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## Annex 6: GRM & Complaint Form

### 1. Introduction

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EGAS and the LDCs are committed to preventing, limiting and, if necessary, remedying any adverse impacts caused by its activities on local populations and their social and physical environment.

Identifying, preventing and managing unanticipated impacts are facilitated by a grievance redress mechanism (GRM). As the World Bank's governance and anticorruption (GAC) agenda moves forward, grievance redress mechanisms (GRMs) are likely to play an increasingly prominent role in Bank-supported projects.

The GRM was designed in order to handle all grievances during the construction and operation phases. The aggrieved person has the full right to lodge his complaint anonymously. However, this might cause a challenge to inform him about any corrective procedures. Additionally, if the complaint is related to service seeking, the aggrieved person should provide full information about himself and about his residential unit.

All information about GRM will be made available on the contracting offices during the construction phase and on customer services offices during the operation phase.

### 2. GRM Objectives

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Effective grievance management helps to:

- Build trust through having a dialogue with stakeholders.
- Detect weak signal and propose solution.
- Reduce risk of conflict between the affiliate and local communities.
- Reduce risk of litigation by seeking fair solutions through mediation in the event of an established impact.
- Identify and manage unanticipated impacts of operation.
- Avoid delays to operations and additional costs.
- Avoid future impacts through analysis of weak signals.

### 3. GRM Cycle

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The grievance received via any of communication channels and tiers will follow the following cycle. The aggrieved person has the full right to submit his grievance to any of the assigned tiers to be mentioned in section 4 of this annex. The aggrieved person also has the full right to submit his grievance to any entity he prefers i.e. the Minister of Petroleum, the



Governorate ...etc. It is essential to mention that the acknowledgement of grievance should not exceed two working days.

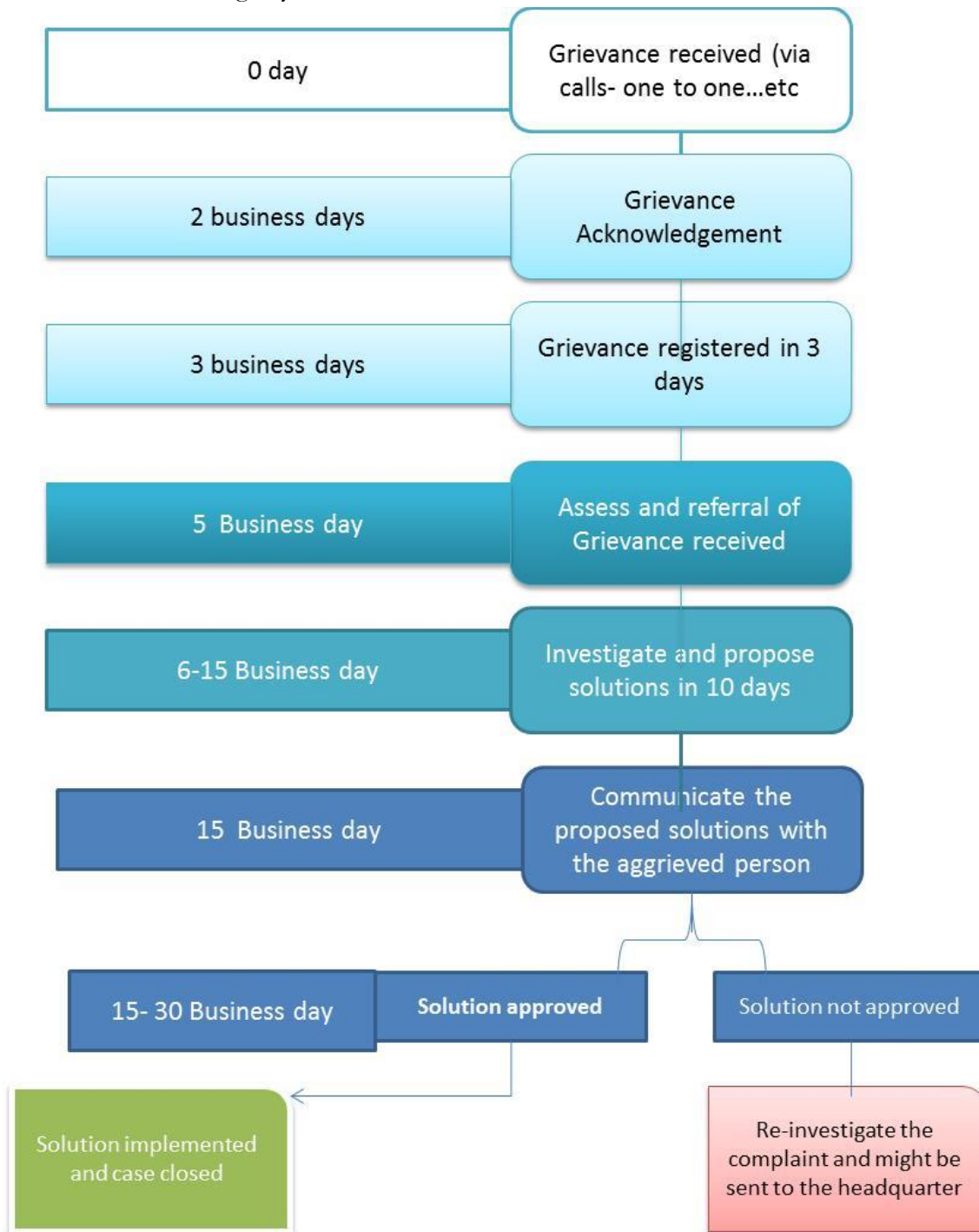


Figure 1 : Grievance cycle



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#### 4. GRM tiers

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The proposed mechanism is built on three tiers of grievances:

- 1- On the level of site engineer and the regional branch of TownGas in **Alexandria**
- 2- On the level of LDC headquarter
- 3- On the level of EGAS

The aggrieved person has the full right to immediately use tier 2 or 3 upon his convenience and there is no need to exhaust the first tier. Additionally, he can resort to any other governmental entities i.e. Ministry of Petroleum. He/ She also have the full right to bring a lawsuit without resorting to any of the grievances tiers.

- *First tier of grievances*

In order to ensure high level of responsiveness to the local communities, it is essential to ensure that a local grievance mechanism is functioning and that the communities are aware of it. TownGas has assigned a Social Development Officer (SDO) (can be more than one) who will be working closely with the assigned SDO of EGAS. It is the responsibility of TownGas SDO to ensure that the GRM system is widely known and well explained on the local level. Moreover, he/she will follow up on the complaint until a solution is reached. The turnaround time for the response/resolution should be 15 business days and the complainant should know that he/she should receive response by then.

The grievances should be presented to the following:

- The foreman working on the ground in **Alexandria** ,
- The project manager in **Alexandria** ,
- The regional department of TownGas in **Alexandria** Governorate

It is worth noting that most of the previous experience of EGAS is suggesting that complaints are usually handled efficiently and resolved on the local level. However, the management of the complaints including level of responsiveness, providing feedback and the documentation of the complaints needs to be significantly strengthened. In case the problem is not solved, the complainant may reach out to the second level of grievance.

- *Second tier of grievances:*

If the aggrieved person is not satisfied with the decision of the first tier, they can present the case to TownGas headquarter. Complaint form is presented below. SDO where they should provide resolution within 15 business days, following is the second level of grievances:

1. The Social Development Officer in TownGas headquarter will handle any complaints raised to him/her.
2. TownGas headquarter SDO should receive the unsolved problems. Thereafter, the SDO gets in contact with the petitioner for more information and forwards the complaint to the implementing entities for a solution.
3. The SDO in TownGas headquarter might communicate with the site SDO for more clarification and coordination



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4. The SDO should follow the complaints and document how they were solved within **15** business days.
  5. The SDO should update the complainant on the outcome of his/her complaint.

- *Third tier of grievances:*

If the aggrieved person is not satisfied with the decision of the SDOs of TownGas at Stage 2, they can present the case to EGAS SDO where they should provide resolution within 15 business days. The following section presents the third level of grievances:

1. The Social Development Officer in EGAS will handle all complaints. He should receive the unsolved problems. Thereafter, they get in contact with the petitioner for more information and forwards the complaint to the implementing entities for a solution.
2. The SDO should follow the complaints and document how they were solved within **15 business** days.
3. The SDO should update the complainant on the outcome of his/her complaint.

## **5. Grievance channels**

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Due to the diversity of the context in different Governorates and the socioeconomic characteristics of the beneficiaries, the communication channels to receive grievances were locally tailored to address all petitioners concerns and complaints. The following are the main channels through which grievances will be received:

1. Foremen act as the main channel for complaints. They are always available on the construction sites. However, complaints raised to him/her are mostly verbal. Thus, s/he should document all received grievances in writing form using a fixed serial number that the complainant should be informed about to be able to follow up on the complaint
2. Hotline: 129 is the hotline in TownGas.
3. The SDO within the LDC and EGAS
4. Email. [info@TownGas.com.eg](mailto:info@TownGas.com.eg)

Trustworthy people, community leaders and NGOs/CDAs will be an appropriate channel to guide petitioner about the various tiers of grievances, particularly, in rural areas. Response to grievances

Response to grievance will be through the following channels

1. The response to grievances should be through an official recognized form to ensure proper delivery to the complainant. It is the responsibility of the SDOs to ensure that complainants were informed about the results of handling their complaints.
2. Response to grievances should be handled in timely manner as mentioned above, thereby conveying a genuine interest in and understanding of the worries put forward by the community.
3. EGAS and TownGas should maintain record of complaints and results.



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## 6. Monitoring of grievances

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All grievances activities should be monitored in order to verify the process. The monitoring process should be implemented on the level of EGAS and the LDC (both in the site and in the headquarter). The following indicators will be monitored:

Means of verification and indicators
<ul style="list-style-type: none"><li>○ Number of received grievances monthly (Channel, gender, age, basic economic status of the complainants should be mentioned)</li><li>○ Type of grievance received (according to the topic of complaint)</li><li>○ Documentation efficiency</li><li>○ Time frame for acknowledgment</li></ul>
<ul style="list-style-type: none"><li>○ Number of grievances solved and closed</li><li>○ Feedback offered to the grievances</li><li>○ Number of unsolved grievances and the reasons behind not solving them</li><li>○ Time consumed to solve the problem</li><li>○ Grievances escalated to 2<sup>nd</sup> and 3<sup>rd</sup> tiers</li><li>○ Grievances escalated to court</li></ul>
<ul style="list-style-type: none"><li>○ Dissemination activities undertaken</li><li>○ Total number of brochures distributed (if any)</li><li>○ Total number of awareness meetings conducted (if any)</li></ul>

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## 7. Institutional Responsibility for the Grievances

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The entity responsible for handling grievances will mainly be the Environmental Affair Department within the implementing agency (EGAS). The Social Development Officer (SDO) working within EGAS in cooperation with the TownGas will address all grievances raised by community members. The main tasks related to grievances of the SDOs on the various levels are:

1. Raise awareness about channels and procedures of grievance redress mechanisms
2. Collect the grievances received through different communication channels
3. Document all received grievances
4. Transfer the grievance to the responsible entity
5. Follow up on how the problem was addressed and solved
6. Document, report and disseminate the outcome of received grievances
7. Ensure that each legitimate complaint and grievance is satisfactorily resolved by the responsible entity
8. Identify specific community leaders, organizations and citizen groups required to enhance the dialogue and communication through a public liaison office to avoid or limit friction and respond effectively to general concerns of the community
9. Monitoring grievance redress activities



Local Distribution Company:-----	
<b>English Complaint Form</b>	
<p>This form is tailored to be employed to handle all grievances pertaining to project activities. There are three tiers allocated to solve the complaints. The LDC site SDO, the LDC headquarter and EGAS. You have the right to submit your complaint to any of the above mentioned entities. They will respond in 15 working days.</p>	
Date:---/---/-----	Time: ---:---
<b>Aggrieved person information</b>	
Name of the customer:-----	ID Number:-----
Address:----- -----	
CRN:-----	
Name of aggrieved person:-----	
Relation to the customer:-----	
Cell phone:-----	
Summary of the complaint: ----- ----- ----- -----	
Name of aggrieved person -----	Signature -----
<b>Complaint recipient</b>	
Name of the person received the complaint-----	Signature:-----
The entity caused the complaint-----	Zone:-----
Analysis of complaint reason: ----- ----- ----- -----	
Proposed corrective procedures: ----- ----- ----- -----	
Person responsible of the corrective procedures:-----	
Signature:-----	



شركة.....

### شكوى عميل

تم إعداد نموذج الشكاوى لكي يتولى استخدامه في تقديم الشكاوى الخاصة بالمشروع. يوجد ثلاث مستويات للشكاوى وهى مسئول التنمية المجتمعية من شركة توزيع الغاز في الموقع وكذلك في المركز الرئيس والشركة المصرية القابضة للغازات الطبيعية. يحق للشاكي تقديم شكواه إلى أى من المسؤولين السابق ذكرهم وسوف يتم الرد عليه في موعد أقصاه 15 يوم عمل

التاريخ :- ...../...../..... الوقت :- :.....

### بيانات الشاكي

اسم العميل : ..... رقم قومي .....:.....

العنوان :- ..... CRN :.....

اسم مقدم الشكوي:..... صفتة:..... تليفون:.....

ملخص الشكوى :

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.....  
.....

مقدم الشكوي

الاسم:..... التوقيع :.....

### بيانات متلقي الشكوي

اسم متلقى الشكوى : ..... التوقيع:.....

الجهة المشكوي منها : ..... المنطقة :.....

تحليل أسباب الشكوى:

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.....  
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الإجراءات التصحيحية:

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اسم متخذ الاجراء التصحيحي : ..... التوقيع : .....



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## **Roles and responsibilities of EGAS and LDCs Social Development Officers**

EGAS, its subsidiary Local Distribution Companies (LDCs), and the contractors will be responsible for adopting the following procedures:

- *Compliance with Bank safeguards*
  - Preparing internal guidelines for the preparation, implementation, monitoring and reporting of social documents required by various safeguard instruments;
  - Reviewing, as applicable, ESMP and other social safeguard documents prepared by consultants to ensure compliance with relevant safeguard policies of the government and the World Bank;
  - Providing recommendations to EGAS/LDC management and other subsidiary companies accordingly and make necessary changes prior to submission of relevant social documents to the World Bank – ensure consistency in the level of proficiency and presentation of the documentation;
  - Carrying out documentation review pertaining to social compliance (including bidding documents, reviews on-site, reports from contractors etc.) throughout project implementation;
  - Coordinating and facilitating the work of consultants engaged to carry out environmental and social impact assessments and resettlement planning and external monitoring of safeguard instruments implementation;
  - Organizing the technical aspects of workshops and meetings as required, as outlined in the ESMF/RPF training and capacity building section;
  - Preparing training materials, and conducting technical training workshops to EGAS/LDC staff and project implementation agencies on social safeguards requirements.
- *Monitoring and reporting*
  - Conducting internal monitoring of the implementation of the RAP and the social component of the ESMP in matters pertaining to timely payments and the provision of temporary measures to affected persons;
  - Contributing to project progress reports pertaining to overall implementation of social requirements of the project;
- *Communication with and responsiveness to targeted communities*
  - Design community friendly grievance redress mechanism with clear and timely bound tiers and responsibilities and ensure dissemination on the local level.
  - Conducting field visits to ensure that the established grievance redress mechanisms are functioning properly and that the individual projects are implemented in a socially sustainable manner;
  - Participate in the process of disbursing compensations and keep track record of the compensation process documentation
  - Reach out to local communities, including PAPs, to raise awareness about the project and the implementation schedule.
  - Build the capacity and provide support to the field staff as needed.