



Ministry of Green Economy and Environment

**EASTERN PROVINCE JURISDICTION SUSTAINABLE  
LANDSCAPE PROJECT (EP-JSLP)**

**FEEDBACK AND GRIEVANCE REDRESS MECHANISM  
(FGRM)**

**22<sup>ND</sup> OCTOBER 2018**

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## ACRONYMS

AP	Aggrieved Party
BioCF	Bio Carbon Fund
CC	Compensation Committee
CLO	Community Liaison Officer
CSA	Climate Smart Agriculture
DMT	District Multi-Stakeholder Team
EP	Eastern Province
ESMF	Environmental and Social Management Framework
GC	Grievance Committee
GIR	Grievance Investigation Report
GRF	Grievance Redress Form
FGRM	Feedback and Grievance Redress Mechanism
GRS	Grievance Redress Service
PF	Process Framework
PPM	Provincial Project Manager
PPIU	Provincial Project Implementation Unit
NDP	National Development Plan
NPC	National Project Coordinator
NPU	National Project Unit
REDD	Reducing Emissions from Deforestation and Forest Degradation
RPF	Resettlement Policy Framework
WDC	Ward Development Committee
ZIFLP	Zambia Integrated Forest Landscape Project

## **1.0 INTRODUCTION**

### **1.1 PROJECT BACKGROUND**

The Zambia Integrated Forest Landscape Project (ZIFLP) is an initiative supported by the government of Zambia with funding from the BioCF, GEF and IDA. The project covers a series of investments that lead ultimately to results-based payments for carbon storage and reduced carbon emissions resulting from reduced deforestation and degradation. The project is jurisdictional in approach, covering all the nine (9) districts of Eastern Province with the aim of promoting reduced greenhouse gas (GHG) emissions from the land sector while at the same time improving rural livelihoods through sustainable management of forest and wildlife resources and adoption of climate smart agriculture (CSA). The ZIFLP is part of the country's REDD+ National Implementation programme that focuses on tackling different drivers of deforestation in both the forestry and other identified key sectors such as agriculture, energy, mining, and infrastructure. The Vision of the REDD+ is to contribute to a prosperous climate change resilient economy by 2030, anchored upon sustainable management and utilization of the nation's natural resources towards improved livelihoods.

The ZIFLP is anticipated to have a positive impact on the lives of the rural communities and on the environment in the project areas. Some project activities might however impact negatively on the environment and the livelihoods of the implementing communities. To ensure that the negative impacts are avoided or minimised, the ZIFLP will implement environmental and social safeguards in line with the World Bank policies and in country legislation. To this effect, safeguards instruments including the Environmental and Social Management framework (ESMF), the Resettlement Policy Framework (RPF) and the Process Framework (PF) have been developed to guide the project in the implementation of safeguards. The project activities and impacts might however give rise to grievances which might be felt and expressed by a variety of parties including individuals, groups, or entities. This grievance redress mechanism (GRM) has therefore been prepared to ensure that the potential grievances arising from the implementation of the project activities are adequately addressed.

### **1.2 THE PROJECT OBJECTIVES AND COMPONENTS**

The Project Development Objective (PDO) is *“to improve landscape management and increase environmental and economic benefits for targeted rural communities in the Eastern Province and to improve the Recipient's capacity to respond promptly and effectively to an Eligible Crisis or Emergency”*.

ZIFLP comprises four components as follows:

### **1.2.1 Component 1: Enabling environment**

Component 1 is intended to help create conditions that will allow the livelihood investment of Component 2 to be successfully implemented. This entails supporting plans, partnerships, and regulatory conditions to help rural communities in the project area to be well placed and to have the capacity to adopt sustainable and low-carbon land management practices. The component would include support for (i) institutional strengthening and regulatory framework improvement in targeted districts across the province which are deforestation hotspot, for coordination of delivery of actions to address deforestation with stakeholders; (ii) support to planning processes at both district and local levels; and (iii) private sector engagement to foster partnerships for community based natural resource management, and leverage existing private sector investments to improve land management practices in the province. In addition, this component will support establishment of the REDD+ architecture for GRZ to receive future results-based emission reductions payments for the Eastern Province. Enabling environment interventions will be financed through grant support from the BioCarbon Fund-ISFL and IDA credit.

### **1.2.2 Component 2: Livelihood and low-carbon investments**

Component 2 will finance on-the-ground activities that improve rural livelihoods, conserve ecosystems and reduce GHG emissions. It has two subcomponents: Agriculture and forestry Management and Wildlife management. Although the subcomponents are sectoral in nature, the cross sectoral and landscape approach of the planning activities that will underlie the activities will ensure a landscape approach is retained.

- *Subcomponent 2.1: Agriculture and forestry management*

The objective of this subcomponent is to provide financing for interventions that increase agricultural productivity, enhance agro and forest ecosystem resilience, reduce GHG emissions, and sequester carbon using a landscape approach. This subcomponent will cover the following activities:

- (a) Scaling up of CSA practices;
- (b) Community forestry management; and
- (c) Land tenure and resource rights regularization.

**Climate Smart Agriculture:** The objective of this subcomponent is to provide financing for interventions that increase agricultural productivity, enhance agroecosystem resilience and reduce GHG emissions. These include conservation agriculture (CA) practices, integrated soil fertility management, agroforestry, and crop value chain development. Interventions will aim at enhancing the income and livelihood of the communities and farmer families through income generating and value-added activities.

This component aims to scale up CSA practices for smallholder farmers through financing support for interventions that increase agricultural productivity, enhance agro-ecosystem resilience and reduce GHG emissions. The component's objective would be achieved through the introduction of tested best practices in CSA and sustainable land management. Project funds will focus on strengthening agricultural extension by addressing CSA skills gap of extension officers and farmers in the form of targeted trainings (e.g., workshops, exchange visits, production of field manuals), and field-based learning (e.g., site visits, demonstration plots and pilots) provided by competent institutions such as ZARI, CGIAR, and relevant NGOS among others. Specific interventions the component will focus on include (a) conservation agriculture (CA) and integrated soil fertility management practices (ISFM), (b) agroforestry, and (c) agriculture and marketing value chains. The project will provide funds for these activities through various funding instruments, such as matching grants, micro loans, credit guarantee schemes, and technical support consultancies.

**Community forestry management.** The objective of the community forestry management is to assist local communities and their organizations to improve the management and conservation of their natural resources, create income opportunities, and generate carbon benefits. This will be accomplished by developing and implementing participatory land and resource use planning and management—including fire control and prevention—and providing specialized TA and training to identify viable investments from the sustainable production of timber and non-timber forest products. Activities to be supported will be consistent with the land and resource use plans developed at the village and district levels. The subcomponent will finance specialized technical and extensions services, small works and equipment, operational costs, and non-consultant services (for example, workshops and study tours). More specifically, the sub component will support:

*Community Forestry Management Groups (CFMG):* Based on the Forest Act of 2015 and its regulations, the Project will assist Villages from selected Chiefdoms and Districts to identify and establish (CFMG). Support will include preparation and approval of Community Forestry Management Agreements, and their formal registration.

*Forest Management Plans:* The Project will support CFMGs to develop and implement forest management plans that are consistent with Village land use plans and follow the guidelines and specifications established in the Forest Act and its regulations. These plans will identify sustainable investments and activities that lead to improving livelihoods and reduce deforestation/degradation.

*Community Forestry Enterprises:* Based on the assessment and productive potential of natural resources identified in forest management plans, the Project will finance small scale investments that fulfil the dual criteria of generating monetary and non-monetary income and generate carbon related benefits. Support will include technical assistance for resource management and production, establishment of small community enterprises, markets studies, and commercialization skills. Investments under this category may include the cultivation or extraction of any forest and non-forest product that can be sustainably managed in the communal forest area of reference. Some examples include: Bee keeping, sustainable charcoal, wood-lots for fire wood production, carpentries for furniture, medicinal herbs, eco-tourism and recreational activities, commercial timber plantations, grass harvesting and grazing of animals, etc.

*Fire management and prevention.* Fire is an important element in rural landscapes, and when management properly, it can be beneficial for agriculture, however, if it goes out of control can destroy forests and generate emissions. To reduce this risk, the Project will support activities to revive and enforce the village level fire ordinances that were functional and effective in the past; and draw upon the lessons from other regions, to prepare community by laws on fire management. The Project will also support local governments and communities on training and incentives for fire management and prevention and financing small works and equipment for fire line clearance and maintenance.

*Forest management near protected areas.* The Project will dedicate special efforts to work with Villages and communities in buffer zones and connecting corridors to reduce pressure on protected areas. The Project will work with existing CRBs and CFMG to develop and finance forest management plans that focus on alternative productive and conservation activities to protect or improve wildlife habitat. Efforts invested by communities in these activities could be compensated by revenues from the wildlife reserves and administered by CRBs, or capture other benefit sharing income from carbon markets.

**Regularization of land and resource rights.** The subcomponent will provide analytical and technical support to expand past and on-going efforts at documenting land rights that could underpin adoption of sustainable low-carbon land management practices and private sector engagement. Activities will feed into the National Land Titling Program and will comprise (a) developing cost-effective systems to sustainably manage information on land rights and linking it to land use; (b) identifying new

possibilities of private sector engagement based on an assessment of the extent and impact of existing arrangements; (c) documenting different types of land rights in ways that are supported by local stakeholders and provide incentives for adoption of CSA, sustainable land use, and intensification; and (d) linking land rights to key parameters of land use (crop cover, soil moisture, and soil carbon) using remotely sensed imagery.

- *Subcomponent 2.2: Wildlife management*

This sub-component will have two major focus areas: i) improved management of the complex of protected areas centered on Lukusuzi National Park in the Eastern Province; and ii) adoption of improved management practices of wildlife at the community level, which can contribute to improved livelihoods of targeted communities. The project will support (i) preparation of park management plans; (ii) investments in infrastructure such as guard houses or other park buildings, upgrading of existing roads and tracks to facilitate park management and ecotourism, provision of water holes, fencing (only in limited areas where judged necessary to minimize HWC); (iii) purchase of equipment such as radios for communication, park guard equipment, patrol equipment, etc.; and (iv) support to park patrols, with a particular focus on management of poaching.

With respect to *improved adoption of wildlife management practices*, the Project seeks to promote practices which will maximize opportunities for rural communities from adjacent wildlife resources. These investments will focus on rural communities of the EP in the vicinity of the Lukusuzi and Luambe National Parks. It should be noted that the activities to be supported will in most cases take place in the same communities targeted for agriculture and forestry investments and the various activities will be planned and implemented in coordination and so as to enhance synergies.

As concerns *direct support to protected area management*, the Project will focus on the complex of protected areas centered on Lukusuzi National Park. Lukusuzi National Park falls within the Nyika Trans-frontier Conservation Area (NTCA) adopted by the governments of Zambia and Malawi. The ZIFLP will support management investments in Lukusuzi National Park, in the surrounding game management areas, and in adjacent Luambe National Park.

### **1.2.3 Component 3: Project management**

This third component will finance activities related to national and provincial-level project coordination and management, including annual work planning and budgeting; fiduciary aspects (financial management and procurement); human resource management; safeguards compliance monitoring; M&E and impact evaluation studies; and communication strategy and citizen engagement. Funds will cover the cost of management unit contract staff, and operations and



maintenance (O&M) costs, such as office space rental charges, fuel and spare parts of vehicles, office equipment, furniture, and tools, among others. It will also finance the costs of project supervision and oversight provided by the National Project Steering Committee and National Technical Committee (or the Provincial Project Steering Committee), and other project administration expenses.

#### **1.2.4 Component 4: Contingent emergency response**

This is a zero-budget component which is included to facilitate the use of IDA funds in the event of a disaster and to be able to respond quickly to a potential Government request to reallocate some funding from existing World Bank projects to provide emergency relief.

### **1.3 INSTITUTIONAL ARRANGEMENTS**

Although there are some project investments under the ZIFLP project that are national in scope such as those related to the REDD+ policy, MRV, policies and national-level institutional strengthening, the major investments of the ZIFLP project are intended to be decentralized, to the lowest level possible, to have funds managed and controlled by beneficiaries.

At the national level, the Ministry of National Development Planning (MNDP) represents the Government of the Republic of Zambia and hosts the National Project Unit (NPU) that is responsible through the National Project Manager to providing overall guidance to the implementation particularly of activities under component 1.

At the provincial level, the Provincial Administration of the EP is the Executing Agency of the project. This arrangement follows the decentralization policy of government and aims to devolve decision-making to sub-national structures to enable more efficient project implementation. The Provincial Development Coordinating Committee (PDCC) chaired by the Eastern Province PS, is responsible for providing policy support, guidance, and advice to the ZIFLP in relation to sectorial issues in the province. The Provincial Planning Sub-Committee (PPSC) of the PDCC, chaired by the Provincial Planner is responsible for the day to day oversight on the operations of the Provincial Project Implementation Unit (PPIU) including reviewing, advising, and approving sub-project activities from the lower levels (districts and communities). The PPIU headed by the Provincial Project Manager (PPM) is responsible for the day-to-day operations of the project's livelihood investments and is supported by the PPSC. The PPIU provides oversight to planning, provides specialized technical support, and carries out fiduciary, safeguards, and monitoring oversight of the project.

At the district level, the District Development Coordinating Committee (DDCC) chaired by the District Commissioner provides policy guidance on development projects in the districts. The District Planning Sub-Committee (DPSC) of the DDCC consisting of technical staff, traditional representatives and civil society partners provide the day to day overall coordination and is responsible for advising, reviewing and recommending community sub-projects from Wards and Communities. The District Planning Officers under the guidance of the DPSC ensure that the project is integrated in existing institutional structures and mandates of the district. Districts are responsible for implementing interventions that fall under their authority and provide coordination responsibility over community level micro-projects that cut across several communities.

At the community level, the overall coordinating responsibilities fall under the Ward Development Committees (WDCs) that are/will be constituted per local government electoral procedures. The WDCs consist of community representatives from the respective Zones, civic leaders and government agencies (e.g. agriculture camp officers, wildlife camp officers, traditional authority representatives and civil society partners. Communities are responsible for implementing and managing interventions at the community level with managerial oversight from the districts and the PPU.

The Feedback and Grievance Redress Mechanism (FGRM) of the ZIFLP will operate under a decentralised approach within the above described institutional arrangement in reporting and resolving all potential grievances arising from the implementation of project activities.

## **2.0 ZIFLP FEEDBACK AND GRIEVANCES REDRESS MECHANISM (FGRM)**

It is a requirement by the World Bank that all projects funded by the Bank have a Feedback and grievance redress mechanism (FGRM) or complaint handling policy in place. Feedback and grievance redress mechanisms are essential for the successful implementation of projects. The FGRM will ensure that community members or any stakeholders are able to raise their concerns regarding project-related activities, including the application of relevant social and environmental safeguards and mitigation measures. The FGRM, once fully functional, will help to safeguard ZIFLP funds and reputation in that they give the Project Management team a method of effectively collecting and responding to key stakeholders' inquiries, suggestions, concerns, and complaints that, if left unresolved, may result in the derailment of the whole project.

FGRMs may be project or organisation-specific or cross cutting. The non-project specific FGRMs may be already established within a country's judicial, administrative, and/or political systems and exist

outside a project. These include the government bureaucracy; courts (judicial institutions); and political institutions such as Parliament, parliamentary select committees, districts and provincial councils. This FGRM is specific to ZIFLP and has been designed to ensure a speedy resolution of the project specific grievances. The FGRM seeks to give the affected parties within the project scope access to seek redress to their perceived or actual grievance or any feedback that needs clarity.

Effectively addressing grievances from people impacted by the project is a core component of managing operational risk and improving a project result. The FGRM can be an effective tool for early identification, assessment, and resolution of complaints on projects.

## **2.1 PURPOSE OF FGRM**

The purpose of this Feedback and Grievance Redress Mechanism is to outline the ZIFLP's approach to accepting, assessing, resolving, and monitoring grievances from those affected by the implementation of the project and sub project activities in a positive or negative way. It provides for a transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting.

The FGRM will encompass concerns as well as serious or long-term issues. They might be felt and expressed by a variety of parties including individuals, groups, communities, entities, or other parties affected or likely to be affected positively or negatively by the social or environmental impacts of the Project. Feedback is about giving information in a way that encourages the recipient to accept it, reflect on it, learn from it, and hopefully make changes for the better.

It is essential to have a robust and credible mechanism to systematically handle, give feedback and resolve any complaints that might arise in order that they do not escalate and present a risk to operations or the reputation of the project and its sponsors. If well-handled, an effective feedback and grievance mechanism can help foster positive relationships and build trust with stakeholders. This FGRM has been designed to promote dialogue and problem solving as an intermediate way for stakeholders to discuss and resolve problems. It is expected to primarily address interest-based conflicts such as conflicts in which groups with some form of interdependency have a difference in (perceived) interest.

Under ZIFLP, this FGRM will complement and interface with the legal or Judicial system and other existing public administrative systems. In the case where ZIFLP stakeholders are unable to find resolution with the FGRM, they may seek redress through existing judicial and administrative dispute

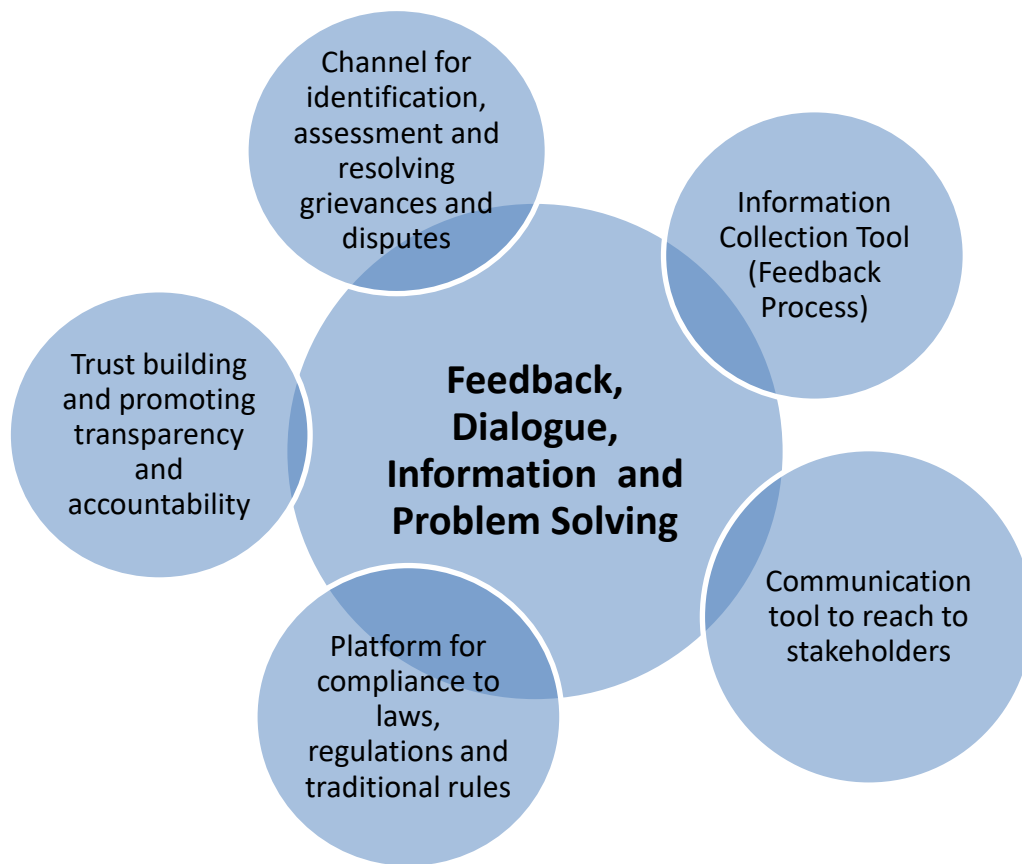
resolution mechanisms. These may include courts, tribunals and traditional legal mechanisms (village courts).

Just like under World Bank, its Grievance Redress Service (GRS) objective is to provide an additional and accessible way for individuals and communities to complain directly to the bank if they believe that the World Bank-funded project had or is likely to have adverse effects on them or their community to help ensure faster and better resolution of project-related complaints. The World Bank's Grievance Redress Service (GRS) is a grievance mechanism managed by the World Bank. It provides a fast and accessible complaint mechanism for individuals and communities who believe that a World Bank-financed project causes harm to their community. The GRS is an additional tool that supplements project-level grievance redress mechanisms. Under the ZIFLP, issues/concerns that cannot be resolved at the project level, will be directed to World Bank Management through the GRS for further redress.

The ZIFLP FGRM has the following specific objectives:

- I. To be responsive to the needs of the beneficiaries by providing a channel for feedback and resolving grievances and disputes at the various levels (local, district) in the project area
- II. To provide an opportunity to the aggrieved party and the project implementers to resolve disputes in a short time before they escalate to big problems
- III. To collect information that can be used to improve project performance and mitigate project risks
- IV. To facilitate effective communication between the project and the affected parties
- V. To enhance the project's legitimacy among stakeholders by promoting transparency and accountability, and deterring fraud and corruption
- VI. To provide a platform to ensure compliance with the provisions of the laws, regulations, and cultural and traditional rules in the project area.

**Figure 1: Purpose and objectives of FGRM for ZIFLP**



## 2.2 SCOPE

The scope of grievances to be addressed by this FGRM will be as provided for in the Environmental and Social Management Framework (ESMF) and will include potential grievances and disputes that arise during the implementation of the sub-projects and resettlement issues. Issues related to compensation programs will be referred to the relevant government legal/administration systems and the ZIFLP FGRM will only provide information to help resolve such grievances. The ZIFLP FGRM will only deal with project specific stakeholders' inquiries, suggestions, concerns, and complaints in the target areas. The FGRM is to be used by parties or stakeholders living in the target areas or have a stake in the targeted areas that might have been inadvertently affected by the project activities and/or outcomes and in their opinion strongly believe they need to seek redress from the Project.

A complaint or grievance is an issue, concern, problem, or claim (perceived or actual) that an individual stakeholder or community group has related to ZIFLP activities. The mechanism does not impede access to judicial or administrative resolutions. This FGRM is intended to deal with grievances that are

directly linked to the ZIFL Project and will not address employees' grievances as other channels exist to address such.

**Geographical scope:** The FGRM will cover the ZIFLP operational landscape of Eastern Province and will focus on specific areas of operations within the districts.

### **2.3 ADVANTAGES OF A FGRM**

The following are some advantages:

- It provides project staff with a practical feedback system that allows them to be more accountable, transparent, and responsive to beneficiaries.
- By publicizing how grievances are resolved, it can help build trust between citizens, the project, government and service providers.
- Grievance-related data provides management with insights into the effectiveness of the Project Implementation Unit's (PIU) programs.
- An effective FGRM can help identify issues before they become serious or widespread, thereby ensuring project effectiveness.

### **2.4 POTENTIAL GRIEVANCES**

The ZIFLP will be proactive in addressing grievances by ensuring that there is adequate stakeholder participation and consultation during the project processes. The Project's ESMF, the Resettlement Policy Framework (RPF) and the Process Framework (PF) are the guiding documents for addressing environmental and social safeguards and provide guidance on anticipated grievances. Potential conflicts or grievances within or between affected communities will be resolved. The ESMF describes potential grievances that relate to access to natural resources, access to project benefits and resettlement issues that may arise during project implementation. The RPF and PF are mainly concerned with measures to be undertaken where involuntary resettlement may arise and where restrictions to accessing natural resources in both Protected Areas and Customary Areas will arise.

The ZIFLP FGRM shall only deal with project specific grievances and disputes such as the following:

- Inventory mistakes made during census survey as well as inadequate valuation of properties;
- Mistakes related to identification and disagreements on boundaries between affected individual(s) and specifying their land parcels and associated development;

- Disagreements on plot/ asset valuation;
- Where affected individual(s) opt for a settlement-based option and there is disagreement on the settlement package (the location of the resettlement site does not suit them);
- Dispute of alleged voluntary donation of land;
- Unfair award of contracts;
- Delayed payments of contractors;
- Delayed disbursement of Project funds;
- Project impacts on rights or usage of forest or other protected area resources which are also governed by the ZIFLP Process Framework;
- Traffic problems related to project activities;
- Construction site related complaints: noise, dust, etc.;
- Long procurement procedures; and
- Delayed commencement of sub-project activities.
- Ensure that the people that are adversely affected by sub-projects are fully compensated for the loss of assets, livelihoods and access rights and successfully relocated; and
- Make all affected persons aware of the processes available for the redress of grievances and ensure the processes are easily accessible and immediately responsive as prescribed in the ZIFLP Resettlement Policy Framework (RPF).

## 2.5 TYPES OF REMEDIES AVAILABLE UNDER THE ZIFLP FGRM

The ZIFLP GRM provides for categories of remedies for the grievances and these include:

- **Acknowledgement of Responsibility and Apology**

In some cases, such as in the event that the FGRMs determine that the project management failed to undertake its obligations (e.g. failure to provide feedback to community on the Matching Grant process) and the impact on the Aggrieved Party is minimal. The project management shall acknowledge the problem and offer a written apology to the Aggrieved Party.

- **Clarification and Provision of Factual Information**

In cases where it is determined that the complaint was based on lack of information or incorrect information on the part of Aggrieved Party, the Project Management shall respond by providing the correct and factual information that should remedy the grievance.

In instances where incorrect information may lead to harm, there is need to assess damage occasioned to the aggrieved party because of incorrect information or otherwise is imperative and so is subsequent compensation.

- **Modification of Conduct/Actions that caused Grievances**

There are specific actions by the project or its agents that could be well intended but may result in individuals or community declaring a grievance. In the event that such actions can be remedied by changing the actions/conduct, the Project Management shall reverse or change such an action.

## **2.6 GUIDING PRINCIPLES**

This FGRM shall be guided by the following principles:

### **Equity**

No complaint is too big or small. All complaints received shall be treated with the urgency and the attention they deserve. All Aggrieved Parties regardless of their social standing, gender, political affiliation, religious affiliation shall be given opportunity to be heard by the responsible officers without prejudice.

### **Accountability**

The project outcomes should benefit the people in the targeted communities and as such the Project Management is accountable to the people in the communities they operate in. The project should be responsive to the needs of the community including their complaints and grievances.

### **Transparency**

Members of the community or aggrieved parties have the right to information on the grievance mechanism, how to access it, who is responsible for handling their complaints and the potential outcome of the processes.

### **Accessibility**

All people in the target communities must have unrestricted and free access to the FGRM. The project shall publicize the GRM to all those who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers of access, including language, literacy, awareness, finance, distance, or fear of reprisal. The Aggrieved Party shall be kept informed at each stage of the process.



**Anonymity**

The FGRM will not disclose the identity(s) of the AP by name or otherwise to maintain confidentiality

**Timely Response**

This FGRM should function promptly and speedily. Prompt action is not only desirable from the complaint's point of view, but also from the management's point of view. Since delay causes frustration and tempers may rise, it is necessary that grievances should be dealt with speedily.

It is a common saying that justice delayed is justice denied. However, any 'unnecessary delay constitutes another grievance. Settlement of grievances "in the shortest possible time and at the lowest level possible," is the ideal one. Some of these cases and incidences might require reporting to the WB Task Team immediately.

**Confidentiality**

Grievances will be treated confidentially. Complainants names and personally identifiable information will be kept in the strictest confidence.

**Building on existing informal and formal dispute resolution flows**

The FGRM will build on existing structures of informal and formal dispute resolution to enhance cost effectiveness. The FGRM will rely on two existing systems: informal dispute resolution practices (through the existing traditional conflict resolution flows) and formal resolution practices (through existing administrative and judicial flows by arbitration and courts of law). By doing this, the mechanism can easily become acceptable as the majority of stakeholders are already familiar with it.

**3.0 IMPLEMENTATION STEPS FOR THE FGRM**

The ZIFLP FGRM has been designed to provide a timely, responsive and effective system of resolving community groups or individual's grievances in the areas the project is implementing activities. It is a process starting at the district, through the Provincial administration to the National level. It is a multi-stage process that ensures that all stakeholders from the community level structures to the National office are involved in finding solutions to the grievances raised by the communities the project is targeting.

All project affected persons will be informed of their rights to raise grievances pertaining to ZIFLP. Mechanisms will be put in place to ensure that grievances are recorded and considered fairly and appropriately. Project management will issue and publicize a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for project improvement. The policy will identify guiding principles; defining the scope and types of grievances to be addressed; setting out a user-friendly procedure for lodging grievances; outlining a grievance redress structure; describing performance standards; and spelling grievance review mechanisms.

### **3.1 STEP 1: IDENTIFYING FOCAL POINTS**

Staff in charge of grievance redress should be skilled and professional. Therefore, the ZIFLP management will identify high-calibre staff (Focal Points) at all levels of their projects and assign them responsibility for handling (receiving and registering) grievances. GRMs can have multiple focal points to receive and register grievances. This FGRM is designed to give the aggrieved parties access to seek redress to their perceived or actual grievance using this mechanism or other existing mechanisms such as the National legal system (i.e. local Courts, magistrate courts, High court and Supreme Court), various tribunals (e.g. Land tribunal), mediation boards, District Development Committees and Provincial Development Committees and traditional systems (village courts). It is equally important to have someone who has overall responsibility for tracking and following up on issues and complaints raised. The descriptions of the FGRM functions should clearly stipulate the official designations and the roles of the focal points so that they can really be held accountable for performing their functions. The FGRM for the ZIFLP has identified the focal point persons from community to national level and their tasks have been formulated (See FGRM including tasks under Table 1).

At community level, the project grievance redress structure will be linked and interface to the existing traditional authority structure as this already provides for resolving conflicts in the communities. This will ensure accessibility to the FGRM as the traditional structures are close to the people. The Focal Point in the community will be the Village Secretary and supported by the Project Committee Chairperson. The Focal Person will be someone with knowledge of the local and/or official language of communication and should be able to record the grievances where need be.

The Project will implement a training program to teach staff, Focal Points, community members and other stakeholders how to handle grievances and why the GRM is important to the project's success. This training should include information about interacting with beneficiaries about grievances, the

organization's internal policies and procedures in relation to grievance redress. It will also be useful to establish or build on local and community-based FGRMs by providing grievance redress training for stakeholders at the local level. This greatly reduces FGRM costs while enhancing beneficiary satisfaction with, and ownership of, the grievance redress process.

### **3.2 STEP 2: REGISTRATION OF GRIEVANCES**

A register of grievances which will be held by the Community Liaison Officer (CLO) or any other appointed person by the project. The Aggrieved Party (AP) must register their grievances with the Community Liaison Officer, the District Planner within the District Multi-Stakeholder Team (DMT) in the district.

To register the grievance, the AP will provide information to the CLO to be captured in the Grievances Registration Form (**Annex 1**). The FGRM will accept complaints from the APs submitted through verbal, email, phone, Facebook, whatsapp, meeting or letter to the office of the CLO, in English or any local language spoken in that region or district. The focal point persons handling grievances will transcribe verbal submissions. Receipt of grievances shall be acknowledged as soon as possible, by letter or by verbal means.

When a complaint is made, the FGRM will acknowledge its receipt in a communication that outlines the grievance process; provides contact details and, if possible, the name of the CLO who is responsible for handling the grievance; and notes how long it is likely to take to resolve the grievance. Complainants will receive periodic updates on the status of their grievances. This FGRM has established clearly defined timetables for acknowledgment and follow-up activities. And to enhance accountability, these timetables will be disseminated widely to various stakeholders, including communities, civil society, and the media.

### **3.3 STEP 3: ASSESSMENT AND INVESTIGATION**

This step involves gathering information about the grievance to determine its validity and resolving the grievance. The merit of grievances should be judged objectively against clearly defined standards. Grievances that are straight forward (such as queries and suggestions) can often be resolved quickly by contacting the complainant.

Having received and registered a complaint, the next step in the complaint-handling process is for the focal points to establish the eligibility of the complaint received. The CLO, who is the Grievances Registration Officer once a complaint or grievance is registered, shall within 5 days assess the registered complaint or grievances to determine its validity and relevance i.e. is it within the scope of the ZIFLP-FGRM as defined in this document. The following criteria can be used to assess and verify eligibility:

- The complainant is affected by the project;
- The complaint has a direct relationship to the project;
- The issues raised in the complaint fall within the scope of the issues that the FGRM is mandated to address.

Having completed the complaint assessment, a response can be formulated on how to proceed with the complaint. This response should be communicated to the complainant. The response should include the following elements:

- Acceptance or rejection of the complaint
- Reasons for acceptance or rejection
- Next steps – where to forward the complaint
- If accepted, further documents and evidence required for investigation e.g. field investigations

Once the registered grievance or complaint has been determined as falling within the scope of this FGRM, the CLO shall investigate the complaint. Investigation of the complaint may include the following:

- On site visit and verification;
- Focus Group discussions and interviews with key informers;
- Review of secondary records (books, reports, public records); and
- Consultations with local government and traditional authorities.

The ZIFLP will ensure that investigators are neutral and do not have any stake in the outcome of the investigation. At the end of the field investigation, the CLO shall compile a Grievance Investigation

Report (GIR) using a standard template (**Annex 2**) on the outcomes of the investigations and the specific recommendation to resolve the grievance or complaint.

### **3.4 STEP 4: RECOMMENDATIONS AND IMPLEMENTATION OF REMEDIES**

After the investigations, the CLO shall inform the AP of the outcome of the investigations and the recommended remedies if any. The AP shall be provided with written response clearly outlining the course of action the project shall undertake to redress the grievances and the specific terminal date by which the recommended remedies shall be completed. Potential actions will include responding to a query or comment, providing users with a status update, imposing sanctions, or referring the grievance to another level of the system for further action. The project will take some action on every grievance. If the recommended remedy involves monetary compensation, the CLO must then seek the approval of the Grievance Committee through the National Project Manager.

The Aggrieved Party shall, provide a response agreeing or disagreeing with the proposed course of action within a minimum reasonable period after receiving the recommended actions.

### **3.5 STEP 5: REFERRAL TO THE PROVINCIAL OFFICE**

In the likely event that the AP is not satisfied with the recommended remedy. The CLO shall forward the copy of Grievance Registration Form (GRF) and the Grievances Investigation Report (GIR) to the Provincial Focal Point Person (PFPP), who in this case shall be the PPM.

The PFPP shall once has received the GRP and the GIR from the District must conduct own investigations and complete his own GIR and communicate to the AP within 30 working days (i.e. repeat stages 2-3). The PFPP in his recommendation shall take into consideration the reasons why the AP rejected the remedies offered by the DFPP. He may decide to offer the same remedies as the CLO or different and improved offer.

Once the PFPP has concluded the investigations and communicated to the AP. The AP shall have 7 days or less to agree or disagree with the proposed remedies. If the AP is agreeable to the remedy the PFPP shall ensure that the remedy is implemented within the agreed time frame.

For a remedy that requires monetary compensation the PFPP submit the information to the relevant government department through the National Project Manager for action.

### **3.6 STEP 6: REFERRAL TO THE GRIEVANCES COMMITTEE**

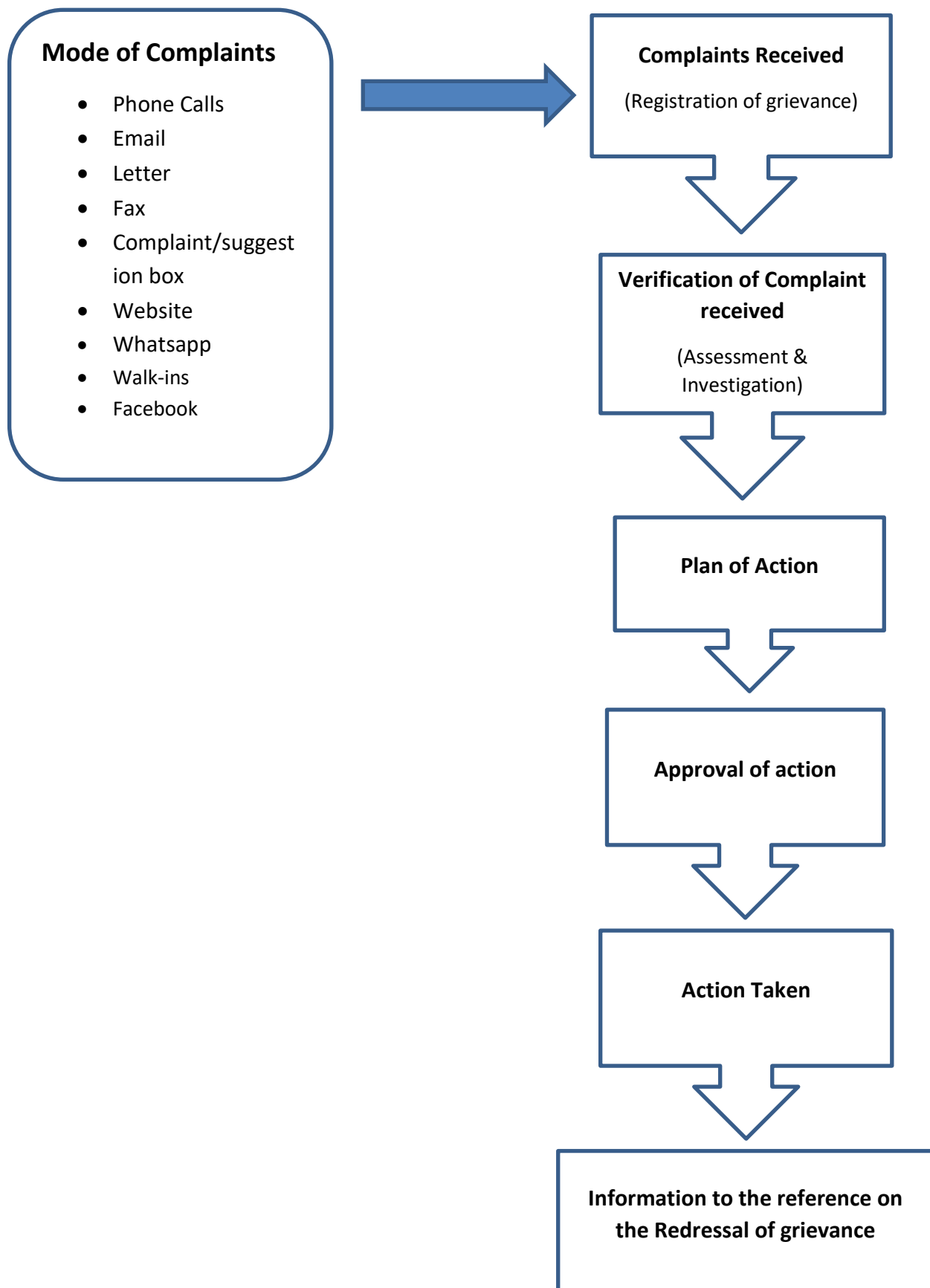
If and when the AP disagrees with the recommendation of the PFPP, the PFPP shall within 7 days of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance from district and the province to the Grievance Committee through the grievance Chairperson who will be elected by the Committee.

The Environmental and Social Inclusion Officer with other staff from government implementing partners at the national level shall investigate the matter further and taking into consideration the recommendation of the CLO and PPM. The Environmental and Social Inclusion Officer shall compile the GIR and submit to the Grievance Committee for consideration. Once the Grievance Committee arrives at a decision it is the responsibility of the ZIFLP to implement the remedies within the agreed time. If the AP disagrees with the remedy offered by the Grievance Committee, the AP reserves the right to appeal to other external GRMs outside ZIFLP.

The above described steps and timeframes will be followed to address grievances emanating from implementing of project activities. For grievances that need quick and urgent attention, the described steps will be adhered to. However, in terms of timeframe, the grievances will be addressed in the shortest feasible period based on case to case basis.

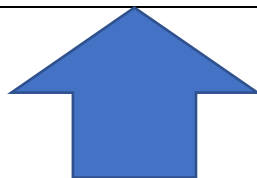
For grievances that cannot be resolved at the project level, these will be reported and directed to World Bank Management through the GRS for further redress.

**Figure 2: Grievance Flow in a basic FGRM**



**TABLE 1: FEEDBACK GRIEVANCE REDRESS MECHANISM FOR ZIFLP**

LEVEL	FOCAL POINT UNIT/ORGANISATION	FOCAL PERSONS (Grievance Committee)	ACTION	RECORDING COMPLAINTS
<b>NATIONAL</b>	Grievance Committee	<ul style="list-style-type: none"> <li>•ESIO – NPU</li> <li>•Independent Auditor</li> <li>•Focal Persons (Forestry, Wildlife, Agriculture &amp; Lands)</li> <li>•Independent Legal personnel from the project implementing Ministry (MLNR)</li> </ul>	<p>The NPIU or an independent Auditor will try to address the complaint:</p> <ul style="list-style-type: none"> <li>•When resolved the person who raised the issue will be informed</li> <li>•If not resolved the complaint will be reported to the World Bank within 2 weeks</li> </ul>	<ol style="list-style-type: none"> <li>1.Record the complaint submitted in the national level grievance data base</li> <li>2.Review monthly monitoring submitted by the district/provincial level and enter all complaints with the status and record in the national level grievance data base</li> <li>3.M&amp;E Officer will periodically review the grievance data base and follow up with focal point persons to ensure all cases are addressed</li> </ol>

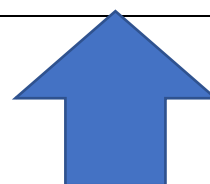


LEVEL	FOCAL POINT UNIT/ORGANISATION	FOCAL PERSONS	ACTION	RECORDING COMPLAINTS
<b>PROVINCIAL</b>	<ul style="list-style-type: none"> <li>•Provincial Planning Sub Committee</li> <li>•Provincial Project Implementation Unit</li> </ul>	<ul style="list-style-type: none"> <li>•Provincial Planner</li> <li>•Provincial Project Manager</li> <li>•M &amp; E Officer**</li> <li>•ESIO PPIU</li> </ul>	<p>The Planner and Project Manager will discuss the issue and try to address it at the provincial level:</p> <ul style="list-style-type: none"> <li>•When resolved the person who raised the issue will be informed</li> <li>•If not resolved the complaint will be reported to the National Project Manager (or if the complaint regards the National Project Manager) submit to the independent Auditor</li> </ul>	<ol style="list-style-type: none"> <li>1.Record the complaint submitted in the provincial level grievance data base</li> <li>2.Record the complaint submitted in the monitoring form</li> <li>3.Submit the monthly monitoring form including a record of complaints to the National level PIU</li> </ol>





LEVEL	FOCAL POINT UNIT/ORGANISATION	FOCAL PERSONS	ACTION	RECORDING COMPLAINTS
<b>DISTRICT</b>	District Planning Sub Committee	District Planner	<p>The Planner will try to address it at the district level:</p> <ul style="list-style-type: none"> <li>•When resolved the person who raised the issue will be informed</li> <li>•If not resolved the complaint will be reported to the Provincial Planner</li> </ul>	<p>1.Record the complaint submitted in the District level grievance data base/Register</p> <p>2.Record the complaint submitted in a monitoring form</p> <p>3.Submit the monthly monitoring form including a record on complaints to the Provincial PIU</p>



LEVEL	FOCAL POINT UNIT/ORGANISATION	FOCAL PERSONS	ACTION	RECORDING COMPLAINTS
<b>WARD</b>	Ward Development Committee	Ward Development Committee Chairperson	<p>The WDC Chairperson will try to address it at the ward level:</p> <ul style="list-style-type: none"> <li>•When resolved the person who raised the issue will be informed</li> <li>•If not resolved the complaint will be reported to the District Planner</li> </ul>	<p>1.Record the complaint submitted in the Ward level grievance Register</p> <p>2.Record the complaint submitted in a simple monitoring form</p> <p>3.Submit the record of complaints to the District Planning Subcommittee</p>



LEVEL	FOCAL POINT UNIT/ORGANISATION	FOCAL PERSONS	ACTION	RECORDING COMPLAINTS
<b>ZONAL/COMMUNITY</b>	<ul style="list-style-type: none"> <li>•Project Committee</li> <li>•Maintenance Committee</li> <li>•Traditional Structure</li> <li>•Facilitator</li> </ul>	<ul style="list-style-type: none"> <li>•Project Committee Chairperson</li> <li>•Village Secretary</li> <li>•Facilitator</li> </ul>	<p>The focal persons at the community level will discuss and try to address the complaint within the community:</p> <ul style="list-style-type: none"> <li>•When resolved the person who raised the issue will be informed</li> <li>•If not resolved the complaint will be reported to the WDC Chairperson</li> </ul>	<ol style="list-style-type: none"> <li>1.Record the complaint submitted in the community level grievance Register</li> <li>2.Record the complaint submitted in a simple form</li> <li>3.Submit the record of complaints to the WDC Chairperson</li> </ol>

**TABLE 2: TASKS FOR FGRM FOCAL PERSONS**

	National Focal Persons	Provincial Focal Persons	District Focal Persons	Ward Level Focal Persons	Community Level Focal Persons
<b>Task</b>	<p>Maintain a data base of grievances</p> <p>Develop Policy and procedures for grievance handling</p> <p>Monitor, evaluate and adapt as necessary</p>	<p>Maintain a provincial level data base of grievances</p> <p>Call for meetings to discuss and resolve grievances referred to the Provincial Planner</p> <p>Supervise and coach district level grievance staff</p> <p>Receive and address incoming and outgoing letters/complaints</p>	<p>Maintain a district level data base of grievances</p> <p>Call for District Planning Subcommittee meetings to discuss and address complaints</p> <p>Supervise and coach ward and community level grievance staff</p> <p>Receive and address incoming and outgoing letters/complaints</p>	<p>Maintain a Ward level register of grievances</p> <p>Call for WDC planning subcommittee to discuss and resolve complaint</p> <p>Raise awareness in the communities on grievances</p>	<p>Maintain a community level register of grievances</p> <p>Call for community level focal point persons to discuss and resolve complaints</p> <p>Raise awareness in the communities on grievances</p>

		Monitor and adapt process as necessary	Monitor process as necessary		
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## **4.0 PERFORMANCE STANDARDS**

To ensure that the ZIFLP FGRM is effective and achieve the intended purposes, the Project Management is committed to the following performance standards:

- At each level of the FGRM, responsible officers shall take measures to ensure the protection of the Aggrieved Party from possible harassment from any other actors in the community.
- No Grievance/dispute shall be considered insignificant or more significant than other. All grievances shall be given equal consideration.
- All grievances will be treated with confidentiality and anonymity.
- All disputes submitted shall be acknowledged by issuance of a grievance acknowledgement form/receipt
- All grievances shall be recorded in grievances register and the register shall be maintained in a safe and secure place.
- The Community Liaison Officer, who is the focal person at district level, shall have up to 14 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Provincial Focal Point Person shall have up to 21 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Compensation Committee shall have up to 30 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Aggrieved Party once feedback is provided shall have up to 7 days to respond to the relevant correspondence agreeing or disagree with the resolution.
- If the Aggrieved Party is awarded compensation, the compensation granted should be in such a way that it at least restores the AP to his original condition/status or makes them better.

## **5.0 COMMUNICATION PLAN FOR FGRM**

In order to sensitise the various stakeholders (community, individuals etc.) about the FGRM, there will be need to produce a number of Information, Education and Communication (IEC) materials such as brochures and posters that will educate the various stakeholders about the content of the FGRM and how to access it. Additionally, radio programs will be produced to compliment IEC materials including

translating the FGRM into local languages. Other sensitisation activities will include community meetings and public forums of the GRM.

## 6.0 MONITORING AND EVALUATION

Monitoring and evaluation are critical to the success of any FGRM. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. The project monitoring and evaluation information system will also include indicators to measure grievance monitoring and resolution. These grievance redress indicators will be incorporated into project results frameworks.

Feedback and Grievance Redress Mechanism (FGRM) monitoring involves assessing the progress being made to handle grievances (World Bank, 2012b). The overall result of an effective FGRM is to enable stakeholders affected by the ZIFL project activities to receive timely feedback and appropriate responses. To achieve this result, specific targets are set, and overall improvement is tracked by a set of indicators. Monitoring will be conducted by the project M & E Officers using performance indicators, which are presented on two different outputs: participation and effectiveness every after 3 months (quarterly). For transparency, stakeholders will have an opportunity to track grievances as well. The M & E Officers will on a quarterly basis prepare a report and a list of existing and new grievances and share with stakeholders at all levels. The complaint, region/area and status of grievance handling will be made public.

**Feedback**—informing FGRM users and the public at large about the results of investigations and the actions taken—enhances the visibility of the FGRM among beneficiaries and increases users’ trust in the system (making it more likely that they will lodge grievances). ZIFLP will provide feedback by contacting the complainant directly (if his or her identity is known) and/or posting the results of cases in high profile locations and conveying the results through radio broadcasts and other media. The project will also inform FGRM users about their right to an appeal if they are dissatisfied with the decision, specifying both internal and external review options.

**TABLE 3: MONITORING AND EVALUATION FRAMEWORK**

<b>Output</b>	<b>Indicator</b>	<b>Base line</b>	<b>Target</b>	<b>Source of information</b>	<b>Frequency of data collection</b>	<b>Responsibility</b>
<b>Participation</b>	No. of complaints registered	N/A	% Decrease	Grievance data base, registers & monitoring forms	Quarterly	M and E Officers
	Number of forest users that have used the GRM	N/A	% Increase	As above	As above	As above
	Number of women forest users that have used the GRM	N/A	% Increase	As above	As above	As above
<b>Effectiveness</b>	Percentage of grievances resolved	N/A	80%	Grievance data base, registers & monitoring forms	As above	As above
	Percentage of grievance addressed in set time frame	N/A	100%	Grievance data base, registers & monitoring forms	As above	As above
	Percentage of grievances handled with simple conflict resolution techniques (apology, explanation)	N/A	50%	Grievance data base, registers & monitoring forms	As above	As above
	Percentage of positive feedback	N/A		Grievance data base, registers & monitoring forms	As above	As above
<b>Resolution</b>	Percentage of grievances resolved with satisfactory output	N/A	100%	Grievance data base, registers & monitoring forms	As above	As above
	Percentage of recurring complaints	N/A		Grievance data base, registers & monitoring forms	As above	As above

## 7.0 ACTION PLAN FOR OPERATIONALIZATION OF FGRM

**TABLE 4: PROPOSED ACTION PLAN FOR OPERATIONALIZATION OF FGRM**

	Activity	Responsibility
<b>Initiation</b>		
<b>Setting Up</b>	Appoint Grievance Focal Point Persons	Provincial Planner
	Develop and share policies and procedures for grievance handling	National Manager and M &E Officer PPU
	Develop and share TORs for grievance officers	Provincial Planner and M&E Officer PIU
	Train focal point officials in GRM policies and procedures and grievance handling	Provincial Planner and PIU
	Raise awareness of GRM at community level	Provincial Planner District Planning Officers
<b>Operation</b>	Grievance handling	All focal point persons
	Monitoring indicators measuring participating of stakeholders in GRM	M&E Officers PPIU/NPIU
	Monitoring indicators measuring effectiveness of GRM	M&E Officers PPIU/NPIU

## 8.0 ANNEXES

### 8.1 ANNEX 1: GRIEVANCE REGISTRATION FORM

Date: \_\_\_\_\_ Grievance Number: \_\_\_\_\_

Plaintiff: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Village: \_\_\_\_\_

Chiefdom: \_\_\_\_\_ District: \_\_\_\_\_

Province: \_\_\_\_\_

Grievance Category (e.g. land, house, etc.): \_\_\_\_\_

\_\_\_\_\_

Grievance location (Village, Ward, District): \_\_\_\_\_

\_\_\_\_\_

Description of grievance: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signature of Recording Officer: \_\_\_\_\_



## 8.2 ANNEX 2: GRIEVANCE INVESTIGATION REPORT

PARTICULARS OF THE GRIEVANCE			
Name of Complainant:			
Grievance Reference Number:			
Grievance Category :			
Grievance Description:			
Grievance location (District, Ward, Village):			
TYPE OF INVESTIGATION CONDUCTED			
Field or Site Visit: Yes. ( ) No. ( )	Desk Review: Yes. ( ) No. ( )	Date Conducted:	
Key people consulted/interviewed:			
Description of the scope of the investigation:			
Summary of the findings:			
Recommendations			
Responsible/Investigation Officer Name:			
Signature:			
Designation:			
Date:			
District:			
Province:			

**Record of Prior Contacts and Discussions of Issues to Date:**

Date	Individuals Contacted	Summary of Discussions

Signed (Plaintiff); \_\_\_\_\_ Date \_\_\_\_\_ :

Signed \_\_\_\_\_ (Filer \_\_\_\_\_ of \_\_\_\_\_ Complaint) :

Name \_\_\_\_\_ of \_\_\_\_\_ Person \_\_\_\_\_ Filing \_\_\_\_\_ in  
Complaint : \_\_\_\_\_

(if different from Plaintiff)

Position \_\_\_\_\_ or \_\_\_\_\_ Relationship to Plaintiff : \_\_\_\_\_  
Date : \_\_\_\_\_

**Record of Prior Contacts and Discussions of Issues to Date:**

Date	Individuals Contacted	Summary of Discussions

Signed (Plaintiff); \_\_\_\_\_ Date \_\_\_\_\_ :

Signed \_\_\_\_\_ (Filer \_\_\_\_\_ of \_\_\_\_\_ Complaint) :

Name \_\_\_\_\_ of \_\_\_\_\_ Person \_\_\_\_\_ Filling \_\_\_\_\_ in  
Complaint : \_\_\_\_\_

(if different from Plaintiff)

Position \_\_\_\_\_ or \_\_\_\_\_ Relationship to Plaintiff : \_\_\_\_\_  
Date : \_\_\_\_\_

**Record of Prior Contacts and Discussions of Issues to Date:**

Date	Individuals Contacted	Summary of Discussions

Signed (Plaintiff); \_\_\_\_\_ Date \_\_\_\_\_ :

Signed \_\_\_\_\_ (Filer \_\_\_\_\_ of \_\_\_\_\_ Complaint) :

Name \_\_\_\_\_ of \_\_\_\_\_ Person \_\_\_\_\_ Filing \_\_\_\_\_ in  
Complaint : \_\_\_\_\_

(if different from Plaintiff)

Position \_\_\_\_\_ or \_\_\_\_\_ Relationship to Plaintiff : \_\_\_\_\_  
Date : \_\_\_\_\_