LUAPULA WATER SUPPLY AND SANITATION COMPANY (LpWSC)

"Clean Water, Better Health"

GRIEVANCE REDRESS MECHANISM (GRM)

For World Bank Program-for-Results (PforR) Financed Projects

Programme: [PforR Programme]

Implementation Districts: Mansa, Samfya, Mwense, Nchelenge, Chiengi and Kawambwa

Document Reference: LpWSC/GRM/01

Prepared by: Environmental and Social Management Specialist (ESMS), LpWSC

In accordance with the World Bank Environmental and Social Framework (ESF), particularly ESS10 (Stakeholder Engagement and Information Disclosure) and ESS2 (Labor and Working Conditions), and the Programme's Environmental and Social Systems Assessment (ESSA)

Date: [June 2026] Version: 1.0

Document Control

Version	Date	Description of Changes	Prepared/Revised By
1.0	[June, 2026]	Initial issue of the standalone LpWSC Grievance Redress Mechanism, aligned with the ZWSSGC Programme ESHSRIM Operations Manual GRM structure and informed by peer Commercial Utility good practice (Kafubu Water and Sanitation Company GRM)	ESMS

Approval

Role	Name	Signature	Date
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List of Abbreviations

Abbreviation	Meaning
CU	Commercial Utility (in this document, LpWSC)
ESF	World Bank Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESHSRIM	Environmental, Social, Health and Safety Risk and Impact Management (ZWSSGC Operations Manual)
ESMS	Environmental and Social Management Specialist
ESS	Environmental and Social Standard
ESSA	Environmental and Social Systems Assessment
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
LpWSC	Luapula Water Supply and Sanitation Company
MWDS	Ministry of Water Development and Sanitation
NWASCO	National Water Supply and Sanitation Council
PAP	Project-Affected Person
PCU	Programme Coordination Unit (national level, under MWDS)
PforR	Program-for-Results (World Bank financing instrument)
PIU	Project Implementation Unit
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
VSU	Victim Support Unit (Zambia Police Service)
ZWSSGC	Zambia Water Supply and Sanitation Growth-Oriented Company / Programme

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1. Introduction

1.1 Background

The Luapula Water Supply and Sanitation Company (LpWSC) is a Commercial Utility responsible for the provision of water supply and sanitation services in Mansa, Samfya, Mwense, Nchelenge and Kawambwa districts of Luapula Province, Zambia. LpWSC is implementing activities under a World Bank-financed Program-for-Results (PforR) Programme [Insert Programme Name/ID], which forms part of the broader national Zambia Water Supply and Sanitation Growth-Oriented Company (ZWSSGC) Programme coordinated by the Ministry of Water Development and Sanitation (MWDS) through its Programme Coordination Unit (PCU).

This Grievance Redress Mechanism (GRM) has been developed specifically for LpWSC, drawing on: (i) the grievance management structure and institutional hierarchy set out in the ZWSSGC Programme's Environmental, Social, Health and Safety Risk and Impact Management (ESHSRIM) Operations Manual, which establishes a multi-tier GRM spanning project/site level, Commercial Utility level, National PCU level, and a Steering Committee appeal level; and (ii) good operational practice from peer Commercial Utilities, including the detailed case-management tools, forms and Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) referral pathway developed by Kafubu Water and Sanitation Company for its own World Bank-financed project sites. This document consolidates and adapts that guidance into a single, standalone, LpWSC-specific GRM, with improved appendices to support day-to-day case management.

1.2 Purpose of the GRM

The Grievance Redress Mechanism (GRM) is established to provide Project-Affected Persons (PAPs), workers, contractors, communities, customers and other stakeholders of LpWSC's Programme activities with accessible, transparent and timely procedures for raising concerns, complaints or grievances related to project activities.

The GRM aims to:

- Resolve grievances promptly, fairly and effectively;
- Strengthen accountability and transparency in LpWSC's Programme implementation;
- Enhance community and customer trust and stakeholder engagement;
- Prevent escalation of conflicts and disputes;
- Ensure compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS10 (Stakeholder Engagement and Information Disclosure) and ESS2 (Labor and Working Conditions), and with the grievance-handling requirements of the ZWSSGC Programme ESHSRIM Operations Manual.

2. Objectives

The GRM shall:

1. Provide clear procedures for receiving, registering and resolving complaints;
2. Ensure fair, transparent and culturally appropriate grievance handling;
3. Protect complainants from retaliation, victimization or reprisal;
4. Ensure confidentiality where required, particularly for sensitive complaints;
5. Promote timely resolution of grievances within clearly defined timeframes;
6. Maintain accurate, secure records for monitoring, reporting and continuous improvement;
7. Provide a survivor-centered referral pathway for SEA/SH complaints, consistent with World Bank requirements;

8. Support the progressive digitization of grievance intake, tracking and reporting, as reflected in LpWSC's Stakeholder Engagement Plan.

3. Legal, Policy and Institutional Framework

3.1 National Legal and Institutional Framework

- The Water Supply and Sanitation Act No. 28 of 1997 (as amended) — establishes Commercial Utilities such as LpWSC and the regulatory oversight of the National Water Supply and Sanitation Council (NWASCO), including consumer complaint handling as a component of regulated service quality;
- The Employment Code Act No. 3 of 2019 — relevant to workplace/labor grievances and workers' right to raise concerns without retaliation;
- The Industrial and Labour Relations Act — governs trade unions, collective bargaining and dispute resolution between employers and employees;
- The Zambia Gender-Based Violence Act No. 1 of 2011 — relevant to the handling and referral of GBV/SEA/SH complaints;
- The Data Protection Act No. 3 of 2021 — relevant to the secure and confidential handling of grievance records containing personal data;
- The Arbitration Act No. 19 of 2000 — governs referral of unresolved disputes to arbitration, where applicable, in accordance with procedures published by the Chartered Institute of Arbitrators, Zambia Branch;
- The ZWSSGC Programme Environmental, Social, Health and Safety Risk and Impact Management (ESHSRIM) Operations Manual — establishes the national multi-tier GRM structure (project/CU level, National PCU level, Steering Committee) within which this LpWSC-specific GRM operates.

3.2 World Bank Requirements

This GRM is prepared in accordance with the World Bank Environmental and Social Framework (ESF), with particular reference to:

- ESS10 – Stakeholder Engagement and Information Disclosure, which requires that a grievance mechanism be established to receive and facilitate resolution of concerns and grievances of Project-Affected Parties in a timely manner;
- ESS2 – Labor and Working Conditions, which requires a separate workers' grievance mechanism, addressed in LpWSC's Labor Management Procedure, and cross-referenced within this document;
- ESS4 – Community Health and Safety, relevant to grievances concerning community safety impacts of Programme activities;
- World Bank good practice on GBV/SEA/SH prevention and response, requiring a survivor-centered referral pathway operating separately from the standard grievance investigation process.

4. Scope of the GRM

This GRM applies to all LpWSC Programme activities in Mansa, Samfya, Mwense, Nchelenge and Kawambwa districts, and covers:

- Community grievances arising from Programme construction/installation activities (e.g., pipeline works, borehole drilling, civil works, solar PV installation);
- Customer grievances, including those relating to prepaid meter installation, billing, and service delivery;
- Workplace grievances from LpWSC staff and contractor personnel;

- Environmental concerns and social impacts of Programme activities;
- Land, way-leave and asset-related complaints;
- Labor and working condition grievances;
- Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) complaints, handled through the survivor-centered referral pathway set out in Section 8;
- Health and safety concerns, including those relating to the Emergency Preparedness and Response Plan (LpWSC/EPRP/07);
- Contractor, consultant and supplier-related complaints;
- Service delivery concerns, including water quality, supply continuity, and customer service issues.

5. Guiding Principles

The GRM shall be:

- Accessible to all stakeholders, including community members, customers, LpWSC employees, contractors and vulnerable/disadvantaged groups;
- Transparent and fair, with publicly documented procedures and timeframes;
- Free of charge to the complainant at every stage;
- Non-discriminatory, regardless of the complainant's gender, age, disability, ethnicity or social status;
- Confidential where necessary, and always for SEA/SH-related complaints;
- Survivor-centered for SEA/SH cases, prioritizing the safety, dignity and informed consent of survivors;
- Responsive and timely, in accordance with the timeframes set out in Section 7.8;
- Culturally appropriate, recognizing and, where suitable, working alongside existing traditional and community-level dispute resolution mechanisms;
- Open to anonymous complaints, without requiring disclosure of the complainant's identity;
- Protective of complainants from retaliation, victimization or any adverse consequence for raising a grievance in good faith;
- Subject to an appeals process, including ultimate access to arbitration or the courts of law, which this GRM does not replace or restrict.

6. GRM Structure

Consistent with the ZWSSGC Programme ESHSRIM Operations Manual, grievances are handled through a hierarchical, multi-tier structure. Grievances should be resolved at the lowest possible level; escalation to a higher level occurs only where a grievance cannot be resolved, or where the complainant is dissatisfied with the outcome at the level below.

6.1 Level 1: LpWSC Site/Community Level

The first level of grievance resolution is at the project site, community, or district level within LpWSC's operational area.

Composition

- Environmental and Social Management Specialist (Chairperson)
- Occupation and Health specialist (Vice Chairperson)
- District Manager or Branch Manager ;
- Contractor's Project/Site Manager (where the grievance relates to an active works contract);

- Environmental and Social Officer (Contractor), where applicable;
- Grievance Focal Point Person (Secretary);
- Community Member Representative;
- Gender Representative.

Responsibilities

- Receive and register grievances arising within the district/site;
- Acknowledge complaints within 2 working days;
- Investigate and resolve straightforward grievances within 7–14 working days;
- Immediately refer any SEA/SH complaint to the designated SEA/SH Focal Person without attempting investigation (see Section 8);
- Refer unresolved or complex grievances to Level 2 (LpWSC Head Office/CU Level).

6.2 Level 2: LpWSC Commercial Utility (Head Office) Level

Complex or unresolved grievances from Level 1 are escalated to the LpWSC Head Office (Commercial Utility/CU) level.

Composition

- Project Coordinator / Programme Implementation Unit Lead (Chairperson);
- Environmental and Social Management Specialist (ESMS) (Secretary);
- Health, Safety and Quality Specialist;
- Head of Human Resources or Legal Counsel;
- Representative from the Ministry of Community Development and Social Services (where relevant to the case);
- Representative from the Ministry of Local Government and Rural Development (where relevant to the case);
- Representative from the Provincial Water Supply and Sanitation office (where relevant to the case).

Responsibilities

- Review escalated grievances from Level 1;
- Conduct or commission further investigation as required;
- Engage affected parties and relevant LpWSC departments;
- Resolve grievances within 21 working days of escalation;
- Maintain the consolidated LpWSC grievance database (see Section 11);
- Refer unresolved grievances to Level 3 (National PCU Level).

6.3 Level 3: National Committee (Programme Coordination Unit) Level

Grievances that cannot be resolved at LpWSC (CU) level, or that are submitted directly to the Ministry of Water Development and Sanitation (MWDS), are addressed by the National Committee at the Programme Coordination Unit (PCU).

Composition

- PCU Programme Coordinator (Chairperson);
- Social Risk Management Specialist (Secretary);
- Environmental Risk Management Specialist (Vice Secretary);
- Representative from the Human Resource and Administration Department;
- Health, Safety and Quality Specialist.

Responsibilities

- Receive, record and ensure that all Programme-related grievances referred from CU level are addressed accordingly;
- Invite relevant departments, units, or LpWSC representatives to participate in meetings or investigations as needed;
- Resolve grievances within the timeframe set out in Section 7.8;
- Refer unresolved grievances to the Steering Committee (Level 4).

6.4 Level 4: Steering Committee (Final Appeal Level)

The Steering Grievance Committee is the final level of the GRM structure, considering appeals from the National (PCU) level. Where the Steering Committee's decision does not resolve the dispute to the complainant's satisfaction, the matter may be referred to arbitration or the courts of law.

6.5 Level 5: Arbitration and Courts of Law

Complainants retain the right to pursue judicial or other legal remedies at any stage of the GRM process; use of the GRM is voluntary and does not preclude or delay access to formal legal channels. Where the Steering Committee is unable to resolve a dispute, the matter shall be referred to arbitration within 30 calendar days, conducted pursuant to the Arbitration Act No. 19 of 2000 and in accordance with the arbitration procedures published by the Chartered Institute of Arbitrators, Zambia Branch, or to the courts of law, at the complainant's election.

6.6 Traditional and Community-Level Mechanisms

Local communities in LpWSC's operational districts have existing traditional and cultural grievance resolution mechanisms. Where appropriate and with the consent of the parties involved, disputes at the community level may first be addressed using these mechanisms, without prejudice to a complainant's right to access the formal GRM structure described above at any time.

7. GRM Process Flow

All complaints, regardless of the level at which they are first received, follow the process steps below.

7.1 Step 1: Submission of Grievance

Complaints may be submitted through any of the following channels:

- Suggestion/complaint boxes at LpWSC district and head offices;
- Toll-free telephone hotline;
- Email;
- SMS/WhatsApp;
- Community meetings and sensitization sessions;
- Written letters;
- Verbal reporting to LpWSC project staff, District Managers or Community Liaison Officers;
- Contractor site offices;
- Traditional and community leadership structures (Zone Leaders, Chiefs, Headpersons), who shall forward the complaint to the nearest LpWSC Grievance Focal Point;
- The digital GRM platform (once operationalized, per Section 14).

Anonymous complaints shall be accepted at all channels; the complainant is never required to disclose their identity to have a grievance registered and addressed.

7.2 Step 2: Registration and Logging

All grievances shall be recorded in the LpWSC Grievance Register (Appendix 8) at the point of receipt, capturing: a unique reference number; date and time received; complainant name/contact (optional); nature and category of the grievance; location/district; the officer responsible; and the current status of the complaint.

7.3 Step 3: Acknowledgement

Acknowledgement of receipt shall be provided to the complainant within 2 working days, through the complainant's preferred method of communication: SMS, phone call, email, written acknowledgement, or verbal confirmation at a community meeting.

7.4 Step 4: Screening and Classification

Grievances shall be screened and classified into one of the following categories: Environmental; Social; Labor/Working Conditions; Community Health and Safety; Land and Property; Service Delivery (including billing and prepaid meter issues); Corruption/Fraud; SEA/SH; Discrimination; Contractor Conduct; or Other.

SEA/SH grievances shall not undergo the standard investigation procedure described in Section 7.5. Instead, they shall be immediately and confidentially referred to the designated SEA/SH Focal Person, following the referral pathway set out in Section 8.

7.5 Step 5: Investigation and Resolution

For all grievances other than SEA/SH cases, the responsible committee at the relevant level shall:

- Investigate the complaint, including site visits and interviews as necessary;
- Consult relevant parties, including the complainant, LpWSC staff, and contractors where applicable;
- Identify appropriate corrective actions;
- Agree on resolution measures;
- Document the investigation findings and proposed resolution using the Grievance Investigation Form (Appendix 2).

7.6 Step 6: Communication of Resolution

The complainant shall be informed of the investigation findings, the proposed resolution, any corrective actions to be taken, and their right to appeal if dissatisfied with the outcome.

7.7 Step 7: Closure

A grievance shall only be closed after: the agreed resolution has been implemented; the complainant has confirmed satisfaction with the outcome, where this can be established; and closure has been documented and signed using the Grievance Closure Form (Appendix 4). Where a complainant cannot be reached despite reasonable attempts, or declines to confirm satisfaction, this shall be recorded accordingly rather than assumed.

7.8 Timeframes

Activity	Timeline
Receipt and registration	Same day
Acknowledge grievance	Within 2 working days
Initial assessment / screening and classification	Within 5 working days
Resolution at Level 1 (Site/Community Level)	7–14 working days

Activity	Timeline
Resolution at Level 2 (LpWSC CU/Head Office Level)	Within 21 working days
Resolution at Level 3 (National PCU Level)	Within 30 working days
Appeal review (Steering Committee)	Within 14–30 working days
Closure and documentation	Within 5 working days of resolution
Referral to arbitration (if unresolved by Steering Committee)	Within 30 calendar days
SEA/SH complaint referral to qualified service provider	Within 24 hours of receipt

8. Special Procedures for SEA/SH Complaints

For World Bank-financed projects, SEA/SH complaints shall not be investigated through the standard grievance mechanism described in Section 7. The GRM shall only record that a complaint was received and referred, while ensuring confidentiality and survivor-centered handling through approved service providers and referral pathways.

8.1 Guiding Principles

- Survivor-Centered Approach — respect the survivor's wishes, rights and choices; prioritize safety, dignity and well-being;
- Confidentiality — information is shared strictly on a need-to-know basis; no personal details are disclosed without informed consent;
- Non-Discrimination — services are provided regardless of age, gender, disability, ethnicity, religion or social status;
- Safety — measures are taken to protect survivors from retaliation, intimidation or further harm;
- Informed Consent — referrals and actions are undertaken only with the survivor's informed consent, except where mandatory reporting requirements apply (e.g., child protection).

8.2 Reporting Channels

SEA/SH complaints may be reported through: the LpWSC GRM (any channel in Section 7.1); Community Liaison Officers; the ESMS or site Environmental and Social Officers; Contractor Focal Persons; the dedicated SEA/SH Focal Person; suggestion/complaint boxes; the telephone hotline; email; or community leaders (with the survivor's consent).

8.3 SEA/SH Referral Process

Step 1: Receipt of Complaint

- Listen without judgment; do not investigate or seek detailed evidence;
- Record only the minimum information necessary;
- Immediately refer the case to the designated SEA/SH Focal Person.

Step 2: Immediate Safety Assessment

The SEA/SH Focal Person assesses immediate medical needs, safety and security risks, risk of retaliation, and the need for urgent shelter or protection.

Step 3: Obtain Informed Consent

Before any referral, the Focal Person explains available services and confidentiality arrangements, obtains informed consent using the Consent Form (Appendix 5), and respects the survivor's decision if they decline services.

Step 4: Referral to Service Providers

Service Required	Referral Institution
Medical Care	Health Facility/Hospital (nearest facility per district — see Appendix 10)
Psychosocial Support	Counsellor / Social Worker
Legal Support	Legal Aid Service
Police Services	Victim Support Unit (VSU), Zambia Police Service
Child Protection	Department of Social Welfare
Shelter/Protection	Approved Safe Shelter Provider

Step 5: Follow-Up

The SEA/SH Focal Person confirms the survivor accessed services, provides additional referrals if needed, monitors safety concerns, and maintains confidentiality throughout.

Step 6: Case Closure

The case is closed only after required referrals have been completed, the survivor indicates no further assistance is required, and follow-up actions have been concluded.

8.4 Roles and Responsibilities for SEA/SH Cases

Role	Responsibility
SEA/SH Focal Person	Receives and manages SEA/SH reports; ensures confidentiality; facilitates referrals; maintains secure records; coordinates follow-up support.
GRM Committee (all levels)	Receives only anonymized case information; tracks the number and status of SEA/SH cases; ensures the referral pathway is functioning; does not conduct direct investigation of SEA/SH incidents.
Contractors and Workers	Report SEA/SH incidents through designated channels; comply with the Code of Conduct; cooperate with authorized investigations where appropriate.
LpWSC Project Implementation Unit	Ensures availability of referral services; trains staff and contractors; monitors effectiveness of SEA/SH measures; reports aggregated data without personal identifiers.

8.5 Confidential Record-Keeping

SEA/SH records shall: be stored separately from general GRM records; be accessible only to authorized personnel; exclude unnecessary personal information; be password-protected (electronic records); and be kept in locked cabinets (hardcopy records).

8.6 SEA/SH Monitoring Indicators

Indicator	Means of Verification
Number of SEA/SH focal persons trained	Training reports
Number of workers inducted on SEA/SH	Attendance registers
Percentage of SEA/SH complaints referred within 24 hours	Referral records
Availability of referral pathway information at project sites	Site inspections

Indicator	Means of Verification
Number of SEA/SH awareness sessions conducted	Activity reports

9. Appeal Procedure

A complainant who is dissatisfied with the resolution or action taken at any level of the GRM has the right to appeal to the next level within fourteen (14) working days of being notified of the outcome. Failure to lodge an appeal within this period shall render the original decision final at that level, without prejudice to the complainant's right to pursue arbitration or judicial remedies at any time, as described in Section 6.5.

Appeals shall be submitted using the Appeal Form (Appendix 9) to the level above the one that issued the decision being appealed, and shall be reviewed and responded to within the timeframe set out in Section 7.8.

10. Roles and Responsibilities (Consolidated)

Role	Responsibility
LpWSC Managing Director's Office	Overall oversight and accountability for the GRM; approves escalation of significant cases and any external communication.
Project Coordinator / PIU Lead (LpWSC)	Chairs the Level 2 (CU) Grievance Committee; oversees GRM implementation across all districts.
Environmental and Social Management Specialist (ESMS)	Secretary of the Level 2 Grievance Committee; day-to-day coordination of GRM implementation, case tracking and reporting.
District/Branch Managers	Chair Level 1 Grievance Committees; local supervision and first-level grievance resolution.
Community Liaison Officers / Grievance Focal Points	Receive, register and facilitate resolution of grievances at community/site level; maintain the local grievance log.
SEA/SH Focal Person	Manages all SEA/SH complaints through the confidential referral pathway (Section 8); does not participate in standard grievance investigations to avoid conflicts of interest.
Health, Safety and Quality Specialist	Supports investigation of health and safety-related grievances; member of Level 2 and Level 3 committees.
Contractors/Consultants/Suppliers	First response to site-level complaints relating to their works; compliance with the Code of Conduct and cooperation with GRM investigations.
Monitoring and Evaluation Officer	Tracks GRM performance indicators; compiles data for monthly and quarterly reporting.
PCU (National Level)	Resolves grievances escalated from CU level; coordinates with LpWSC and other Commercial Utilities on Programme-wide GRM performance.
Steering Committee	Final appeal level within the GRM structure prior to arbitration or courts of law.

11. Monitoring and Reporting

11.1 Key Indicators

- Number of grievances received (by category, district and level);
- Number and percentage of grievances resolved within the stipulated timeframe;
- Number of grievances pending, and their age (days open);

- Number of grievances escalated/referred between levels;
- Number of appeals received and resolved;
- Number of anonymous complaints received;
- Number of SEA/SH complaints received and referred within 24 hours (aggregated, non-identifying);
- Average resolution time by category and level;
- Complainant satisfaction rate with resolution, where recorded.

11.2 Reporting Frequency

- Monthly site/district-level GRM summary reports (Appendix 7), compiled by Community Liaison Officers and submitted to the ESMS;
- Quarterly consolidated LpWSC GRM reports, incorporated into the Programme's broader ESMP monitoring reports to senior management and the Programme Implementing Agency;
- Annual safeguard performance reports, summarizing GRM trends, systemic issues identified, and corrective actions taken at the institutional level.

12. Awareness, Disclosure and Capacity Building

- GRM procedures shall be publicized in local languages (including Bemba, as widely spoken in Luapula Province) through community meetings, radio announcements, and printed materials;
- GRM contact details (hotline number, email, physical addresses) shall be displayed prominently at all LpWSC district offices, active project sites, and, where feasible, on customer bills/notices;
- Community sensitization meetings shall be conducted prior to commencement of works in each area, and periodically thereafter, per LpWSC's Stakeholder Engagement Plan (SEP);
- LpWSC staff, contractors and community liaison focal points shall receive training on grievance handling procedures, the SEA/SH referral pathway, and use of the case management tools in the Appendices, prior to their assuming GRM-related responsibilities and at least annually thereafter.

13. Confidentiality and Data Protection

All grievance records shall be securely stored, with personal information protected and access restricted to authorized personnel only, in compliance with the Data Protection Act No. 3 of 2021. SEA/SH records shall be maintained separately from the general Grievance Register, with the enhanced protections set out in Section 8.5. Aggregated, non-identifying data only shall be used in monitoring reports and shared with the Programme Implementing Agency or World Bank.

14. Digitization of the GRM

Consistent with LpWSC's Stakeholder Engagement Plan, which identifies user specification for digitization of the grievance redress mechanism as a priority activity, LpWSC intends to progressively transition GRM intake, case tracking and reporting from the paper-based tools in the Appendices to a digital platform (e.g., a database or mobile-accessible system integrated with the toll-free hotline and SMS channel). Pending full digitization, this document's paper-based Appendices remain the authoritative case-management tools and shall continue to be used in parallel with any digital system during the transition period, with the Grievance Register (Appendix 8) serving as the single source of truth for case status.

- Phase 1 (Pilot): User specification, design, and piloting of the digital GRM platform in a subset of districts;
- Phase 2 (Roll-out): Sensitization of staff and communities on the digital platform, and phased roll-out across all five districts;

- Phase 3 (Full Operation): Full operationalization of the digital GRM, with the paper-based register retained as a backup and for areas with limited connectivity.

15. Review and Update of the GRM

This GRM shall be reviewed at least annually, and immediately following: (i) any significant change in the scope or scale of LpWSC's Programme activities; (ii) identification of a systemic weakness through monitoring or audit; (iii) a serious or high-profile grievance (including any SEA/SH case) revealing a gap in current procedures; or (iv) changes to applicable Zambian law or World Bank ESF requirements. Updates shall be documented in the Document Control table at the front of this document.

Appendices

The following appendices provide the standard case-management tools for the LpWSC GRM. They should be printed and made available at all LpWSC district offices, project sites and contractor offices, and retained (securely, per Section 13) as the official record of grievance handling.

Appendix 1: Grievance Registration Form

Field	Details
Programme/Project Name	[Insert PforR Programme Name]
District	☐ Mansa ☐ Samfya ☐ Mwense ☐ Nchelenge ☐ Kawambwa
Project Location/Site	
Grievance Reference Number	
Date Received	
Time Received	
Received By (Name/Position)	
Channel Used	☐ Suggestion box ☐ Hotline ☐ Email ☐ SMS/WhatsApp ☐ Community meeting ☐ Letter ☐ Verbal ☐ Contractor office ☐ Traditional leader ☐ Digital platform
Complainant Name (Optional)	
Gender	☐ Male ☐ Female ☐ Other
Age Group	☐ Under 18 ☐ 18–35 ☐ 36–60 ☐ Above 60
Phone Number	
Physical Address/Village/Zone	
Preferred Method of Communication	☐ Phone Call ☐ SMS ☐ Email ☐ In-Person ☐ Other: _______________
Would you like to remain anonymous?	☐ Yes ☐ No
Date Incident Occurred (if applicable)	
Location of Incident	
Type of Grievance	☐ Environmental ☐ Health & Safety ☐ Labour/Working Conditions ☐ Community Health & Safety ☐ Land/Property ☐ Service Delivery/Billing ☐ Prepaid Meter Issue ☐ Corruption/Fraud ☐ SEA/SH ☐ Discrimination ☐ Other: _______________
Description of Grievance	(What happened, where, when, and persons involved)
Expected Resolution	(What action would the complainant like to see taken?)
Supporting Evidence Attached?	☐ Yes ☐ No — If yes: ☐ Photographs ☐ Documents ☐ Witness Statements ☐ Other: _______________
Contains Sensitive Information?	☐ Yes ☐ No — If yes: ☐ SEA/SH-related ☐ Child Protection ☐ Personal Data ☐ Other
--- GRM COMMITTEE USE ONLY ---	
Complaint Category (assigned)	
Assigned Officer	

Field	Details
Date Assigned	
GRM Level Assigned	☐ Level 1 (Site) ☐ Level 2 (CU/Head Office) ☐ Level 3 (PCU) ☐ Level 4 (Steering Committee)
Target Resolution Date	
Status	☐ Open ☐ Under Investigation ☐ Resolved ☐ Referred ☐ Closed
Receiving Officer Signature / Date	

Important Notice: All grievances will be treated fairly, transparently and confidentially. Complaints may be submitted anonymously. SEA/SH-related grievances will be handled using survivor-centered and confidential procedures per Section 8 of this GRM.

Appendix 2: Grievance Investigation Form

This form supports structured, auditable investigation of non-SEA/SH grievances, improving traceability compared to free-text investigation notes.

Field	Details
Grievance Reference Number	
Investigating Officer(s)	
GRM Level	☐ Level 1 ☐ Level 2 ☐ Level 3 ☐ Level 4
Date Investigation Commenced	
Parties Consulted (names/roles)	
Site Visit Conducted?	☐ Yes ☐ No — Date: _______
Summary of Evidence Reviewed	
Root Cause Identified	
Was the grievance substantiated?	☐ Fully ☐ Partially ☐ Not substantiated ☐ Inconclusive
Proposed Resolution/Corrective Action	
Responsible Party for Implementing Resolution	
Target Completion Date for Resolution	
Escalation Recommended?	☐ Yes, to Level ___ ☐ No
Reason for Escalation (if applicable)	
Investigating Officer Signature/Date	
Reviewing Supervisor Signature/Date	

Appendix 3: Corrective Action Tracker

Use this tracker to follow corrective actions through to completion after a grievance investigation, rather than relying on the investigation form alone — this prevents agreed actions from being lost once a case moves to 'resolved' status.

Grievance Ref. No.	Corrective Action	Responsible Person	Due Date	Status	Date Completed	Verified By

Appendix 4: Grievance Closure Form

Field	Details
Grievance Reference Number	
Date Grievance Received	
Date Closed	
Complainant Name (if disclosed)	
District/Village/Zone	
Type of Grievance	
Brief Description of Grievance	
Investigation Findings	
Corrective Actions Implemented	
Date Corrective Actions Completed	
Final Resolution Provided	
Resolution Communicated to Complainant?	☐ Yes ☐ No — Date: _______ Method: ☐ Phone ☐ SMS ☐ Email ☐ Meeting ☐ Letter ☐ Other
Was the complainant satisfied with the resolution?	☐ Yes ☐ No ☐ No Response Received
Comments from Complainant	
Grievance Status	☐ Closed – Resolved ☐ Closed – Referred to Appropriate Authority ☐ Closed – No Further Action Required ☐ Closed – Complainant Unreachable ☐ Other
Reason for Closure	
Case Officer Name/Signature/Date	
GRM Committee Chairperson Name/Signature/Date	
Complainant Acknowledgement (Name/Signature or Thumbprint/Date)	

Confidentiality Note: All grievance records shall be maintained securely and confidentially. Sensitive complaints, including SEA/SH cases, shall be handled through survivor-centered referral mechanisms per Section 8 and shall not include personal or identifying information in general grievance records. Only authorized personnel may access such records.

Appendix 5: SEA/SH Referral and Informed Consent Form

CONFIDENTIAL — Store separately from the general Grievance Register. Access restricted to the SEA/SH Focal Person and authorized personnel only.

Field	Details
Case Reference Number (SEA/SH-specific series)	
Date/Time Received	
Received By (Focal Person Name)	
Immediate Safety Concerns Identified?	☐ Yes ☐ No — Action taken: _______________
Immediate Medical Needs Identified?	☐ Yes ☐ No — Referral made: _______________
Services Explained to Survivor?	☐ Medical ☐ Psychosocial ☐ Legal ☐ Police/VSU ☐ Child Protection ☐ Shelter
Informed Consent Obtained?	☐ Yes ☐ No (if No, record survivor's decision and respect it)
Services Survivor Consented To	
Referral Institution(s) Contacted	
Date of Referral	
Follow-Up Confirmed Services Accessed?	☐ Yes ☐ No — Date: _______
Ongoing Safety Concerns?	☐ Yes ☐ No — Details: _______________
Case Status	☐ Open ☐ Referred ☐ Follow-up in progress ☐ Closed
Date Closed	
Closure Basis	☐ Required referrals completed ☐ Survivor indicates no further assistance needed ☐ Other: _______
SEA/SH Focal Person Signature/Date	

Appendix 6: GRM Process Flow Chart (Summary)

Stage	Action	Timeframe
1	Grievance/Complaint Received (verbal, written, phone, email, suggestion box, community meeting, digital platform)	Same day
2	Registration of Complaint (Grievance Register + reference number issued)	Same day
3	Acknowledgement of Receipt	Within 2 working days
4	Screening and Classification (General / Urgent / SEA-SH)	Within 5 working days
4a	IF SEA/SH → Immediate confidential referral to SEA/SH Focal Person (Section 8)	Within 24 hours
4b	IF General/Urgent → Investigation and Assessment by GRM Committee/Responsible Officer	Per Section 7.8
5	Proposed Resolution Developed	Per Section 7.8
6	Communication of Resolution to Complainant	Per Section 7.8
7	Is the Complainant Satisfied? → Yes: Implement Resolution → Case Closed	—
7a	Is the Complainant Satisfied? → No: Appeal/Escalation to Next Level (Section 9)	Within 14 working days of notification
8	Review by Next-Level Committee → Decision Issued	Per Section 7.8
9	Case Closed, Records Archived and Included in Reports	Within 5 working days of resolution

Appendix 7: Monthly GRM Reporting Template

Field	Details
Programme/Project Name	
Implementing Entity	LpWSC
Reporting Period	
District(s)	
Prepared By	
Date of Report	

Grievance Statistics

Indicator	Current Month	Cumulative to Date
Number of grievances received		
Number of grievances acknowledged		
Number of grievances resolved		
Number of grievances pending		
Number of grievances referred/escalated		
Number of appeals received		
Number of appeals resolved		
Number of anonymous complaints		
Number of SEA/SH complaints received*		

**Only report the number of SEA/SH complaints received and referred. Do not include personal details or case information.*

Grievance Breakdown by Category

Category	Received	Resolved	Pending
Environmental Issues			
Occupational Health and Safety			
Community Health and Safety			
Labour and Working Conditions			
Land and Property Issues			
Service Delivery / Billing / Prepaid Meter Issues			
Stakeholder Engagement Issues			
Corruption/Fraud			

Category	Received	Resolved	Pending
SEA/SH Cases*			
Other			
Total			

Analysis, Challenges and Recommendations

- Major grievances raised (issue, frequency, root cause, corrective action);
- Challenges encountered in grievance management during the reporting period;
- Lessons learned and recommendations for improving GRM performance;
- GRM awareness activities conducted (activity, target audience, date, number of participants, means of verification).

Monitoring Indicators

Indicator	Target	Actual	Status
Grievances acknowledged within stipulated timeframe (%)	100%		
Grievances resolved within stipulated timeframe (%)	80%		
Number of stakeholder sensitization meetings conducted			
Number of GRM awareness materials distributed			
Number of workers trained on GRM procedures			

Approvals

Role	Name	Signature	Date
Prepared By (ESMS)			
Reviewed By			
Approved By			

Appendix 8: Grievance Register (Case Management Log)

This register is the single source of truth for all grievances received across all LpWSC districts and GRM levels. It should be maintained continuously (electronically where possible) by the ESMS, with district-level extracts maintained by each Community Liaison Officer for their area. Sample entry provided; blank rows follow for ongoing use.

Ref. No.	Date Received	District	Complainant (or Anon.)	Category	GRM Level	Assigned Officer	Status	Date Acknowledged	Target Resolution Date
GRM-2026-001	05/07/2026	Mansa	Anonymous	Environmental (dust)	Level 1	C. Liaison Officer	Closed	07/07/2026	19/07/2026

Status options: Open, Under Investigation, Resolved, Referred, Closed. This register should be reviewed and reconciled against Appendices 1–4 and 7 monthly to ensure no case is dropped between forms.

Appendix 9: Appeal Form

Field	Details
Original Grievance Reference Number	
Date of Original Decision Being Appealed	
GRM Level that Issued the Original Decision	☐ Level 1 ☐ Level 2 ☐ Level 3
Appellant Name (Optional)	
Contact Details	
Reason for Appeal	
Desired Outcome	
Date Appeal Received	
Received By	
Appeal Deadline Check (within 14 working days of original decision?)	☐ Yes — proceed ☐ No — record reason for exception, if any
Referred to GRM Level	☐ Level 2 ☐ Level 3 ☐ Level 4 (Steering Committee)
Appeal Outcome	
Date Appeal Resolved	
Further Escalation Requested? (arbitration/courts)	☐ Yes ☐ No
Reviewing Officer Signature/Date	

Appendix 10: Community Liaison and Grievance Contact Directory

To be completed and displayed at every LpWSC district office and active project site, and reviewed at least quarterly.

District	GRM Focal Point / Community Liaison Officer	Telephone	Email	Nearest Health Facility (for SEA/SH referral)	Nearest Police/VSU
Mansa					
Samfya					
Mwense					
Nchelenge					
Kawambwa					
LpWSC Head Office / ESMS					
Toll-Free Hotline (all districts)					

Appendix 11: GRM Committee Membership Register

This register records the named individuals currently serving on each GRM committee level, to ensure the structure in Section 6 is not just a policy on paper but reflects real, contactable people at all times. Update immediately upon any staff change.

GRM Level	Role on Committee	Name	Position/Organization	Contact	Date Appointed
Level 1 (Site — Mansa)	Chairperson				
Level 1 (Site — Samfya)	Chairperson				
Level 1 (Site — Mwense)	Chairperson				
Level 1 (Site — Nchelenge)	Chairperson				
Level 1 (Site — Kawambwa)	Chairperson				
Level 2 (LpWSC CU/HQ)	Chairperson				
Level 2 (LpWSC CU/HQ)	Secretary (ESMS)				
SEA/SH Focal Person (LpWSC-wide)	Focal Person				