

Ministry of Innovation and Technology (MInT)  
Ethiopia Digital Foundation Project  
(EDFP)



Grievance Redress Mechanism  
(GRM)

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## Acronyms

BAT	Best Available Technology
CEFCC	Commission for Environment, Forst and Climate Change
CPO	Criminal Protective Order
PDF	Digital Foundation Project
ECA	Ethiopia Communication Authority
EDFP	Ethiopia Digital Foundation Project
ESMF	Environment and Social Management Framework
ESS	Environment and Social Standards
GBV	Gender-Based Violence
GDP	Gross Domestic Products
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GoE	Government of Ethiopia
ICT	Information Communication Technology
IDA	International Development Association
IRU	Indefeasible Right of Use
MDAs	Ministries, Departments, and Agencies
MoF	Ministry of Finance
MOP	Ministry of Peace
MSME	Micro, Small and Medium Enterprises
NGO	Non-Governmental Organization
PIU	Project Implementation Unit
PSC	Project Steering Committee
SA	Social Assessment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SOE	State-Owned Enterprises
TOR	Terms of Reference
TVET	Technical and Vocational Education and Training
VAW	Violence Against Women
VAWC	Violence Against Women and Children

## Background and Introduction

### Background

Ethiopia is in the Horn of Africa and is a land-locked country with an area of 1.1 million km<sup>2</sup>. Ethiopia is the second-most populous country in Sub-Saharan Africa with a population of 110 million; based on projections of the census conducted in 2007. It has a high percentage of the young population with 46% of the population being under 15 years of age. The gender disaggregation is 50% with slightly higher women (51%) in urban areas. The average household size in Ethiopia is 4.6 persons. It is a diverse and multi-cultural nation and a home for over 90 ethnic groups.

Regarding telecommunication and internet services, Ethiopia lags in key digital indicators compared to its peers. In a country of more than 100 million people where 40 percent are aged under 15, internet use/access was a meager 18.6 percent at the end of 2017. Mobile phone use and ownership in Ethiopia (SIM cards per 100 inhabitants) stand at around 44 percent in mid-2020. Ethiopia remains one of the least connected countries in the world. The level of internet and mobile phone penetration remains low in Ethiopia. Recent figures show that about 20.6% or 23.96 million people have internet connections while 38.5 percent of the population or 44.86 million mobile services. The number of internet users in Ethiopia increased by 2.8 million (13%) between 2020 and 2021 (DATAPORTAL 2021). The telecom infrastructure is largely absent in rural areas and there is generally low access and irregular supply of power to rural areas where the majority of the population resides.

While the Government of Ethiopia (GoE) sets out on its vision to transform Ethiopia from a largely agrarian low-income country to an industrialized lower-middle-income country by 2030, the initiative gives special emphasis to sectors such as agriculture, manufacturing, mining, tourism, and information and communication technology (ICT). The GoE has also initiated reforms characterized by market liberalization—opening the private sector for competition and foreign participation—with partial and/or full privatization of selected State-Owned Enterprises (SOEs) planned in key strategic sectors, including telecommunications, energy, aviation, and logistics. The implementation of these reforms is expected to transform the economy toward a more sustainable model by strengthening the role of the private sector, enhancing the efficiency of the industry, contributing to export expansion, and spurring competition in several critical sectors. Although Ethiopia's strong economic growth has been driven by large-scale public investment in infrastructure, the country was experiencing the limitations of the state-led development model, as evidenced by slowing Gross Domestic Product (GDP) growth, the crowding out of the private sector, and financial sector vulnerabilities exacerbated by the continued expansion of SOE debt. The high domestic inflation and continuing foreign exchange shortages have also pushed the GoE to adopt a comprehensive structural reform program that has the potential to boost the economy.

The Ethiopian Government identified digital services development to transform the economy, reduce poverty, create jobs, and achieve the ambitious objective of improving Ethiopian competitiveness in the digital age, through increased inclusions, affordability of digital services, and digital job creation. To achieve the project development objective the Ethiopian government launched Ethiopia Digital Foundations Project (EDFP) with the support of the World Bank under the Ministry of Innovation and Technology (MInT). The project is intended to develop Ethiopia's digital economy through the expansion of the digital market and regulatory environment and improve its infrastructure and expand digital service coverage. The project will enable citizens, businesses, and Government to reap digital dividends in the form of faster growth, lower transaction costs, more jobs, and greater efficiency to develop Ethiopia's digital economy. It will support the necessary steps to introduce market competition, private sector participation, foreign investment, and independent sector regulation. The EDFP is a five-year project (2021 to 2026) financed by the World Bank Group with a total amount of 200 million USD (IDA Credit).

The Ethiopia Digital Foundation Project is envisioned to lay the building blocks to develop Ethiopia's digital economy through support to the policy and regulatory environment, improving infrastructure and quality of broadband connectivity and supporting the digitalization of services, and promoting digital

entrepreneurship. The project will be implemented in all regions of the country including the Federal, Regional, and Woreda levels. The project benefits the public by creating new opportunities for digital transformation in Government and education and new opportunities for innovation and entrepreneurship. The EDFP project has five main components and eight subcomponents which are briefly described as follows.

- Component 1: Digital Economy, enabling legal and regulatory environment. It consists of the following three subcomponents:
  - ✓ Sub-component 1.1: Partial privatization of Ethio-Telecom
  - ✓ Sub-component 1.2: Strengthening independent ICT sector regulation,
  - ✓ Sub-component 1.3: Supporting the development of the Digital Economy
- Component 2: Digital Government and Connectivity: The objective of this component is to develop the capacity of GoE to deliver digital services, and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. Component 2 has the following three sub-components which are among the important ones in terms of environmental and social risk management.
  - ✓ Sub-component 2.1: Digital Government and COVID-19 response. Capacity-building activities include:
    - Developing a government e-Portal accessible by citizens and firms,
    - Improving Government facilities for remote working, and
    - Building the digital skills of Government officials. In response to the COVID-19, the project will address Government requirements for improved facilities for remote working, and the installation of up to 50 Communications Rooms with internet connections.
  - ✓ Sub-component 2.2: Connecting targeted public institutions to broadband across the Country. The locations of targeted public institutions to be served would include Ministries, Department, and Agencies (MDAs), youth community associations across the country, and especially in the first phase selected hospitals and health centers, as part of the COVID-19 response. The proposed mechanism to do this would entail an upfront commitment for the pre-purchase of internet bandwidth from private sector operators under Indefeasible Right of Use (IRU) contracts, over a period of 5-10 years.
  - ✓ Sub-component 2.3: Connecting selected educational institutions to broadband. This sub-component will connect selected educational institutions to high-speed internet services. This will include universities, colleges of teacher's education, research institutions, and Technical and Vocational Educational Trainings (TVETs), with the aim of nationwide coverage in the first phase and some 200 selected secondary schools in the second phase and eventually all secondary schools in the country.
- Component 3 – Digital Business and Entrepreneurship: This component has the following two subcomponents.
  - ✓ Subcomponent 3.1 Grants to digital start-ups and digital businesses- The subcomponent introduces two financing windows for digital start-ups and digital businesses. Window 1 is a co-investment grant aimed at helping digital start-ups gain access to risk capital, knowledge, and networks to start operating as a viable business. Window 2 is aimed at incentivizing more established digital businesses to provide training, digital devices, and other support to Ethiopians to participate in the digital economy by becoming suppliers of goods/services for productive purposes (e.g., enabling offline farmers to sell products via e-commerce and earn higher income).

- ✓ Subcomponent 3.2: Technical Assistance to the Ministry of Innovation and Technology. This subcomponent will also provide capacity building to MInT for harmonizing Ethiopia with the regional digital single market initiative proposed under the Horn of Africa Digital Foundations Initiative.

- Component 4: Project Management: This component will support the Project Implementation Unit to be set up in MInT.
- Component 5: Contingent Emergency Response Component: This will have an initial zero value may be financed while the project allows for an agile response to an eligible crisis or emergency.

According to the Stakeholder Engagement Plan (SEP), the Ethiopia Digital Foundation Project (EDFP) has wide-ranging stakeholders whose engagement in the project is important for achieving the project objectives. These Project stakeholders can be divided into a) project-affected parties- these are stakeholder groups who are affected or likely to be affected by the project described above and b) other interested groups: these are stakeholder groups who may have a possibility to be involved in the project decision making related to the project or may have an interest in the project like donors, media, academia, investors, donors, private and public sectors c) disadvantaged and vulnerable individuals and groups refers to those who may be more likely to be adversely affected by the project or are less able to, understand the project impacts or aware of project benefits. These groups are more likely to be excluded from the consultation process. These include women, girls, non-literate people, people with disabilities, the elderly, low-income youth, and the rural population.

Since the project is launched in February 2021, Ethiopian Communication Authority (ECA) and MInT took the overall implementation of Sub-component 1.1 and Sub-component 1.2 respectively, while MInT will deliver most of the activities under Sub-components 1.3, 2.,1, and Component 3. MoE through (EthERNet) will partner with MInT for activities under Sub-component 2.3. MInT will also liaise with Digital ID in the Prime Minister’s Office (under Subcomponent 1.3), the Ministry of Labor and Skill (ML&S) also be a beneficiary through TVET in sub-component 2.3. The PIU will be guided by a Project Steering Committee (PSC), chaired by a State Minister of MInT (or his/her designee) and comprising representatives from all beneficiary MDAs such as MoF, ECA, MoE (representing EthERNeT), Digital ID, and Ministry of Labor and Skills (ML & S). Technical Committees (TC), one for each component, chaired by MInT and appointed by and reporting to the PSC, will conduct specific tasks, such as managing the grants and Monitoring and Evaluation (M&E) reporting process for component 3. The TCs will extend their consultations to the private sector, including the new market entrants. Terms of Reference (TOR) for the PSC and TCs have already been defined before project effectiveness.

The project and sub-project activities are also required to maintain the national and the World Bank environmental and social standards by applying cutting-edge Best Available Technologies (BTAs) which are environment-friendly technologies and other social sustainability standards. As these project and sub-project activities are anticipated to involve terrestrial and aquatic ecosystem alteration, occupational health and safety and community health and safety risks, access road blockage, Right of Way issues, exclusion of underserved communities and vulnerable groups due to lack of infrastructure, weak institutional capacity and other barriers and risk of exclusion of women and girls from project benefits, the project services such as improved internet access, Wi-Fi and broadband services can be misused and facilitate acts that may cause GBV/SEA through stalking, bullying, sexual harassment, defamation, hate speech and exploitation. In rural areas, there is a potential for increased misuse of digital technology for recruiting young boys, girls, and children for human trafficking, etc.

Ministry of Innovation and Technology (MInT) through the Project Implementation Unit (PIU), developed a Grievance Redress Mechanism (GRM) to handle any dispute in relation to the project and sub-project activities. This Grievance Redress Mechanism (GRM) act/ serves as an option for situations in which, despite proactive stakeholder engagement, some stakeholders have a concern about a project or program’s potential impacts/risks on them and they believe that system should be established to control and mitigate these impacts/risks. Moreover, the establishment of GRM processes will not solve all complaints such as

grievances that allege corruption, compulsion, or major and systematic violations of rights and/or policies, are normally referred to organizational accountability mechanisms or administrative or judicial bodies for formal investigation, rather than to GRMs, which are designed for collaborative problem-solving.

## Introduction

While considerable efforts have been made to include the Environmental and Social Standards in the design and implementation of the project to minimize and prevent potential E & S impacts/risks, there is always a possibility that the interests of some individuals, groups, and institutions may still be negatively affected by the activities of the project and sub-projects that require the need for applying Grievance Redress Mechanism (GRM). Grievance Redress Mechanism (GRM) is a set of arrangements that enable EDFP stakeholders, such as project-affected parties, interested parties, and disadvantaged/ vulnerable individuals or groups to raise their grievances with the project or sub-project activities and seek redress when they perceive a negative impact arising from the project. The main objective of a Grievance Redress Mechanism (GRM) for Ethiopia digital Foundation Project (EDFP) is to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The Grievance mechanism for the project should be adapted to the specific contexts of project implementation. The project implementation takes place at the Federal level, in selected public institutions, at the Woreda level with woreda offices as well as community women and youth associations. The GRM needs to be integrated with the existing grievance mechanisms in kebeles, Woreda, MDAs, Universities, and TVETs. Similarly, grievance mechanism in the context of underserved communities requires an approach that considers the existing community institutions and local mechanisms. The GRM should be close to the potentially affected communities. The project will have three pathways for grievance redress.

- Pathway 1- is for grievances related to the expansion of services to underserved communities and rural areas. The first point of complaints under pathway-1 will be existing GRMs in the Kebeles/Woredas where the complainants reside.
- Pathway 2- grievances related to beneficiary government offices and institutions targeted by the project at any level. The first point of grievance under pathway 2 is the GRM of the targeted beneficiary institution (MDAs, public institution, city administration or Woreda office, Universities, TVET., etc.)
- Pathway 3- is of grievances related to component 3.1 by aggrieved persons, farmers, or MSMEs that could be submitted directly to the project level GRM.

The GRM is also designed to include grievances related to more sensitive types such as Gender-Based Violence (GBV) and Sexual Exploitation and Abuse. In this respect, the project developed a digital and physical GRM, complaint management system in which, all the application and response processes respect confidentiality, choices, needs, safety, and wellbeing of the victim. The Labor-Management Procedure (LMP); Social Assessment Report and Gender-Based Violence Risk Assessment and Action Plan embedded in the ESMF document, which will be used as a base for the project E & S risks management have been posted on the EDFP portal ([dfp.gov.et](http://dfp.gov.et)) for further reference.

This document provides guidance for the management of complaints and grievances under the Ethiopia Digital Foundation Project (EDFP)/ Ministry of Innovation and Technology (MInT). The purpose is to provide a suitable, centralized mechanism (GRM) for EDFP/MInT that can also be applied to meet the National policies, strategies, laws, and regulations; World Bank's ESS standards, and regulatory frameworks. The Grievance Redress Mechanism (GRM) sets out the approach in dealing with complaints and grievances that may result from Project or Sub-Project implementation by the stakeholders/beneficiary MDAs under the Ministry of Innovation and Technology (MInT). The complaint can be either on social or community-related disputes, environmental pollution (air, water, or soil), sexual exploitation and harassment, damage to the natural habitats due to the project or sub-project activities. This GRM procedure developed by Ethiopia Digital Foundation Project (EDFP) with guidance from the World Bank (WB) will

be used by EDFP/MInT as GRM manual once approved by Project Steering Committee (PSC) and The World Bank (WB).

## Grievance Redress Mechanism

A grievance is a feeling of resentment over activities believed to be wrong or unfair and having been neglected. Grievances can cover a broad range of concerns, from potentially illegal actions such as unethical recruitment, sexual harassment or victimization, concerns about wages, how a poor relationship between two employees in the workplace has been managed, and a complaint about the quality of food in the canteen or a disagreement over holiday arrangements, community displacement, and disputes, community, and occupational health and safety. Grievances arising with the implementation of this project could typically include access and quality of services, issues about targeting for services and, availability of facilities and resources. Grievances that are related to the expansion of infrastructural activities and packaging and hazardous waste management (e-waste) with some physical footprints in the later stages of project implementation could be a cause for occupational and community health and safety issues. Grievances provide information to the Project Management about project implementation actual and potential problems. Grievance Redress Mechanism (GRM) is also an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with a grievance management platform that will help in addressing issues at an early stage. This GRM is, therefore; intended to help EDFP/MInT to provide effective remedies/services to affected parties who perceive that their rights have been adversely affected by the project and sub-project implementation activities. In general, Grievance Redress Mechanism (GRM) is a way to realize, manage, mitigate, and resolve potential negative E & S impacts/risks, as well as achieve obligations under international human rights law and contribute to positive relations with communities and employees.

Grievance in the EDFP will be handled in stages/ levels, the institutions within which project activities are implemented are the first level of grievance redress for components 1 and 2. Each institution, (MDAs, universities, colleges, TVETs, city administrations, hospitals, health centers, woreda, regional office) where project activities are undertaken will use existing grievance mechanisms, if any, to receive, review, and address grievances. The first level of grievances associated with component 3 will be handled at the PIU/MInT level GRM with the GRC that is composed of representatives from implementing partners represented in the PSC. However, those grievances that cannot be solved by the existing redress mechanisms at beneficiary institutions due to lack of the mechanism or the nature of the issue will still be escalated to the PSC/GRC at PIU/MInT which is the second level. Moreover, any aggrieved could also apply his/her grievances through MInT/ PIU developed complaint management platform/system accessing through([dfp.gov.et](http://dfp.gov.et)) or through physically displayed accesses. The full contact details of the grievance committees for components 1,2 & 3 will be disclosed publicly on the MInT portal and on the website of beneficiary/ partner institutions. The same information should be displayed on the notice boards of the institutions along with the complainant box that should be placed in a visible location within the premises of the institutions. Grievances from the project dedicated complainant box will be collected and reviewed by the institution's grievance committee on a weekly basis.

## GBV Related Grievance Redress

When Gender-Based Violence (GBV) related grievances are received at any level of the GRM or through any channel, the complaint should be kept confidential by the person or persons receiving the complaints. The complaints shall be reported to the PIU coordinator / focal person at the project and immediate actions should be taken that are consistent with the wishes and choices, rights, and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filing complaints and the possible outcomes, the timelines, and the types of support available to be able to make informed



decisions. For GBV cases, it is important to ensure that access to the complaints processes is as easy, confidential, and as safe as possible for the survivor. The recording of incidence should be limited to the nature of the complaint put exactly in the words of the complainant, the age of the survivor and if to the best of their knowledge, the perpetrator associated with the project. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data for details, please refer to Annex-6 of this manual.

**Safety & Well-Being:** The safety of the survivor shall be at all times ensured including during reporting, investigation, and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process. The survivor is never to blame for reporting an act of GBV and should never be made feel investigated. On the contrary, it is important that she/he feels that her story is heard, believed, and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights, and dignity of the survivor.

**Confidentiality:** The confidentiality of complainants, survivors, and other relevant parties must be always respected. All GBV-related information must be kept confidential, identities must be protected, and the personal information on survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.

**Survivor-Centered Approach:** All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety, and wellbeing remain at the center in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights, and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

**Accessibility and non-discrimination:** The mechanism must be accessible to all potential complainants and sufficient information must be given on how to access it, making the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context-sensitive. To facilitate incident reporting and avoid stigmatization reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

The PIU Environmental and Social Safeguards Experts/Specialists will initially brief all staff of the project office, the Project Steering Committee (PSC), all stakeholders from (MDAs), consultants and contractors on the Grievance Redressal Mechanism and GBV complaints mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedure high-level training and or awareness campaigns would be conducted targeting officials in beneficiary/partner institutions, project stakeholders, including project-affected persons, and surrounding community members to inform them on the availability of the mechanism; various mediums to be used, structural arrangements, and the roles and responsibilities. The GRM will also be published on the EDFP/MInT website and those of the implementing beneficiaries/ partners website or Facebook page if there is one. Site board will be erected on EDFP/MInT where PIU is established and at the sites where the sub-projects activities are implemented, indicating the existence of the mechanism and a name, phone number, email, and address of the focal person/s for further information. The GRM will also be translated into local languages if needed.

### GRM Objectives

The main objective of the grievance Redress Mechanism (GRM) is to assist complaints grievances in a timely effective and lasting outcome. It is also building trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. It also addresses complaints from stakeholders and workers and other project-affected people that will be directly or indirectly engaged in the EDFP/MInT processes.

The Specific, GRM objectives are:

- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during project implementation.
- Allow anonymous grievances to be raised and addressed; complaint boxes and others that allow anonymity of the complainant will be available.
- Ensure that culturally appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complaints.
- Avoid the need for judicial procedures.
- Ensure that the World Bank Environmental and Social Standards are adhered to all sub-project activities.
- Address any negative environmental and social impacts/risks of all project and sub-projects activities.
- Resolve all grievances emanating from the project activities in a timely manner.
- Establish relationships of trust between project staff and stakeholders.
- Create transparency among stakeholders including affected persons through an established communication system.
- Bolster the relationship trust amongst the project staff and the affected parties.

### Levels of Grievance Approaches

#### a) First level

Ethiopia Digital Foundation Project (EDFP), Grievance Redress Mechanisms (GRM) has the following levels of approaches:

The project beneficiary institutions within which project activities are carried out are the first level of grievance redress for component 1 and 2. Each institution (MDA, Universities, colleges, TVETs, city administrations, hospitals, health centers, Woreda, regional office where project activities are undertaken will use existing grievance redress mechanism if any to review or address or they can direct the aggrieved to the PIU /MInT digital grievance management platform/system. The first level of grievances associated with component 3 will be handled at the PIU level GRM that is composed of representatives from the implementing agency EDFP/MInT and the implementing partners represented in the PSC (GRC). The full contact details of the Grievance Redress Committee (respective PSC members and the E &S specialists or focal persons from MDAs) for components 1,2 & 3 will be disclosed publicly on the website of the PIU/MInT and beneficiary MDAs.

The same information should be displayed in the notice boards of the beneficiary (Ministries, Departments, and Agencies) along with the complainant box that should be placed in a visible location within the premises of the institutions, (Ministries, Departments, and Agencies). Grievances from the project dedicated complainant box will be collected and reviewed by the institution's grievance committee on a weekly basis. Grievances can be received in person, verbally via phone, in writing, or via e-mail, fax, text message, portal, or any other media. Grievances submitted anonymously could also be submitted through the complainant box or the digital management system. Grievances received will be recorded using the format (Annex 1). All grievances will be acknowledged by telephone or in writing by the grievance handling the focal body of the institution/s using the Grievance Acknowledgment Form (Annex2) **within 48 hours** of receipt and the complainant informed of the approximate timeline for addressing the complaint if it can't be addressed immediately. The grievance handling body will work to ensure the speedy resolution of the grievance. If the complaint cannot be resolved at this level it is taken to the next level.

**The procedure for receipt of a complaint is:**

**Register/Log Grievance:** After complaints are received, they will be recorded on the incident report form on Annex-1. Then it will be recorded on Annex 2 to be acknowledged to the aggrieved in 48 hrs. The same

complaint will be registered in the Grievance Redressal Registration and Monitoring Sheet (GRRMS) (Annex 3).

**Screen:** The complaint will be forwarded to the grievance structure that is responsible for investigating the claim and liaising with the aggrieved in order to come to an acceptable resolution. Meetings with the aggrieved/complainant will be held, if necessary, to resolve the matter.

**Investigate:** The investigation by the grievance committee will include, but is not limited to, meetings with the aggrieved/complainant, site visits, meetings/interviews with project staff, and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decisions will be recorded on the Meeting Record Form annexed as Annex 4.

**Resolution:** The resolution at the first level should normally be completed within **15 working days** of receipt of the grievance and notified to the concerned party through the Closure Form (Annex 5). If the grievance is not resolved within this period, it can be referred to the next level of the Grievance Redressal system. However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given either verbally or in writing. If the issue cannot be resolved within **25 working days**, it will be transferred to the next level. Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the Closure Form included in Annex 5. If the proposed resolution is not accepted, the grievance will be escalated to level 2.

#### **b) Second Level**

A Grievance Redressal Committee (GRC) will be formed at the PIU/MInT comprised of key implementing entities, that will consist of members of their respective Project Steering Committees E & S focal persons. The GRC will be called into place when a first-level resolution is not accepted by the aggrieved. However, the GRC shall also meet regularly on a quarterly basis to evaluate the performance of the project level GRM. This committee will be chaired by the GRC representative of EDFP/MInT in the Project Steering Committee. The implementing partner Ministries, Departments Agencies represented in PSC will assign representatives to the GRC.

The functions of the Grievance Redressal Committee (GRC) are to:

- 1) Provide relief and support to the affected persons in a timely manner.
- 2) Prioritize grievances and resolve them at the earliest reasonable time.
- 3) Provide information to PIU on serious cases at the earliest plausible time.
- 4) Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance.
- 5) Study the normally occurring grievances and advise the PM/PIU as to their scale and scope.

The project manager at the PIU will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal. The GRC will hold the necessary meetings with the affected party/complainant the concerned officers and attempt to find a solution acceptable at all levels. GRC will record the minutes of the meeting using the same format detailed in Annex 4. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained on the disclosure format as in Annex 5. If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within **30 working days** of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of **60 working days**.

#### **c) Third Level**

If the affected party/complainant does not agree with the resolution at the 2<sup>nd</sup> level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider taking it to the

third level (second level for component 3 related grievance). This level involves the complainant taking legal resources within the local courts.

### Monitoring and Reporting GRM

The project Environmental Safeguards and/or Social Specialist/s will prepare the yearly plan on the anticipated grievances to be received with a mitigation plan to reduce the occurrences and identify possible stakeholders for the implementation of the mitigation measures and prepare Monthly and Quarterly Reports on the Grievance Redress issues of the project. The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures, and forward these to the PSC for implementation.

The following indicators could be used as monitoring purposes:

- Number of active project complaints and appeals recorded and reported in each institution
- Percentage of grievance redressed claims settled within the specified period
- Percentage of unresolved complaints or disputes during the monitoring period
- Comments received by government authorities, women & youth, family, community leaders and other parties and passed to the Project

### GRM Principles

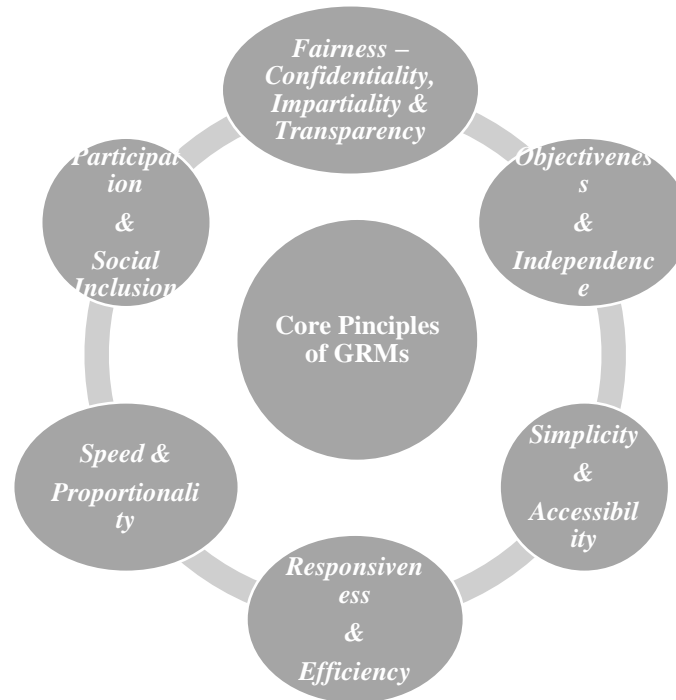
Several guiding principles should drive the design of GRMs. The primary principle is that all complaints and grievances are resolved as quickly as possible; therefore, this GRM is developed based on the following principles:

**Simplicity and accessibility:** Procedures to file grievances, and seek action were simplified as much as possible so that the project beneficiaries can avoid excessive red tape and complexity. Employees in the project or sub-projects and surrounding community should have a range of contact options including, at a minimum, a telephone number, and e-mail address, and a postal address. Besides, the GRM is accessible to all project participants, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income.

**Objectivity and independence:** The GRM operates independently of the interests of all stakeholders to guarantee fair, objective, and impartial treatment to each case.

**The procedure of grievance redress doesn't replace legal processes:** On the basis of consensus, procedures will help to resolve quickly issues to accelerate receiving rights, without resorting to long trials. If the procedure of satisfaction of grievance doesn't yield results, the persons that made grievance still can resort to the judgment of question. Grievance Mechanism's satisfaction is developed based on a solution for disputes at early stages that will be in the interests of all concerned parties.

## Core Principles



## GRM Requirements

The grievance process is based upon the premise that:

1. Stakeholders are free to raise their concerns to relevant representatives at no cost or threat of any negative repercussions.
2. Concerns arising from all sub-project implementation are adequately addressed in a timely and respectful manner; and
3. Participation in the grievance process does not preclude the pursuit of legal remedies under the laws of the country.

Since GRMs are intended to be accessible, collaborative, expeditious, and effective in resolving concerns through dialogue, joint fact-finding, negotiation, and problem-solving, they are generally designed to be the “first line” of response to stakeholder concerns that have not been prevented by proactive stakeholder engagement. GRMs are intended to complement, not replace, formal legal channels for managing grievances (e.g., the court system, organizational audit mechanisms, etc.).

The legitimate rights of the complainant to undertake legal proceedings remain unaffected by participation in this process. The organizational structures of EDFP/MInT for the GRM should include women’s representatives to allow female employees/stakeholders to make complaints or lodge grievances more easily on sexual harassment. The representative is also available to any affected party and may be used in situations where the affected party cannot represent themselves (for example when the affected party is a child or disabled). Representatives can include but are not limited to women, youth, and religious institutions or Non-Government Organization (NGO) representatives as seen as appropriate by the affected party.

## Institutional Set-Up for GRM

Grievance Redress Mechanism can be an effective tool for early identification, assessment, and resolution of complaints on projects. Grievance Redress Mechanism (GRMs) are institutions, instruments, methods, and processes by which a resolution to a grievance is sought and provided. It is a way to receive, assess or review and resolve complaints that may arise from the EDFP supported subproject activities.

Understanding when and how a GRM may improve project outcomes can help both project teams and beneficiary institutions improve results. The goals of GRM are:

- Open channels for effective communication
- Mitigate or prevent adverse impacts on individuals and communities caused by project activity
- Improve trust, respect, and promote productive relationship

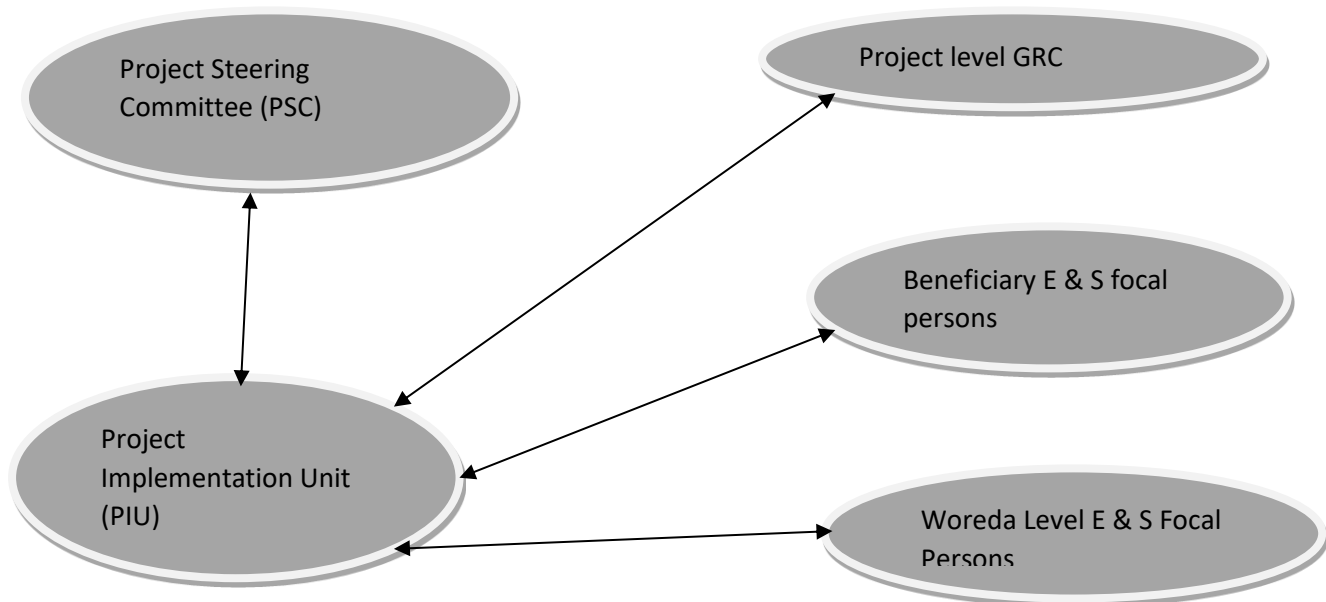
The grievance mechanism for the project should be adopted to the specific contexts of the project implementation. The grievance mechanism should be accessible and needs to be integrated with the existing grievance mechanisms (such as well-developed GRM, “Kireta Semi Komitee” or Gender Offices) in the woreda, MDAs, Universities, TVETs focal regional bureaus implementing agency and partner ministries. Similarly, grievance mechanisms in the context of underserved communities require an approach that considers the existing community institutions (such as “Edir, Mahber, or Equb”) with local mechanisms. The GRM should also be close to the potentially affected communities.

**Grievance Redress Committee:** The project will set up a project-level grievance mechanism consisting of representatives from the members of the PSCs or from the beneficiary MDAs. It will be the final level of the GRM within the project.

**Implementing Agency/Partner GRC:** Each federal level implementing agency and partners (MInT, ECA, MoE/EthERNeT, Ministry of Labor & Skills, Ministry of Trade and Regional Integration, Ministry of Industry) will assign a focal person for handling project-related grievances. The GRC at PIU will address project or subproject-related grievances submitted directly or through the beneficiary MDAs and from regional bureaus of health, education.

**Beneficiary Institution GRC:** Beneficiary /partner institutions and offices such as universities and TEVTs will use focal persons in the respective institutions to receive complaints and report them to PIU for second-level resolution by GRC/PSC.

**Woreda GRC:** The Woreda level beneficiaries will also assign a focal person for project-related grievances, address, and report to the respective regional bureaus and to the PIU for second-level resolution. Complainants who feel their grievance has not been fairly handled may seek justice in a court of law. The PIU is the responsible body for ensuring that all beneficiary institutions have assigned E & S focal persons in each beneficiary institution functioning GRC and GRM procedures to be followed, documentation, and reporting of grievances. The PIU should provide regular training to improve the capacity of GRM at various levels on the handling of grievances.



## GRM Budget

The budget for the implementation and monitoring of GRM/GBV/SEAH will be 100,000 USD and will be covered by the Project Implementation Unit under Component-4.

## GRM Implementation Procedure

For all the complaints and grievances associated with the project or subproject the following procedure will be applied:

### Complaints

In practice, complaints can be made to anyone involved in EDFP/MInT or perceived to be in authority including Ministers, Members of Parliament, Local Authorities, Officers stakeholders of the project too. Irrespective of the initial receiver of the complaint, the following will happen for EDFP/MInT related complaints:

- All complaints will be communicated to and registered by EDFP/MInT nominated/authorized representative (E & or S Specialists) in the EDFP/MInT or MDAs usually an independent person assigned will register immediately upon receipt, including details of the complainant, attempts made to resolve the complaint, the resolution of the complaint and outcome.
- The focal person should also need to acknowledge the receipt of complaints, and records using the form at Annex 1, or the daybook will be made available for inspection by any authorized representatives (E & S Focal Persons) of EDFP/MInT, GRC, or PSC.
- The EDFP/MInT will inform the local representative or grievance focal persons of the stakeholders/beneficiary (MDAs) within 2 days of all complaints received regarding the subproject activities in their respective institution including those that have been resolved.
- EDFP/MInT at the first level will have a maximum of 15 days to resolve the complaint and convey a decision to the complainant. The complaint and decisions and its resolution can be heard and agreed upon by the relevant local administration.
- Once resolved, the resolution should accordingly be entered in the grievance redressal, monitoring form at annex 3 or on recording book, and the grievance focal person should be informed of the outcome and details should be included in the report for review and analysis by the assigned GRC.

- If the Complainant is not satisfied with the proposed resolution by the beneficiary institutions or by EDFP/MInT initial intervention on the issue or any aspect of communication around the issue, the matter will then be passed to the relevant higher offices as applicable and/or to the Project Steering Committee to be resolved within 30 working days,; however; if the complainant is not satisfied yet, it must be recorded on the form at Annex 3 as a grievance unresolved and the subsequent legal procedure for grievance redress should be followed.
- Regular community representative meetings will be held for all EDFP/MInT beneficiaries concerning GRM related activities. These meetings will include consideration of all aspects of the EDFP/MInT team and Social Affairs on nuisance, analysis of complaints, and confirmation of steps to prevent or reduce nuisance, and confirmation that all complaints have been resolved. Inherent causes of complaints that cannot be resolved by changes to work practices or simple on-site solutions but require to be referred to the top management or PSC for resolution.
- Results of complaints records of the Grievance Redress monitoring form Annex 3 and meetings across EDFP/MInT sub-projects will be reviewed regularly by the (Grievance Redressal Committee) GRC/PSC to identify opportunities to reduce impacts of project activities and reduce complaints.
- All complaints about the project and sub-project implementation activities will be dealt with as presented within this EDFP/MInT Grievance Redress Mechanism and should be recorded irrespective of the outcome.
- All grievances applied at and resolved by the EDFP/MInT Grievance Redress Mechanism, and a Grievance Complaint Form completed and forwarded to the grievance redress focal person/GRC and other stakeholders.
- Grievances involving compensation for (non-land) resources will be addressed using existing compensation rates developed by government agencies (Woredas, sub-cities, or Regions) and currently in use for loss or damage due to infrastructure projects.

### Grievance Handling

- All grievances from any pathway must be referred by the community or by any stakeholder directly to focal persons at MDAs or at regional levels and/or to EDFP/MInT E & S specialists for resolution and details will be recorded using a Grievance Receiving Form (Annex 1) and if the complaint is not resolved at this first level, it will be directed to GRC for resolution.
- When a grievance is received through the portal or from the suggestion box it will be referred to the Project Coordinator who/that may delegate this responsibility to a suitable grievance redress focal person or to (GRC) and who will report the incident to the PSC until the grievance is resolved.
- Concerns, complaints, and grievances from affected women, children, or other disadvantaged or vulnerable groups in the community or stakeholders may be raised by a representative in the same manner as a community complaint or grievance.

### Labor Related GRM

Different categories of workers are expected to be employed to work on the project and subprojects implementation except for a few technical experts; the majority of which is expected to be existing government civil servants, who will remain subject to the terms and conditions of their existing sector employment. Additional staff who may be directly engaged to support the project or sub-project will need to be contracted in line with the requirements of ESS2 of WB ESF and to the labor-management procedures included in the ESMF prepared for the project (Annex E of the EDFP, ESMF). According to ESMF, the anticipated Labor-related risks are OHS, community and health and safety, GBV due to contact among project or subproject workers, discrimination, and/or unequal opportunities. For detailed procedures and information on labor-related grievances, please refer to Annex-E of the ESMF.

The project also recognizes the vulnerability of the target communities by the labor influx, beneficiaries, and the different types of workers to be involved or people affected by the project activities. The Grievance



Redress Mechanism for addressing and managing workplace and employment-related conflicts or complaints as well as Gender-Based Violence (GBV) is crucial for EDFP. Project or sub-project worker with any complaint or grievance has the right to present it and obtain proper redress through the Grievance Redress Mechanism established by the project. This GRM will provide service to all the direct and contracted workers, their complaints can also be accepted through the anonymous column in the digital complaint management system or through the physical options accessible, the suggestion box, being anonymous. The redress process for labor related GRM will follow its own procedures as other grievances or complaints are managed and in a transparent and understandable way and provide timely feedback with the language they can understand without any retribution and will operate in an independent and objective manner. As it is stated in the ESS2 of the WB ESF project workers including the contract workers under different contractors will never be retaliated against or otherwise subject to reprisal or negative actions for reporting a dangerous working condition or removing himself/herself from the dangerous working situation. The PIU will ensure that all project-related workers including those engaged by the contractors will have the right to report and remove themselves from dangerous work situations without being subjected to reprisal or negative actions.

According to the provisions in the Ethiopian Labor Proclamation 1156/2019, it is unlawful for an employer to (a) impede the worker in any manner in the exercise of his/her rights or take any measures against him/her because he/she exercises his/her right, (b) discrimination against female workers, in a matter of remuneration, on the ground of their sex (c) terminate a contract of employment contrary to the provision in the labor proclamation, (d) coerce any worker by force or any of the manner to join or to cease to be a member of a trade union or vote for or against any given candidate in the election for a trade union, (e) require any worker to execute any work which is hazardous to his life, (f) discrimination between workers on the basis of nationality, sex, religion, political outlook or any other conditions.

The workers will be informed of the GRM at the time of recruitment and on how to access it and the options presented in the GRM procedures and the measures put in place to protect them against reprisal for its use. All the subproject activities supported by EDFP and the contractors who engage workers will undergo periodical monitoring by PIU for their compliance with all the stated rights of employees in the Labor-Management Plan concerning rest, wages, leaves (annual, sick, family events, union members, special purpose, and maternity leave), benefits in the case of employment injury, probation of child and forced labor, occupational health and working condition, and for the implementation of World Bank ESS2.

## Community or Stakeholders Consultation

Regular meetings will take place between EDFP/MInT focal persons and community representatives. The purpose of these meetings is to review that all complaints have been identified and resolved timely and properly and if possible, resolve any ongoing complaints or grievances. All activities under EDFP/MInT and stakeholders/beneficiary MDAs are also subject to GBV mitigation, through the Environmental and Social Management Framework (ESMF) and Environmental and Social Commitment Plans (ESCPs) that set conditions to be met by the EDFP/MInT and partner/beneficiary institutions. Any breaches of the conditions set out in ESMF or in other ESCP documents will also be entered into the daily registration book at the relevant site(s) and the condition of resolution of the breach will be recorded accordingly by the focal person(s). However, this GRM is not intended to deal with grievances relating to internal communication or disputes between the project team, Implementing Agency, other agencies; nor intra/inter-community conflicts that are not project related. Therefore, for the GRM is to function as intended, the potential complainants must be aware of how to access the GRM using proper consultation. Therefore, it is important that the GRM and its functions shall be presented, and awareness shall be created to potentially impacted parties through different media and languages.

## How to Make Complaints

To process grievances properly, project staff (E & S Specialists) or focal persons assigned by beneficiary institutions has the primary role in resolving complaints as part of their day-to-day activities as they interact with stakeholders/Beneficiaries of the project.

**Complaints** can be submitted by (face to face), (the phone-specific number for complaints uptake), (email – specific email address for complaints uptake), (mail – specific address for complaints uptake), (SMS), (webpage or project portal), (verbally to project, sub-project, or beneficiary’s staff) however, the verbal complaints should be recorded on the form attached as Annex-1 by the help of the focal person on spot for the complaints to be considered. For site-specific sub-projects, especially in remote areas: A staff member, community liaison officer, (-name, and phone number-) will receive complaints in person from citizens who can be impacted by the project activities and live close to the project site or through intermediary or representative. Anonymous complaints will be accepted by phone, but the complaints should be recorded on the form to be processed. Information from these various channels for complaints will be publicly displayed on (project or sub-project offices/ cardboard at project or stakeholders/beneficiary’s premises/ local media/flyers). Complaints received will be assigned a number that will help the complainant track progress on an online system at the project portal (<https://dfp.gov.et>) or at existing resources being developed by the World Bank projects. Where possible, complainants will be handed a receipt containing contact details (place and time), and the responsibilities of grievance handling focal person shall be clearly posted wherever accessible and visible. (See Annex I) and a flyer that describes the GRM procedures, which will be distributed and be read to them at their request.

### Contact Details

Where to complain to whom will include contact details of people responsible for the specific project or sub-project activities as well as EDFP/MInT will be posted on the project portal and on the notice board of EDFP/MInT and on the Notice boards of partner/beneficiary institutions.

### Responsibilities

A responsible body or focal person(s) will be assigned (on a desk or at the dedicated Phone line) to filter and ensure the accuracy of the complained issues and resolve the concern in the agreed time frame with the complainants. Besides, proper disclosure of a summary of the GRM process, including the information highlighted above like:

- Name of the responsible person,
- The issues presented, and
- How and when shall be resolved and displayed at suitable EDFP/MInT office and will also be disclosed to aggrieved communities in Amharic as well as English or other local languages (as needed/applicable).

## Grievance Resolution Procedure

The grievance resolution process includes four key stages: -

- (i) Complaints will be received.
- (ii) Complaints will be acknowledged
- (iii) Complaints will be investigated/enquired.
- (iv) Grievances will be resolved; and
- (v) Follow-up/Close Out sessions will be properly attended.

The general intention of outlining the grievance resolution procedure is to ensure that grievances are properly lodged, and complaints managed as quickly as possible to avoid exacerbation of the issue. Unresolved complaints may be treated as grievances only if, in the opinion of EDFP that they fall within the definition of grievance under EDFP/MInT. Irrespective of the stage of the process, a Complainant can pursue the grievance through the court as it is his or her legal right. A Complainant also has the right of

recourse to the EDFP/MInT Grievance Redress Service (GRS) at any time throughout the grievance resolution process. The major steps of grievance management are presented as follows

**(i) Receive**

Relevant focal person (Social or/and Environmental specialist) at EDFP/Mint will be required to accept formal grievances and ensure avenues for lodging grievances are accessible to the public and affected persons. Avenues will include face to face with EDFP/MInT focal person(s), regional government representative, or community representative, by telephone or in writing to the above or via dedicated phone lines or e-mail. The first point of contact for all potential grievances from the public or community is usually the EDFP/MInT focal person/s or the project manager. The grievance may be made directly by the aggrieved party or through the local administration or a community, women's representative for issues relating to project or sub-project activities. A grievance may also be made directly to anyone involved in EDFP/MInT or perceived to be in authority including Ministers, Members of Parliament, Provincial Authorities, MInT experts; however, the grievance must be passed/communicated to the EDFP/MInT for it to be formally recorded and received into the GRM system.

**(ii) Investigate or Enquire**

The EDFP/MInT/ project manager (coordinator) the ES specialists from EDFP/MInT and focal person deployed by the beneficiary (MDAs) and a representative from the local community will investigate the details and grounds for the grievance with assistance from the project or sub-project manager if required. Additional support or primary information may be gathered from the actual site or any other sources to clearly assess or examine the cause and effects of grievance and its level of urgency or severity and its relationship to EDFP/MInT. The environmental and social safeguard specialists of the project or the focal persons from beneficiary MDAs may require community representative (chief or women's representative) supports in order to assist investigations and confirm details of the grievance. Investigations may include site visits and meetings to determine: the social (including GBV) or environmental concerns and impact of the grievance and what options there may be for appropriate responses or resolutions.

**(iii) Resolve and Respond**

After investigation, all grievances will be assessed and responded to by EDFP/MInT or Beneficiary MDAs representative directly to the Complainant within one-two weeks based on the severity of the issue, after the completion of the investigation and identifying potential resolutions. If additional time is needed, the Complainant will be advised of this in advance. The Complainant may formally be invited to provide additional input to develop an appropriate response or resolution. The severity of each grievance and subsequent course of action shall be determined by the relevant Grievance Redress Committee established in the project. If the issue is easily resolvable, the responsible parties should endeavor to address the issue directly on site. If the grievance is a more complex issue, it may require additional meetings and further investigation and may need to be managed by the EDFP/MInT/ GRC. If a grievance is dismissed as groundless or not resolved at any stage, the Complainant will be informed of their rights in taking it to the next stage. A copy of the decision is to be given to the Complainant in writing and a copy will be sent to the next level of authority to inform them of the complaint. The records shall be kept and filed into the Grievance database managed by the EDFP/MInT. All responsible parties involved in the GRM process must keep complete records of their activities. These records of the grievance redress mechanism will be monitored by the environmental and /or social safeguard specialist and GRC. The results will be included in the regular project reports. If an agreement is not reached between the Complainant and the focal person at beneficiary MDAs or at regional or Woreda level, the grievance will be directed to the environmental and/or social safeguard specialist at EDFP/MInT or GRC for review and final decision. If necessary, further action will be taken to resolve the issue. If the Complainant is still dissatisfied with the outcome, they may be referred to proceed with the formal legal process available at any stage to the Complainant. However, courts should be the last avenue for addressing grievances.

**(iv) Follow up/ Close up**

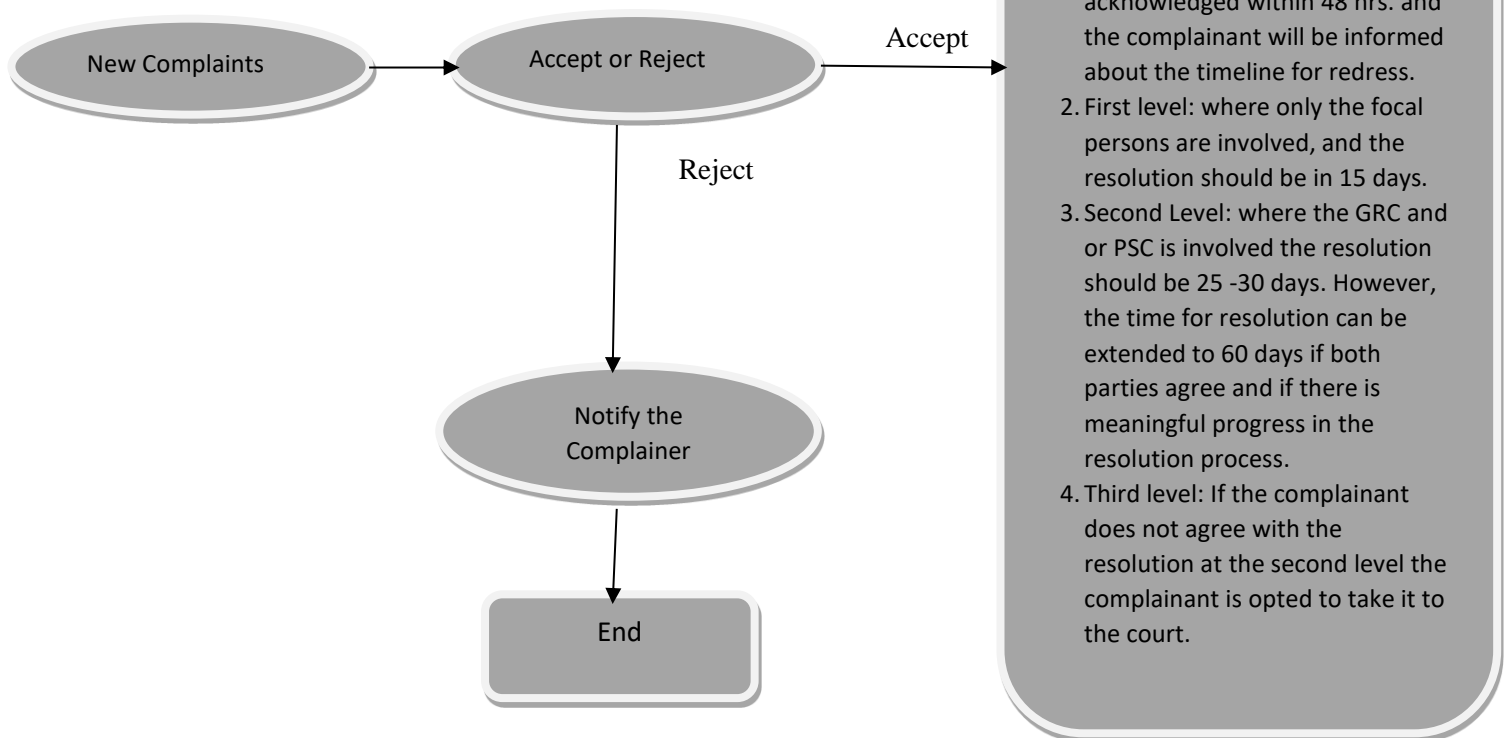
A grievance is *closed out* when no further action can be or needs to be taken. All grievances should be *closed out* within the initial 30 days or as soon as possible thereafter all reasonable attempts to resolve the grievance have been made. The findings of the investigation and the resolution made should be communicated and seek approval from the Complainant. If the Complainant is satisfied with the outcome, then the grievance is closed out and they provide their signature (or fingerprint) on the agreement as confirmation. Whether the Complaint outcome is either reject, appeal/accept, then the closure status will be recorded. Closure status will be entered into the Grievance database using the form (Annex-5) as follows:

- **Resolved** – the resolution has been agreed and implemented and the signed documentation is evidence of this.
- **Unresolved** – it has not been possible to reach an agreed resolution and the case has been authorized for closeout by EDFP/MInT/.
- **Abandoned** – cases where the attempts to contact the Complainant using the contact address filled in the form (Annex-A) have not been successful for two months following receipt of a formal grievance.

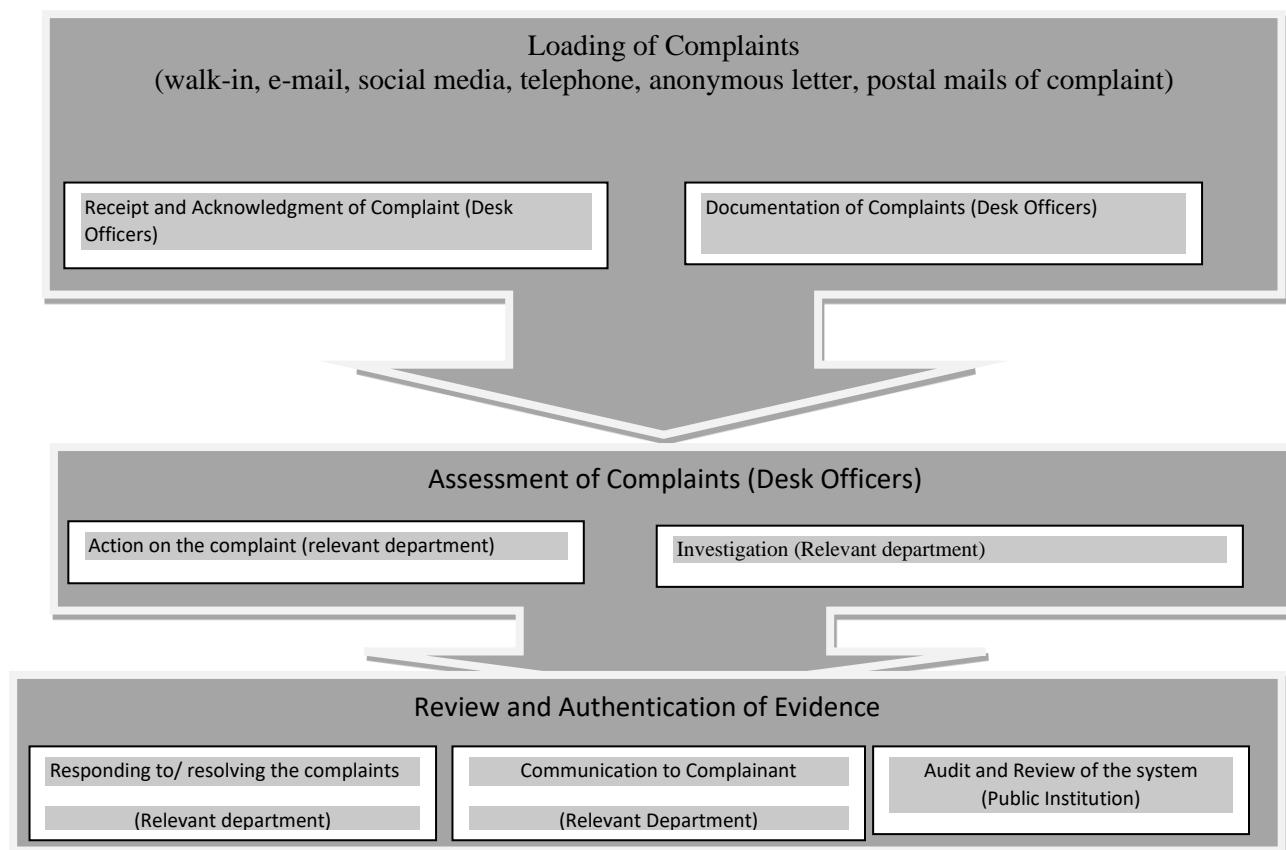
All grievances will be reviewed for opportunities to help identify and reduce future, similar occurrences across EDFP/Mint implementation.

**GRM Workflow**

Process flow of the Grievance Redress Mechanism



Below is an illustration adapted from Ombudsman’s Guide complaints handling mechanism:



## General Remarks

To make projects grievance **redress mechanisms** to be more meaningful and effective, a structured **system** should be **built up**. Such a **system** would ensure that the required **redressed** is just, fair, timely, and is within the given framework of rules and regulations.

### The mandate of the GRM will be to:

- (i) (collectively “Grievance”) alleging actual or potential harm to the affected person(s) (the “Claimant(s)”) arising from Project.
- (ii) assist in the resolution of Grievances between and among Project Stakeholders/ beneficiaries, as well as the various government ministries, departments, and agencies in the context of the Project.
- (iii) Conduct itself at all times in a flexible, collaborative, and transparent manner aimed at problem-solving and consensus-building.

### The Functions of the GRM will be to:

- (i) Receive, Log, and Track all Grievances received.
- (ii) Provide regular status updates on Grievances to complainants, Project steering Committee’s members, and other relevant Stakeholders/Beneficiaries, as applicable.
- (iii) Engage the beneficiary institutions (MDA) and other relevant Stakeholders in Grievance resolution.
- (iv) Process and propose solutions and ways forward related to specific Grievances within a period not to exceed sixty (60) days from receipt of the Grievance.

- (v) Identify growing trends in Grievances and recommend possible measures to avoid the same.
- (vi) Receive and service requests for, and suggest the use of, mediation or facilitation.
- (vii) Develop quarterly reports, disclose them, and ensure their availability to the public, stakeholders (including reports, findings, and outcomes).
- (viii) Ensure increased awareness of accessibility, predictability, transparency, legitimacy, and credibility of the GRM process.
- (ix) Collaborate with Partner Institutions and other NGOs, CSOs, and other entities to conduct outreach initiatives to increase awareness among Stakeholders as to the existence of the GRM and how its services can be accessed.
- (x) Ensure continuing education of focal persons and their respective institutions about the relevant laws and policies that they will need to be aware of to participate in the development of effective resolutions to Grievances likely to come before the GRM.
- (xi) Monitors follow up to Grievance resolutions, as appropriate.

### World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World bank (WB) supported project may submit complaints to existing project level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaints to the WB's independent inspection panel which determines whether harm occurred or could occur, as a result of WB non-compliance with its policies and procedures. Complaints can be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's Corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-service/grievance-redress-services>.

For information on how to submit complaints to the World Bank Inspection panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## References

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- Environmental and Social Management Framework (ESMF) for Digital Foundation Project/Ministry of Innovation and Technology, 2021, Addis Ababa, Ethiopia February.
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- Joint FCPF/UN-REDD Program Guidance Note for REDD+ Countries: Establishing and Strengthening Grievance Redress Mechanisms JUNE 2015
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- Report on review of county grievance redress mechanisms & proposals for best fit models for implementation 17 September 2018 commissioned by the world bank Kenya accountable devolution program
- Republic of Vanuatu: Vanuatu Infrastructure Reconstruction and Development Project -Financed by: The World Bank- March 2018.
- Stakeholder Engagement Plan, Digital Foundation Project/Ministry of Innovation and Technology, 2021, Addis Ababa, Ethiopia.
- Tajikistan higher education project grievance redresses mechanism-
- UNDP Social and Environmental Standards (SES)-October 2017

## ANNEXES

### Annex-1 Grievance Record Form

#### GRIEVANCE INCIDENT REPORT FORM

Complaints Directions: If you believe that you have been subjected to alleged inequity as it applies to the organization's Policies, System Procedures, or Project Procedures, you are required to fill out this incident report form. The Project can only base its findings on and take actions based on the information provided by you. If more space is necessary, please continue your comments on the back of this form, or on a separate sheet of paper.

<b>Date and Time Received:</b>	Date: (dd-mm-yyyy)	
	Time: _____ am _____ pm	
<b>Name of Grievant:</b>		<input type="checkbox"/> You can use my name but do not use it in public. <input type="checkbox"/> You can use my name when talking about the issue in public. <input type="checkbox"/> You Cannot use my name at all.
<b>Company if applicable</b>		<input type="checkbox"/> You can use my company name, but do not use it in public. <input type="checkbox"/> You can use my company name when talking about this concern in public. <input type="checkbox"/> You cannot use my company name at all____
<b>Contact Information:</b>	Phone: _____	
	e-mail _____	Adress: _____
	Physical Adress: Region _____ City _____ Sub-City _____ Woreda _____	
	(Kindly indicate the preferred method of communication)	
<b>Details of Grievance: (who, what, when, and where)</b>	_____One time incident/Complaint	



	_____ Happened More than Once (indicate how many times)
	_____ Ongoing (currently existing problem)

\_\_\_\_\_  
Grievant/Complainant Signature if Applicable

\_\_\_\_\_  
Date (dd-mm-yy)

\_\_\_\_\_  
Signature- Project Personnel  
(To Confirm Receipt only)

\_\_\_\_\_  
Date (dd-mm-yy)

**Disclosure**

To investigate your grievance, it will be necessary to interview you, the alleged respondent, and any witnesses with knowledge of the allegations or defenses. The statements and the information that you are providing may be attributed to you and could be included in any grievance reports that are prepared.

Authorization to disclose the identity of the complainant: \_\_\_Yes \_\_\_No

\*Please note limiting the organization’s ability to disclose will affect the MinT/DFP’s ability to respond to the grievance.

Please provide your contact information Phone Number\_\_\_\_\_ Alternate Phone Number

\_\_\_\_\_ Email\_\_\_\_\_

**Acknowledgment**

I, \_\_\_\_\_, am willing to cooperate fully in the investigation of my grievance and provide whatever evidence the (Ministry deems relevant). I affirm that the information I am providing is true and correct to the best of my knowledge. I understand that my statements and the information that I am providing may be attributed to me and could be included in any investigation reports that are prepared. I also understand that this investigation is confidential and for me to disclose any information that I have obtained during this investigation could interfere with the investigation. Further, I understand that discussing this investigation with Non-MInT/DFP Officials could expose me to civil liability under current defamation law. I also understand that if I do not fully cooperate, decisions will be made based on the best information available to the organization.

Signature\_\_\_\_\_

Date \_\_\_\_\_

Witness\_\_\_\_\_

Date\_\_\_\_\_

<b>For PIU use only:</b>	
Grievance No: _____ Grievance Category:	
___ Problems During Material Transport	___ Smell
___ Blocked Road Access	___ Problem with Project Staff
___ Dust	___ Other Specify: _____
___ Noise	
Grievance Owner/MDAs:	
_____	
_____	
_____	

## Annex 2: Grievance Acknowledgement Form

The project acknowledges receipt of any stakeholder/beneficiary, public, or personalities complaint and will contact you within 10 days.

<b>Date of Grievance/Complaint: (dd-mm-yyyy)</b>	
<b>Name of Grievant/Complainant:</b>	
<b>Complainant Address and Contact Information:</b>	
<b>Summary of Grievance/Complaints (Who, What, When, Where)</b>	
<b>Name of Project Staff Acknowledge:</b>	
<b>Signature:</b>	
<b>Date: (dd-mm-yyyy)</b>	

**Annex 3: Grievance Redressal Registration Monitoring Sheet**

No	Name of Grievant/complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Actions to be Taken by PIU	Resolution accepted or not accepted Date acceptance /non-acceptance
1							
2							
3							
4							
5							

**Annex 4: Grievance Meeting Record Form**

<b>Name of the Complaints:</b>		<b>Grievance Description</b>
<b>Date of Meeting:</b>		
<b>Time:</b>		
<b>Location:</b>		
<b>Attendance:</b>		
<b>Meeting Notes</b>	<b>Actions</b>	
	<b>Names</b>	<b>Due Date</b>

**Annex 5: Closure Form**

<b>Grievance No:</b>	
<b>Name of Grievant/Complainant:</b>	
<b>Date of Complaint:</b>	
<b>Summary of Complaint:</b>	
<b>Summary of Resolution:</b>	
<b>Resolved at:</b>	<input type="checkbox"/> <b>First level</b> <input type="checkbox"/> <b>Second level</b> <input type="checkbox"/> <b>Third Level</b>
<b>Date of Grievance Resolution:</b> dd-mm-yyyy	

## Annex 6: Code of Conduct Gender-Based Violence Related GRM at EDFP/MInT

### 1. Introduction

Gender-Based Violence is any harm or suffering that is perpetrated against a woman or girl, man, or boy and has a negative impact on the physical, sexual, or psychological health, development, or identity of the person. The cause of the violence is founded in gender-based power inequalities and gender-based discrimination.

Localized and national surveys indicate that violence against women and girls in Ethiopia is widespread, with regional variations. Violence against women is a manifestation of the prevailing gender inequality in the country and impairs the enjoyment of women of their fundamental freedoms and human rights. It is widely recognized that the most common forms of gender-based violence in Ethiopia are rape, abduction, early marriage, spousal battering, Female Genital Mutilation (FGM), and trafficking of women.

The underlying causes of violence against women include, among others, women's low status and limited power, their low access to social and economic resources, limited enforcement of the available gender-sensitive laws, and lack of legal protection for women and girls. This lack of power makes women more vulnerable to acts of violence and exposes them to more severe forms of violence and more serious injuries than do male victims.

The project will involve limited construction activities for infrastructure development within the premises of existing public facilities. The GBV/ SEA/ SH as risk within the project scope is considered moderate. However, according to the ESMF, SA conducted the identified main GBV/SEAH risks are:

**SEA/SH risk in training activities and workplace:** There is a high prevalence of SEAHs in workplaces of public institutions, universities, and offices where services are accessed in return for sexual favors. Although there are national civil servant laws and regulations that prohibit such acts, problems remain widespread. In this project context there are a) GBV/SH between project workers b) GBV/SEA/SH, perpetrated by project workers towards members of local communities, and c) GBV/SEA/SH risks in the selection process/ targeting of the women and girls d) SH risks in activities supporting startups and IT businesses.

**Sexual Violence in Higher Education:** There is a high prevalence of sexual violence in higher education institutions of Ethiopia although reporting is very low due to cultural norms. Existing grievance mechanisms (often handled by gender officers) within higher institutions are weak and insufficiently resourced to be able to provide the needed services such as counseling and referral services. The expansion and improvement of digital services in higher institutions such as broadband and Wi-Fi services in the libraries and dormitories are likely to aggravate such GBV risks.

**Digital Technology Enabled GBV/SEA/SH:** Digital technology-facilitated GBV (including stalking, bullying, sexual harassment, defamation, hate speech, and exploitation) is a global that has serious psychological and social impacts for the victims. Technology facilitated GBV/SEAH is action by one or more people that harms others based on their sexual or gender identity or by enforcing harmful gender norms. This action is carried out using the internet or mobile technology. The impact of online GBV takes a monumental toll on mental health, including depression, anxiety, and fear that follows women offline at home, school, work, and other social spaces. Most of these crimes are not reported due to a low level of awareness among public and law enforcement agencies. The project activities to enhance the capacity of higher institutions, MDAs, regional and Woreda offices could potentially increase such digitally facilitated GBV/SEAs.

**Labor Related GVB/SEA/SH Risks:** GBV in relation to contacts between project workers such as the engineers working on the broadband installation, ICT experts, consultants, and others and members of project-affected local communities and local communities (component 2; and 3). Although there might be a risk of discrimination i.e the potential inappropriate treatment or harassment of project workers (e.g. based on gender, age, disability, ethnicity, or religion) potential exclusion/preference with respect to recruitment,

training, and development, termination of employment, and working conditions, discrimination is unacceptable as per Ethiopian law and WB ESS2.

### **Key Recommendations to Address GBV**

- Awareness creation on digitally enabled GBV/SEAs in all beneficiary institutions including ICT heads, library, and information centers managers, and educate users on personal data protection, safe use of the internet, and reporting abuse.
- Project should put in place open and transparent criteria and procedures for project accessing and project services and communicate properly to potential participants.
- Ensuring that service points for the internet (library, WiFi spots, internet cafes) are safe environments for service users and can be monitored.
- Develop codes of conduct on the use of ICT services in public space (libraries, information centers, etc.) and display in public space.
- Advice and create awareness on content filters especially education institutions and public offices.
- Hire part-time GBV specialist for effective management of GBV/SEAH risks.
- A robust GBV action plan is needed for preventing and mitigating possible related risks.
- Develop Code of Conduct (CoC) to be signed by commits all persons engaged by the contractor, sub-contractors, and suppliers, to acceptable standards of behaviors.

## **2. Procedure GBV GRM**

When GBV related complaint has been received any complaint of the pathway should be observed confidentially and the safety and wellbeing of the complainant should also be taken into consideration. The GRC will designate members for GBV complaints handling. Once complaints are reported to the relevant committee, immediate action should be taken that is consistent with the wishes, choices, rights, and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filling complaints and possible outcomes, the timelines, and types of support available to be able to make informed decisions. For GBV cases It is important to ensure that access to the complaints process is as easy as and as safe as possible for the complainant survivor. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data. The digital complaint management system has also a privilege to receive and process the GBV related grievances confidentially and the complainant can apply being anonymous.

### **Complaints Submission**

**Face to Face:** This may be verbal or written submission done at any time through face-to-face interaction with members of committees, program officials, local administration structures. The name and contact details of the focal for the GRC at the project site shall be disclosed in a clear and observable location such as a notice board located at project activity sites or service points.

**Complaint Box:** Grievance boxes placed in strategic project implementation sites or communities where project-affected parties would drop in their grievances at any time. This will be located at visible sites where project activities take place and at service points (libraries, internet cafes, offices) the boxes will be marked and secured.

**Phone calls and SMS:** This will be at the project affected person's discretion and capability. Where possible, details of relevant immediate contact persons in the project area shall be made available.

**Digital Complaints System:** Any complainant of pathway who can access the EDFP portal is able to apply his/ her complaints digitally and the issue will be handled with the GBV handling procedure.

## **GBV Grievance Management Procedure**

### **Handling GBV Complaints**

All the Partner/beneficiary institutions, regions and woredas in which the projects are implemented need to have a framework for handling GBV allegations. There are at least the following key actors involved in handling GBV allegations: the GRM operators, the Grievance Redress Committee (GRC) specific to GBV grievance resolution committee including E & S focal persons or Gender / Social Development Specialist if any of each partner/beneficiary institutions. It is therefore essential that prior to GBV complaints being received, it shall clearly identify who specifically will be responsible for handling the complaint: what sanctions will be applied and, the survivor is safe after raising a complaint. EDFP encourages all staff, stakeholders, and clients regardless of their identity or position, to report any incidents of discrimination, harassment, or retaliation. To better facilitate the process of receiving and handling GBV cases, the bellow steps are explained briefly:

#### **Step 1: Staffing and Registration**

The first step for receiving and handling GBV complaints is to have a safe and supportive environment and trustful staff to whom the survivor can easily raise her/his complaint. The, E &/or S specialist, E&S focal persons at the beneficiary MDAs or at universities, colleges, TVETs at the Regions and Woredas where the subproject is implemented need to be assigned to receive and register the GBV complaints; along with normal cases; with full confidentiality. She (The GRM handling person) is well trained and has Knowledge about GBV and its causes and consequences and knows that if the case details are disclosed then she will be responsible.

She should have the ability to use a survivor-centered approach in the interactions with survivors including the ability to use active listening skills and speaking in the respective local languages (of localities where EDFP is operating), and to remain non-judgmental and adhere to survivor-centered principles of confidentiality (including informed consent for each stage of the complaints process), non-discrimination, safety, and respect.

Complaint handling is a limited process and the GRM handling person must always be careful not to exceed the scope of her role, trying to investigate, conduct fact-finding, evidence gathering or even dismissing cases, etc. This also means ensuring that the GRM handling person will refrain herself from using these and similar statements “you shouldn’t have done this”, “why did you do it or say it?”, “You should do this”. The GRM handling person will also avoid victim blaming at any cost. The only purpose is to receive the initial complaint, determine any immediate protection or assistant needs of the complainant, and process onward referrals. The GRM handling will also provide details of assistance available for the complainant. An updated referral pathway will be available for the purposes of onward referral to available GBV service providers to support the survivor’s access to any treatment or recovery services and to provide advocacy support where necessary.

The digital Complaint Management System developed by PIU/MInT that the GRM handling person uses for GBV cases is protected and limited to a few individuals such as only authorized in the complaints handling team. If any complainant is unhappy with how the complaint has been handled they should be provided with a phone number, identification code, of the focal person to discuss their case and how it was handled further with the GRM and GBV/SEA/SH Grievance Handling Committee; preferably this person should not be a member of the GRC specific to GBV grievance resolution committees in the PIU or in the partner/beneficiary institutions and should have the authority to potentially recommend that the case is “reopened”.

#### **Step 2: Referring the case to GBV Grievance Resolution Committee**

The E & S specialist or the E & S focal persons in the partner/ beneficiary institutions reports the case to the GRC/ specific to GBV grievance resolution committee of the PIU, the committee as soon as they receive the case, starts assessing the case maintaining confidentiality, survivor-centered approach, and in a timely manner.



It is a proven practice that based on survivor centered approach, the survivor can choose which way the case should be solved. It means that the survivor can choose the solution (formal/informal) based on her/his needs, status, and probable consequences.

### **GBV Grievance Resolution Committee Formation**

All partner/beneficiary institutions will set up a Grievance Redress Committee comprising 2 members from senior staff including the PIU coordinator comprising trained personnel from Senior Management (1 member), HR (1 member), and E & S specialists or Focal persons Gender Unit/ Social Development (2 members) if any, to review each GBV complaint/allegation received individually. The PIU coordinator will act as a focal point on the senior management team for GBV/SEA/SH case investigations and other committee members will receive training on how to conduct fair and robust survivor-centered investigations and GBV.

### **Step 3: Investigation and response to GBV complaint**

The case will only be disclosed to the GBV grievance resolution committee (solely, if the survivor permits) and the investigation starts. The investigation is taking place within a course of actions as follows:

- Face to face and private interviews with survivors and perpetrators. The two will not be interviewed together, and survivors will be particularly encouraged to bring their GBV caseworker, if any, to the interview for support.
- Interview with the officemate and colleague of both survivor and perpetrator (if needed) Checking the evidence and proves that both sides may present.
- Group discussion among GBV grievance resolution committee on how to solve the case.

Following training on survivor-centered investigations, the committee will strive to conduct investigations underpinned by the principles of impartiality, non-discrimination, and confidentiality. The GBV grievance resolution committee will keep the principles of confidentiality, the dignity of survivor and perpetrator, no discrimination, no-judging, and neutrality.

### **Informal Procedure**

In situations where the complainant does not want to register the grievance formally or raise grievances verbally and does not want to put it in the system, the E&S specialist, or the E & S focal persons for the GRM will bring the issue to the PIU coordinator attention, so that they notify the supervisor of the alleged person should be informed considering the complainant's consent and permission. If the complainant does not want to disclose her/his name but just wants to bring that bad behavior or SEA/SH case to the attention of the alleged person's supervisor through the focal persons, she should be able to do so. In any case, the service SHALL NOT encourage informal mediation approaches to GBV cases.

### **Step 4: Case Conclusion**

The length of time that the conclusion of a GBV case takes greatly varies from case to case. The investigation report along with decisions taken or recommendations is submitted to the senior management. If the investigation concludes the allegations are valid and abuse has likely occurred, then sanctions will be applied to the perpetrator based on the nature and level of GBV. The sanction, cited from the code of conduct, are as follows:

- Formal or informal warning
- Additional training
- Loss of salary
- Suspension of employment (with or without payment of salary)
- Termination of employment.
- Report to the police or other authorities as warranted.

The final decision that is taken by the GBV grievance resolution committee and any disciplinary action signed on the perpetrator will be reflected in her/his HR profile.

Sometimes, survivors may request the closure of the case, even if they haven't had all their needs met. The team respect this request and must ensure that the cancellation is completely voluntary and unconstrained. In other instances, the alleged resigns in the middle of case investigation, in such cases, the investigations should continue regardless of whether the alleged resigns and any conclusions including the fact that an investigation has taken place should be placed on file.

All the process of the investigation is documented and to be updated on the system, as and when necessary. After the case is closed, data on the system shall be protected in accordance with data protection and archiving policies. Similarly, all printed materials that are no longer needed should vanish. If the printed papers should be stored, then lock them in a file cabinet or other secure container, and limit access to the combination of keys or any other password protection.

**Note:** By closing the GBV complaint, any survivor should feel safe to return to the GBV grievance resolution committee or to complain once again if s/he faced violence because raising a complaint increases the risk of harm more ever. The survivor is referred to the GBV services providers if she needed psychological and emotional support, only if she permits to share the case with the service provider.

### 3. Target of the Code

The Code does not exempt anyone and in accordance with relevant employing affiliate's policies and procedures, any breach may result in disciplinary action (including dismissal in some instances), and in some cases could lead to criminal prosecution. In accepting your appointment, you undertake to discharge your duties and to regulate your conduct in accordance with the requirements of this Code, thereby contributing to EDFP/MInT quality of performance and reputation. The code describes what EDFP/MInT expects from its employees and what the employees can expect from EDFP/MInT. Whilst recognizing that local laws and cultures differ considerably from one community to another, EDFP/MInT is a federal level institution, and therefore the Code of Conduct is developed from national, International and UN standards. This Code is subject to relevant national, international human rights law, wherever the employee is employed and shall be read in a manner that is compliant with that law/ 'EDFP/MInT'\* means any EDFP/MInT beneficiaries throughout the country. To implement the laws and combat against sexual harassment, DFP/MInT, which is chaired by the project Steering Committee (PSC), has developed this Code of Conduct on Sexual Harassment in the Workplace, hereinafter referred to as "the Code". This Code aims to help employers in EDFP/MInT and beneficiary MDAs workers and project-affected communities to prevent and address sexual harassment, and to promote healthy, safe, and productive workplaces.

### 4. Objectives

The Code provides practical guidance to EDFP/MInT employers, and trade unions, beneficiary institutions, contractors, consultants on the implementation of regulations to effectively prevent and address sexual harassment in the workplace in accordance with the Labor Code. It also recommends the development, implementation, and monitoring of Grievance Redressing Mechanism Guideline on sexual harassment to promote safe and healthy workplaces, where all workers, irrespective of gender or status, are treated with fairness, dignity, and respect.

### 5. Scope and Coverage

The Code applies to EDFP/MInT employers and beneficiary MDGs employers, contractors, consultants, sub-project activities implemented in the region, and any project-related public and private sectors, regardless of size. Small companies may need to adapt some of the practical content identified in the Code to fit their operational structures, but adaptations should always be consistent with the general principles of the Code.

The term “workplace” in the Code refers not only to the specific location where work is being performed, such as an office or construction site but also to locations where work-related business may be conducted. These could include, but are not limited to:

- Work-related social activities, such as a reception organized by the project/beneficiary MDAs for staff or clients, etc.
- Conferences and training sessions.
- Official business travel.
- Business meals.
- Work-related telephone conversations; and
- Work-related communications through electronic media.
- Different services provided by the project.

## **6. Definition, Identification, and Forms of Sexual Harassment**

### **A. What is Sexual Harassment**

Sexual harassment” is defined as any behavior of a **sexual** nature that affects the dignity of women and men, which is considered as **unwanted, unacceptable, inappropriate, and offensive** to the recipient, and that creates an **intimidating, hostile, unstable, or offensive** work environment. “Quid pro quo” (this for that) sexual harassment is committed when an employer, supervisor, manager, or co-worker, undertakes or attempts to influence the process of recruitment, promotion, training, discipline, dismissal, salary increment, or another benefit of an existing staff member or job applicant, in exchange for sexual favors. The worst forms of sexual harassment are criminal acts such as sexual assault or rape, which are covered under the Penal Code.

### **B. What is not Sexual Harassment**

Occasional compliments that are socially and culturally acceptable and appropriate are not considered sexual harassment. Any interaction of a sexual nature which is consensual (except for those prohibited by the law such as sexual intercourse with children), welcome, or reciprocated is not considered sexual harassment.

### **C. Forms of Sexual Harassment**

Sexual harassment in the workplace can be physical, verbal, or non-verbal, and include the major forms as follows:

- **Physical forms** of sexual harassment such as any unwanted contact, ranging from intentionally touching, caressing, pinching, hugging, or kissing to sexual assault or rape.
- **Verbal forms** of sexual harassment include socially and culturally inappropriate and unwelcome comments with sexual overtones such as sexually suggestive jokes or comments about a person’s dress or body made in their presence or directed toward them. They also include persistent proposals and unwelcome requests or persistent personal invitations to go out.
- **Non-verbal** forms of sexual harassment include unwelcome gestures, suggestive body language, indecent exposure, lascivious looks, repeated winks, and gestures with fingers. It also includes the unwelcome display of pornographic materials, sexually explicit pictures and objects, screen savers or posters as well as sexually explicit e-mails, notes, or SMS messages.

## **7. Roles and Responsibilities**

### **7.1 Employers**

It is the roles and responsibilities of the EDFP/MinT and every beneficiary institution, and the contractors and consultants hired by these institutions regardless of their size and nature their company must create and maintain a working environment that is free from sexual harassment. The project or beneficiary MDAs should respond promptly to any accusation of sexual harassment, ensuring that alleged victims do not be afraid of reprisals or feel that their grievances are being ignored or trivialized. For effective prevention of sexual harassment at the workplace, every employer should adopt, promote implement, and monitor a

policy on sexual harassment within workplace regulations, collective agreement, or other legal regulations of the company. The policy should jointly be developed with the trade union to ensure its effective implementation.

### **7.2 Workers**

All workers, regardless of their gender, age, position, type of contract, or status, have a responsibility to ensure that the workplace is free from sexual harassment, to discourage and report unacceptable behavior, and to comply with the company's sexual harassment policy.

### **7.3 Trade Unions**

Trade unions have the responsibility to participate in the development and implementation of a company's sexual harassment policy and ensure that issues related to sexual harassment in the workplace are negotiated in a fair and transparent manner. They should also provide information, advice, and representation to workers who have been sexually harassed, as well as to workers against whom allegations of sexual harassment have been made and include such information on sexual harassment in their regular education and training programs.

### **7.4 The Ministry and Beneficiary MDAs**

Employers' organizations should ensure that information on sexual harassment is included in their HR guidelines, staff orientation, and education and training programs.

### **7.5 Labor Supervisors**

Labor Supervisors need to carefully review company records and practices with the aim of detecting and appropriately responding to allegations of sexual harassment. It is important for labor Supervisors to take the lead in investigating not only allegations of physical sexual harassment, but any relevant conduct (verbal or non-verbal) which was reported as unwelcome, unwanted, or offensive.

### **Code of Conduct: Standards and Values**

As EDFP/ beneficiary institutions employee I will:

- **Uphold the integrity and reputation of EDFP/MinT by ensuring that my professional and personal conduct is demonstrably consistent with the values and standards of the institution.**

I will seek to maintain and enhance public confidence in EDFP/MInT by being accountable for the professional and personal actions I took and ensuring that I manage the power that comes with my position inappropriately restraint. Whilst observing the requirements of the Code of Conduct, I will also be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the Code of Conduct. I will, if necessary, seek (and will receive) support and advice from MInT. I will not work under the influence of alcohol or use or be in possession of, illegal substances on-premises, vehicles, or accommodation of the ministry.

- **Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation, or abuse**

EDFP/MInT and Beneficiary institution staff hold a privileged position of power and trust in relation to our partners and the communities that we came to serve. When carrying out EDFP/MInT mission I understand that it is important not to abuse my own position of power/unequal power relationships in any way. Recognizing my role in EDFP/MInT's mission to challenge injustice and poverty, I will respect all peoples' rights, including children's rights, and I will contribute to a working environment characterized by mutual respect, integrity, dignity, and non-discrimination.

I will ensure that my relationships and behavior are not abusive, insulting, or corrupt in any way, and I will not engage in any form of sexual abuse or exploitation of any persons of any age. In line with the national,

international standards I will not have sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or any other reason) recognizing the inherently unequal power dynamics involved, and that such behaviors can undermine the integrity and credibility of EDFP/MInT implementation.

I will also not exchange money, offers of employment, goods or services for sex or sexual favors, nor any other forms of humiliating, degrading, or abusive behavior, understanding that these standards exist to challenge sexually exploitative and abusive behavior. I will use my best endeavors to report any such behaviors or malpractice in the workplace by others to my line management or through recognized confidential reporting systems.

- **Perform my duties and conduct my private life in a manner that avoids possible conflicts of interest with the work of EDFP/MInT.**

I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact the work of EDFP/MInT (e.g., contract for goods/services, employment or promotion within EDFP/MInT, partner organizations, beneficiary MDAs). I will advise DFP/MInT of any intention to seek a nomination as a prospective candidate or another official role for any political party or public office to clarify whether any conflict or perceived conflicts, with my duties with DFP/MInT, may arise. Even when the giving and acceptance of gifts is a normal cultural practice, I will reject monetary gifts or inappropriate gifts from governments, beneficiaries, donors, suppliers, and other persons, which have been offered to me because of my employment with DFP/MInT and beneficiary MDGs and other stakeholders. Where the giving and acceptance of gifts is normal cultural practice, I will ensure that such gifts are within the limits of reasonable judgments and in accordance with procurement policies and I will report gifts to the line management and where appropriate hand them onto DFP/MInT.

I will assure you that assistance by DFP/MInT is not provided in return of any service or favor from others. I will act against any form of corruption and not offer, promise, give or accept any bribes.

- **Be responsible for the use of information, equipment, money, and resources to which I have access by reason of my employment with DFP/MInT**

I will use my discretion when handling sensitive or confidential information. I will seek authorization before communicating externally in EDFP/MInT's name and will avoid any unintended detrimental repercussions for me or EDFP/MInT. I will appropriately account for all EDFP/MInT money and property, (e.g vehicles, office equipment, MINT-provided accommodation, computers including the use of internet, email, and intranet).

- **Protect the health, safety, security, and welfare of all EDFP/MInT employees, volunteers, and contractors.**

I will undertake and act on appropriate risk assessments. I will comply with local security management guidelines and be proactive in informing management of any necessary changes to such guidelines. I will behave in such a way as to avoid any unnecessary risk to the safety, health, and welfare of myself and others, including partner organizations and beneficiaries.

- **Promote human rights, protect the environment, and oppose criminal or unethical activities**

I will ensure that my conduct is consistent with the human rights framework to which EDFP/MInT subscribes.

I will use my best endeavors to protect the natural environment and work in a sustainable way.

I will contribute to preventing all forms of criminal or unethical activities.

I will inform EDFP/MInT of any relevant criminal convictions or charges I have had prior to my employment in which EDFP/MInT may have a legitimate interest.

I will also notify EDFP/MInT if I face any criminal charges during my employment that may impede my ability to perform the duties of my position subject to national legislation.

I will adhere to the following policies and procedures (see list below) that support the above Standards:

### **Annex 7: National Policies, laws, and Regulatory Framework**

Any proposed and implemented development Project should be governed by the relevant environmental policies, strategies, proclamations to ensure environmental sustainability and community wellbeing. The environmental policies, laws, legislations, proclamations, and institutional frameworks pertinent to this GRM are summarized and presented below. Several international and regional instruments, including the Convention on the Rights of the Child (ratified by Ethiopia in 1991), the African Charter on the Rights of the Child (1999), and the Convention on the Elimination of Discrimination against Women (CEDAW) (ratified within the Constitution 1995). Most recently, the Sustainable Development Goals Education Goal 4 includes a target on creating child, disability, and gender-sensitive education facilities and to ‘provide safe, non-violent, inclusive and effective learning environments for all.

- **Constitution of the Federal Democratic Republic of Ethiopia**

The Constitution is the supreme law of the country, whose provisions are providing guidance to all other policies, regulations, and institutional frameworks. The Constitution of the FDRE has various provisions that are aimed to ensure the implementation of a development project in an environmentally sustainable manner. The concepts of sustainable development and environmental rights are enshrined in the Constitution of the FDRE through articles 43 and 44, which states among others the right to development and the right to live in a clean and healthy environment. Article 44(2) of the Constitution states that all persons who have been displaced, or whose livelihood has been adversely affected because of state programs have the right to commensurate monetary or alternative means of compensation including relocation with adequate State assistance. The government shall pay fair compensation for property found on the land, but the amount of compensation shall not consider the value of land. Moreover, the Constitution states that, without prejudice to the right to private property, the government may expropriate private property for public purposes subject to payment in advance of compensation commensurate to the value of the property (Article 40(8). Moreover, Article 43 (2) dealing with the rights to development states that nationals have the right to participate in national development and to be consulted with respect to policies and projects affecting the community. Article 92 of the Constitution states that the design and implementation of any program and development projects shall not damage or destroy the environment, and people have the right to be fully consulted and express their views in planning and implementation of environmental policies and project

- **Environmental Policy of Ethiopia**

The Environmental Policy of Ethiopia (EPE) was issued in April 1997. The overall policy goal is to improve and enhance the health and quality of life of all Ethiopians and promote sustainable social and economic development through sound management and use of natural, human-made, and cultural resources and their environment, to meet the needs of the present generation without compromising the ability of future generations to meet their own needs. The policy consists mainly of guiding principles and various sectoral and cross-sectoral policies for sustainable environmental management.

The policy seeks to ensure the empowerment and participation of the people and their organizations at all levels in environmental management activities, raise public awareness, and promote understanding of the essential linkage between environment and development. In addition to its guiding principles, the policy addresses sectoral and cross sectoral environmental issues.

- **The Health Policy of Ethiopia**

The health policy under Article 3.4 stipulates the need to develop safe disposal of household agricultural and industrial wastes and encourages the recycling of waste. This policy under Article 5.3 also indicates the need to the prevention of environmental pollution from hazardous chemical wastes

Public health proclamation No. 200/2000 was promulgated by the Federal Republic of Ethiopia on 9<sup>th</sup> March 2000. The proclamation is meant to promote the participation of society in the health sector and enforce the objectives of the health policy of Ethiopia. The proclamation under its Part II discusses public health issues, including food quality control, water quality control, and waste handling and disposal, availability of toilet facilities, control of bathing places and pools, etc. The article which deals with waste handling and disposal further elaborates that:

- ✓ Any person shall collect waste in a specially designated place and in a manner that does not affect the health of society.
- ✓ No person shall dispose of solid, liquid, or other waste in a manner that contaminates the environment or affects the health of society.
- ✓ Any solid, liquid, and other wastes generated from hospitals should be handled with special care and their disposal procedures should meet the standards set by the public health authorities.

- **Land Tenure Policy**

The Land Policy of Ethiopia strongly supports that project plans must include attractive and sustainable resettlement strategies to the people who are going to be displaced as a result of the development plan, and they must be fully convinced, compensated, and must participate in all phases of the project implementation.

- **Environmental Pollution Control (Proclamation No. 300/2002)**

Primarily aims to ensure the right of citizens to a healthy environment and to impose obligations to protect the environment of the country. The law addresses the management of hazardous waste, municipal waste, and establishment of environmental quality standards for air, water, and soil, and the monitoring of pollution. In this connection, the Proclamation provides a basis from which the relevant environmental standards applicable to Ethiopia can be developed, while sanctioning violation of these standards as criminally punishable offenses. Furthermore, it empowers the Commission for Environment Forest and Climate Change (CEFCC) or the Regional Environmental offices to assign environmental inspectors with the duties and responsibilities of controlling environmental pollution. In order to ensure implementation of environmental standards and related requirements, inspectors belonging to the CEFCC, or the relevant regional environmental agency is empowered by the Proclamation to enter, without prior notice or court order, any land or premises at any time, at their discretion. Such wide powers derive from Ethiopia's serious concern and commitment to protecting the environment from pollution.

- **Proclamation 513/2007, Solid Waste Management**

Proclamation no. 513/2007 aims to promote community participation in order to prevent adverse effects and enhance benefits resulting from solid waste. It provides for the preparation of solid waste management action plans by urban local governments. Therefore, Solid Waste Management Proclamation No. 513/2007 states (Article 5.1) that Urban Administrations shall ensure the participation of the lowest administrative levels and their respective local communities in designing and implementing their respective solid waste management plans. In Article 5.1 each Region or urban administration shall set its own schedule and based on that, prepare its solid waste management plan and report of implementation. Measures related to waste handling and disposal:

- ✓ Any person shall collect waste in an especially designated place and in a manner, which does not affect the health of the society. No person shall dispose of solid, liquid, or any other waste in a manner that contaminates the environment or affects the health of society.

- **Labor Proclamation 377/2003**

The Labor Proclamation (which was revised in 2003) provides the basic principles which govern labor conditions considering the political, economic, and social policies of the Government, and in conformity with the international conventions and treaties to which Ethiopia is a party. The proclamation under its Part Seven, Chapter One, and Article 92 of this proclamation deal with Occupational Safety, Health and Working Environment, Prevention Measures, and Obligations of the Employers. Accordingly, the

Proclamation obliges the employer to take the necessary measure for adequate safeguarding of the workers in terms of their health and safety. Moreover, the Occupation Health and Safety Directive (MOLSA, 2003) provides the limits for occupational exposure to working conditions that have adverse impacts on health and safety

- **National Policy of Women**

This Policy was issued in March 1993 and stresses that all economic and social programs and Activities should ensure equal access of men and women to the country's resources and in the decision-making process so that they can benefit equally from all activities carried out by the Federal and Regional institutions.