



LUAPULA WATER SUPPLY AND SANITATION COMPANY LIMITED

GRIEVANCE REDRESS MECHANISM (GRM)

World Bank-Financed Program-for-Results (PforR) Project

Procedures for Receiving, Registering, Investigating, Resolving and Appealing Project-Related Grievances

Applies to: Mansa, Samfya, Mwense, Nchelenge and Kawambwa Districts

Applicable to: Communities, Customers, LpWSC Staff, Contractors, Consultants and Suppliers

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1. INTRODUCTION AND PURPOSE

1.1 Background

Luapula Water Supply and Sanitation Company Limited (LpWSC) is the Commercial Utility responsible for water supply and sanitation services in Mansa, Samfya, Mwense, Nchelenge and Kawambwa districts of Luapula Province. LpWSC is implementing activities under a World Bank-financed Program-for-Results (PforR) Programme, forming 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 the grievance management structure 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 — together with good operational practice from peer Commercial Utilities.

1.2 Purpose

The GRM provides Project-Affected Persons, 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. It aims to resolve grievances promptly, fairly and effectively; strengthen accountability and transparency; enhance community and customer trust; prevent escalation of conflicts; and ensure compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS10 (Stakeholder Engagement and Information Disclosure) and ESS2 (Labor and Working Conditions).

1.3 Objectives

- i. Provide clear procedures for receiving, registering and resolving complaints.
- ii. Ensure fair, transparent and culturally appropriate grievance handling.
- iii. Protect complainants from retaliation, victimization or reprisal.
- iv. Ensure confidentiality where required, particularly for sensitive complaints.
- v. Promote timely resolution of grievances within clearly defined timeframes.
- vi. Maintain accurate, secure records for monitoring, reporting and continuous improvement.
- vii. Provide a survivor-centered referral pathway for SEA/SH complaints, consistent with World Bank requirements.
- viii. Support the progressive digitization of grievance intake, tracking and reporting.

2. SCOPE AND GUIDING PRINCIPLES

2.1 Scope

This GRM applies to all LpWSC Programme activities across its five operational districts, and covers:

- Community grievances arising from construction/installation activities (pipeline works, borehole drilling, civil works, solar PV installation);
- Customer grievances, including 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 pathway in Section 5;
- Health and safety concerns, including matters relating to the Emergency Preparedness and Response Plan;
- Contractor, consultant and supplier-related complaints;
- Service delivery concerns, including water quality, supply continuity, and customer service.

2.2 Guiding Principles

The GRM shall be:

- Accessible to all stakeholders, including vulnerable and disadvantaged groups;
- Transparent and fair, with publicly documented procedures and timeframes;
- Free of charge to the complainant at every stage;
- Non-discriminatory, regardless of gender, age, disability, ethnicity or social status;
- Confidential where necessary, and always for SEA/SH-related complaints;
- Survivor-centered for SEA/SH cases, prioritizing safety, dignity and informed consent;
- Responsive and timely, in accordance with the timeframes in Section 4.4;
- Culturally appropriate, working alongside existing traditional and community-level mechanisms where suitable;
- Open to anonymous complaints, without requiring disclosure of identity;
- Protective of complainants from retaliation, victimization or any adverse consequence for raising a grievance in good faith;
- Subject to a right of appeal, including ultimate access to arbitration or the courts of law, which this GRM does not replace or restrict.

3. GRM STRUCTURE — FIVE LEVELS

Grievances are handled through a hierarchical, multi-tier structure, consistent with the ZWSSGC Programme's ESHSRIM Operations Manual. 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.

Level	Name	Composition / Notes	Resolution Timeframe
Level 1	Site / Community Level	ESMS (Chair), OHS Specialist (Vice Chair), District/Branch Manager, Contractor's Site Manager, Grievance Focal Point (Secretary), Community & Gender Representatives	7–14 working days
Level 2	LpWSC Head Office (Commercial Utility) Level	Project Coordinator/PIU Lead (Chair), ESMS (Secretary), Health/Safety/Quality Specialist, Head of HR or Legal Counsel, relevant Government representatives	Within 21 working days
Level 3	National Committee (Programme Coordination Unit) Level	PCU Programme Coordinator (Chair), Social Risk Management Specialist (Secretary), Environmental Risk Management Specialist, HR representative, Health/Safety/Quality Specialist	Within 30 working days
Level 4	Steering Committee (Final Appeal Level)	Considers appeals from National (PCU) level	As per appeal timeframe
Level 5	Arbitration and Courts of Law	Available to the complainant at any stage; use of the GRM is voluntary and never precludes legal recourse	Arbitration within 30 calendar days if referred

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 above at any time.

4. GRM PROCESS FLOW

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

Step	Stage	Description
1	Submission	Complaint boxes, toll-free hotline, email, SMS/WhatsApp, community meetings, written letters, verbal reports to staff/District Managers/Community Liaison Officers, contractor site offices, traditional leaders, or the digital GRM platform. Anonymous complaints are always accepted.
2	Registration and Logging	Recorded in the LpWSC Grievance Register with a unique reference number, date/time, complainant details (optional), nature/category, location, responsible officer and status.
3	Acknowledgement	Provided to the complainant within 2 working days, via their preferred communication method.
4	Screening and Classification	Classified as Environmental, Social, Labour/Working Conditions, Community Health & Safety, Land/Property, Service Delivery, Corruption/Fraud, SEA/SH, Discrimination, Contractor Conduct, or Other. SEA/SH cases bypass Step 5 and go straight to the Section 5 referral pathway.
5	Investigation and Resolution	The responsible committee investigates (site visits, interviews), consults relevant parties, identifies corrective actions, and documents findings using the Grievance Investigation Form.
6	Communication of Resolution	The complainant is informed of the findings, the proposed resolution, corrective actions, and their right to appeal if dissatisfied.
7	Closure	Closed only once the resolution is implemented and the complainant's satisfaction is confirmed where possible, using the Grievance Closure Form.

4.4 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
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

5. SPECIAL PROCEDURE FOR SEA/SH COMPLAINTS

Key Principle

For World Bank-financed projects, SEA/SH complaints are never investigated through the standard grievance mechanism in Section 4. The GRM only records that a complaint was received and referred, while ensuring confidentiality and survivor-centered handling through approved service providers.

5.1 Guiding Principles

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

5.2 The Referral Process

- Receipt of Complaint** — listen without judgment; do not investigate or seek detailed evidence; record only the minimum necessary; immediately refer to the SEA/SH Focal Person.
- Immediate Safety Assessment** — the Focal Person assesses medical needs, safety/security risks, risk of retaliation, and need for urgent shelter or protection.
- Obtain Informed Consent** — available services and confidentiality arrangements are explained; consent is documented; the survivor's decision to decline services is respected.
- Referral to Service Providers** — as set out in the table below.
- Follow-Up** — the Focal Person confirms services were accessed, provides further referrals if needed, and monitors safety concerns.
- Case Closure** — only once required referrals are complete, the survivor confirms no further assistance is needed, and follow-up actions are concluded.

Service Required	Referral Institution
Medical Care	Health Facility / Hospital (nearest facility per district)
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

5.3 Confidential Record-Keeping

SEA/SH records are stored separately from general GRM records; accessible only to authorized personnel; exclude unnecessary personal information; are password-protected (electronic) and kept in locked cabinets (hardcopy). GRM Committees at all levels receive only anonymized case statistics and do not conduct direct investigation of SEA/SH incidents.

6. 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 renders the original decision final at that level, without prejudice to the complainant's right to pursue arbitration or judicial remedies at any time.

Appeals are submitted using the Appeal Form to the level above the one that issued the decision being appealed, and are reviewed and responded to within the timeframes set out in Section 4.4.

7. HOW TO RAISE A GRIEVANCE — QUICK GUIDE

- i. Report your concern through any convenient channel — a complaint box, the hotline, SMS/WhatsApp, email, a community meeting, LpWSC staff, a Community Liaison Officer, a contractor site office, or a traditional leader. You do not have to give your name.
- ii. You will receive acknowledgement within 2 working days.
- iii. Your case will be investigated and, in most cases, a decision reached within 7–14 working days at site/community level.
- iv. If you disagree with the outcome, you can appeal to the next level within 14 working days.
- v. If it's a GBV/SEA/SH concern, it goes straight to a confidential, survivor-centered pathway — not the standard process — with referral to appropriate support within 24 hours.
- vi. At any point, you retain the right to pursue arbitration or the courts of law — using the GRM is voluntary and never blocks that right.

Appendix 1: Grievance Registration Form

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 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