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## Annex -8: 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. Grievance channels

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1. 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 GRM system should have multiple channels to receive complaints or comments from any stakeholder, whether during construction phases or operation. Complaints and



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comments can be made via email, post, fax, on the telephone or in person. The comments and complaints will be all received in writing form using a fixed serial number that the complainant should be informed about to be able to follow up on the complaint. It will be summarized and listed in a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

The following are the main channels through which grievances will be received:

2. 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
3. Hotline: 129 is the hotline in Town Gas for emergency.
4. Hotline: 19129 is the hotline in Town Gas for customers service
5. The SDOs within the LDC and EGAS
6. Complains and technical support: <http://towngas.com.eg/support/>

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.

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. Also response to grievances should be handled in timely manner. EGAS and Town Gas should maintain record of complaints and results.

#### **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 Town Gas in **Giza Governorate**.
- 2- On the level of LDC headquarter (SDOs)
- 3- On the level of EGAS (SDOs)

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 (site engineers)*

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. Town Gas has assigned a Social Development Officer (SDO) (can be more than one) who will be working closely with the site engineers. It is the responsibility of Town Gas 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



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the response/resolution should be 10 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 the project areas in **Giza**,
- The project manager.
- The regional department of Town Gas in Giza 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 Town Gas headquarter. Complaint form is presented below. SDO where they should provide resolution within 10 business days, following is the second level of grievances:

1. The Social Development Officer in Town Gas headquarter will handle any complaints raised to him/her.
2. Town Gas 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 Town Gas headquarter might communicate with the site SDO for more clarification and coordination.
4. The SDO should follow the complaints and document how they were solved within **10** 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 Town Gas at Stage 2, they can present the case to EGAS SDO where they should provide resolution within 10 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 forward the complaint to the implementing entities for a solution.
2. The SDO should follow the complaints and document how they were solved within **10 business** days.
3. The SDO should update the complainant on the outcome of his/her complaint.



## 5. GRM Cycle

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 business days.

## 6. Monitoring of grievances

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>

## 7. Institutional Responsibility for the Grievances

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 Town Gas 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



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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 10 business 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 وهي 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: ..... صفة: ..... تليفون: .....

### ملخص الشكوى :

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.....  
.....

### مقدم الشكوي

الاسم: ..... التوقيع :

### بيانات متلقي الشكوي

اسم متلقي الشكوى : ..... التوقيع:.....

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

### تحليل أسباب الشكوى:

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.....

### الإجراءات التصحيحية:

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