB Facility and GFF related grievances in the most effective and efficient manner

- ii. Build trust between the WiB Facility and GFF proponents and stakeholders such as Technical skilling Firms, BDS providers, MDAs, FIs, grant and loan beneficiaries, communities, etc.
- iii. Provide feedback in a timely manner to those adversely affected by actions and inactions of WiB Facility and GFF actors on the resolution of their grievances.
- iv. Use grievances as feedback for improving WiB Facility and GFF implementation arrangements.

2.5 Management of WiB Facility and GFF Related Grievances

2.5.1 The Policy and Legal Framework and Other Instruments to Guide Grievance Resolution

The resolution of grievances by all entities (GRCs) at every level will be consultative and will include where necessary, engagement with those lodging grievances / complaints and those about whom the grievances / complaints are lodged, among others. National policies, national and international best practice and the World Bank Environmental and Social Framework (ESF) among others will guide the process of grievance resolution. Specific guidance will be drawn from GROW Project instruments namely, the financing agreement for GROW Project between the World Bank and Government of Uganda, the agreement or Memorandum of Understanding (MOU) between the PSFU and different entities, the agreement between the some entities and beneficiaries (such as the agreement between FIs and loan /grant beneficiaries), GROW Project Appraisal Document (PAD), the GROW Project Operations Manual (POM), Environmental and Social Management Framework (ESMF), the Vulnerable and Marginalized Groups Plan (VMGP), the Stakeholder Engagement Plan (SEP), the Labour Management Plan (LMP), the Resettlement Policy Framework (RPF) and the Environmental and Social Commitment Plan (ESCP). The aforementioned project specific documents except for the agreement or Memorandum of Understanding (MOU) between the PSFU and different entities and the agreement between some entities and beneficiaries (such as the agreement between FIs and loan /grant beneficiaries), may be accessed through the MGLSD Website: mglsd.go.ug and the GROW project website grow.go.ug

2.5.2 Role of Different Entities

Under the overall supervision and guidance of PSFU GROW Project Office, different entities implementing WiB Facility and GFF will, within their mandate, manage grievances related to GROW Project funded activities. The entities will put in place structures but preferably use existing ones for grievance management and employ other grievance management measures that are **appropriate and proportionate** to the number and complexity of grievances. The entities also have reporting obligations as elaborated in section 6 below.

2.5.3 Management of Grievances at PSFU

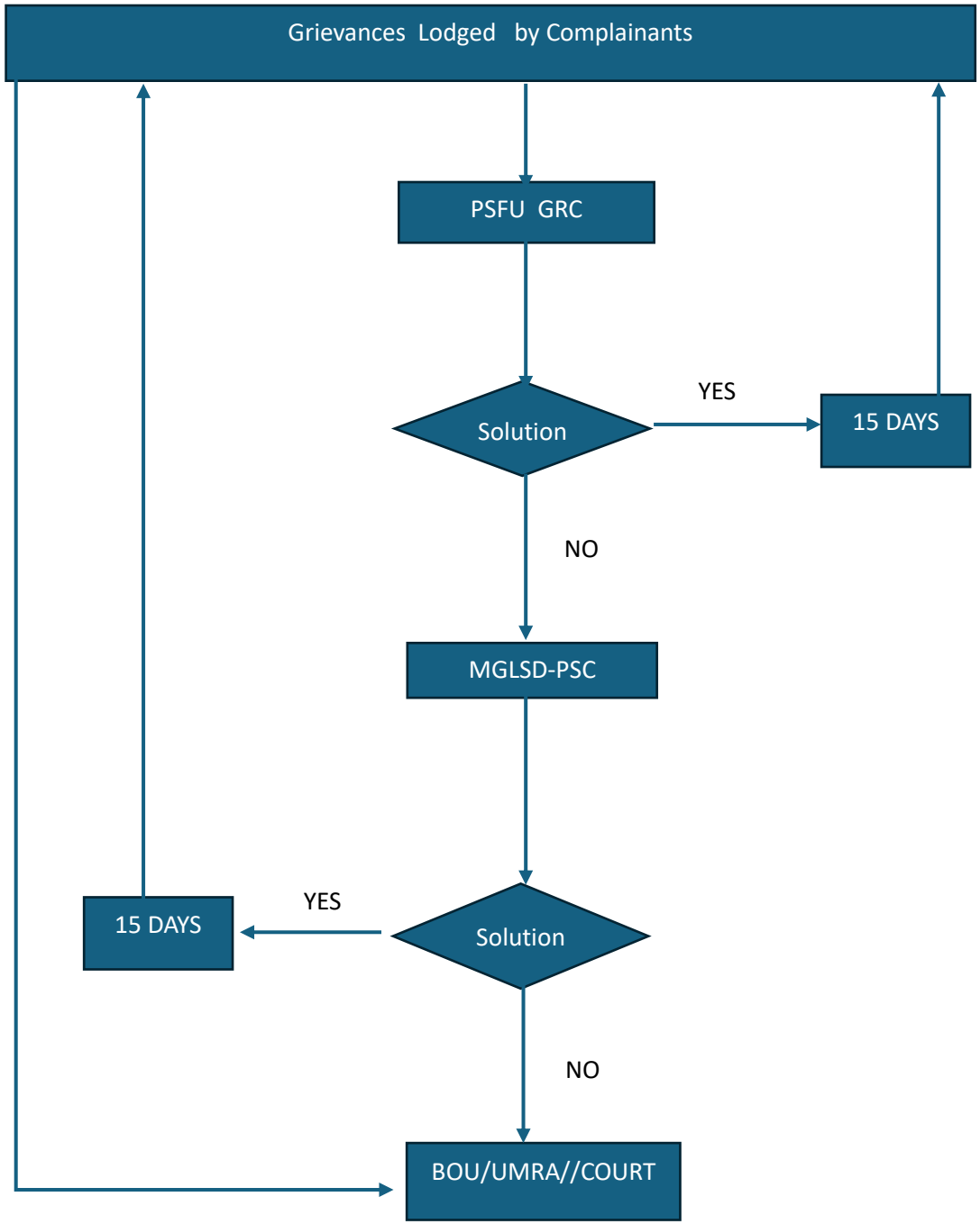
- i) **Point of First Instance for Managing Grievances:** The PSFU has delegated responsibility to manage WiB Facility and GFF related grievances within its mandate. PSFU GROW office is therefore the point of first instance for receiving and resolving WiB Facility and GFF grievances related to its actions and inactions. This includes actions and inactions of its staff and structures such as the Awards Committees for WiB Facility and GFF.
- ii) **Types of Grievances:** The grievances reported to PSFU among others may include those related to dissatisfaction with outcomes of the selection process by PSFU GROW Project office and the Awards Committees (WiB Facility and GFF Awards Committees) lodged by applicants for technical skilling, BDS services , financial serves (FIs) and delays in the selection process. Others may be on referral by Technical Skilling Firms, BDS Providers, MDAs and Financial Institutions (FIs) or appeal of decisions by these entities submitted by complainants. They will also include women entrepreneurs not selected for skilling or BDS services being dissatisfied where the

selection is done by PSFU. In addition, the grievances reported to PSFU will include those escalated as referrals and appeals through the Local Government GRC tiers 1 to 4.

- iii) **The Grievance Redress Committee (GRC) at PSFU:** The PSFU GROW Project Senior Management Team, headed by the GROW Project Coordinator will constitute the GRC. The PSFU GROW Project Coordinator will, where necessary in resolving certain grievances, liaise with or seek guidance from PSFU Chief Executive Officer and the GROW Project Technical Committee (PTC) members and any other relevant entities. Grievances related to decisions of the Awards Committees (WiB Facility and GFF) will, where necessary, be referred to these Committees for review. This will apply to cases where the Project Coordinator is satisfied that the Committees in their earlier decisions, did not consider some aspects of the applications and this omission adversely affected the applicants who have submitted complaints /grievances.
- iv) **How will Grievances be reported:** Grievances will be reported to PSFU through the following channels:
- a) Telephone call using: **039-4514071, toll-free line: 080030777**
 - b) Social media (WhatsApp) number: **076-2304961**
 - c) Radio and TV talk shows and call-in programs
 - d) Walking in and making a verbal complaint in a language complainant best understands through the Client Relations Officer at the PSFU GROW Project Offices, Trust Towers, Plot 4 Kyadondo Road. Refer to 2.3 (j) on the issue of language .
 - e) Written communication through email address: grievances@grow.go.ug, grow@psfu.org.ug or P.O. Box 7683, Kampala, Uganda
 - f) Use of a suggestion box at the PSFU GROW Project Offices, Trust Towers, Plot 4, Kyadondo Road, Kampala
 - g) Verbal reporting of grievances during stakeholder meetings
- v) **Who will receive the Grievances:** At the PSFU GROW Project Offices located in Trust Towers, Plot 4 Kyadondo Road, Kampala, the Client Relations Officer will receive and record grievances in a grievance register. An acknowledgement will be issued to the complainants indicating when the grievance will be resolved and a written response given to the complaint using the email address, Post Office number or telephone number he /she will indicate at the time of reporting the grievance. The grievances will be discussed with the Social Development Specialist who will liaise with the PSFU GROW Project Coordinator and other technical officers, depending on the grievance being handled, to resolve the grievances. Note that complainants may, for different reasons, choose whoever they want to report their grievance to and this is their right. All PSFU GROW office staff must therefore be conversant with the procedure for receiving and processing grievances. All grievances irrespective of who they are reported to must be handed over to the Client Relations Officer for further processing . Requirements of the complainant at time of reporting the grievance such as confidentiality must be observed. Principles of the CSA for GBV including SEA and SH grievances (**see section 2.5.10**) and those applicable to AHA related grievances (**see section 2.5.11**) must be complied with. This exception as to who will receive grievance will apply to all entities implementing or benefiting from WiB Facility and GFF that are required to manage grievances. **See Annex 1: Grievance Acknowledgement Form/Letter and Annex 2: Grievance Log and Redress Register.**

- vi) **Time Frame for Resolving Grievances by GRC at PSFU:** Grievances reported to PSFU directly or those on referral will be resolved within 15 working days of receiving the grievances and a written response given to the complainant. Some grievances at all levels of the GRM may, however, not require a meeting of the full GRC and all the 15 working days. Such grievances may be resolved immediately by the GROW Project Coordinator at PSFU or relevant officers in other entities in consultation, where necessary, with other technical officers and a response given to the complainant.
- vii) **Referral of Grievances:** Depending on the nature and gravity of the concern, the PSFU GRC through the GROW Project Coordinator may, where necessary and consultation with the CEO, PSFU, refer grievances to the Project Steering Committee (PSC) at Ministry of Gender, Labour and Social Development (MGLSD) and to Bank of Uganda (BOU) or the Uganda Microfinance Regulatory Authority (UMRA). This will mainly apply to grievances that have policy implications. The PSFU GRC may also refer grievances received to the relevant entity such as a FI, Technical Skilling Firm, BDS Provider, MDA, local government (tiers 1 to 4), grant or loan beneficiary, etc. if the relevant entity was not involved by the complainant as a point of first instance for resolving the grievance for unjustifiable reasons and if the entity is best positioned to resolve the grievance.
- viii) **Appeal of PSFU GRC Decisions:** Complainants not satisfied with the decision of the PSFU GRC may appeal to the PSC. In case of GFF related grievances, complainants not satisfied with the decision of the PSFU GRC and PSC may appeal to Bank of Uganda (BOU) or the Uganda Microfinance Regulatory Authority (UMRA) before seeking legal redress through courts of law. BOU and UMRA will come into play if the complaint is about actions or inactions of FIs. **Refer to Figure 1: PSFU Uptake, Resolution, Referral and Appeal Pathway for Grievances.**
- ix) **Management of Staff Grievances:** The GRC at PSFU GROW project office will also serve as the Workers' Committee for resolving staff grievances. The Project Coordinator may reconstitute the GRC if necessary, when it is acting as a Staff Committee. This may include all cadres of staff being represented on the Workers' Committee. All other entities implementing WiB Facility and GFF namely, Technical Skilling Firms, BDS Providers, MDAs, Financial Institutions (FIs), Loan and Grant beneficiaries will put in place Workers' Committees or use existing mechanisms for resolving staff grievances. Refer to the GROW Project **Labour Management Plan** on the website mglsd.go.ug and grow.go.ug for further guidance.

FIGURE 1: PSFU UPTAKE, RESOLUTION, REFERRAL, AND APPEAL PATHWAY FOR GRIEVANCES

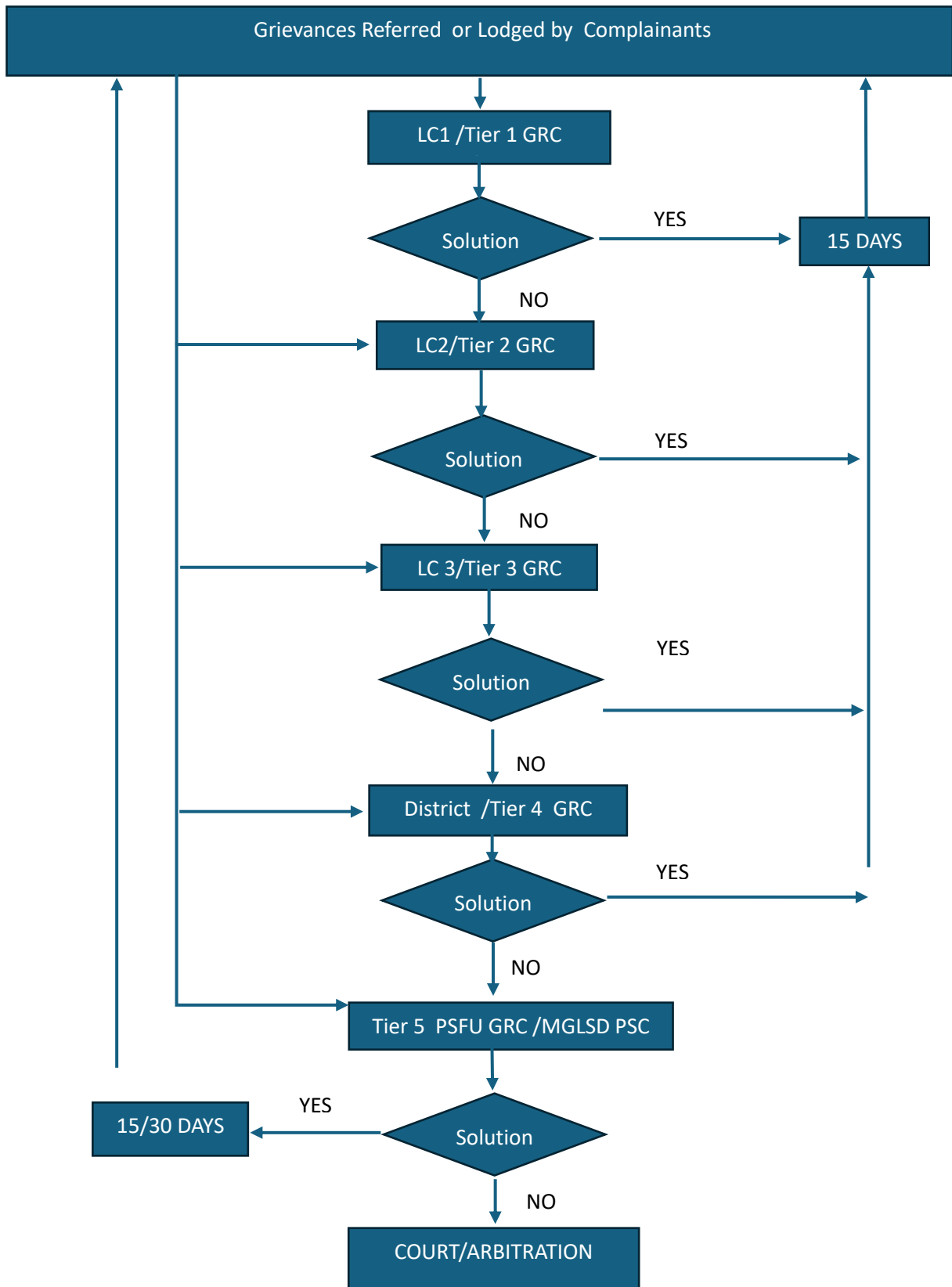


2.5.4 Management of Grievances by Local Governments, Cities and Municipalities

- i. **Offices of First Instance or Referral and Appeal:** Local Government, Cities and municipalities will manage WiB Facility and GFF related grievances within their mandate. They will manage WiB Facility and GFF related Grievances as points of first instance or referral by PSFU, Technical Skilling Firms, BDS Providers, MDAs and Financial Institutions (FIs) or appeal by complainants who are not satisfied with the decisions of GRCs of Technical Skilling Firms, BDS Providers MDAs and Financial Institutions (FIs), grant and loan beneficiaries .
 - ii. **Types of Grievances :** Will include among others, poor conduct of workers of the grant and loan beneficiaries and trainers . This includes engaging in GBV , SEA and SH , damage to community facilities such as water sources by GROW project implementers and beneficiaries , nonpayment by GROW project implementers and beneficiaries for supplies made by community members, causing accidents and injuries to community members, noise, pollution, poor working conditions including non or delayed payment of workers , child labor, grievances related to accidents and injuries and other health and safety risks triggered by activities of GROW project implementers and beneficiaries , household GBV triggered by economic empowerment of women through GROW project.
- ii) **GRC at Local Government Level:** Existing structures at local government levels will serve as GRCs for managing WiB Facility and GFF related grievances within their mandate . The structures include: LC1 (Tier1 GRC), LC2 (Tier 2GRC), LC3 (Tier 3 GRC) and District level (Tier 4 GRC). Tier 1 GRC is made up of LC1 Executive, Tier 2 GRC is made up of the existing PDM Technical Committee. Tier 3 GRC comprises the Subcounty Technical Team of civil servants and will be chaired by the Subcounty Chief. Tier 4 GRC (subcommittee of the District Technical Planning Committee) will be chaired by CAO or his/her representative . It will comprise at least the following : District Community Development Officer , District Labour Officer, District Environment Officer, District Commercial Officer, District Health Officer and the District Planner . The CAO will co-opt other relevant members who will include 3 representatives of the District Platform of Women entrepreneurs and a representative of CSOs. Similar GRCs based on existing structures will be set up in City and Municipal Councils.
- Note that it is not mandatory** that every grievance must start at tier 1 GRC. If a complainant chooses, for example, to report a labour dispute with a grant or loan beneficiary to tier 4 instead of tier 1, a solution may be provided by the District Labour officer (tier 4 GRC) since this office is mandated to address such issues. This may, of course, cause unnecessary delays in accessing justice since some simple labour disputes may easily be resolved at the LC 1 level (tier 1 GRC). Where to report different types of grievances will therefore, in some cases, be a judgment call on the part of complainants. During community engagements and GRC training, this will be emphasized to ensure the right judgement is made.
- iii. **How will Grievances be reported:**
 - a. Telephone call using telephone numberers of the Focal Persons for Grievances (see current list of Focal Persons)
 - b. Walking in and making a verbal complaint at the relevant local government , city or municipal office
 - c. Written communication through email addresses of local governments , cities or municipal councils and Post Box Numbers.

- d. Suggestion box at the relevant local government , city or municipal office
 - e. Verbal reporting of grievances during stakeholder meetings
- iv. **Who will Receive the Grievances:** Focal Person for grievance management at different local government, city or municipal levels will receive the grievances. At LC 1, the Secretary for Women is the Focal Person for grievances, at LC2, the Parish Chief is the Focal Person for grievances, at LC3, the Community Development Officer of the subcounty is the Focal Person for grievances. At the district level, the Focal Person for GROW Project in the District is the Secretary for the GRC and Focal Person for grievance management. The list of the Focal Person for GROW Project in Districts, Cities and Municipalities can be found on the MGLSD website : grow.go.ug
- v. **Time Frame for Resolving Grievances:** At every GRC tier in local governments, cities or municipalities, grievances reported directly or those on referral will be resolved within 15 working days of receiving the grievances and a written response given to the complainant or the entity that referred the grievance to the respective GRC.
- vi. **Referral and Appeal:** WiB Facility and GFF grievances submitted to Local Government , City or Municipality GRCs may be escalated through the Referral Pathway as presented in **Figure 2: Local Government , City and Municipality Uptake, Resolution and Referral Pathway for Grievances**

FIGURE 2: LOCAL GOVERNMENT, CITY, AND MUNICIPALITY UPTAKE, RESOLUTION, AND REFERRAL PATHWAY FOR GRIEVANCES



2.5.5 Management of Grievances by Technical Skilling Firms, BDS Providers, MDAs and Financial Institutions

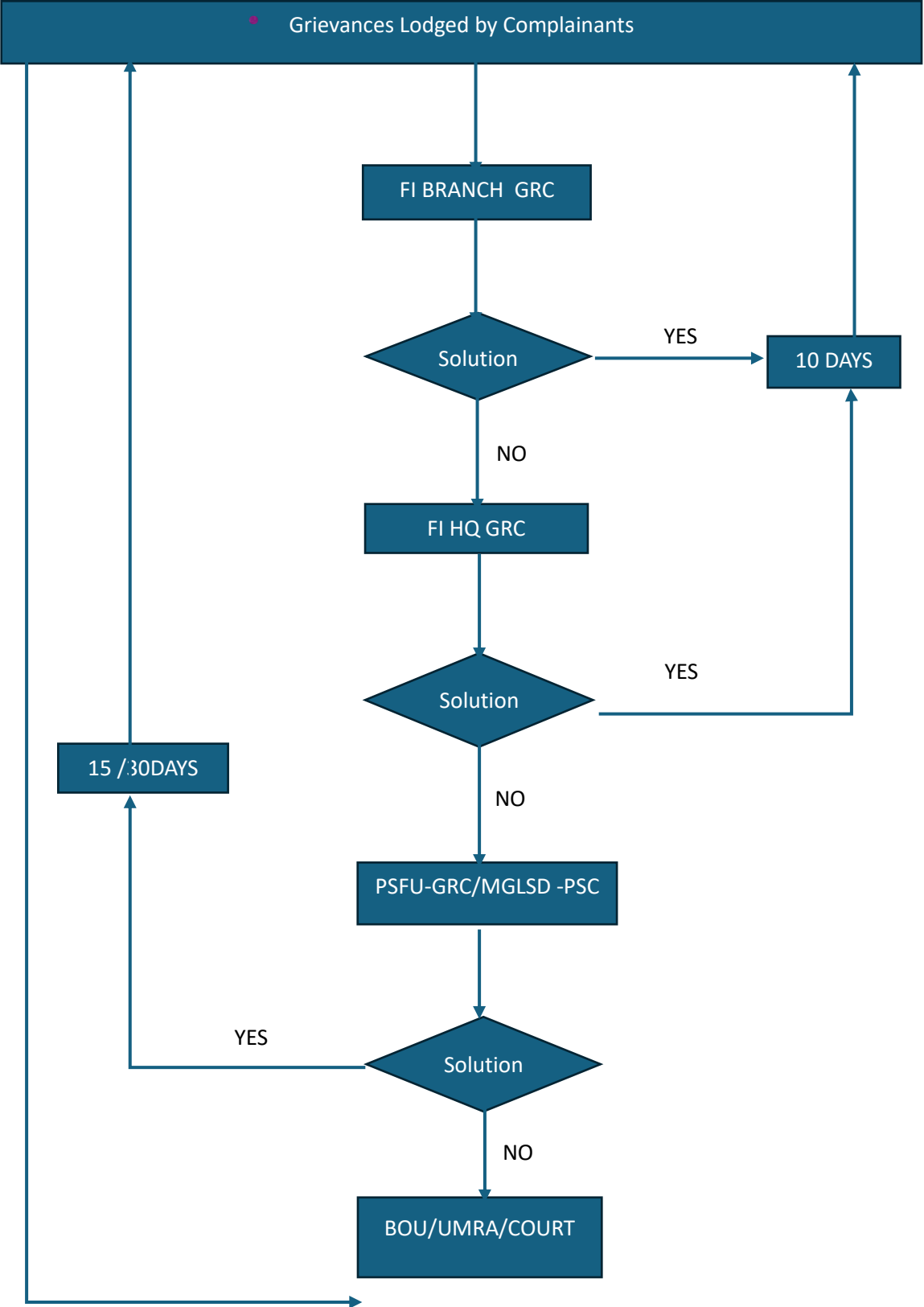
- i) **Offices of First Instance for Grievances:** Grievances will be resolved as close as possible to the point where they occur. Head offices of FIs and their branches, Head offices of Technical Skilling Firms, BDS, MDAs and their branches or field offices, will therefore be the offices of first instance for receiving and resolving grievances related to actions and inactions of these entities. This includes the actions and inactions of their staff and agents.
- ii) **Types of Grievances**
Grievances reported will among others, include:
 - a. **Technical Skilling Firms ,BDS Providers and MDAs:** Applicants not being selected for training and BDS by these entities , demands for sexual favours before being selected for a skilling opportunity or to access BDS and during skilling and the BDS process, grievances related to accidents and injuries experienced by trainees during training, poor welfare during skilling such as poor meals, accommodation and sanitation facilities for trainees, gender insensitive training program and facilities, grievances by community members related to conduct of trainees and trainers including SEA/ SH, spouses not happy with partners being selected for skilling without their permission or being informed, noise and pollution generated by training activities.
 - b. **FIs:** Applications for loans and grants not approved by FIs, delays in considering applications for loans and grants, recalling /termination of approved loans , demands for sexual favours before accessing loans and grants , harassment during loan recovery , unexplained deductions from accounts of loan and grant beneficiaries,
- iii) **GRC at Technical Skilling Firms ,BDS Providers, MDAs and FI:** Each of these entities will establish or use an existing structure to act as GRC for resolving grievances related to their actions and inactions including their employees , agents or contractors. Entities with branches will have a GRC at the branch level with referral pathway to their headquarters for grievances which cannot be resolved at the branch level or appeal by complainant not satisfied with the decision of the branch GRC.
- iv) **How and where Grievances will be reported :** Grievances will be reported to these entities through the following channels :
 - a) Telephone numbers provided by the entities
 - b) Walk in at known offices of the entities to lodge grievances
 - c) Written communication through email addresses and telephone numbers provided by the entities
 - d) Suggestion boxes at offices of the entities
 - e) Social media avenues provided by the entities
- v) **Who will receive the Grievances:** Every entity will identify a Focal Person for grievances from among the existing staff. His/her role will include receiving grievances and liaising with management of the Entity on the management of grievances received.

vi) Time Frame for Resolving Grievances: Grievances reported to the Entities including those on referral from their branches or apparel by complainants will be resolved within 15 working days of receiving the grievance and a written response given to the complainant.

vii) Referral and Appeal

- a) **Referral:** These institutions may, where necessary, refer grievances to the PSFU GRC . The decision of the PSFU GRC will be communicated to the entities within 15 working days of receiving the referral at PSFU. They may also refer to local governments , cites and municipalities if the issue is within the mandate of local governments , cites and municipalities.
- b) **Appeal to PSC:** Complainants not satisfied with the decision of the PSFU GRC, may appeal to the PSC at MGLSD. The decision of the PSC will be communicated by the Permanent Secretary (PS), MGLSD to complainants within 30 days from the time of receiving the appeal. Complainants may seek legal redress through courts of laws if not satisfied with the decision of the PSC.
- c) **Appeal to BOU and UMRA:** In the case of GFF related grievances, complainants namely grant, and loan applicants and beneficiaries may submit their grievances to FI branches. The grievance may be escalated to the FI headquarters (HQ) through appeal or referral. The grievances may further be escalated to PSFU GRC and MGLSD PSC. Those not satisfied with the decision of the PSFU GRC and PSC, may appeal to Bank of Uganda or the Uganda Microfinance Regulatory Authority (UMRA) before seeking legal redress through courts of laws if not satisfied with BOU or UMRA decisions. **See Figure 3: FI Uptake and Referral of Grievances Submitted by Loan and Grant Applicants and Beneficiaries**

FIGURE 3: FI UPTAKE, RESOLUTION , REFERRAL AND APPEAL PATHWAY FOR GRIEVANCES SUBMITTED BY GRANT AND LOAN APPLICANTS AND BENEFICIARIES



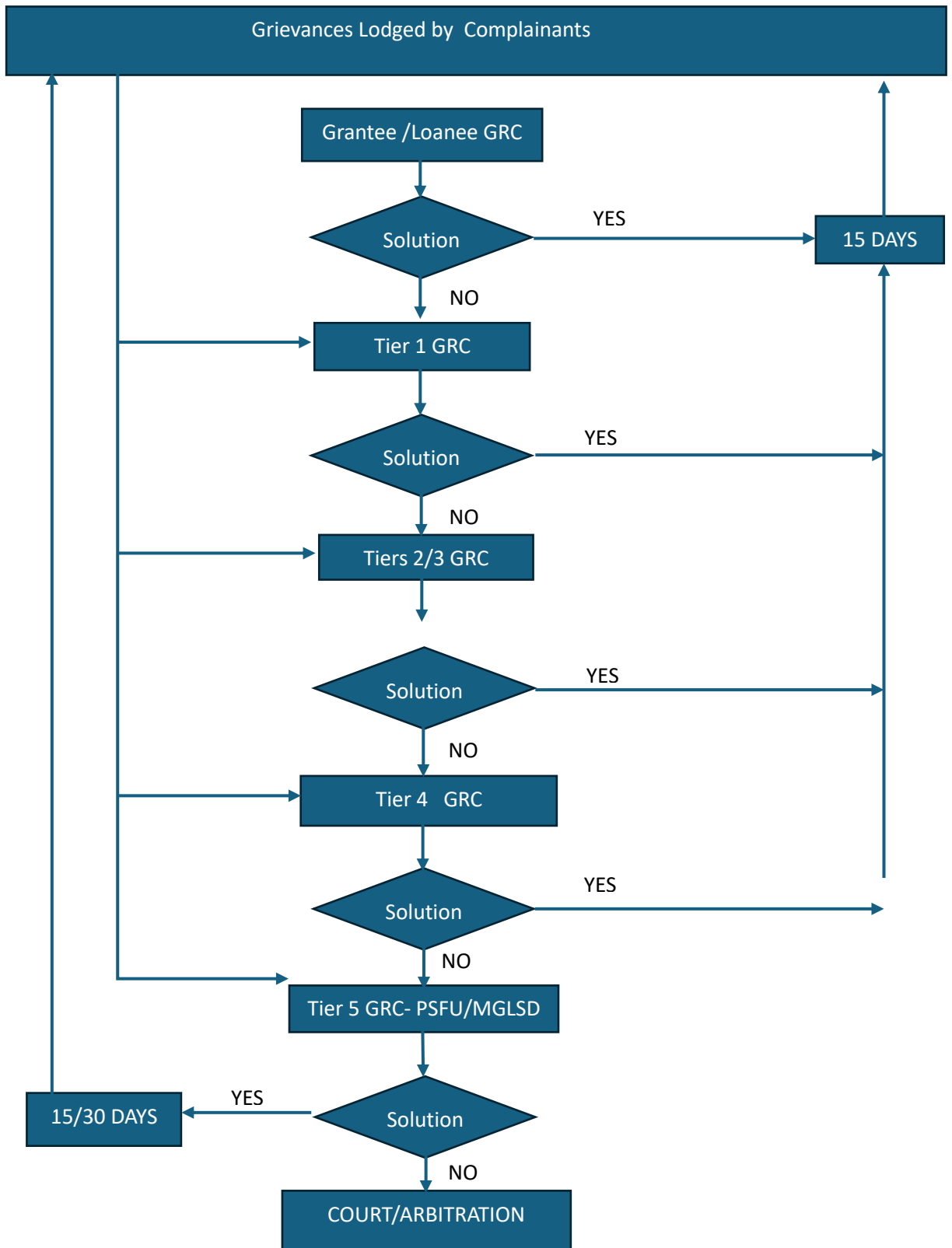
2.5.6 Management of Grievances by Loan and Grant Beneficiaries:

- i) **Point of First Instance for Grievances:** Loan and grant beneficiaries will be the point of first instance for receiving and resolving grievances directly related to their business activities including the conduct of their workers, contactors and agents
- ii) **Types of Grievances :** Grievances among others may include damage to community facilities such as water sources arising of business activities, causing accidents and injuries to community members and workers, noise, pollution, nonpayment for supplies made by community members, poor conduct of workers of the grant and loan beneficiaries including engaging in GBV , SEA and SH, non or delayed payment of workers, child labour , degrading the environment and poor waste disposal.
- iii) **GRC:** Every loan and grant beneficiary will establish or use an existing structure or office to act as GRC for resolving grievances related to their business activities including conduct of their workers, agents or contractors.
- iv) **How and where Grievances will be reported :** Grievances will be reported to these entities through the following channels :
 - a) Telephone numbers provided by the entities
 - b) Walk in at known offices of the entities to lodge grievances
 - c) Written communication through email addresses and Post Office Box numbers provided by the entities
 - d) Suggestion boxes at offices of the entities
 - e) Social media avenues provided by the entities
- v) **Who will receive the Grievances:** Every entity will identify a Focal Person for grievances from among the existing staff. His/her role will include receiving grievances and liaising with management of the entity on the resolution of grievances received.
- vi) **Time Frame for Resolving Grievances:** Grievances reported to the entities including those on referred from their branches or apparel by complainants will be resolved within 15 working days of receiving the grievance and a written response given to the complainant.
- vii) **Referral and Appeal**
 - a) **Referral:** These institutions may, where necessary, refer grievances to the local government tiers 1 to 4 as appropriate. This will apply to grievances within the mandate of local government, cities and municipalities.
 - b) **Appeal :** Complainants not satisfied with the decision of the loan and grant beneficiary may appeal to local government GRC, tiers 1 to 4 as appropriate if the issue is within the mandate of the local government cities and municipalities. . The grievance may also be escalated to tier 5 GRC (PSFU GRC and PSC at MGLSD). Complainants may seek legal redress through courts of law if not satisfied with the decision of the PSC. The GRCs (tiers 1 to 5) may consult with FIs in resolving grievances related to activities funded by FIs. This may include requesting FIs to halt funding if the loan and grant beneficiaries are not , for example,

complying with environmental and Social (E&S) standards which are the trigger for the grievances . FIs as part of their monitoring of grant and loan beneficiaries, may also suspend or even cancel funding to grant and loan beneficiaries that are not complying with E&S standards which may be the trigger for the grievances. This will be done in close collaboration with relevant MDAs and the local government departments.

See Figure 4: Grant and Loan Beneficiary Uptake, Resolution, Appeal and Referral Pathway for Grievances .

FIGURE 4: GRANT AND LOAN BENEFICIARY UPTAKE, RESOLUTION, APPEAL AND REFERRAL PATHWAY FOR GRIEVANCES



Note: Grievances about actions and inaction of other entities namely, Technical Skilling Firms, BDS Providers and MDAs will follow the same route presented in Figure 4 above, if the grievances are within the mandate of local governments, cities and municipalities.

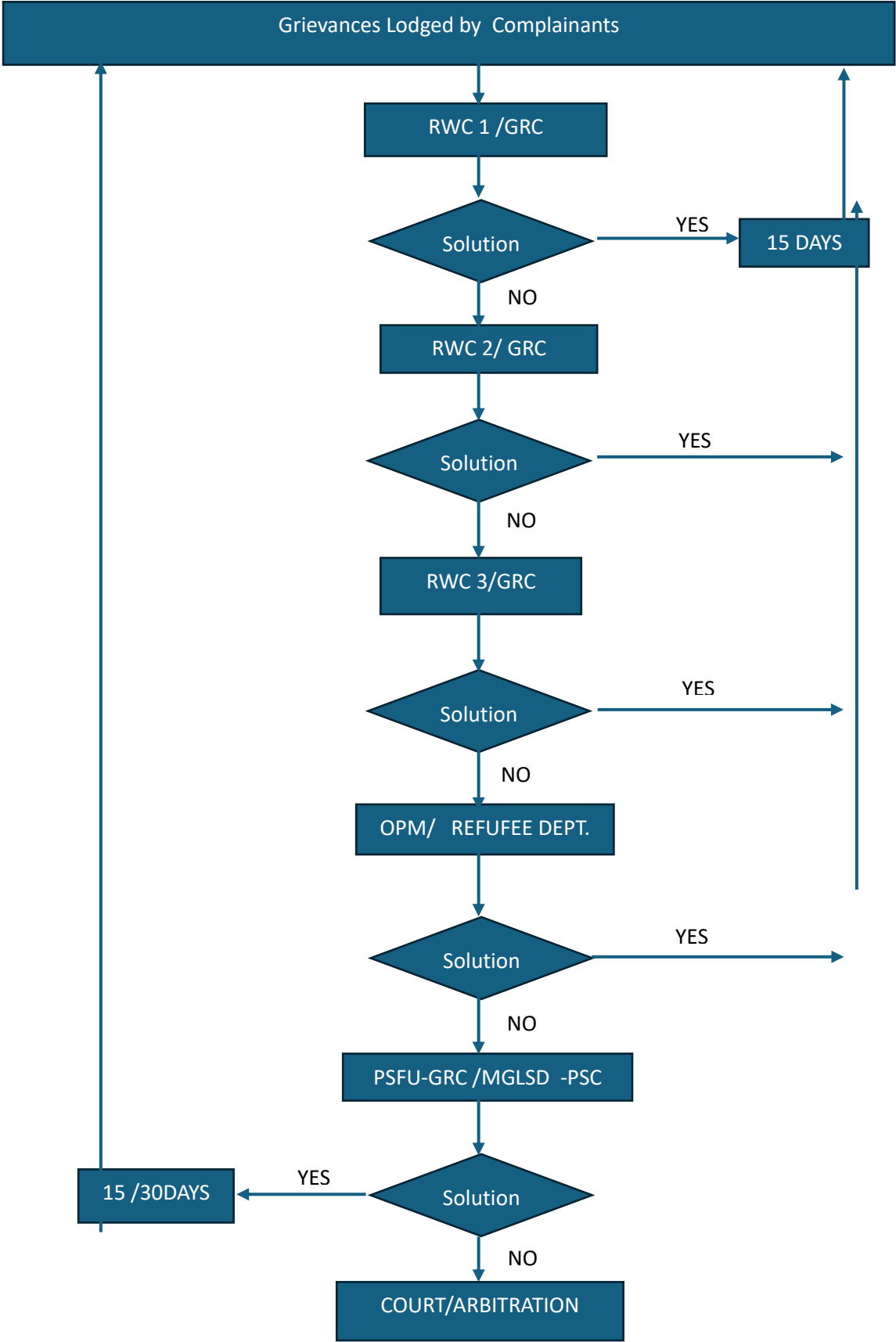
2.5.7 Management of Grievances in Refugee Resettlements

- i. **Offices of First Instance for Grievances:** The Office of the Refugee Resettlement Commandant will be the Office of first instance for receiving and resolving GROW related grievances within the Refugee Resettlement. This will apply where complainants and those complained about are refugees.
- ii. **Types of Grievances:** Grievances reported to Refugee Resettlement Commandant include delayed payment for goods and services supplied to refugee women entrepreneurs by fellow refugees, cases of GBV and other conflicts at family and community level resulting from economic empowerment by GROW project of refugee women entrepreneurs, GBV such as SEA committed by refugee workers of grant and loan beneficiaries against fellow refugee community members.
- iii. **GRC in Refugee Resettlements:** WiB Facility and GFF related grievances within the refugee community where refugees are the complainants or the victims will be managed through existing structures within the Refugee Resettlement namely, the Refugee Welfare Committees 1 to 3 (RWC 1 to 3). RWCs will only handle issues within their mandate. The 11 member RWC is constituted through an election and comprises: a) A Chairperson b) Vice Chairperson (Woman) c) General Secretary d) Publicity e) Women Affairs f) Health g) Education h) Production i) Security j) Youth k) Persons with Special Needs (PSN) such as PWD
- iv. **How and where Grievances will be reported**
 - a. Toll free telephone numbers to be provided by the Resettlement Commandant
 - b. Walk to the offices of the Focal Person for grievances or Resettlement Commandant
 - c. Written communication through email addresses and Box numbers provided by the Resettlement Commandant
 - d. Suggestion boxes at the office of Focal Person for grievances or Resettlement Commandant
- v. **Who will receive the Grievances:** Every Refugee Resettlement will identify a Focal Person for grievances whose tasks will include receiving grievances, recording the grievances in the register and issuing an acknowledgement to the complainant. He/she will also be responsible for liaising with relevant offices of the Refugee Resettlement or RWCs to resolve grievances.
- vi. **Time Frame for Resolving Grievances:** At RWC 1 to 3, grievances reported will be resolved within 15 working days and a written response given to the complainant
- vii. **Referral and Appeal of Grievances:** The appeal and referral pathway is for grievances within the mandate of RWCs. Other issues such as complaints by refugee grant and loan beneficiaries about unexplained deduction from bank accounts, FI delays in responding to grant and loan applications, termination / recalling loans, not being considered for loan and grants (**which**

are outside the mandate of RWCs) will be reported to the FIs by complainants and subsequently will follow the referral pathway in figure 3. The OPM Department of Refugees will resolve the grievances that cannot be resolved at RWC 1 to RWC 3 before the issue is escalated to PSFU GRC and MGLSD PSC. **See Figure 5: Uptake, Resolution, Appeal and Referral Pathway for Grievances Related to Implementers in Refugee Resettlements**

Note: Refugees who have grievances related to activities of **national (non-refugee)** loan and grant beneficiaries such as nonpayment of refugees employed will follow the grievance pathway in **Figure 4**. Grievances related to activities of Technical Skilling Firms, BDS Providers and MDAs will be reported to these entities as the point of first instance for resolving the grievance. The Office of the Prime Minister will, where necessary, support refugees to receive justice from national systems including GRCs at all project implementation levels.

FIGURE 5: UPTAKE, RESOLUTION, APPEAL AND REFERRAL PATHWAY FOR GRIEVANCES RELATED TO IMPLEMENTERS IN REFUGEE RESETTLEMENTS



2.5.8 Management of Grievances in Communities of Ethnic Minorities

- i) **Existing Mechanisms in Communities of Ethnic Minorities:** The existing mechanisms for management of grievances among ethnic minorities, namely the IK, BATWA, TEPETH and BENNET will, to the extent possible, be the point of first instance for receiving and resolving grievances related to WiB Facility and GFF that are within the mandate of these mechanisms. Such grievances may include conflicts triggered by WiB Facility and GFF.
- ii) **Appeals and referrals:** Appropriate appeals and referrals will be made to tiers 1 to 4 of the GRM at the district level will be made if the grievances are within the mandate of local governments. The grievances may be escalated to PSFU GRC, PSC at MGLSD and to courts of law for legal redress if complainants are not satisfied with the PSC decision. Grievances of ethnic minorities about Financial Institutions (**outside mandate of local governments**) will be reported to branches of Financial Institutions and escalated where necessary through referrals and appeals to headguards of the banks and to PSFU, PSC and ultimately being VMGs, may however, where necessary, seek the support of the Focal Person for GROW Project at the district level in reporting grievances to Financial Institutions.

2.5.9 Grievances of a Criminal Nature: Grievances of a criminal nature will not be resolved by the GRC at PSFU, MGLSD (PSC), Technical Skilling Firms, BDS providers, MDAs, FIs, any of the Local Government GRC structures (tiers 1 to 4), grant and loan beneficiary. Such grievances will be recorded in the GRM logbook by these entities and referred to relevant law enforcement organs. The Accounting Officer or responsible officer will however ensure that appropriate information and or clarifications related to the grievance where available, is provided to complainants to ensure grievances are not based on misinformation or lack of information.

2.5.10 GBV Including SEA/SH Related Grievances: Gender based Violence (GBV) including sexual harassment (SH) and sexual exploitation and abuse (SEA) grievances will also **not** be resolved by the GRC of any implementing entity. Such grievances will also be received, recorded and referred to providers of relevant services in the MGLSD GBV referral Pathway. However, it should be noted that Local councils and RWCs in Refugee Resettlements are mandated to resolve GBV grievances of a non-criminal nature. The former are part of the MGLSD GBV Referral pathway. Resolution and referral of GBV cases will be done in a manner that is consistent with principles of the survivor Centered Approach (SCA). The principles include confidentiality of the survivor, respect and non-stigmatization of the survivor, not blaming the survivor, access to services, informed choice and survivor self-determination of the course of action. The GRCs in all entities (PSFU, Technical Skilling Firms, BDS providers, MDAs, FIs any of the Local Government GRM structures (tiers 1 to 4), grant and loan beneficiary), will have confidential avenues for reporting, receiving and referral to service providers of such grievances. The MGLSD GBV Referral Pathway can be found on the Ministry website: grow.go.ug

2.5.11 Grievances Related to the Anti-Homosexuality Act: Such grievances will also **not** be resolved by the GRC of any of the entities (MGLSD, PSFU, Technical Skilling Firms, BDS providers, MDAs, FIs, any of the Local Government GRC structures (tiers 1 to 4), grant and loan beneficiaries. Anti-Homosexuality Act (AHA) related grievances received at any level will immediately be submitted to PSFU GROW Project Coordinator. Grant and loan beneficiaries will report the grievances to FIs who will in turn report the grievances to PSFU GROW Project Coordinator. The PSFU GROW Project Coordinator will, in collaboration with the CEO, PSFU, submit the grievances to the **Third-Party Monitoring Firm (TPM)** that will be hired by the World Bank for all World Bank funded projects in Uganda. Note however, in keeping with Uganda Constitution of 1995, as amended, there shall be no discrimination of anyone in accessing GROW Project services. However, GROW project is

targeting Women Entrepreneurs. A typical example of a possible grievance or issue may be when a transgender woman whose national ID is still reading “Male” seeks GROW project services. The arising grievance shall be submitted to the GROW Project Coordinator for onward submission to TPM. In receiving and submitting to PSFU and TPM such grievances, respect, not being judgmental, non-stigmatization and confidentiality shall be observed. TPM shall submit the grievance to the World Bank that will discuss the grievance with Ministry of Finance, Planning and Economic Development. The latter (Ministry of Finance, Planning and Economic Development) will communicate the decision on such grievances to the Accounting Officer of the concerned project after consulting with MDAs such as the Attorney General where necessary.

3. TRAINING IN GRIEVANCE MANAGEMENT

All PSFU, Technical Skilling Firms, BDS Providers, Financial Institutions (FIs), Loan and Grant Beneficiary and local government members of the GRC including RWC and other staff will be trained in grievance management including principles of the SCA for managing GBV including SEA and SH grievances. PSFU and Technical Skilling Firms, BDS Providers, MDAs, Financial Institutions (FIs) GRCs will be trained by PSFU Environmental and Social (E&S) Team. Loan and Grant Beneficiary GRCs will be trained by FIs with PSFU E& S team support. Local government GRCs (tiers 1 to 4) will be trained by PSFU E& S team in collaboration with MGLSD GROW Project E&S team. Appropriate materials such as brochures and posters on grievance management have also been developed by PSFU and will be made available to the different entities. Entities may also develop their own materials.

4. RAISING AWARENESS ON WiB FACILITY AND GFF GRM

It is a requirement for all entities implementing GROW project to have a GRM and to have it disclosed to all stakeholders, especially those who may be adversely affected by the actions and inactions of the implementers. The GRM at different entities has been or will be disclosed as follows:

- a) **PSFU:** The PSFU has included the mechanism for receiving and resolving WiB Facility and GFF related grievances (GRM) in its communication strategy ~~that us being finalized~~. This includes regularly explaining the GRM to all stakeholders during different engagements. The GRM has also been disclosed on the GROW Project website: grow.go.ug. Other PSFU GRM disclosure avenue include radio and TV programmes, brochures, posters and other materials which include avenues for reporting WiB Facility and GFF related grievances and how the grievances will be resolved. The list of the current District Focal Persons for GROW who also serve as Focal Persons for grievance management may be accessed through the GROW Project website: grow.go.ug
- b) **Technical Skilling Firms, BDS Providers, MDAs, Financial Institutions, Grant and Loan Beneficiaries and Refugee Resettlements:** These entities will include in their communication plans, their mechanism for receiving and resolving grievances related to GROW Project funded activities they are implementing. All stakeholders including communities in the area of influence of the GROW funded activities should be made aware of how they can report grievances and have them resolved. GRM disclosure avenues will include the website of these entities, notice boards at their offices, radio, TV, social media, brochures, billboards, community and other stakeholder meetings. As part of their Environmental and Social Management Systems (ESMSs), FIs are required to demonstrate procedures for communication and stakeholder engagement through which awareness on the GRM among other issues will be raised.

5. BUDGETING FOR GRIEVANCE MANAGEMENT

PSFU and all other entities implementing WiB Facility and GFF that will play a role in grievance management will have a budget for executing different grievance management tasks. The budget will be commensurate with the envisaged grievance management tasks. The budget for GRM will include the following items as applicable to different entities: training GRCs and other staff in grievance management , development of information education and communication (IEC) materials on grievance management, Grievance Acknowledgement Form/Letter, Grievance Log and Resolution Register, community/ stakeholder engagements on grievance management, Radio and TV programmes on grievance management, monitoring of the GRM and reporting (to be part of overall monitoring and reporting).

6. MONITORING, EVALUATION AND REPORTING

All entities involved in grievance management will also have monitoring, evaluation and reporting roles with regard to grievance management as summarized below.

- i) **Regular Reporting:** The GRM at all levels must be monitored, evaluated and reported on. The monitoring and reporting template issued by PSFU to WiB Facility and GFF implementers includes GRM parameters.
 - a) **PSFU:** The entire WiB Facility and GFF GRM will be monitored by PSFU Environmental and Social (E&S) Team. The PSFU Quarterly report on environmental and social risk management which will include grievance management will be shared with MGLSD and will be incorporated in the overall E&S quarterly report for the GROW Project. The consolidated E&S quarterly report will subsequently be submitted to MoFPED and the World Bank.
 - b) **Technical Skilling Firms, BDS Providers, MDAs and Financial Institutions:** Will submit quarterly environmental and social risk management reports to PSFU which include management of grievances. FIs will collect data on grievance management by loan and grant beneficiaries which they will include in their quarterly reports submitted to PSFU.
- ii) **Incident and Accident Reporting**
 - a) **PSFU :** Incidents and accidents and the related grievances will be reported to the World Bank within 24 hours by the GROW Project Coordinator after the incidents and accidents have been brought to his/her office by Technical Skilling Firms, FIs, BDS providers, MDAs and FIs, etc.
 - b) **Technical Skilling Firms, BDS Providers, MDAs and Financial Institutions:** Will report incidents and accidents and the related grievances to PSFU GROW Project Coordinator immediately after the incidents and accidents have been brought to their attention.
 - c) **Grant and Loan Beneficiaries:** Will report incidents and accidents and the related grievances to FIs immediately after the incidents and accidents have been brought to their attention. See b) above on reporting the incidents and accidents to PSFU.

ANNEX 1: GRIEVANCE ACKNOWLEDGEMENT FORM / LETTER

RE: COMPLAINT / GRIEVANCE ACKNOWLEDGEMENT FORM /LETTER

PSFU GROW Project Office acknowledges that we received your complaint / concern / grievances dated PSFU takes stakeholder complaint / concern / grievances seriously and we thank you for submitting your concern / complaint / grievance. We will make every effort to ensure that your complaint / concern / grievance is considered quickly and fairly.

PSFU has a Grievance Redress Mechanism (GRM) that we follow to consider and resolve complaints / concerns / grievances received. The PSFU GRM is part of the overall GROW Project GRM. The details of WiB Facility and GFF GRM and overall GROW Project grievance management procedures may be accessed through the website: **grow.go.ug**

In accordance with our GRM, we will attend to your complaint / concern / grievance and give you feedback on the next steps. We will contact you for more information if necessary.

You can expect to hear from us within working days from the date of this letter.

Sincerely

.....

Dr Ruth Biyinzika Kasolo

Project Coordinator, GROW Project, PSFU

ANNEX 2: GRIEVANCE LOG AND REDRESS REGISTER

S/N	Name of Complainant (optional)	Gender (M/F)	Complainant's ID No (optional)	Complainant's Mobile Number, E-mail address (optional)	Description of the Grievance and what Complainant proposes to be done to Resolve the Grievance	Date of Grievance Receipt and Recording	Date Acknowledgement of Grievance was Given to Complainant	Date of Resolution of the Grievance and Date Resolution was Communicated to Complainant	Specific Nature of Action Taken to Redress Grievance	Reaction of Complainant to Redress Action taken	Status of the Grievance Reported Todate
1.											
2.											
3.											
4.											
5.											
6.											
7.											
8.											

