



GRIEVANCE MECHANISM

Introduction

A grievance is a concern or complaint raised by an individual or group affected by the project activities. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure

A suitable mechanism for direct engagement is to establish a working group, and formalize a system for affected members to solve problems and/or issues related to the project collectively, and to receive feedback on the project, on a regular basis. It should act as a forum for the project's stakeholders to channel concerns, which affect them directly. The central element is a Grievance Mechanism that allows an affected person to voice his/her issues/concerns/comments to the proponent in a fair manner.

This SEP therefore provides a detailed framework for the Grievance Redress Mechanism (GRM) for the GKMA-UDP. It defines the channels through which the public or Project Affected Persons (PAPs) can lodge complaints or raise concerns related to the Program, its personnel, or contractors during implementation. Additionally, it outlines the procedures, roles, and responsibilities involved in managing and resolving grievances.

This Grievance Mechanism will consist of procedures in Kampala Capital City Authority, and those of the Ministry of Kampala Capital City and Metropolitan affairs

The established Grievance Mechanism must continue to function beyond the project's operations period and deal with grievances related to environmental, health and safety aspects, cultural and socio-economic issues.

Objectives

To align the Grievance Redress Mechanism (GRM) with the objectives of the Stakeholder Engagement Plan (SEP) and the Greater Kampala Metropolitan Urban Development Program, while

adhering to World Bank procedures and SEP guidelines, the following refined and tailored objectives are proposed:

1. **Formalize and Streamline Grievance Management:** Establish a clear, structured, and transparent process for managing grievances from all stakeholders, ensuring that grievances are addressed promptly and effectively to minimize potential risks to the Program's implementation.
2. **Ensure Stakeholder Awareness and Participation:** Actively communicate the GRM to all stakeholders from the outset and throughout the Program's lifecycle. Ensure that stakeholders are informed about how to access the GRM, how it works, and how to provide feedback on its effectiveness.
3. **Promote Accessibility and Inclusivity:** Provide multiple accessible channels for stakeholders to raise grievances, including anonymous options such as community suggestion boxes, online platforms, and hotline numbers, ensuring inclusivity for all community members, particularly vulnerable and marginalized groups.
4. **Facilitate Early Detection and Resolution of Issues:** Enable early detection and timely resolution of issues, concerns, or conflicts to prevent escalation, reduce the potential for program delays, and ensure that grievances are handled before they adversely impact program timelines and objectives.
5. **Monitor and Evaluate GRM Effectiveness:** Implement a robust system for tracking, monitoring, and evaluating the effectiveness of the GRM, ensuring that it meets international best practices, World Bank requirements, and stakeholder expectations. Regularly review the GRM to identify areas for improvement.
6. **Ensure Fairness, Transparency, and Accountability:** Handle all grievances in a fair, transparent, and accountable manner, in line with World Bank policies, international best practices, and lender expectations. Ensure that all decisions are documented and communicated clearly to the stakeholders.
7. **Support Conflict Prevention and Social Cohesion:** Utilize the GRM as a tool to prevent conflicts and promote social cohesion within the program areas by ensuring that all grievances are managed effectively and equitably, thereby minimizing the risk of stakeholders resorting to alternative, potentially harmful, means of expressing dissatisfaction.

8. **Promote Continuous Improvement and Feedback Integration:** Encourage ongoing stakeholder feedback on the GRM process, using this input to make continuous improvements to the mechanism, ensuring it remains fit for purpose throughout the program's duration.
9. **Ensure Compliance with Social and Environmental Safeguards:** Align the GRM with the SEP's social and environmental safeguards, ensuring that grievances related to these areas are given due attention and resolved in a manner that upholds the Program's commitment to not leaving stakeholders worse off than pre-program conditions.

Scope of the GRM

The GRM covers a broad range of issues related to program implementation, including:

1. **Disclosure of Information:** Concerns the adequacy, transparency, or timeliness of information provided to stakeholders about the project.
2. **Land Acquisition and Resettlement:** Issues related to land acquisition, compensation, resettlement procedures, and impacts on affected communities.
3. **Criminality on the Projects:** Complaints regarding illegal activities or criminal behavior connected to project activities.
4. **Project Selection/Identification:** Concerns about the criteria and process for selecting and identifying project activities or beneficiaries.
5. **Procurement Procedures:** Issues related to the procurement process, including fairness, transparency, and compliance with established procedures.
6. **General Contract Management/Project Implementation:** Complaints about contract management, adherence to project plans, and overall implementation.
7. **Infrastructure Designs:** Issues regarding the design and construction of infrastructure, including technical and safety concerns.
8. **Time and Pace of Work:** Complaints about delays, pacing of project activities, and adherence to the project schedule.
9. **Fraud and Corruption:** Issues related to corrupt practices, fraudulent activities, and misuse of funds.
10. **Environmental Concerns:** Complaints related to the environmental impacts of project activities, including pollution, habitat destruction, and other ecological issues.

11. **Time and Manner of Payments:** Concerns the timing and method of payments to stakeholders, including contractors, suppliers, and affected communities.
12. **Other Environmental and Social-Related Concerns:** Any additional environmental or social issues impacting the people and communities involved or affected by the project.

Potential infrastructure development Grievances

Category	Grievances
Land-Related Issues	1. Non-payment or delayed payment of compensation.
	2. Underpayment or disputed valuation of compensation.
	3. Undervaluation of property or assets.
	4. Omission or exclusion of affected properties from compensation lists.
	5. Delayed return of residual land titles after project completion.
	6. Land ownership disputes arising from project activities.
	7. Damage to property, such as cracks in buildings or disruption due to construction near culverts.
	8. Registration of fraudulent Project Affected Persons (PAPs).
	9. Forgery of documents, such as land titles, death certificates, and powers of attorney.
	10. Fraudulent activities, including obtaining compensation through false claims.
	11. Impersonation of rightful property owners or beneficiaries.
Environmental Issues	1. Poor management of stormwater and drainage systems leading to flooding.
	2. Noise, dust, and vibrations from construction activities, including stone blasting.
	3. Air pollution from machinery and construction vehicles.
	4. Unrestored borrow areas and pits, leading to environmental degradation.
	5. Encroachment on natural resources, such as forests or wetlands.

	6. Improper waste management and disposal practices.
	7. Dumping of construction debris on private property, swamps, or other protected areas.
	8. Soil erosion and sedimentation affecting local water bodies.
	9. Contamination of local water sources due to project activities.
Social Issues	1. Disruption of essential services and utilities, including hospitals, schools, and water and electricity supply.
	2. Traffic congestion and delays caused by road diversions or construction activities.
	3. Impact on physical and cultural resources, including historical sites and community centers.
	4. Increased risk of sexual exploitation and abuse (SEA) due to the influx of construction workers.
	5. Rise in unwanted pregnancies linked to project activities.
	6. Heightened risk of HIV/AIDS and other communicable diseases.
	7. Incidences of child labor due to increased demand for cheap labor.
	8. Family disruptions and breakages resulting from project-induced stresses.
	9. Gender-based violence (GBV) linked to project activities.
	10. Displacement or loss of access to markets and community spaces for local traders.
Road Safety Issues	1. Increased accidents due to construction activities and changes in traffic patterns.
	2. Development of potholes or cracks on newly constructed or existing roads.
	3. Narrow road sections that pose safety risks for both drivers and pedestrians.
	4. Dangerous bends or curves introduced or exacerbated by construction.

	5. Inadequate drainage leading to waterlogging or flooding on roadways.
	6. Absence or insufficiency of speed humps in critical areas.
	7. Lack of or inadequate road signage, leading to confusion and accidents.
	8. Identification and mitigation of road blackspots (areas with a high frequency of accidents).
	9. Damage to pavements caused by utility companies during installation or repairs.
	10. Presence of stationary or abandoned vehicles causing road obstructions.
	11. Traffic diversions onto poorly maintained or unsuitable roads.
Occupational Health & Safety (OHS) Issues	1. Lack of or inadequate provision of personal protective equipment (PPE) to workers.
	2. Insufficient measures for the provision of HIV/AIDS education and services to workers.
	3. Inadequate training on safety protocols and emergency procedures.
	4. High exposure to hazardous materials or dangerous equipment without proper safety measures.
	5. Poor implementation of safety measures, leading to accidents and injuries on site.
	6. Fatigue or overwork among construction workers due to inadequate rest periods.
	7. Lack of access to first aid and emergency medical services at construction sites.

The Grievance Management Principles and Commitments;

- The grievances can be received and documented on a grievance form which will be accessible at the LCI offices. The first points of reporting can be physically or by phone;

- Facilitate appropriate and mutually acceptable corrective actions, and address complaints efficiently;
- Ensure that transparency and clarity about the nature of complaints covered under this procedure and where and how people can file a grievance and also when and how the Team will provide feedback;
- Ensure that complainants are satisfied with the outcomes of any corrective actions undertaken by the client;
- Effort will be made to ensure that grievances are captured and feedback is given in all cases in writing. The complainants will be required to sign a form acknowledging that they have received a response to their complaint.
- To avoid/minimise the need to resort to judicial proceedings, all effort will be made to resolve all project related grievances using internal mechanisms. However, in case the complainants can have recourse to other grievance resolution mechanisms and facilities by the Laws of Uganda e.g. the law courts of Uganda or the Uganda Human Rights Commission.
- Time bound; The procedure will ensure that responses to Complaints will be within a reasonable timeframe not exceeding 30days. In case the grievance is not resolved in the stipulated time, an update will be provided to the complainant in writing explaining the stage of investigation and the remaining processes before resolution of the grievance is concluded.

There is need to protect PAPs in case they fear to report grievances for fear of retaliation. In some cases, grievances are not reported by the contractors for fear that they will be judged as no performers.

Grievance redress will be a continuous process based on the procedure detailed below

- Grievance Registration form
- Grievance acceptance and closure form
- Letter of refusal of a complaint
- Acknowledgement form
- Close out letter

Procedure for Grievances Management

This grievance procedure will not replace existing legal processes in Uganda but rather it will seek to resolve issues quickly so as to expedite receipt of entitlements and smooth resettlement without resorting to expensive and time-consuming legal processes. The objectives of the proposed grievance resolution mechanism are to:

- Promote a mutually constructive relationship between the project and the community or PAPs;
- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of land and asset acquisition, including during the process of moving homes;
- Ensure that appropriate and mutually acceptable corrective actions are identified and implemented to address complaints;
- Verify that complaints are satisfied with outcomes of corrective actions;
- Prevent and address community concerns; and
- Minimize the need to resort to expensive court proceedings

The grievance mechanism ensures that all Project Affected Persons including vulnerable groups e.g. the elderly, women and the disabled can easily access help at no cost.

The steps taken by the Grievance Management Committees (GMC) for receiving and handling any such concerns are outlined below.

STEP 1: Submitting a Grievance

A grievance can be submitted to the various levels of GMCs in several ways.

- Community grievance redress committees
- Division Grievance redress committees
- Authority Grievance redress committee

STEP 2: Logging the Grievance

Once a grievance has been received it must first be logged in the grievance database register.

STEP 3: Providing the Initial Response

The person/community/stakeholder that lodged the initial grievance will then be contacted within 7 days to acknowledge that the responsible person has logged the complaint. This response will either

accept or refute possible responsibility for the grievance. This notification will include details of the next steps for investigation of the grievance, including the person/department responsible for the case.

STEP 4: Investigating the Grievance

Then the grievance should be investigated. The GMCs will aim to complete investigation within two weeks of the grievance first being logged. Depending on the nature of the grievance, the approach and personnel involved in the investigation will vary. A complex problem may involve external experts for example. A simpler case may be easier, and quicker to investigate. The GMC will involve the aggrieved in this investigation, where possible, to ensure participation.

The GMC will continually update the aggrieved on the progress of the investigation and the timeline for conclusion.

STEP 5: Concluding/Resolving the Grievance

The grievance should then be concluded. The GMC will outline the steps taken to ensure that the grievance does not re-occur. Consultation with aggrieved parties and views sought about KCCA recommendations. If complainant is satisfied, then seek their sign off from GMC Chairperson.

STEP 6: Taking Further Steps if the Grievance Remains Open

However, if the grievance still stands then the GMC will initiate further investigation and determine the steps for future action.

STEP 7: Record Keeping

All comment responses and, grievances are to be logged using the grievance logging forms and registers. This includes details of the comments/grievance, the commenter/aggrieved, and ultimately the steps taken to resolve the grievance. Hard copies of the form are to be kept once with the GMCs and another given to the complainant. Any accompanying documentation e.g. written statements, photographic evidence, or investigation reports are to be filed along with the grievance log both in hard and soft copies.

Eligibility to lodge a grievance

Only PAPS within the project road corridor and directly or indirectly affected by the Kampala roads rehabilitation project will be allowed to lodge a grievance.

Grievances may be lodged if a PAP;

- Is certain that he/she is affected but has not been engaged
- Communities along the project area have disputes amongst themselves.
- Is dissatisfied with the consent system of land acquisition
- His/her property is highly affected by the project
- The project is taking more of what was agreed upon.
- He/she was not consulted for consent
- Believes there is misconduct on the part of a consultant, Contractors and or KCCA staff
- Communities not involved in land acquisition process

Grievance Resolution Stages

KCCA already has a Grievance Management Process in place. The implementation of GKMA-UDP will follow the same process used during KCCRP and KIIDP II to resolve project grievances. Project related grievances are handled through the following levels.

Action to be undertaken in registering a complaint (steps)

1. Receipt of complaint
2. Meeting with complainant
3. Determination of corrective action
4. Implementation of corrective action
5. Verification of corrective action
6. Action by the relevant Persons
7. Action by Grievance Committee

For successful grievance management, there should be four levels in grievance management pass way. These levels will include the grievance resolution committees at the community level, Division level, KCCA head office, which will be the highest level of grievance management before the affected person, is advised to seek legal redress in the courts of law.

Facilitation Of The Grievance Resolution Committee (GRC)

It will be the responsibility of Kampala Capital City Authority to facilitate the activities of the Grievance Resolution Committee especially at the lower levels i.e. LC I Chairpersons, PAP representatives and community support teams, stakeholder engagements, etc.

Grievance resolution process

Through sensitizations (community meetings, media announcements, writing letters), the PAPs, other community members and other stakeholders will be informed of the grievance management mechanisms in place for them to lodge their complaints and dissatisfactions. The steps that will be followed during the grievance resolution are listed below;

Step 1:

Grievances will be lodged by the PAPs by filling a Grievance Resolution Form or by formally writing to KCCA. A sample of the form will be availed and shown to PAPs during GRC constitution and sensitization meeting. The forms will be made available to all the secretary of each grievance committee. PAPs can also lodge their grievances by writing letters of complaints to the community level GRC.

The Community Level GRC will receive grievances.

The committee will register and categorize the grievances. Thereafter, it will review the grievance and take all the necessary steps to resolve the grievance. The findings of the grievance and action plans will be communicated to the PAP and the Division level Grievance Committee. If the PAP is satisfied then the case will be closed and the PAP will sign a closure statement. However, if the PAP is not satisfied the case will be forwarded to the Division level Grievance Committee.

Step 2:

Division level Grievance Committee will receive the Grievance forwarded from the Community Grievance Redress Committee Level GRC. The committee will register and categorize the grievances. Thereafter, it will review the grievance and take all the necessary steps to resolve the grievances. The findings of the grievance and action plans will be communicated to the respective PAP and the Authority Grievance Committee. If the PAP is satisfied then the case will be closed and the PAP will

sign a closure statement. However, if the PAP is not satisfied the case will be forwarded to the Authority Grievance Committee.

Step 3:

The Authority Grievance Committee will register/categorize and review grievances received from the Division Grievance Committee. The Committee will communicate its findings to the PAP and the lower Grievance Committees. If PAP is satisfied, he/she will sign a closure statement. If PAP is not satisfied, then he/she can lodge the case at the courts of law. The PAP will notify Kampala Capital City Authority of the court ruling.

All measures will be undertaken so that the grievances are solved amicably between the concerned parties and the courts of law will be the last resort. Efficiency and transparency in solving of the grievances will be of paramount importance.

The Grievance Mechanism operating at each road will receive inputs from four main sources:

- Directly affected Project Affected Persons.
- Other Aggrieved Community members
- KCCA Human Settlement Section
- Members of the Grievance Redress Committees.

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The grievance process to be followed is depicted in figure below.

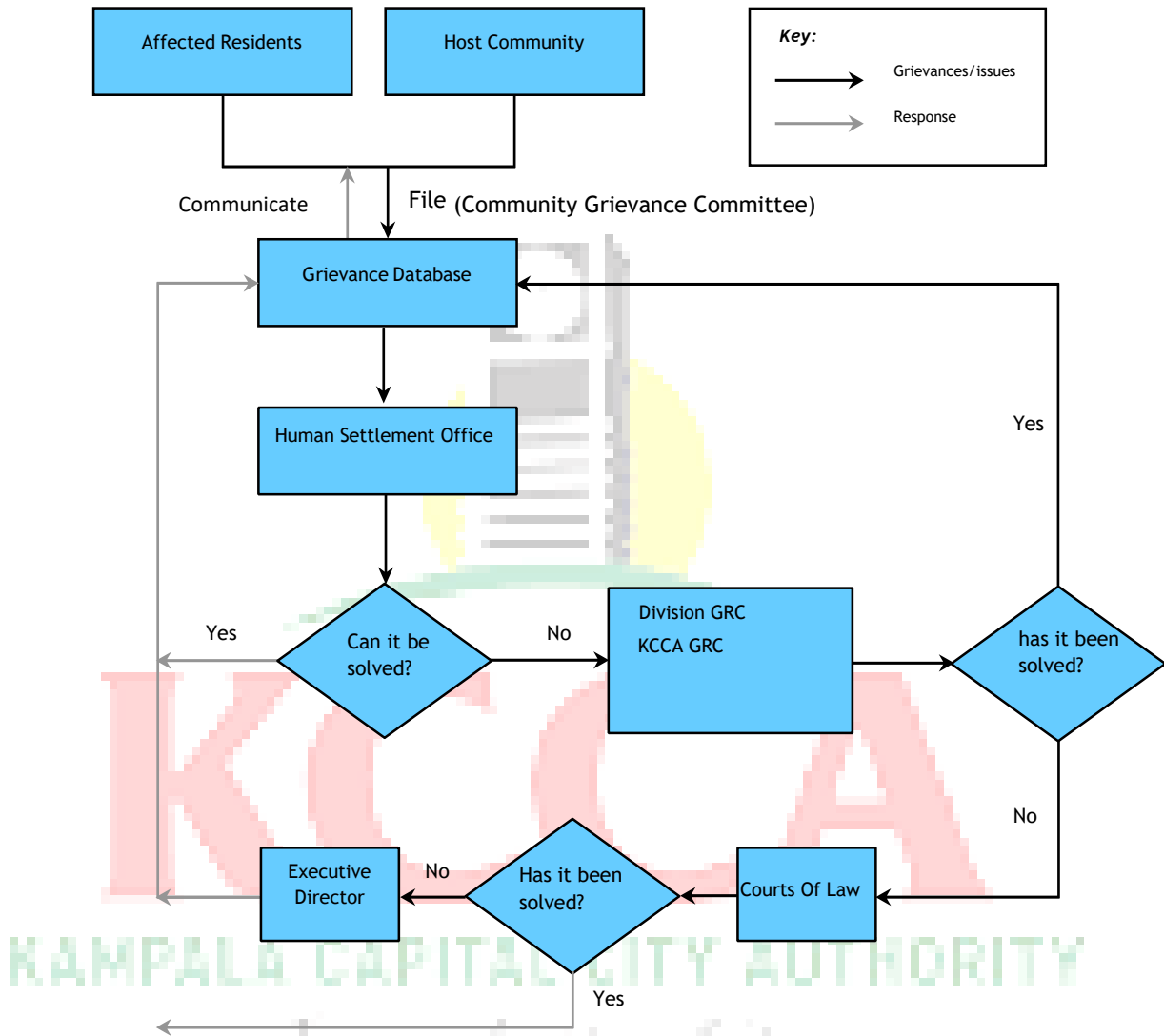
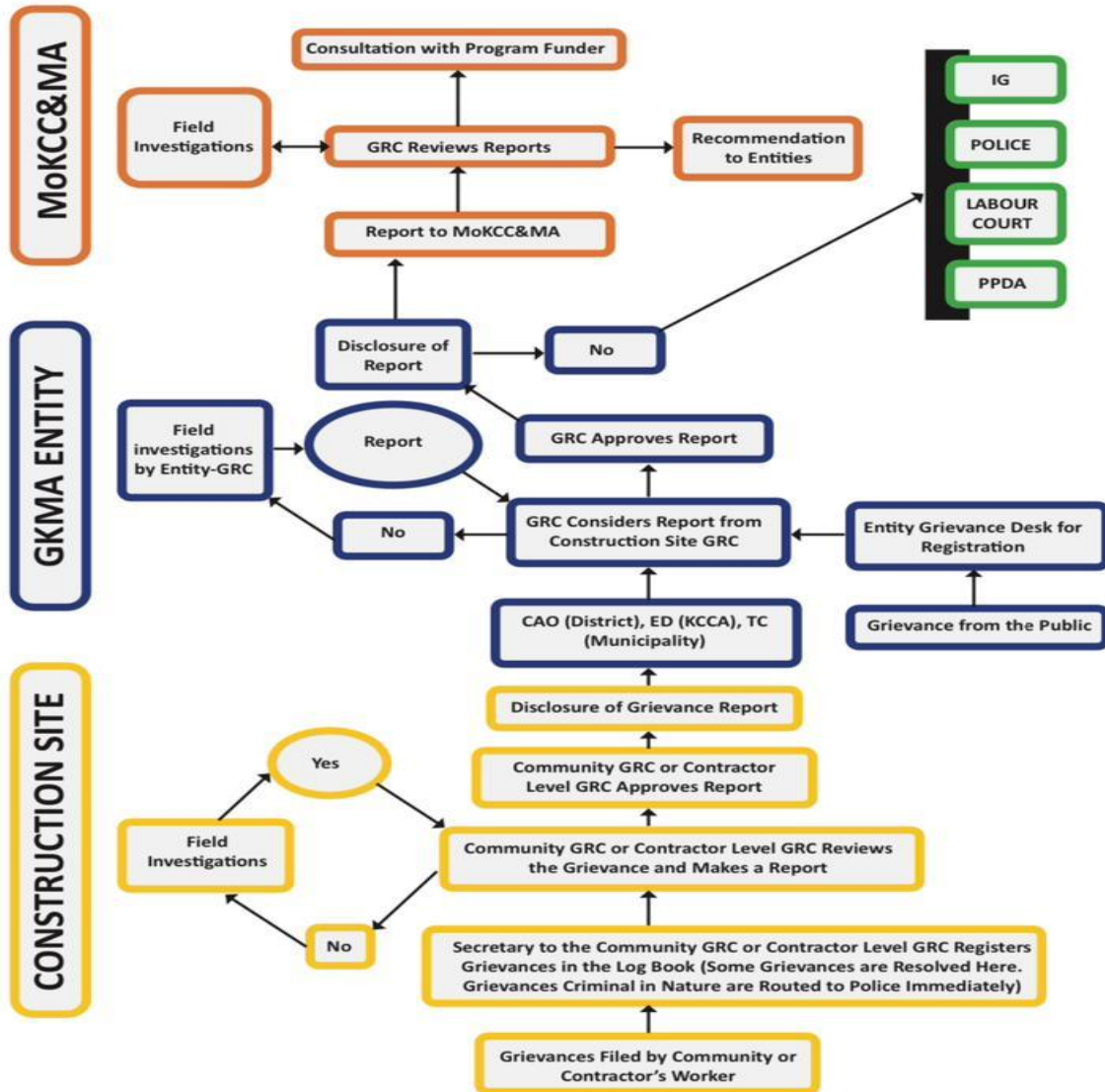


Figure 1: KCCA Grievance management mechanism

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GRIEVANCE REDRESS PROCEDURE



Both the above Grievance structures can apply interchangeably depending on the need and the nature of grievance. As extracted in the MoKCCMA GRM, The KCCA GRM will consist of agreed upon procedures, from MoKCCMA and those already established at KCCA. As provided for in the

MoKCCMA GRM stated “The GRM will consist of procedures at the (MoKCC&MA), those of the implementing entities, communities and construction sites.

MONITORING AND REPORTING

In addition to the Grievance Resolution Form, a Grievance Log will be kept by Kampala Capital City Authority at community level by the secretary of the Community GRC, at the Division and Authority levels indicating the date the complaint was lodged, a brief description of the grievance, actions to be taken, status of the resolution, etc. The Chairperson and secretary of the committee will monitor and document the progress of all complaints through weekly or monthly grievance resolution reports.

Monitoring and evaluation of the stakeholder process is considered vital to ensure the GMCs respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- Enough resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in the GMCs elected by the PAPs;
- Clearly defined approaches; and
- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken.

Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

GRIEVANCE RESOLUTION FORM

Name (Filer of Complaint): _____

ID Number: _____ (PAPs ID number)

Contact Information: _____ (Village; mobile phone)

Nature of Grievance or Complaint:

Signed (Filer of Complaint): _____

Name of Person Filing Complaint: _____ (if different from Filer)

Position or Relationship to Filer: _____

GRIEVANCE MANAGEMENT COMMITTEE ACTION

Date	Individuals Contacted/Position and Contact details	Summary of Discussion
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Review/Resolution

Date of Conciliation Session: _____

Was Filer Present? Yes No

Was field verification of complaint conducted? Yes No

Findings of field investigation:

Figure 11: *The grievance filling form.*

It is recommended that efforts be made during grievance resolution process that a solution is obtained at the lowest level possible to avoid costly and time consuming courts of law. This can be achieved through continuous engagement and consultation with affected persons, establishment of liaison system between KCCA and project affected communities and through participatory project implementation measures.

GRIEVANCE MANAGEMENT STRUCTURE / COMPOSITION

It has been suggested that there should be a composition of community members to constitute the grievance committees at each level of grievance management. These committees will be operational until no grievance is registered. Table 1 below illustrates the proposed grievance committees at all levels, its composition and responsibility of each member.

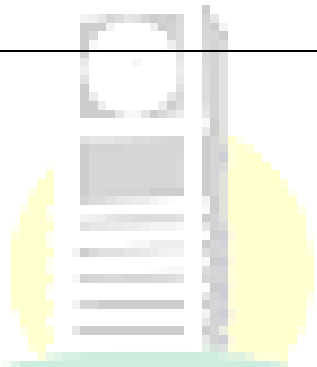


Table 1: Grievance Management Committee composition and roles of each member

GM levels	Members Constituting the committees and Roles	Sitting Intervals	Remarks
Road Level (Community)	<ol style="list-style-type: none"> 1. Chairman II – Chairperson of the committee 2. Councilor representative at the Division. - Division representative 3. Opinion Leader (Elder or Religious Leader). Mobilizer 4. Chairperson of the affected village- Registrar and secretary 5. Division Representative- Technical input 6. KCCA Human settlement Officer - Advisor 7. Women representative- Gender mainstreaming 	<p>Within three days of receiving the case by Local council chairperson</p>	<p>Any other member that will be felt important including the youth, vulnerable etc.</p>

<p>Division Level</p>	<ol style="list-style-type: none"> 1. Mayor –Chairperson of Committee. 2. Town Clerk- Secretary 3. Community Development Officer- Mobilizer 4. Division Engineer- Technical input 5. Councilor Roads- Technical support 6. KCCA Officer Human Settlement- Advisor 7. Chairperson from Affected Village- Grievance register (Log book) 	<p>Within one week after a grievance is registered at the Division.</p>	<p>Ensure cases are resolved at the Road Level.</p>
<p>KCCA (Authority level)</p>	<ol style="list-style-type: none"> 1. Director Gender & Community Development-Chair on behalf of AO 2. Director Legal Affairs – Legal interpretation 3. Director Physical Planning- Technical support 4. Director Engineering and Technical Services Design interpretation 5. Supervisor Human Settlement- RAP/RoW Guidance 6. Project Coordinator. 7. And any other person as may be summoned for information 	<p>Within a month of receiving grievance</p>	<p>And any other member as may be co-opted from time to time</p>

Court.	Court		This SHOULD be avoided where possible.
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N.B: The committees proposed are not conclusive. Additional members can be co-opted depending on the situation at hand. The committees are supposed to meet whenever a complaint is received by the grievance register officer preferably the chairperson of each village. It is recommended that at each seating, the committee is logistically facilitated by the implementing entity (KCCA.)

KCCA resettlement officer in liaison with chairperson of the committee, upon receiving the grievance will organize logistics and plan for the seating at any appropriate location convenient to the affected person and other members of the committee.

Resort to Courts of Law.

If KCCA together with established grievance committee and a complaint fail to reach a consensus, the grievance will be resolved by a competent court of law in Uganda. However, to establish an effective grievance redress mechanism, here will need to be an *Advisory Committee* that can arbitrate prior to litigation.

It should be noted that this grievance redress committee is not a substitution of the existing national legal frameworks, but rather a mechanism to mitigate cases that will cause delays in execution of the project. further more. This mechanism is aimed at saving time, money all for the smooth implementation of the project.

The Advisory committee shall constitute:

KCCA Land Officer;

- Representative of the Valuer;
- Surveyor
- Legal Officer
- KCCA Human Settlement Section
- Relevant Grievance Committee representatives
- KCCA Responsible Engineer