GRIEVANCE REDRESS MECHANISM FOR THE ZAMBIA-MALAWI INTERCONNECTOR PROJECT

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EXECUTIVE SUMMARY

ZESCO intends to construct the Zambia - Malawi Interconnector Project (ZAMA), which is a 46.6km long 400kV transmission interconnection line from Chipata West 330/132kV Substation in Chipata District to Lunda Village (Zambia - Malawi border) in Vubwi District. The ZAMA is part of the proposed 188km long Malawi – Zambia 400kV Transmission Interconnector (MAZA) Project. This Project is one of the Southern African Power Pool (SAPP) projects of regional significance aimed to optimize power trade within the region. The Project scope for the MAZA includes the construction of the 400kV transmission line between Nkhoma 400/132kV Substation (in Lilongwe, Malawi) and Chipata West 330/132kV Substation (in Chipata District, Zambia). The two portions of the lines will be developed by the respective national utilities, ZESCO and ESCOM of Malawi. The ZAMA Project is scheduled to commence in 2027 and end in 2030, in accordance with the Agreement between the World Bank and ZESCO Limited.

GOPA Intec has been contracted to conduct the Environmental and Social Impact Assessment (ESIA) and Resettlement Action Plan (RAP) for the Project, and ZESCO, being the Project developer, will endeavor to undertake all activities related to the ZAMA in an environmentally and socially sustainable manner. The Project has the potential to trigger various grievances from Project Affected Persons (PAPs) and other stakeholders, in its developmental pathway. These grievances may arise from negative environmental and social impacts related to aspects such as land acquisition, economic disturbance, community health and safety, and pollution. This Grievance Redress Mechanism (GRM) has been established with reference to key project environmental and social instruments, which include the ESIA, Environmental Social Management Plan (ESMP), RAP, Stakeholder Engagement Plan (SEP) and Labour Management Procedure (LMP), among others. Some grievances may be technical in nature; thus, a GRM has been developed for the ZAMA and is being implemented to provide an effective channel for managing and resolving grievances arising from Project related activities.

In addition to addressing grievances arising from the Project, this GRM aims to sustain good working relationships that ZESCO has with its wide range of stakeholders. The GRM will be in force from Project preparation until Project closure and will serve as a system for receiving complaints and providing feedback related to Project implementation. The GRM is intended to ensure principles of responsiveness, confidentiality, objectivity, independence, simplicity, timeliness, participation and fairness are adhered to for effective complaint and grievance resolution. As key beneficiaries of the Project, input will be solicited from stakeholders in resolving

grievances relating to various Project related issues such as, but not limited to, environment, community health and safety, labour, compensation and resettlement, Gender-Based Violence (GBV), Sexual Exploitation Abuse and Harassment (SEAH), and child labour. Management of grievances will be monitored at regular intervals to ensure effective resolution of cases. ZESCO will be responsible for implementing this ZAMA GRM. The GRM shall be implemented in accordance with ESS10 and the Project SEP and shall be accessible, free of charge, confidential, transparent, non-retaliatory and culturally appropriate. It shall be available to Project Affected Persons (PAPs), affected communities, local authorities and other stakeholders throughout preparation, RAP implementation, construction, operation and project closure. Worker grievances shall be handled through the separate worker grievance mechanism established under the LMP, while SEA/SH-related grievances shall be handled only through confidential, survivor-centred channels and shall not be investigated or deliberated by community or project grievance committees.

The ZAMA GRM intends to complement and not replace formal legal channels for managing grievances such as the court system and organizational audit mechanisms, among other formal channels. In a similar manner, the establishment of the ZAMA GRM will not prevent employees, citizens, or communities from pursuing their rights and interests in any other national or local designated mechanism. Stakeholders will however be recommended to use this GRM before seeking redress through the courts, administrative law procedures, or other formal dispute resolution mechanisms, except with unique complaints such as those alleging GBV, SEAH, corruption, coercion, or major and systematic violations of rights and policies.

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ACRONYMS AND SYMBOLS

8NDP	Eighth National Development Plan
EHS	Environment, Health, and Safety
EAPP	Eastern Africa Power Pool
ESIA	Environmental & Social Impact Assessment
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
GBV	Gender Based Violence GRM
GRM	Grievance Redress Mechanism
GRZ	Government of the Republic of Zambia
LFPPs	Local Focal Point Persons
LGRC	Local Grievance Redress Committee
LMP	Labor Management Procedure
MAZA	Malawi-Zambia Interconnector Project
PIU	Project Implementation Unit
PGRC	Project Grievance Redress Committee
RAP	Resettlement Action Plan
RETRADE	Regional Energy Transmission, Trade and Decarbonization
SEAH	Sexual Exploitation Abuse and Harassment
SAPP	Southern African Power Pool
SEP	Stakeholder Engagement Plant
ZAMA	Zambia-Malawi Interconnector Project

1.0 INTRODUCTION

The Regional Energy Transmission, Trade, and Decarbonization (RETRADE) Platform is the World Bank response to support countries in the Eastern and Southern African Region in enhancing energy security, resilience, and a transition toward a low-carbon energy sector. In the Southern Africa region, the RETRADE platform will be implemented through a horizontal Multi-Phase Programmatic Approach (MPA), consisting of four phases namely: Phase 1 comprising two components including investments in the Zambia-Tanzania Interconnection Project (ZTIP); Phase 2, which will finance the Angola-Namibia Interconnection Project (ANNA) in the Western corridor; Phase 3, which will support the development of one additional high-benefit interconnection in the Central or Western corridor; and Phase 4 which will finance the Zambia-Malawi (ZAMA) Interconnector Project in the Eastern corridor.

The ZAMA scope comprises: (i) a 46.6 km segment of a 400kV double-circuit overhead transmission line from the existing Chipata West 330/132/33/11kV substation to the Zambia/Malawi border, using triple-bundle ACSR "Tern" conductor on self-supporting lattice steel towers in vertical configuration, within a 50 m right-of-way; (ii) the extension of Chipata West Substation to include a new 400kV switchyard with 2 line bays, 2 line-connected shunt reactors, 2 × 600 MVA 400/330kV autotransformers, a 400kV busbar system, and a new control building; and (iii) Project Management and Technical Assistance.

The development objective of the ZAMA is to increase cross-border transmission capacity in the Eastern Province of Zambia and strengthen ZESCO's operational and commercial capacity to engage in regional power trade with Malawi. The Project is thus aligned with the strategic objectives of SAPP and the broader development goals of both countries. Additionally, the Interconnector will provide power to the Lobito Corridor. The Corridor is a strategic transport, industrial, and trade route centered on the railway line from the Port of Lobito in Angola to the Copperbelt regions of the Democratic Republic of Congo and Zambia.

The objectives of the ZAMA are:

i. To promote and enhance electricity trade between the Southern African Power Pool (SAPP) and Eastern Africa Power Pool (EAPP).
ii. To increase the reliability and stability of the ZESCO Transmission network.

iii. To promote regional integration.
iv. To increase the power transfer capacity to the increasing mining loads on the Copperbelt and North-Western Provinces.

ZESCO Limited will contract an Owners Engineer to develop the transmission line, with an expected construction period of 24 months. The Project is consistent with the long-term development objectives of the Government of the Republic of Zambia (GRZ), as articulated in the Vision 2030 and the Eighth National Development Plan (8NDP).

The Grievance Redress Mechanism outlines management procedures for grievances and other problems that may arise as result of undertaking of the ZAMA.

2.0 GRIEVANCE REDRESS MECHANISM

The Project has established a GRM to manage any complaints from different categories of stakeholders, to ensure that complaints are addressed as early as possible, to avoid delaying implementation of the planned activities. For this project, a GRM refers to a process for receiving, evaluating and addressing project-related complaints from affected communities at the level of project component or activity. The main goal of the GRM is to promote and ensure transparency and accountability with stakeholders and provide channels for project stakeholders to give feedback on project activities.

It provides a mechanism that allows for the identification and resolution of issues affecting the project and wider community, including environmental and social safeguards related complaints, misconduct of staff, misuse of funds, abuse of power, and other improper behavior by increasing transparency and accountability. Other key issues it seeks to address include complaints around community, health and safety, labour, compensation and resettlement, GBV, SEAH, and child labour.

It further reduces the risk of the project inadvertently affecting project beneficiaries and serves as important feedback and learning mechanisms that can help improve project impacts. The GRM has been established with reference to key project tools such as the ESIA, ESMP, RAP, SEP and LMP. The GRM shall be operational before RAP implementation, contractor mobilisation, land access and commencement of civil works in affected sections. ZESCO shall ensure that the GRM is disclosed to communities in accessible formats and local languages and that the GRM is adequately staffed, resourced and documented before implementation activities generate grievances.

2.1 Scope and Purpose of the GRM

2.1.1 Scope of the GRM

The ZAMA GRM covers issues that may arise throughout Project implementation (i.e. preparation, construction, operation and any other activities related to the Project) as a cross-cutting mechanism, in line with the ESIA, ESMP, RAP, SEP and LMP developed for the Project. The scope of the GRM is extended to all parties, whether directly or indirectly, impacted and affected by Project activities. The scope of the GRM includes, but is not limited to, grievances related to land acquisition, eligibility, asset inventory, valuation, compensation, livelihood restoration, relocation assistance, access restrictions, contractor conduct, traffic and community safety, environmental impacts, labour influx, stakeholder engagement, security personnel if used, and SEA/SH-sensitive complaints. RAP/ESS5-related grievances shall be addressed in accordance with the RAP and ESS5 requirements and not only national administrative procedures.

2.1.2 Purpose of the GRM

The main purpose of the GRM is to provide and outline procedures for receiving and responding to any complaints made over the Project as quickly as practicable to avoid, as much as possible, any conflict and/or potential judicial processes.

The GRM will apply to all stakeholders and will serve as a recourse for resolution of grievances arising from project activities that may potentially impact these stakeholders. It thus aims to enhance a mechanism for PAPs, project employees, communities and all stakeholders to report Project related complaints, as well as enhancing a feedback mechanism for the Project developer.

Specific objectives of the GRM include the following:

i. To increase trust and transparency amongst all project stakeholders;
ii. To foster positive relationships among different stakeholders and host communities;
iii. To work as a risk management tool and hedge the Project developer's reputational risk; and
iv. To comply with World Bank Environmental and Social Framework (ESF) requirements, national regulatory requirements, and international best practice requirements for developmental projects to have a functioning GRM.

A well developed and functioning GRM may include the following:

i. Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site;
ii. A log where grievances are registered in writing and maintained as a database;
iii. Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
iv. Transparency about the grievance procedure, governing structure and decision makers; and
v. An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

This GRM shall ensure that all the concerns and views of persons affected by the Project activities carried out throughout project implementation, including any grievances related to compensation processes, resettlement, and any other grievances are received accordingly and acted upon in a timely manner and through an effective and transparent process. The GRM will provide a forum to mediate conflict and cut down on the possible lengthy litigation, which often delays projects. It will also address any objections or concerns regarding the Project activities through a well-defined conflict resolution procedure. Use of the GRM shall be voluntary and shall not prevent complainants from

seeking judicial or administrative remedies or using the World Bank Grievance Redress Service and Accountability Mechanism. The GRM shall also allow anonymous complaints where possible and shall protect complainants, witnesses and focal persons from retaliation.

The Project reflects a unique geographical location as it is being implemented in rural areas of the country, traversing Chipata and Vubwi Districts for 46.6km. Most of the areas where the Project will be implemented are remote, making it difficult for communities to access key services. This is coupled with low literacy levels that may pose a barrier to some project stakeholders, especially marginalized groups. This GRM will therefore apply a simplified mechanism to fit the nature of the Projects' area of influence.

2.2 GRM Guiding Principles

In designing this GRM, and to enhance the effective resolution of stakeholder grievances, the following principles shall be adhered to:

2.2.1 Responsiveness and Confidentiality

Adopting the doctrine that there is always room for improvement, this GRM will accommodate all types of complaints, comments and suggestions, with a view to improve the Project's efficacy and efficiency. Comments and suggestions received for improvement of the Mechanism will be given due consideration and the providers of the input will be kept informed of the response to their inputs. To ensure transparency in handling and processing grievances, all Project stakeholders, especially complainants, will be kept informed of the outcome of the redress process in a timely manner. As confidentiality is an integral part of the process, the identity and personal details of complainants will only be disclosed to those involved in the resolution of the grievance.

2.2.2 Objectivity and Independence

The mechanism empowers the committees that will be established in the grievance redress hierarchy, to operate independently and objectively, while handling grievances and to ensure that all information, stakeholders and records required for inquiry and analysis are easily accessible. To avoid any conflicts of interest, the selection and appointment of Local Focal Point Persons (LFPPs) who will receive and log in grievances into the grievance register that will be established, will be made from ZESCO, through a transparent and inclusive process. Appointment of the LFPPs is aimed to promote an efficient GRM process, as these persons will be from within the community.

2.2.3 Simplicity

Literacy levels may not be the same in all the areas and therefore, simple procedures will be adopted for the GRM for lodging complaints and/or submitting suggestions or comments. The GRM shall be made accessible and understandable to all PAPs and project stakeholders' especially marginalized people, vulnerable groups, and female beneficiaries within and in close proximity to the Project area. A summarized grievance procedure shall be translated into applicable local languages which shall be displayed in communal areas such as hospitals, schools and local councils in the Project area.

2.2.4 Fairness

The GRM will equally consider all complaints irrespective of their nature, size and complexity. All complaints, comments and suggestions received will be registered and the person or entity making the request for redress will be acknowledged in writing and/or any other means as may be appropriate. The Project staff implementing the GRM will be trained for grievance handling and resolution.

2.2.5 Timelines

All grievances, irrespective of their nature and size shall be considered and corrective actions taken within reasonable time. All possible efforts will be made to complete the process within the shortest possible time. Urgent grievances involving imminent risk to life, health, safety, security, serious OHS incidents, major pollution, land entry without compensation, forced eviction, or SEA/SH allegations shall be escalated immediately to the PIU and relevant responsible personnel. SEA/SH cases shall be referred to appropriate service providers as soon as possible and preferably within 24 hours of disclosure, subject to the survivor's informed consent.

2.2.6 Participation

The GRM encourages all stakeholders to lodge complaints, and make suggestions, including improvements to the GRM. The GRM will ensure that project beneficiaries are included in the process of redressing grievances and incorporating suggestions where required. Matters concerning environmental and social management and involuntary resettlement or loss of livelihoods (where applicable) will be an integral part of the process.

2.2.7 Accessibility

The grievance redress procedures will be placed in convenient public locations (such as hospitals, schools, local councils) within the Project area, with full details and contacts

for respective LFPPs and ZESCO District GRM Coordinators. The applicable local language shall be used to assist those who may face barriers in terms of the English language and literacy. The communities within the Project area, including persons affected by the project, will be made aware of the GRM with regards to their rights and procedures for making grievances, which will include options for raising complaints (such as anonymity, suggestion boxes, text messaging etc.) and appropriate referral pathways.

For the vulnerable and uneducated PAPs, the grievance procedures will be simple, accessible, flexible, just, fair and capable of being administered efficiently with minimum delay. In this regard, the Project developer shall keep updated records of grievances and their resolutions in the Project area, which records shall be consulted to validate claims. Additional measures shall be applied to ensure access for women, elderly persons, persons with disabilities, youth, low-literacy complainants, poorer households and other vulnerable or disadvantaged groups. These measures shall include oral intake of complaints, use of local languages, female and male focal points, accessible venues, assistance to complete forms, and targeted outreach during RAP implementation and construction.

2.3 Types of Complaints

This GRM will be accessible to all stakeholders in the Project area as a means for resolution of grievances which may occur throughout project implementation. These grievances could be related to environmental, social, health and safety, service delivery, application processes, gender bias, labour, compensation and any issues that may arise due to interactions between the labour workforce and host communities. Resettlement-related grievances, such as the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts, and timing of compensation, amongst others, will also be handled by this process. Grievances will be handled through negotiation aimed at achieving consensus. RAP-related grievances shall be tracked as a dedicated category in the GRM database and shall include grievances on eligibility, cut-off date, census and asset inventory, valuation, compensation payment, replacement cost, transitional support, livelihood restoration, physical relocation, vulnerable household assistance, access to residual land, and contractor entry onto land. Where a grievance affects land access or compensation eligibility, the relevant section shall not be handed over for works until the grievance has been resolved or otherwise managed in accordance with the RAP and ESS5 requirements.

The GRM will be set up and administered at Project Implementation Unit (PIU) level. Records of grievances and responses will be maintained by the PIU.

Potential grievances and disputes that may arise during Project implementation may include:

i. Inventory errors/omissions made during census survey as well as inadequate valuation of properties;
ii. Disagreements on plot demarcations/ asset valuation;
iii. Disputed ownership of properties due to death, divorce or multiple possession;
iv. Where affected individual(s) opt for a settlement-based option and there is disagreement on the resettlement package;
v. Dispute of alleged voluntary donation of land;
vi. Unfair award of contracts;
vii. Delayed payments to contractors;
viii. Long procurement procedures;
ix. Delayed commencement of sub-project activities; and
x. Grievances related to: traffic safety, restricted access to homes and farms, dust, noise, other pollution, worker-community interactions, safety around electrical facilities and delayed household connections.

Grievance procedures for projects such as these, in the Zambian context, are generally guided by provisions for any matter decided upon by an authority to be taken to the immediate superior authority as an appellant authority. Aggrieved parties also have access to the Arbitration system and when all else fails, have recourse to the Court system for settlement of grievances.

To this effect the grievance procedure will be simple and administered in relation to the existing local grievance systems in the Project area as far as possible, to facilitate access and flexibility, while upholding a speedy, just and fair process. Annex 1 contains a sample grievance submission form that may be adapted for use in recording grievances.

3.0 GRIEVANCE REDRESS MECHANISM PROCEDURES

Mechanisms will be put in place to ensure that grievances are recorded and considered fairly and appropriately. These include:

i. A register of grievances which will be held by the ZESCO District GRM Coordinator (at District level) and LFPPs, as guided by the Project Social Officer(s) / Gender-Based Violence Specialist as well as any other person(s) appointed by the Grievance Committee;
ii. Receipt of grievances will be acknowledged within stipulated timeframes for handling of complaints, through convenient means of communication such as written letters, verbally and email;
iii. The grievance will be reviewed by the respective Grievance Committee and corrective action will be implemented. Should the complainant disagree on prescribed actions, the matter will be escalated as per prescribed referral pathway. The preferred course of action will be discussed with the affected person to ensure consensus in the resolution of the grievance; and
iv. Relevant details of grievances, with outcomes, will be made available to the affected parties including an explanation of the approach and methodology used to resolve the grievance.

ZESCO will ensure an inclusive and consultative process with relevant stakeholders in the selection of project alignments/sittings, cognizant of technical, environmental, economic and social parameters.

3.1 Channels of Reporting a Grievance

The channels for reporting a grievance are as indicated below:

i. **Written complaint:** A grievance can be raised by formally writing to ZESCO and and/or the Project team about arising concerns and complaints.

ii. **Verbal Complaint:** This is in a case where a complainant physically meets with the appointed LFPPs to lodge in a grievance.

iii. **Suggestion Box:** Suggestion boxes will also be put at various locations in the community for lodging grievance anonymously. However, emphasis shall be put that

complainants should provide sufficient details to enable the receiver of the grievance make appropriate action.

iv. **Phone call**: Contact numbers will also be provided as a means of lodging in grievances. This includes existing emergency toll numbers for GBV/SEAH related grievances.

Contact channels to be provided for easy communication from various categories of aggrieved parties include:

i. Contact Details:
ii. Dedicated Email:
iii. Postal Address for Letters and other official Notifications:

ZESCO will institute a multi-level process for resolving any disputes over asset inventories and valuations as recommended in the document. On the premise that disputes are most amicably resolved informally at the local level, ZESCO will first work through the Local Grievance Redress Committee (LGRC) to resolve disputes, which may be referred for resolution to the Project Grievance Redress Committee (PGRC), at PIU Level, if unresolved at the first committee.

3.2 Steps in Implementing the GRM

3.2.1 Selection of Local Focal Point Persons

Selection and establishment of LFPPs for receiving and registering complaints at community and district level is one of the first actions in the implementation of the GRM and these should be clearly identified and established. The ZAMA runs through 2 districts with over 14 communities spread on a corridor stretching for a distance over 46.6km. For the ZAMA, at community level, each community will have 2 LFPPs, that is, one male and one female, whose role will be to receive and register grievances. The LFPPs will be selected through a transparent process of nomination and voting among community members. The LFPPs will have log books for registering grievances and will be reporting to the LGRC. At district level, there will be a GRM Coordinator, who will be an officer selected from the local ZESCO office.

The LGRC will work in collaboration with the existing traditional authority structures in respective chiefdoms traversed by the project. The primary requirement for an LFPP is that they should be respected persons from within the community, have knowledge of the local culture, and be able to communicate fluently in the local language of the

community. The LFPP should be able to record the grievances, received verbally and through other means such as suggestion boxes, in the grievance log book.

3.2.2 Receiving Grievances

As highlighted in section 3.1 various methods of logging complains will be provided. At community/local level the selected LFPPs will be receiving grievances reported at community or village centres and record them in log books. Grievances reported at district level where ZESCO stations are present will be received and recorded by the GRM District Coordinator who is a selected ZESCO employee at that station. The roles of LFPPs and District Coordinators will be receiving and recording the grievances in their logbooks at community and district level respectively. Complaints may also be lodged to an appointed officer from the Project Implementation Unit (PIU), such as the Social Officer or GBV Specialist. The recorded grievance must be read and explained to the complainant to confirm whether the grievance has been recorded correctly.

The LFPPs and District Coordinator will be members of the Local Grievance Committee who will be reporting unresolved issues to PGRC at project management level. Each non-SEA/SH grievance shall be assigned a unique case number, recorded in the GRM tracker, acknowledged within the stipulated timeframe, categorized by type and location, assigned to a responsible officer, and tracked until closure. The complainant shall be informed of the process, expected timelines, appeal options and the right to use other remedies. Personal information shall be protected and disclosed only on a need-to-know basis.

3.2.3 Recording Grievance

Grievances received from LFPPs, Coordinators and those directly reported to the PIU will be recorded in the GRM Tracker by the appointed Social Officer or GBV Specialist within 2 days of receiving the complaint. Following the recording of the lodged grievance, the GRM referral process will be implemented and includes investigating the grievance, consulting relevant persons within the project site, defining and implementing resolution actions, following up on implementation and completion of resolution actions, tracking progress of individual grievances, and referral to the judicial system if the grievance is not resolved at LGRC and PGRC levels.

Confidentiality will be ensured in all instances were grievances are lodged, including when the person making the complaint is known. This will ensure the stakeholder remains

anonymous throughout the process, unless they wish to be known. Specific procedures for GBV and SEAH including confidential reporting with safe and ethical documentation of such cases will be handled by respective and appropriate service provides determined on a case-by-case basis. SEA/SH complaints shall not be entered in the general grievance log with personally identifiable information. The project shall record only minimum non-identifiable information necessary for monitoring and reporting, such as case code, type of allegation, whether the allegation is project-related, age/sex of survivor if voluntarily provided, whether referral was offered and accepted, and status of administrative follow-up. All identifiable information shall be held separately and securely by trained SEA/SH personnel or qualified service providers.

3.2.4 Investigation and Assessment

The delegated responsible officer/s from the PIU at Local GRC level for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance within 7 days following acknowledgment and recording of grievance in the tracker. Investigations shall not be done for GBV/SEAH cases and other related grievances. All GBV/SEAH related complaints shall be reported to respective GBV Service Providers outside the GRM committees. However, progress of GBV/SEAH cases shall be monitored through the GBV Specialist under the PIU. The rest of the grievances shall be investigated as per roles and responsibilities of respective GRCs.

For SEA/SH allegations, the GRM shall not investigate the truth of the allegation, mediate between survivor and alleged perpetrator(s), or require survivors to present evidence to any grievance committee. The role of the GRM is limited to safe intake, informed consent, referral to services, assessment of whether the alleged perpetrator is project-related for purposes of employer/contractor accountability, and monitoring of agreed administrative actions while preserving confidentiality and survivor safety.

Investigation findings will be used to provide information for decision making and recommendation of appropriate remedies. Verbal and then written feedback will be provided to the stakeholder that raised the grievance to enable that a record of correspondence is retained. At this stage an opportunity to seek further clarifications on issues from the grievance or request for further information will be done. If grievance is considered out of the scope of this GRM, the assigned officer/s will draft a response explaining why it is out-of-scope and thereafter provide guidance on further avenues for appropriate feedback.

The following is a summarized criterion that will be used to assess and verify that the grievance is within the scope of the Project:

i. The complainant is directly affected by the project;
ii. The complainant has a direct relationship to the project;
iii. The issues raised in the complaint fall within the scope of the issues that the GRM is mandated to address.

A response will be formulated on how to proceed with the grievance and the affected person or complainant will be communicated to on the way forward. The response will be guided by the following steps:

i. Acceptance or rejection of the grievance
ii. Reasons for acceptance or rejection of the grievance
iii. Next steps – where to forward the grievance
iv. If accepted, further documents and evidence may be required for investigation e.g. for land conflicts, documents of ownership and maps maybe required to assist in investigation.

Following acceptance of grievance and determination of being within scope, an investigation will be instituted. Investigation of the grievance may include the following;

i. On site visit and verification;
ii. Focus Group discussions and interviews with key informers;
iii. Desk top review of available and/or provided documents (reports, procedures, regulations and policies, title deeds and maps); and
iv. Consultations with local authorities, traditional leadership and relevant institutions.

The investigations will gather facts in order to generate a clear picture of the circumstances surrounding the grievance.

3.2.5 Resolution and Response

The results of the investigation, and the proposed response to the complainant, will be presented for consideration to the LGRC. Once a decision has been made on the course of action and on the response to be provided to the aggrieved, the actions will be

described, and response communicated to the aggrieved. All issues not resolved by the LGRC will be referred to the PGRC. at project management Level.

If the grievance is resolved at that level, then the affected shall be informed of the outcome, through appropriate means, with a copy to the Chairperson of the respective Committee. Unresolved grievances by the LGRC and PGRC shall be referred to arbitration/courts of law. All agreed corrective actions shall be documented in the GRM tracker, including the responsible party, deadline, verification method and closure evidence. For contractor-related grievances, corrective actions shall be linked to the contractor's C-ESMP obligations and may include non-compliance notices, time-bound corrective action plans, sanctions, or escalation to ZESCO and the Supervising Engineer.

3.2.6 Appeal/Arbitration

If there is dissatisfaction from affected individuals/groups that cannot be resolved within the Project's proposed grievance resolution process, the matter shall be referred to arbitration within 30 days, pursuant to the Arbitration Act No. 19 of 2000 and in accordance with arbitration procedures published by the Chartered Institute of Arbitrators, Zambia Branch. The arbitration shall be chaired by one arbitrator who shall be appointed by written agreement of both parties. Where the parties fail to agree on an arbitrator, each party shall in writing appoint one arbitrator, and the third arbitrator who shall be the chairman of the arbitration tribunal shall be appointed by written agreement of both parties, and in default of agreement, by the President of the Chartered Institute of Arbitrators, Zambia Branch. The following will apply to the arbitration process:

i. The decision of the arbitration panel shall be final and binding to the parties;
ii. The seat of arbitration shall be Lusaka, Zambia; and
iii. Nothing shall prevent or delay a party from making claims or seeking injunctive or interlocutory relief in any court of competent jurisdiction in Zambia.

3.2.7 Courts of Law

It should be noted that arbitration only works where the parties to a dispute agree to resolve a difference through arbitration. Where there is no consent, then a court of jurisdiction may be used to resolve a dispute. The GRM shall be free of charge and shall not require complainants to waive their rights to seek redress through courts, administrative bodies, traditional mechanisms, the World Bank Grievance Redress

Service, or the World Bank Accountability Mechanism. Information on these options shall be disclosed to communities in a clear and accessible manner.

3.2.8 GRM Process Management

The GRM set up for the Project will build on both traditional conflict-resolution flows as well as administrative and Project based steps to ensure community members or any stakeholders have an opportunity and means to raise their concerns or to provide suggestions regarding Project-related activities.

A reporting line of received (and addressed) grievances will also be clearly defined, so that the PIU will have a full complement of data. Grievances will be categorized and recorded at each level of the GRM structure and consolidated periodically in a project grievance tracker by the Social Officer or GBV Specialist and informed by the District GRM Coordinator at the local ZESCO office. All documents related to grievance management both hard and soft copies shall be kept and managed by respective appointed officers at the PIU. The tracker will be used to monitor progress and detect potential obstacles in the Project implementation of the GRM. The tracker will be set up as a Microsoft Excel file, and upgraded into other software as and when needed as the Project progresses.

The tracker will be under the custody of the Social Officer or GBV Specialist and will be made available and easily accessible to the PIU to allow ease of transition as the Project transitions between phases and in the event of any change of staff appointed with responsibility of updating progress of activities within the defined scope of the GRM. The GRM tracker shall be maintained by the PIU and shall include, at minimum, case number, date received, location, complainant category where voluntarily disclosed, grievance category, whether RAP/ESS5-related, responsible officer, status, actions taken, dates of acknowledgement and response, resolution deadline, closure evidence and appeal status. SEA/SH cases shall be tracked only through a separate confidential register using non-identifiable information.

During the participatory assessment process for Project preparation and sensitization sessions, the Project's GRM ("communication steps" for beneficiaries) will be explained so that all stakeholders are aware and encouraged to use the Mechanism for transparency and desired Project outcomes. To better inform stakeholders, the Project will prepare materials (e.g., posters, leaflets) in a widely spoken local language and

displayed in public accessed areas[1] as part of the communication activities, in addition to other interventions as may be deemed appropriate.

The illustration in Figure 1 summarizes the procedure and key steps for grievances redress mechanism and Chart 1 gives summary of grievance redress process.

[1] These may include ZESCO Offices, Local Authorities offices, Hospital/Rural Health Centers, Schools etc.

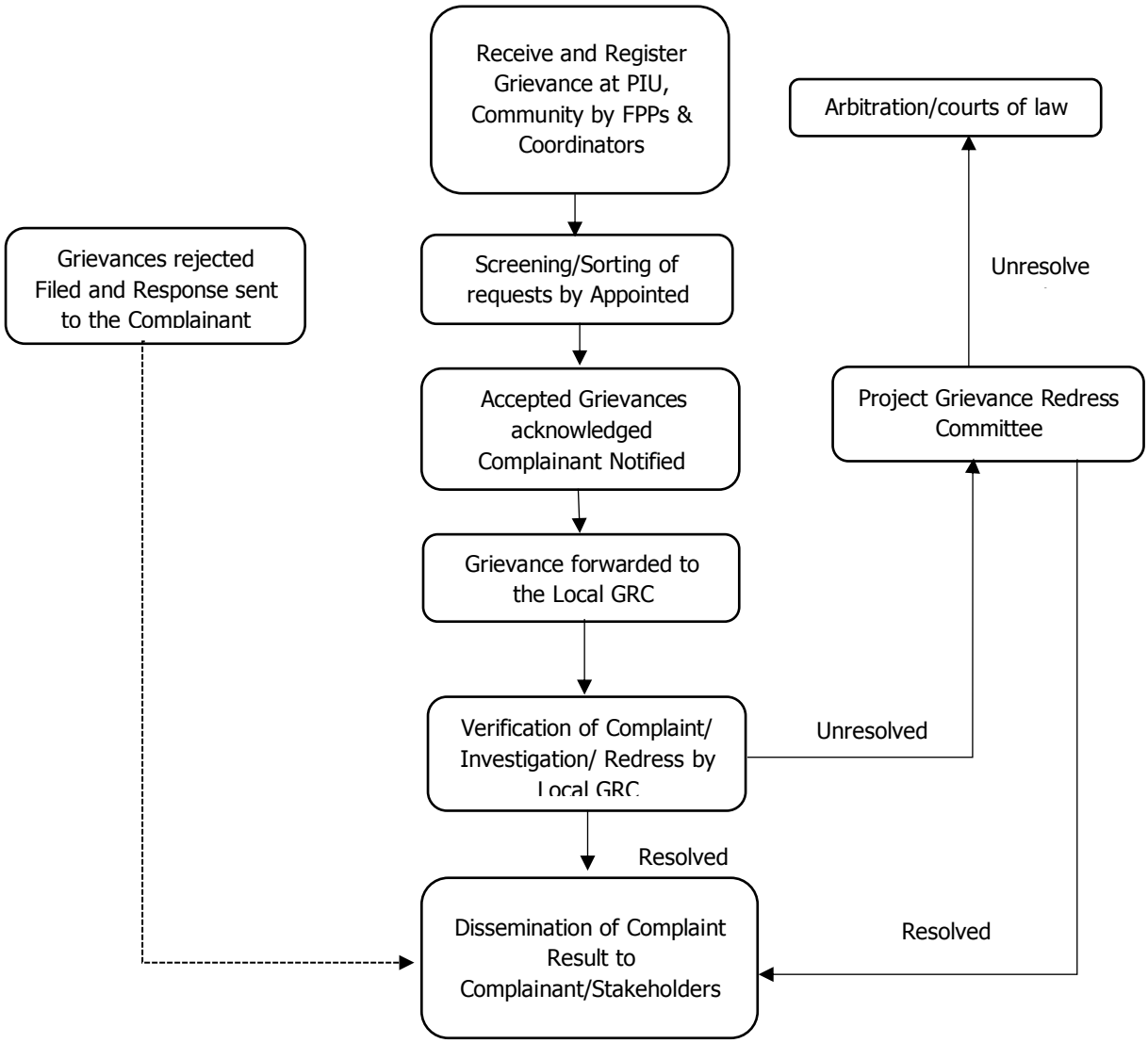


Figure 1: Key Steps in the Grievances Redress Mechanism

Chart 1: Summary of Grievance Redress Process



3.2.9 Timeframes for Grievance Redress

Table 1 highlights the suggested timeframes for grievance management. All grievances related to the Project, irrespective of their nature and size shall be considered and

corrective actions taken within reasonable time. All possible efforts will be made to complete the process within the shortest possible time.

Table 1: Suggested Timeframes for Grievance Redress

PROCESS	TIME FRAME
Receive and register grievance	Within 2 Days
Acknowledge, assess grievance and assign responsibility	Within 7 Days
Development of response	Within 3 Days
Implementation of response if agreement is reached	Within 2 weeks
Close grievance	Within 5 Days
Initiate grievance review process if no agreement is reached at the first instance	Within 2 weeks
Implement, review recommendation and close grievance	Within 2 weeks
Grievance taken to court by complainant	This will depend on the type of grievance

3.3 Grievance Redress Committees Composition

The composition and operation of grievance committees shall avoid conflicts of interest and shall include appropriate representation of women and affected persons. Committee members, LFPPs, District GRM Coordinators, contractors and PIU staff shall receive training on ESS10, ESS5/RAP entitlements, confidentiality, non-retaliation, inclusive engagement, grievance documentation, escalation procedures and SEA/SH survivor-centred referral requirements. SEA/SH complaints shall not be deliberated by these committees. The various GRM Committees shall be composed as stated below.

3.3.1 Project Grievance Redress Committee

The Project Grievance Redress Committee shall be composed of:

i. Director Planning & Projects - ZESCO
ii. Project Manager – ZAMA, ZESCO Limited ZAMA;
iii. Head – Environment, ZESCO Limited
iv. Representative from Ministry of Energy
v. Chief Environmental and Social Analyst - ZAMA
vi. Technical Manager - ZAMA
vii. Chief Social Officer - ZESCO

viii. GBV Specialist - ZAMA

The Chairperson for the Committee shall be the Project Manager - ZAMA. The Committee shall sit as and when need arises for resolution of grievances unresolved at the LGRC level.

3.3.2 Project Grievance Redress Committee Roles & Responsibilities

i. Resolving and addressing complaints categorized at Level 3 and 4 (**Error! Reference source not found.**);
ii. Reviewing appeals lodged against the resolutions of LGRC;
iii. Considering and determining corrective measures in the light of comments and suggestions received by the LGRC;
iv. Monitoring GRM handling by the LGRC and reviewing resolutions suggested thereof;
v. Reporting to ZESCO Corporate Leadership unresolved grievances at project management level
vi. Constituting special committees if required under unusual circumstances for redress of grievance of exigent nature and/or for resolutions of complaints requiring broader inquisitorial procedures.

3.3.3 Local Grievance Redress Committee

The Committee shall be composed as follows:

i. Chiefs Representative
ii. Headman / Headwoman
iii. Community Representatives (Man, Woman, Youth)
iv. Local Focal Point Person(s)
v. GRM District Coordinator (where applicable)
vi. Social Officer – ZAMA
vii. Local Non-Governmental Organisations (where required)
viii. Victim Support Unit (where required)
ix. Health Centres (where required)
x. Representative from Ministry of Community Development and Social Welfare Officer (where required)

The Chiefs Representative shall chair the committee at this level.

Community representatives and affected peoples' representatives will be part of the contracts to be signed by the affected persons, and all complaints of non-fulfilment of contracts, levels of compensation and seizure of assets, shall be addressed to the Local and District Authorities in the area either in person or in writing. All stakeholders will be made aware of the GRM through ZESCOs sensitisation to communities on the provisions of this mechanism.

3.3.4 Local Grievance Redress Committee Roles & Responsibilities

The roles and responsibilities of the Local Grievance Redress Committee are as stipulated below:

i. Receive, log and track all grievances received;
ii. Resolving and addressing complaints categorized at Level 1 and 2 (**Error! Reference source not found.**);
iii. Provide regular status updates on grievances to complainants, ZAMA PIU and other relevant Stakeholders as applicable.
iv. Engage the ZAMA PIU and other relevant stakeholders in grievance resolution.
v. Process and propose solutions and courses of actions related to specific grievances within a period not exceeding 10 working days from receipt of the complaint;
vi. Identify growing trends in grievances being reported and recommend possible measures to avoid the same;
vii. Receive and service requests for, and suggest the use of, mediation or facilitation;
viii. Regular reporting to PGRC on all unresolved grievance for further assessment
ix. Ensure increased awareness, accessibility, predictability, transparency, legitimacy, and credibility of the GRM process;
x. Collaborate with relevant local institutions and NGOs to conduct outreach initiatives to increase awareness among stakeholders on the existence of the GRM, its purpose and how its services can be accessed;
xi. Ensure continual education to stakeholders about the relevant laws and policies that they need to be aware of to participate in the development of effective resolutions to grievances likely to come before the ZAMA GRM; and
xii. Monitor and follow up grievance resolutions, as appropriate.

The LGRC shall also support awareness on RAP entitlements, construction schedules, temporary access restrictions, traffic safety, contractor-community interaction rules, worker Codes of Conduct, and available grievance channels. It shall not negotiate or reduce RAP entitlements agreed in the RAP and shall escalate any dispute involving

eligibility, valuation or livelihood restoration that cannot be resolved promptly. Table 2 outlines the entry points and decision-making at respective levels of the GRM process.

Table 2: Complaint Levels and Response Process

Level	Description	Type of Request	Authority for Redress	Authority for Appeal
Level - 1	1.1 Complaints regarding E&S matters	Complaint	LGRC	PGRC
	1.2 Complaints regarding resettlement and compensation issues	Complaint	LGRC	PGRC
	1.3 Suggestion/comments regarding implementation of ESMP & RCAP	Suggestion/comment	LGRC	PGRC
	1.4 Complaints against staff involved in E&S and RCAP	Complaint	LGRC	PGRC
Level - 2	2.1 Compliant pertaining to site selection /technological designs	Complaint	LGRC	PGRC
	2.2 Complaint Regarding Technical Staff	Complaint	LGRC	PGRC
	2.3 Complaints regarding implementation of interventions pertaining to technical project scope	Complaint	LGRC	PGRC
	2.4 Complaints regarding contractor implementation interventions of technical project scope	Complaint	LGRC	PGRC
	2.5 Suggestions/Comments on Implementation of interventions of technical project scope	Suggestion/ Comment	LGRC	PGRC
Level - 3	3.1 Complaint against Contractors	Complaint	PGRC	ZESCO Corporate Leadership
	3.2 Complaint against PIU Staff	Complaint	PGRC	ZESCO Corporate Leadership
	3.3 General complaint regarding malpractices without documentation/detail	Complaint	PGRC	ZESCO Corporate Leadership
	3.4 Complaints submitted by PIU Staff pertaining to personal matters/ issues	Complaint	PGRC	ZESCO Corporate Leadership

Level	Description	Type of Request	Authority for Redress	Authority for Appeal
	3.5 Complaints received from Government Representatives	Complaint	PGRC	ZESCO Corporate Leadership
Level - 4	4.1 Complaint regarding procurement of goods and services	Complaint	PGRC	Arbitration
	4.2 Complaint pertaining to malpractice by contractor/PIU and/or consultants	Complaint	PGRC	Arbitration
	4.3 Complaint against harassment	Complaint	PGRC	Arbitration
	4.4 Claims against Project	Complaint	PGRC	Arbitration
	4.5 Queries /complaints from Public Representatives	Complaint	PGRC	Arbitration
	4.6 Comments/suggestions on change in design and scope of Project interventions	Suggestion/ Comment	PGRC	Arbitration

Figure 2 shows the hierarchy of the various committees with respect to the GRM process.



Figure 2: Grievance Redress Committees

3 GENDER BASED VIOLENCE/SEXUAL EXPLOITATION ABUSE AND HARASSMENT RELATED GRIEVANCES

This GRM will respond to GBV/SEAH cases in accordance with the ZAMA GBV/SEAH action plan. The SEA/SH grievance procedure shall be aligned with the World Bank Good Practice Note on SEA/SH and shall be reviewed by the World Bank E&S team before implementation. SEA/SH complaints shall be managed through confidential, survivor-centred channels and shall not be handled through public or community grievance committee deliberations.

3.1 GBV/SEAH Service Providers

The GRM will also receive GBV/SEAH complaints, however, the LFPPs and GRM District Coordinators will not investigate but merely refer to relevant GBV Service Providers. These GBV Service Providers will include, among others legal, psycho-social, medical care, safety and security-related support to GBV survivors. The list of GBV service providers available in the Project area can be accessed from the Republic of Zambia Gender Division Gender-Based Violence Referral Pathway Service Directory which is accessible at: https://tinyurl.com/2hsyu6v4.

This directory provides a list of GBV/SEAH Service Providers mapped and available in the Project area (Province and District). The list of GBV/SEAH Service Providers can also be accessed from the Project GBV/SEAH directories that will be developed after the GBV/SEAH service mapping exercise. Prior to contractor mobilisation, ZESCO shall verify and update the service provider mapping for Chipata and Vubwi Districts, including health, psychosocial, legal, police/Victim Support Unit, protection and safe referral services. The referral pathway shall identify which providers are available, accessible, confidential, survivor-centred, and able to respond within reasonable timeframes. Referral information shall be shared with trained focal persons and communities without disclosing survivor information.

3.2 Procedure for Handling GBV/SEAH Related Grievances

The steps and processes to be followed when handling a GBV/SEAH related grievances are highlighted below:

i. Step 1: Submission of Complaint[2]

Safe and confidential reporting channels will operate at all levels to enable the submission of grievances with whoever the complainant feels more comfortable with. This includes;

[2] SEA/SH survivors shall be allowed to report through the channel they consider safest, including trained SEA/SH focal points, qualified service providers, the GBV Specialist, the national GBV toll-free line, or other confidential channels. Survivors shall not be required to report through LFPPs, community committees, supervisors, contractors or any person with whom they are uncomfortable.

- The Local Focal Point Person (LFPP);
- The GRM District Coordinator, ZESCO representative at local office; and.
- The PIU, through the GBV Specialist and Social Safeguards specialist.

Complaints can be submitted by multiple types of complainants (e.g., GBV survivors, witnesses, or whistleblowers) using the following channels;

- Face to face
- Calling 944 National toll-free line for GBV
- In writing

ii. Step 2: Recording of the Complaint

For complaints reported through the local GRM structures, the LFPP will record the details in the GBV/SEAH Incident Reporting Form (Annex 2) without divulging personal identifier details about the survivor. He/she will also be responsible for recording the basic necessary information in the logbook. Information in the logbook will be limited to the following;

- Case number
- Person who received the case,
- To where the referral was made
- The person who received it (acknowledged receipt through signing in logbook for easy follow up/tracking)
- A column which shows the status of a case i.e. pending or closed.

The LFPP is tasked with maintaining the details of the grievance completely confidential and store the GBV/SEAH Incident Report Forms in a dedicated folder/secure place until the GBV Specialist collects these forms and stores them in secure cabinets.
In addition to the forms, a logbook at the PIU will be used to record all cases received related to GBV/SEAH to be kept and monitored by the GBV Specialist/Social Specialist. They will be responsible for sorting, processing, and monitoring these grievances. The GBV Specialist will report the anonymized incident (with the consent of the survivor), within 24 hours of receiving it, to the Project Manager, and they, in turn, will inform the World Bank on the allegation within 24 hours of receipt.

LFPPs shall not collect detailed survivor statements, investigate allegations or retain personally identifiable SEA/SH records unless specifically trained and authorized to do

so. Their role shall be limited to safe listening, explaining available options, obtaining consent where appropriate, and facilitating referral to the GBV Specialist or qualified service provider. Any forms containing personal information shall be stored securely and separately from the general GRM records.

Some survivors may choose to directly go to the referral services. In these instances, contact persons at referral organizations must be advised to report cases purported to be project related to the GBV specialist, Social Specialist, LFPP, or GRM District Coordinator so they can record all cases for tracking. Sample of GRM Tracker for the ZAMA is presented in Annex 4.

iii. Step 3: Consent and Referral

The LFPP will obtain the survivor's informed consent by completing the Consent Form - Part 2 of the GBV/SEAH Incident Report Form (Annex 2) before referring the survivor to the appropriate GBV/SEAH support service using the GBV/SEAH Referral Form (Annex 3). The choice to access the services ultimately resides with the survivor. Where the survivor does not provide informed consent for information sharing regarding their case, the LFPP or GRM District Coordinator provides the survivor with information on available GBV related services to allow the survivor to decide whether to access the services or not. If consent is granted, the LFPP or GRM District Coordinator assesses the risks to the survivor and where feasible, identifies the most appropriate service provider to whom they should be referred.

Informed consent shall be voluntary, specific, time-bound and revocable. Survivors shall be informed of what information will be shared, with whom, for what purpose, and the possible implications. No referral, report or administrative action shall disclose identifying information without the survivor's consent, except where mandatory reporting obligations apply under national law and after explaining such obligations to the survivor.

Where the complainant is not the survivor, the complainant will be encouraged to reach out to the survivor and explain the potential benefit of coming forward alone or with the person reporting. If there is a credible concern about the safety of the survivor, the LFPP may attempt to approach the survivor directly to offer a referral to services if consent is granted. These services may include legal, psychosocial, medical care, safety and security-related support.

iv. Step 4: Investigation

If the survivor opts to formally proceed with the complaint, the GBV Specialist communicates the allegation to the GBV/SEAH committee (comprised by her/him, the Chief Environmental and Social Analyst, the Project Manager, at least one member of a local service provider and a representative of the contractor (if relevant)) for review and consideration, and to determine if the allegation is linked to the Project. The Committee promptly considers the allegation within 5 days of its receipt.

The project grievance mechanism shall not conduct a factual investigation into SEA/SH allegations or determine whether SEA/SH occurred. Any employer or contractor disciplinary process shall focus on whether the alleged perpetrator is project-related and whether contractual Codes of Conduct, labour obligations or disciplinary provisions have been breached, while maintaining survivor confidentiality and safety. The survivor shall not be required to participate in disciplinary proceedings as a condition for receiving referrals or support.

If the complaint is not project-related, the process ends at providing referrals and one follow-up before closing the case. If the complaint is project-related, suspected perpetrators temporarily cease to participate in project activities, such as being put on leave or not being allowed to participate in project activities until the investigation is complete, if their participation could result in interference with the matter or pose further harm to the survivor.

Disciplinary action to take for perpetrators, in line with codes of conduct and/or applicable legislation, may include the following, depending on the severity of the case:

- Informal or formal warnings,
- Additional training,
- Loss of salary,
- Suspension or termination of employment (with or without payment of salary),
- Report to the police or other authorities as warranted

v. Step 5: Closure

If the survivor does not wish that disciplinary action be pursued, and has not pursued legal action independently, the process will be closed after the referral to service(s) has been provided. Closure of a SEA/SH case in the GRM shall mean that referral

options were offered, consent-based actions were taken, and any project-related administrative follow-up was completed or transferred to the relevant employer/contractor process. Closure shall not imply that the allegation was investigated or determined by the GRM, and the survivor may continue to access services or pursue legal remedies independently.

In cases where the survivor seeks disciplinary action to be pursued or where the survivor pursues independent legal action, the process is closed in the GBV/SEAH GRM once that disciplinary or legal action has been initiated. The GRM's logbooks (at all levels) should show the results of the referral and the chosen follow-up action (i.e., employment sanction or judicial verdict). Should the survivor seek further assistance, the survivor may return to the GRM.

Once the survivor has accessed the necessary services, investigations concluded, and the survivor is satisfied with the outcome, the case is closed.

The GBV/SEAH reporting procedure is presented in Figure 3.

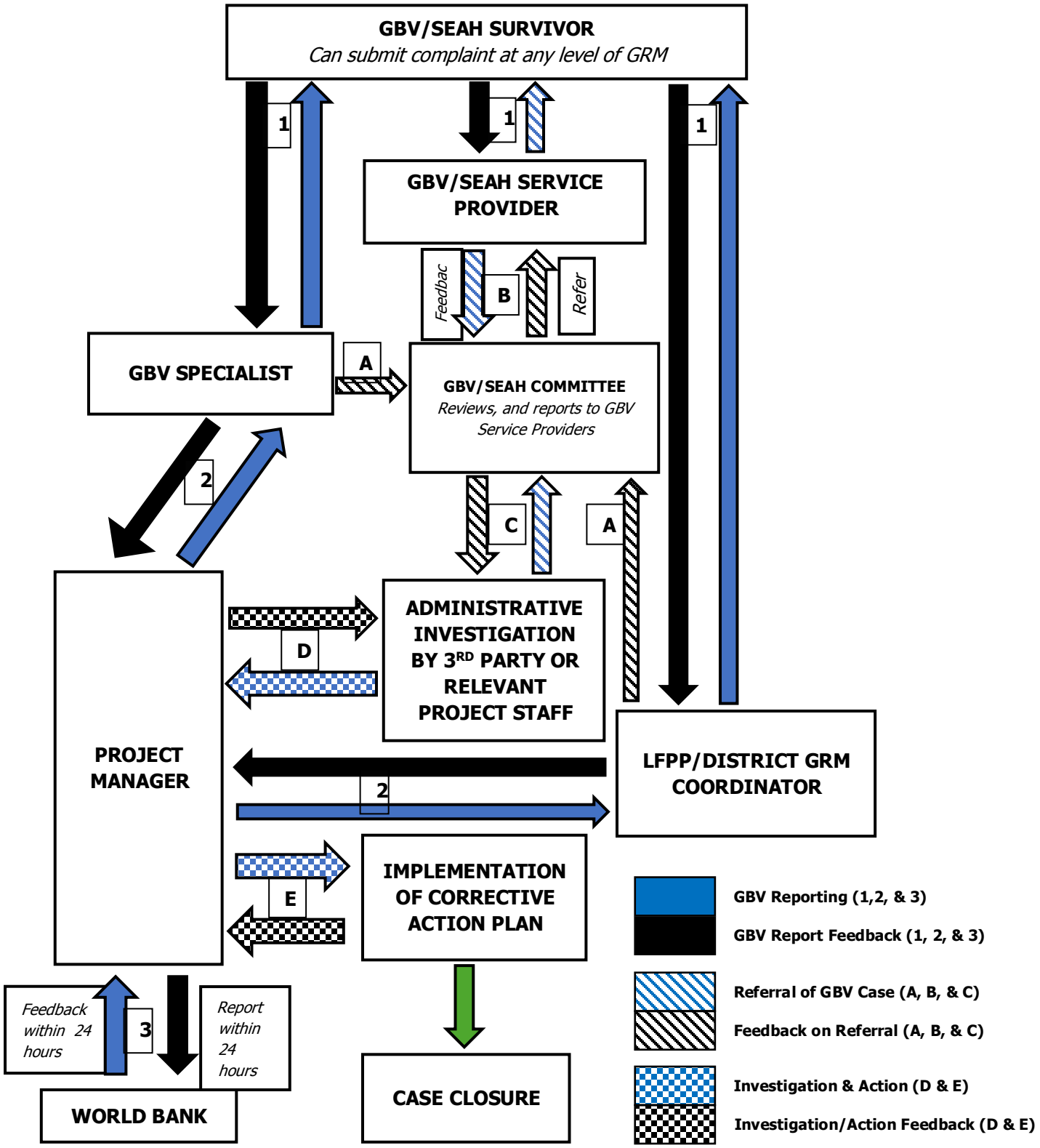


Figure 3: GBV/SEAH Reporting Procedure

5.0 MONITORING AND EVALUATION

All grievances and complaints including suggestions/comments on the GRM will be categorized and recorded at each level of the structure and consolidated periodically in a Project grievance tracker.[3] The PIU will have a full set of the database. The database will be an effective management tool to monitor progress and detect potential obstacles in the Project implementation.

The GRM will be part of the project reporting on a monthly basis or as may be deemed necessary depending on prevailing circumstances. Monitoring and evaluation criteria will include the following:

i. Number and description of the grievances registered over a specified time frame;
ii. Percentage of complaints resolved, and percentage that resorted to legal route;
iii. Time taken to resolve the complaints against the GRM time stipulations;
iv. Number of complainants by gender;
v. Percentage resolutions;
vi. Number of Referrals;
vii. Ongoing efforts at resolutions; and
viii. Status of implementation of ongoing resolutions.

The GRM will be available to the public bi-annually, through a report describing the work of the GRM, listing the number and nature of the grievances received and processed in the previous six (6) months. The level of detail provided with regards to any individual grievance will depend on the sensitivity of the issues and stakeholder concerns about confidentiality, while providing appropriate transparency about the activities of the GRM. The report will also highlight key trends in emerging conflicts, grievances and dispute resolution.

[3] Monitoring shall also include the number of grievances received by category and location, number and percentage acknowledged within the required timeframe, number and percentage resolved or formally responded to within the GRM timeframe, number of RAP/ESS5-related grievances and their status, number of contractor-related grievances, number of grievances submitted anonymously, number of appeals, corrective actions overdue, and evidence of community awareness activities. SEA/SH information shall be reported only in aggregated, non-identifiable form.

ANNEXES

ANNEX 1: Grievance Submission Form

ZAMA Project			
Section 1: Complainant Details			
Grievance Reference Number:	Date received:	Submitted by:	Name of person recording the grievance:
		□ Person submitting grievance □ Male/Female □ Other (please specify who)	
Name of Complainant / Organisation registering complaint (or write Anonymous):			
Address:	Telephone Number:	Email address:	How was the grievance lodged:
			□ In person □ By Phone □ At Community Meeting □ By Mail □ By Email
Signature of Complainant:	Confirm that the Grievance has been acknowledged and a copy of this form provided to the complainant?		
	□ Yes	Date:	
Section 2: Details about the Grievance			
Description of Grievance:			
Section 3: Action Taken / Required			
Acknowledgement of grievance sent to Complainant? (Y/N)	Date when Acknowledgment provided:	Date set for resolution of Complaint:	Date logged in Grievance Log by Complaints handling Officer:
Grievance classification:	Reason(s) why:		Manager/safeguard specialist/Director responsible for addressing grievance:
□ Critical priority □ Medium priority □ Low priority			

Description of action required (to be updated as needed):		
Action carried out by:	Date of Completion:	Method of feedback to Complainant:
Stakeholder response to action:		
Section 4: Effectiveness Review		
Status of Grievance:	Date:	
To what extent has the grievance been addressed to the satisfaction of the complainant:		
Grievance Closed:	Date:	Signed off: Manager/safeguard specialist/Director responsible

ANNEX 2: GBV/SEAH Incident Reporting Form

Note: This form is confidential and shall be used only by trained personnel or qualified service providers. It shall not be attached to the general GRM log, shared with grievance committees, or circulated in project reports. Project reporting shall use coded, anonymised information only. Any personally identifiable information shall be stored securely, separately and accessed only on a strict need-to-know basis with survivor consent.

Part I: Complaint Form

Case Number:	
Full name of the complainant (optional):	
Date of Birth (Approximate if necessary):	
Incident reported by:	☐ Survivor ☐ Family Member ☐ Friend ☐ Caregiver/Guardian ☐ Other, specify
Date of interview (Day/Month/Year):	Time: Location:
Date of incident (Day/Month/Year):	Time: Location:
Gender	☐ Male ☐ Female
Is the client a person with a disability?	☐ No ☐ Mental ☐ Physical ☐ Both
General area of residence (Do not specify physical address)	
Is the client an Unaccompanied Minor, Separated Child, or Other Vulnerable Child?	☐ No ☐ Unaccompanied Minor ☐ Separated Child ☐ Other Vulnerable Child
State the physical and emotional state of the victim/survivor (Describe any cuts, bruises, lacerations, behaviour and mood, etc.):	
Account of the incident/Description of the incident (*summarize the details of the incident in the client's words*)	

Was there any exchange of money, goods, benefits, or services related to the incident?	☐ No ☐ Yes
Has the complainant sought any type of medical care?	☐ No Yes
Is the perpetrator known?	☐ No ☐ Yes
If known, is the perpetrator associated with the project?	☐ No ☐ Yes ☐ Don't know
Is the client at risk of retaliation by the perpetrator?	☐ No ☐ Yes
How would you like the issue to be resolved? What actions would you like to take? *(*When asking this question, make sure you don't discourage anyone from making complaints and do NOT suggest a course of action on their behalf, nor suggest any informal mediation*).	
Would the complainant like to access available assistance? (*such as Counselling, GBV Case Management Service, etc.)*	☐ No ☐ Yes
Type of Referral provided (*tick all that apply*)	☐ Medical/Health Care ☐ Safety and Security ☐ Legal and Justice ☐ Mental Health and Psychosocial Support ☐ Protection and Shelter ☐ Other e.g. NFI/Food/Cash (specify)
Is the client willing to provide a contact number/person for follow-up?	☐ Yes (Enter detail) ☐ No

Incident Received by	Name: Position: Contact No: Date: Signature:

Part II: Consent Form

CONFIDENTIAL

(Consent for release of information)

(This form should be read and clearly explained to the complainant that he/she has the option to choose from the listed options.)

I, _____, give

(Indicate Full Name)

my permission to _____

(Indicate name and position of project representative)

to share information about the incident I have reported to them as explained below:

- I understand that by giving my permission, I agree to the sharing of the specific case information from my incident report with the appropriate service providers and/or other relevant parties.
- I understand that some non-identified information may also be shared for reporting purposes. All shared information will maintain my confidentiality and anonymity, ensuring I cannot be identified based on what is shared.
- I understand that the information will be treated with utmost confidentiality and respect and shared only as needed for reporting and to provide the assistance I request.
- I understand that releasing this information means that the service provider may come and talk to me.
- I understand that I have the right to change my mind about sharing information with the designated focal point persons or service providers listed below at any point in time.

I would like information released to the following service providers:

YES	NO	SERVICE PROVIDER
		Protection Services:
		Medical Services:
		Psychosocial Services:
		Legal Assistance:
		Safe Space:
		Other (specify)

Date: _____

_____

Signature (or Thumbprint) of Complainant

ANNEX 3: GBV/SEAH Referral Form

General Information	
▪Location	
▪Contact Details	
▪Date	
▪Institution being referred to	
Personal Information of the person being referred	
▪Name	
▪Sex	
▪Age	
▪Next of Kin (Names)	
▪Contact Number	
▪Address	

Services Referred			
Has the consent for this referral been acquired?		(Tick/ Cross) **YES** □	**NO** □
Details of person referring	**Names**	**Role**	**Signature**

Referral Received By:	
Name of receiver:	Position:
Organisation:	Date:
Services Provided:	
Comments:	
Signature of Service Provider Representative: _____	Official Stamp:

ANNEX 4: GRM Tracker - ZAMA



GRM Tracker - ZAMA.xlsx

ANNEX 5: GRM SERVICE PROVIDER / GRM DIRECTORY

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
ZESCO / ZAMA Project	Environmental and Social Specialist	Luwita Changula 0952149999	Lusaka	Overall oversight of environmental and social safeguards; reviews and resolves escalated grievances relating to environmental and social impacts of the project	Project Affected Persons (PAPs) along the ZAMA transmission line corridor	Monday - Friday, 08:00 - 17:00	Grievances escalated from District GRM Coordinators and community focal points are reviewed and actioned by the Environmental and Social Specialist	
ZESCO / ZAMA Project	Area Manager	Mr Chifunda 0972859859	Chipata	Oversees project implementation, stakeholder engagement and grievance handling within the Chipata & Vubwi areas	Project Affected Persons (PAPs) along the ZAMA transmission line corridor	Monday - Friday, 08:00 - 17:00	Grievances from community focal points/District GRM Coordinator are escalated to the Area Manager for resolution	
ZESCO / ZAMA Project	District GRM Coordinator	Easter Nyanyinza 0977349272	Chipata	Coordinates the District Grievance Redress Mechanism (GRM); receives, records, tracks and forwards community grievances	Project Affected Persons (PAPs) along the ZAMA transmission line corridor	Monday - Friday, 08:00 - 17:00	Grievances collected from community focal points/GRM boxes are logged and forwarded to the relevant Specialist for resolution	
ZESCO / ZAMA Project	Gender-Based Violence	Jemma K Bbalo 0973620157	Lusaka	Handles GBV-related grievances confidentially and	Project Affected Persons (PAPs) along the ZAMA	Monday - Friday, 08:00 - 17:00	GBV cases are referred confidentially and directly (bypassing	

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
	(GBV) Specialist			coordinates referral of survivors to appropriate support services	transmission line corridor		standard channels where needed) from community focal points/District GRM Coordinator to the GBV Specialist	
ZESCO / ZAMA Project	Social Specialist	Judy Mumba 0971010180	Lusaka	Manages social safeguards, resettlement and community liaison matters; supports resolution of social grievances	Project Affected Persons (PAPs) along the ZAMA transmission line corridor	Monday - Friday, 08:00 - 17:00	Grievances escalated from the District GRM Coordinator/community focal points are reviewed and actioned by the Social Specialist	
Community Local Focal Point Person	Community Focal Point (Male)	Damaseke Nali 0777541019	Kauzu	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Kauzu	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Kauzu Primary School, Kauzu Community Chipata.
Community Local Focal Point Person	Community Focal Point (Female)	Theresa Mbazima 0965212777	Kauzu	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project	Community members of Kauzu	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
				information within the community				
Community Local Focal Point Person	Community Focal Point (Male)	Bisalom Tembo 0767755838	Pashane	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Pashane	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Mapwelelo Primary school, Pashane Community Chipata.
Community Local Focal Point Person	Community Focal Point (Female)	Agness Phiri 0978766427	Pashane	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Pashane	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Matthews Banda 0974499287	Daula	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Daula	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Makangila Primary School, Daula Community Chipata.

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
Community Local Focal Point Person	Community Focal Point (Female)	Sarafina Soko 0971857219	Daula	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Daula	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Abiton Zulu 0970195460	Chuindama	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chuindama	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	St Benedict Clinic, Chuindama Chipata.
Community Local Focal Point Person	Community Focal Point (Female)	Prisca Tembo 0771552524	Chuindama	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chuindama	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal	Community Focal Point (Male)	Eneliko Mawere 0979099834	Kachikoti	Receives, records and reports community grievances; assists	Community members of Kachikoti	Daily (as needed)	Grievances collected are forwarded to the District GRM	Makwe Health Post, Kachikoti

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
Point Person				community members to access and use the GRM box; disseminates project information within the community			Coordinator (Chipata) for logging, tracking and escalation	Chipata.
Community Local Focal Point Person	Community Focal Point (Female)	Ester Moyo 0971479342	Kachikoti	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Kachikoti	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	James Matoto 0977260157	Jelemani	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Jelemani	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Fwaya School, Jelemani Chipata. Jelemani GRM Box
Community Local Focal Point Person	Community Focal Point (Female)	Angela Daka 0973911563	Jelemani	Receives, records and reports community grievances; assists community members to access and use the GRM box;	Community members of Jelemani	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
				disseminates project information within the community				
Community Local Focal Point Person	Community Focal Point (Male)	Jason Banda 0770125867	Chibwe	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chibwe	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Seventh Day Adventist Church, Chibwe, Chipata
Community Local Focal Point Person	Community Focal Point (Female)	Esnart Matoto 0972371367	Chibwe	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chibwe	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Samson Phiri 0979257120	Lufazi	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Lufazi	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Mwami Central School, Lufazi, Chipata

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
Community Local Focal Point Person	Community Focal Point (Female)	Patricia Banda 0978563449	Lufazi	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Lufazi	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	George Tembo 0973308383	Mphande	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Mphande	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Mukanda Primary School, Mphande, Chipata.
Community Local Focal Point Person	Community Focal Point (Female)	Faides Nyambi L 0973302762	Mphande	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Mphande	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal	Community Focal Point (Male)	Anthony Tembo 0570783092	Pililani	Receives, records and reports community grievances; assists	Community members of Pililani	Daily (as needed)	Grievances collected are forwarded to the District GRM	Fumu Chichele Palace,

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
Point Person				community members to access and use the GRM box; disseminates project information within the community			Coordinator (Chipata) for logging, tracking and escalation	Pililani, Chipata
Community Local Focal Point Person	Community Focal Point (Female)	Vestina Lungu 0770786643	Pililani	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Pililani	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Patrick Phiri 0777967095	Chaoleka	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chaoleka	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Chaoleka Primary School, Vubwi
Community Local Focal Point Person	Community Focal Point (Female)	Judith Lungu 0572123912	Chaoleka	Receives, records and reports community grievances; assists community members to access and use the GRM box;	Community members of Chaoleka	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
				disseminates project information within the community				
Community Local Focal Point Person	Community Focal Point (Male)	Ferdant Phiri 0776072014	Chibau	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chibau	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	AdioAdio School, Chibao, Vubwi
Community Local Focal Point Person	Community Focal Point (Female)	Dolika Mwale 0971662362	Chibau	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Chibau	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Peter Longwe 0979719597	Lundu	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Lundu	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Matemba Primary school, Vubwi

Service Provider	Type of Service Provider	Focal Point Contact Details	Physical Location/Address	Services Provided	Target Group	Operating Days and Hours	Referral Procedure	GRM Box Location
Community Local Focal Point Person	Community Focal Point (Female)	Loveness Mbewe M Not provided	Lundu	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Lundu	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	
Community Local Focal Point Person	Community Focal Point (Male)	Isaac Mbewe 0974793059	Mukaya	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Mukaya	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	Muzigawa Police Post, Vubwi
Community Local Focal Point Person	Community Focal Point (Female)	Joyce Phiri 0775679784	Mukaya	Receives, records and reports community grievances; assists community members to access and use the GRM box; disseminates project information within the community	Community members of Mukaya	Daily (as needed)	Grievances collected are forwarded to the District GRM Coordinator (Chipata) for logging, tracking and escalation	