

GRIEVANCE REDRESS MECHANISM

FOR

REHABILITATION AND MODERNISATION OF

NKULA B AND KAPICHIRA I HYDROPOWER

STATIONS

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EXECUTIVE SUMMARY

The *Kapichira I and Nkula B Hydropower Stations Rehabilitation and Modernization Project*, implemented by EGENCO with financial support from the African Development Bank (AfDB), recognizes the critical importance of a robust and inclusive Grievance Redress Mechanism (GRM) to promote transparency, accountability, and stakeholder engagement. This GRM has been developed in alignment with Malawi's national legal framework and AfDB's 2023 Integrated Safeguards System (ISS), ensuring compliance with national and international standards.

The mechanism provides a clear, accessible, and tiered framework for managing complaints from communities, project workers, and other stakeholders. It incorporates community-level, district-level, and national-level grievance redress structures namely, the Community Grievance Redress Committee (CGRC), District GRC (DGRC), National GRC (NGRC), and Workers GRC (WGRC). The system supports diverse reporting channels including in-person, phone, WhatsApp, grievance boxes, and direct access to the PIU and AfDB. Special attention is given to sensitive issues such as Gender-Based Violence, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) through a standalone GBV/SEA/SH Action Plan.

Monitoring and evaluation are core to the GRM's design. Responsibilities are shared between the Project Implementation Unit (PIU) and an Independent Observer (Supervising Engineer), who will oversee functionality, assess trends, and report on the quality and timeliness of grievance resolution. A centralized digital grievance database will facilitate real-time tracking, documentation, and analysis. Key performance indicators (KPIs) have been established to assess responsiveness, resolution rates, user satisfaction, and system efficiency. Periodic

reporting monthly, quarterly, and annually—will be submitted to key stakeholders, including AfDB, EGENCO leadership, and relevant government ministries.

The GRM is supported by a multi-year, costed implementation plan covering operational setup, training and capacity building, community awareness, third-party monitoring, and adaptive learning. Capacity-building efforts will ensure all GRM committees are fully trained, while proactive communication strategies will raise community awareness and encourage use of the mechanism.

Ultimately, this GRM aims to ensure that all project-affected people have a safe, accessible, and responsive channel to express concerns and seek redress. Its implementation will strengthen community trust, uphold human rights, and contribute to the project's overall sustainability and development impact.

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ABBREVIATIONS AND ACCRONYMS

AfDB	African Development Bank
AGRC	Area Grievance Redress Committee

CGRC	Community Grievance Redress Committee
DGRC	District Grievance Redress Committee
EGENCO	Electricity Generation Company (Malawi) Limited
EMA	Environmental Management Act
ESCOM	Electricity Supply Corporation of Malawi Limited
ESMP	Environmental and Social Management Plan
E & S	Environment and Social
GBV	Gender-Based Violence
GoM	Government of Malawi
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
GVH	Group Village Headman
IDA	International Development Association
IEC	Information, Education and Communication
IRM	Independent Resource Mechanism
IRP	Integrated Resource Plan
ISS	Integrated Safeguard System
KPI	Key Performance Indicator
MGDS	Malawi Growth & Development Strategy
MW	Megawatt
NGRC	National Grievance Redress Committee
NGO	Non-Governmental Organization
OEM	Original Equipment Manufacturer
OS	Operational Safeguards

PIU	Project Implementation Unit
PML	Power Market Limited
SAPP	Southern African Power Pool
SDGs	Sustainable Development Goals
SE	Supervising Engineer
SEA	Sexual Exploitation and Abuse
SH	Sexual Harrasment
TA	Technical Assistance
T/A	Traditional Authority
VAC	Violence Against Children
VGRC	Village Grievance Redress Committee
EUR	Euro (Currency)

DEFINITION OF TERMS

Complainant: An individual or group with an issue, concern, problem, complaint or claim concerning the project that they want to be addressed and/or resolved.

Complaint: An issue, concern, problem or claim (perceived or actual) concerning the project that an individual or community group wants a project, company or contractor to address and resolve.

Grievance: A concern or complaint raised by an individual, a group within communities and any stakeholders affected by project operations.

Grievance Redress Mechanism (GRM): The plan describes affordable and accessible procedures for third-party settlement of disputes arising from the project; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.

Grievance Redress Committee (GRC): a committee set up at community, district and national levels to receive and handle grievances which may arise during the project implementation.

Project Operation: All activities undertaken directly by EGENCO or indirectly by service providers with financing from EGENCO such as Consulting Engineer and Contractor



ELECTRICITY GENERATION COMPANY (MALAWI) LIMITED



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1. INTRODUCTION

Electricity Generation Company (Malawi) Limited (EGENCO) is a wholly government-owned enterprise with the mandate to generate electricity for the nation. It was incorporated on 9th September 2016 as a public company under the Companies Act (Cap 46:03) and commenced operations on 1st January 2017. In compliance with Malawi's market rules, EGENCO sells all electricity it generates to Electricity Supply Corporation of Malawi Limited (ESCOM), the designated single buyer, through its transmission infrastructure.

Currently, EGENCO's total installed capacity connected to the national grid is 441.55 MW, comprising 390.15 MW from hydropower sources and 51.40 MW from diesel generators. The diesel generators are primarily operated as peaking and emergency plants.

According to the Integrated Resource Plan (IRP, 2022), the peak electricity demand in Malawi is projected to be 508MW in 2025, while the installed generation capacity is still at 441.55 MW. This deficit highlights the urgent need for both capacity expansion and system reliability improvements.

Following more than two decades of commercial operation at Nkula B and Kapichira Phase I Power Stations, the generating units have aged significantly. As a result, their availability and efficiency can no longer be guaranteed. Frequent equipment downtimes caused by mechanical failures in turbines, generators, and unit control systems are increasingly common. Moreover, obsolescence of spare parts due to technological advancements has hindered effective maintenance, contributing to plant inefficiencies and reduced reliability.

In response to these challenges, EGENCO, through the Ministry of Finance and Economic Affairs, has secured funding from the African Development Bank (AfDB) to implement a rehabilitation and modernization project. This project will target turbines, generators, and control systems at Kapichira Falls and Nkula Falls Hydropower Stations. The modernization is expected to extend the useful life of the equipment and significantly improve operational

efficiency, system reliability, safety, data management, and overall availability of the power plants.

The successful completion of the project is expected to increase the quality and quantity of power supplied to the national grid. This will also support regional power trade through the interconnected Southern African Power Pool (SAPP) network. Furthermore, the project will enable diesel plants to revert to their original function as peaking plants, thereby reducing operational costs. It is anticipated that the project will also create employment opportunities for Malawians during the implementation phase and potentially beyond.

The total project implementation period is estimated at 21 months, 6 months for Kapichira and 15 months for Nkula, excluding the time required for manufacturing and delivery of parts, which may take between 10 to 12 months. The project cost is approximately EUR 12 million for Nkula and EUR 4.5 million for Kapichira.

2. PURPOSE OF THE GRM

The implementation of infrastructure development projects usually generates dramatic changes for communities. While change may lead to opportunities for some, it may put others at risk despite project efforts to be socially and environmentally responsible or genuine attempts to engage communities and create project safeguards. It is necessary, therefore, for the project to provide an environment for communities and/or individuals to channel and resolve their grievances.

The absence of such an environment can lead affected persons or communities to seek redress through alternative, and sometimes disruptive, means such as street protests, litigation, or exposure through the local and international media. In other cases, affected communities may feel powerless to act, while their unresolved, ignored, or scorned grievances accumulate over time, eventually erupting into intractable community opposition. The costs of ignoring such disputes or responding too late are high leading to project delays or derailed

due to unresolved grievances over land, water, or labour, particularly where communities are heavily involved in implementation.

Grievance Redress Mechanisms are therefore critical for ensuring that grievances, whether from communities, workers, or other stakeholders, are captured and resolved as early as possible. They serve as a tool to prevent and address concerns, reduce risk, and support broader processes that lead to positive social change.

The Electricity Generation Company (Malawi Limited) (EGENCO) and the project financier, the African Development Bank (AfDB) are committed to addressing and resolving grievances, disputes, and conflicts that may arise in the course of implementing the Rehabilitation and Modernization of Kapichira I and Nkula B Hydropower Stations. EGENCO has developed this Grievance Redress Mechanism (GRM) as a formal recourse for situations in which stakeholders may be aggrieved by project activities or impacts.

This GRM provides a platform for project-affected persons and workers to express their concerns and obtain timely and fair remedies. It also promotes constructive relationships between communities, workers, and project implementers. The mechanism has been developed in alignment with the AfDB's Integrated Safeguards System (ISS, 2023), including Operational Safeguards on Environmental and Social Assessment (OS1), Labour and Working Conditions (OS2), and Stakeholder Engagement and Disclosure (OS10), as well as relevant national legal provisions and the project's Stakeholder Engagement Plan (SEP). The GRM will remain operational throughout the project lifecycle and contribute to the project's overall accountability, inclusiveness, and long-term sustainability.

3. OVERVIEW OF THE PROJECT

3.1 PROJECT DESCRIPTION

The primary objective of the project is to enhance the performance, efficiency, availability, and longevity of the Nkula and Kapichira power stations. This will be achieved through the

refurbishment of turbines, generators, and associated components, and the modernization of outdated control, excitation, and protection systems with modern state-of-the-art technologies.

The project scope includes complete plant overhauls, supply and installation of new components, and recommissioning of the generating units. Consultancy services for the project were provided by the Original Equipment Manufacturer (OEM), Voith Hydro, who is also expected to execute the rehabilitation and modernization works.

The project will be executed under a single contract covering both power stations, with implementation phased: Kapichira will be rehabilitated first, followed by Nkula B.

These improvements are expected to significantly enhance the reliability and quality of electricity supplied to the national grid via the Single Buyer. The proposed rehabilitation and modernization scope includes:

- i. Refurbishment of turbines and associated components
- ii. Refurbishment of Main Inlet Valves (MIVs) and bypass valves
- iii. Installation of backup hydro-cyclone filters
- iv. Refurbishment of generators and associated components
- v. Replacement of digital and hydraulic governors
- vi. Replacement and repositioning of the MIV hydraulic system (Nkula)
- vii. Replacement of generator and transformer protection systems
- viii. Refurbishment or replacement of obsolete electrical auxiliaries
- ix. Refurbishment or replacement of obsolete mechanical auxiliaries
- x. Replacement of unit control, common control, and automation systems with modern technologies
- xi. Testing and recommissioning of the units

3.2 PROJECT LOCATION

The rehabilitation and modernization project will be implemented at two major hydropower stations in the Southern Malawi: Nkula Falls Hydropower Station in Neno District and Kapichira Falls Hydropower Station in Chikwawa District. These two facilities are part of EGENCO's cascade of hydropower stations along the Shire River and together contribute significantly to Malawi's total electricity generation capacity. Understanding the geographic and operational context of these sites is essential for appreciating the scope and importance of the planned upgrades.

3.2.1 Nkula Falls Hydropower Station

Nkula Falls Hydropower Station is located in Neno District, approximately 80 km from the commercial city of Blantyre, in the Southern Region of Malawi. It is the first of EGENCO's cascaded power stations along the Shire River. The station comprises two plants: Nkula A, with three machines each rated at 11.7 MW, producing a total of 35.1 MW, and Nkula B, with five machines each rated at 20 MW, producing a total of 100 MW. The total installed capacity for Nkula Falls is therefore 135.1 MW. The Nkula B units were commissioned between 1980 and 1992.

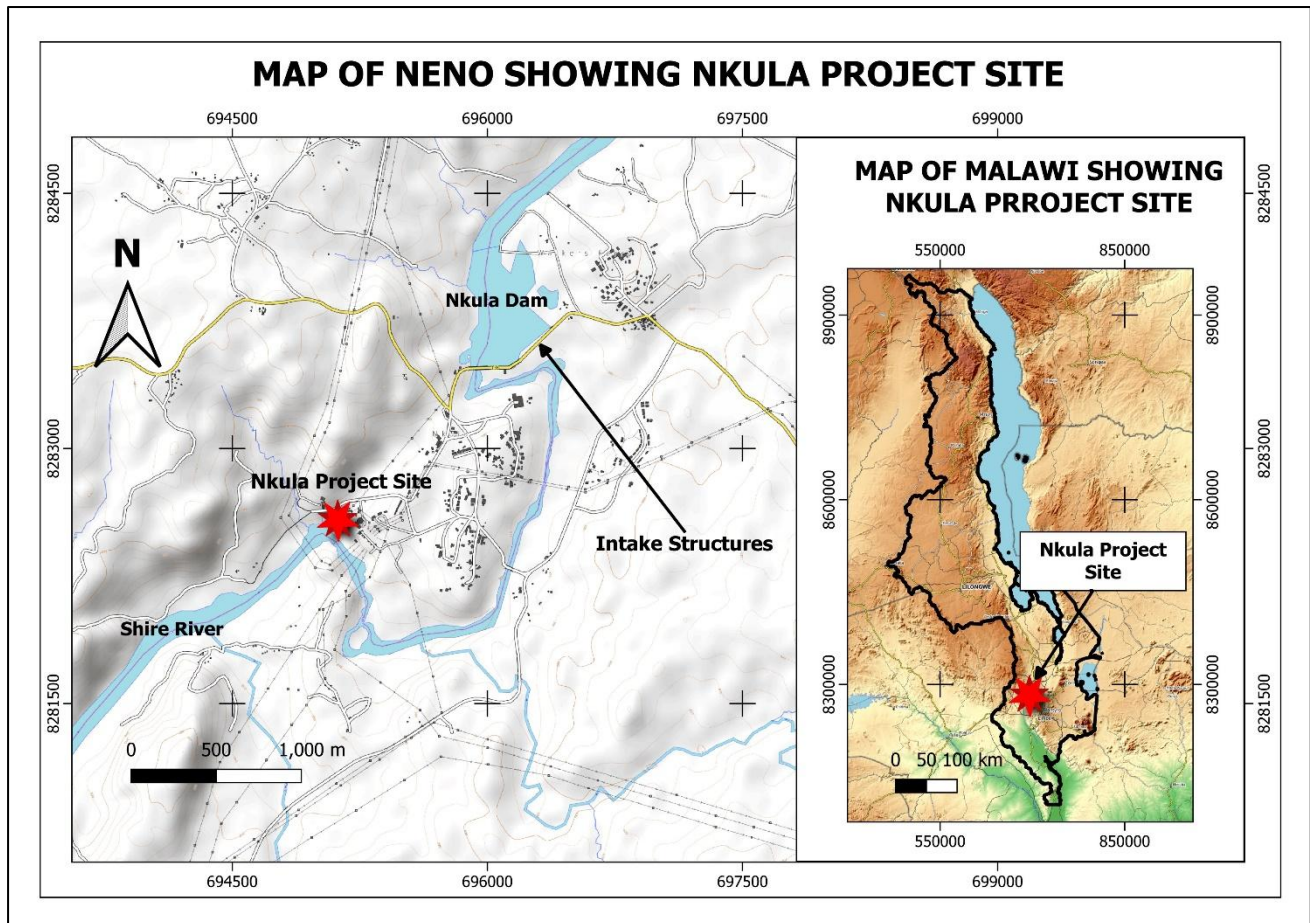


Figure 1: Map showing the location of Nkula B project site

3.2.2 Kapichira Falls Hydropower Station

Kapichira Falls Hydropower Station is located in Chikwawa District, in the Lower Shire area, about 70 km from Blantyre. It is the last in the cascade of hydropower stations along the Shire River. The station consists of two phases: Kapichira Phase I, commissioned in 2000, comprises two machines each rated at 32.4 MW, totaling 64.8 MW; and Kapichira Phase II, commissioned in 2013, which includes two additional machines also rated at 32.4 MW each. The total installed capacity for Kapichira Falls Hydropower Station is 129.6 MW.

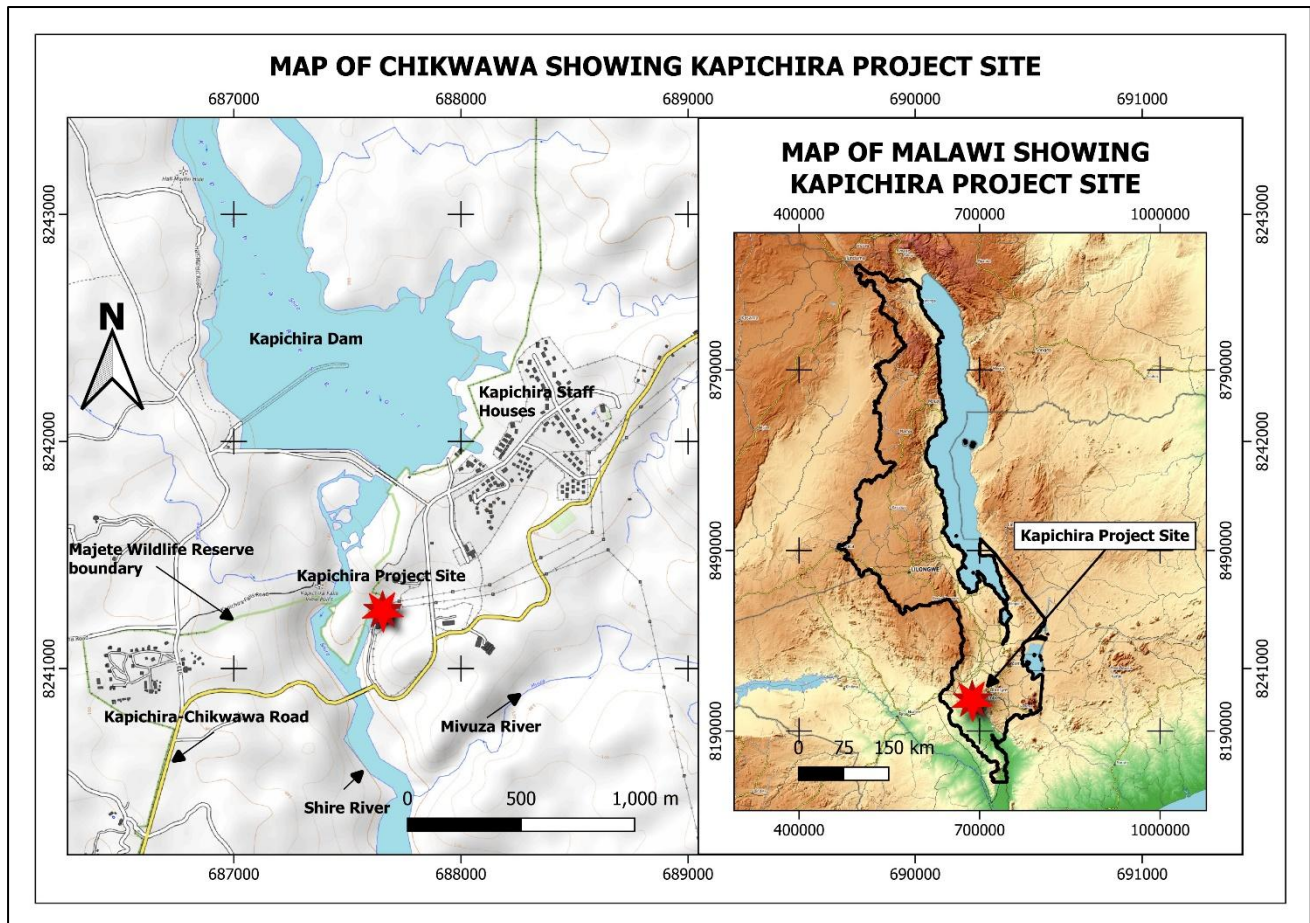


Figure 2: Map showing the location of Kapichira Phase I project site

3.3 STAKEHOLDER CONSULTATION

During the preparation of this Grievance Redress Mechanism (GRM), comprehensive stakeholder engagement activities were undertaken to ensure inclusive consultation and incorporation of community and institutional concerns. Site visits and consultations were conducted at key project locations, including the Kapichira 1 Hydropower Station and surrounding communities such as Liwonde, Maganga II, Kandeu, and Kuzambo Villages in Chikwawa District. Consultative meetings took place from November 2023 through early 2024, with notable sessions held on 11th and 16th January 2024, involving local leaders and community members.

A virtual stakeholders meeting was also held with representatives from Majete Wildlife Reserve, EGENCO, and the consulting team, ensuring participation of environmental and

regulatory institutions. Key institutions consulted included the Malawi Environment Protection Authority (MEPA), Chikwawa District Environmental Subcommittee (DESC), Ministry of Labor, Majete Wildlife Reserve, and various local government officials.

The consultations employed diverse methods including public meetings, focus group discussions, interviews with key informants, and household surveys using pretested questionnaires to collect baseline socio-economic data. Detailed minutes of these consultations and a list of participants are available in the project's Environmental and Social Management Plan (ESMP).

Key issues raised during the consultations included the need for HIV/AIDS prevention measures among workers and communities, establishment of a functional GRM for timely grievance handling, proper waste management especially concerning historic fish deaths linked to alleged pollution, protection of aquatic biodiversity, prevention of child labor, mitigation of impacts from expected power blackouts, and enhanced involvement of the District Environmental Subcommittee during project activities. Communities also expressed interest in understanding project benefits, employment opportunities particularly for women, protection against sexual exploitation and abuse, and corporate social responsibility initiatives such as provision of additional boreholes.

The stakeholder engagement process has been critical in shaping the GRM design to ensure responsiveness, transparency, and cultural appropriateness, aligning with project commitments to foster positive social outcomes and mitigate risks throughout the rehabilitation and modernization works at Kapichira 1 and Nkula B Hydropower Stations.

4. LEGAL AND POLICY REQUIREMENTS ON GRIEVANCE MANAGEMENT (GRM)

This section outlines the key policy and compliance obligations that guide the establishment, operation, and monitoring of the Grievance Redress Mechanism (GRM) for the Nkula and

Kapichira Hydropower Rehabilitation and Modernization Project. The framework draws from relevant national laws and the African Development Bank's Integrated Safeguards System (ISS, 2023), including applicable Operational Safeguards (OS). Together, these instruments ensure that the GRM is transparent, inclusive, culturally appropriate, and responsive throughout the project lifecycle.

4.1 MALAWI NATIONAL LEGAL AND POLICY REQUIREMENTS RELATED TO GRIEVANCE MANAGEMENT

The Government of Malawi has established several legal and policy instruments to support stakeholder consultation and grievance handling in development projects. These include:

4.1.1 The Constitution of Malawi (1994)

The constitution provides the right to access justice, to be heard in Section 43, while Section 41 provides access to legal remedies. These principles support access to grievance redress, although they do not establish procedural standards for project-level grievance redress processes.

4.1.2 Environmental Management Act (EMA), 2017

Requires the establishment of accessible grievance and complaint resolution procedures during environmental and social impact assessment (ESIA) and implementation stages. Section 44 mandates community engagement and the use of participatory methods in impact mitigation.

4.1.3 Labour Relations Act (1996)

Provides for formal structures for grievance redress within workplaces, including disputes between employees and employers. It requires that all complaints be addressed fairly and within reasonable timeframes.

4.1.4 Occupational Safety, Health and Welfare Act (1997)

Supports the right of workers to report on unsafe working conditions without fear of retaliation, which informs labour-specific grievance mechanisms.

4.1.5 Public Procurement and Disposal of Assets Act (2017)

Offers a grievance process related to procurement but does not address social, environmental, or human rights concerns arising from development projects.

4.1.6 Access to Information Act (2017)

Reinforces the right of stakeholders to access information, which is critical for meaningful participation in grievance redress processes.

4.1.7 National Environmental Policy (2004)

Encourages the establishment of systems for managing environmental complaints but is non-binding and lacks institutional accountability mechanisms.

In general, while Malawi's legal framework provides a supportive policy environment, it lacks operational and institutional provisions necessary to implement effective GRMs at the project level.

4.2 AFDB'S INTEGRATED SAFEGUARDS SYSTEM (ISS, 2023) AND APPLICABLE OPERATIONAL SAFEGUARDS ON GRM

The African Development Bank's ISS (2023) offers a structured and enforceable framework for grievance redress that projects must implement to maintain compliance.

4.2.1 OS1: Assessment and Management of Environmental and Social Risks and Impacts

OS1 requires projects to assess and manage environmental and social risks throughout the project lifecycle, including the establishment of a culturally appropriate, inclusive, and accessible GRM. For this project, OS1 is relevant due to anticipated environmental and social impacts arising from construction works, temporary power disruptions, and community

exposure to project activities. A functioning GRM is essential to allow affected stakeholders to raise concerns and receive timely redress.

4.2.2 OS2: Labour and Working Conditions

OS2 promotes safe, fair, and equitable working conditions and requires internal grievance procedures for workers. This safeguard applies to the EGENCO project due to the employment of contractors and local labour who must be protected from unsafe conditions, discrimination, or unfair practices. A parallel worker GRM must be in place.

4.2.3 OS3: Resource Efficiency and Pollution Prevention and Management

OS3 mandates pollution control and efficient use of energy and resources. Given the potential for pollution (e.g., oil spills, noise, and waste) during equipment removal and installation, this safeguard applies directly. The GRM must accommodate environment-related grievances, especially from communities near project sites.

4.2.4 OS4: Community Health, Safety and Security

OS4 focuses on managing risks to community health and safety during project implementation. This is critical for the EGENCO project as movement of heavy machinery, construction works, and prolonged blackouts may pose risks to nearby populations. The GRM must capture and respond to these concerns effectively.

4.2.5 OS7: Vulnerable Groups

OS7 requires protection of vulnerable groups from disproportionate project impacts. The project's rural and peri-urban setting may include elderly persons, women, or persons with disabilities who face barriers in accessing GRM services. The system must be tailored to accommodate these groups.

4.2.6 OS10: Stakeholder Engagement and Disclosure of Information

OS10 mandates early and ongoing stakeholder engagement and access to information. For this project, it reinforces the need to raise awareness of the GRM, ensure it is widely accessible,

and integrate it into broader engagement strategies so that communities are informed and able to participate meaningfully.

4.2.7 AfDB Independent Recourse Mechanism (IRM)

Provides a higher-level accountability mechanism for individuals or communities who believe that a project has violated the ISS. The IRM is critical in contexts where national frameworks lack independent grievance bodies.

Together, these safeguards demand not only the creation but also the continuous implementation and monitoring of grievance systems throughout the life of the project.

4.3 LEGAL AND POLICY REQUIREMENTS AND GAP ANALYSIS FOR GRM

Table 1 below provides a summary of gap analysis comparing Malawi's legal and policy provisions relevant to grievance handling with the African Development Bank's Integrated Safeguards System (ISS, 2023). The analysis highlights key national instruments, corresponding AfDB Operational Safeguards (OS), existing legal or institutional gaps, and specific project-level commitments to ensure full compliance and operational effectiveness of the GRM throughout the project lifecycle.

Table 1: Legal and Policy Requirements and Gap Analysis

Malawi GRM Law and Policies	AfDB ISS (2023) – Related to GRM	National Gaps	Project Commitments (to Ensure Compliance)
Constitution of Malawi (1994) – Provides the right to be heard and access to legal remedies under Sections 41 and 43.	OS1: Environmental and Social Risk Management – Requires culturally appropriate, accessible, and responsive GRMs from project identification through completion.	The Constitution grants broad rights but lacks operational procedures, enforcement standards, or defined project-level GRM structures.	Establish a comprehensive GRM that includes complaint steps, timeframes, responsible personnel, and escalation procedures.
Environmental	OS1: Environmental	No statutory	Operationalize the

Management Act (EMA), 2017 – Requires stakeholder consultation and community engagement during the ESIA process.	and Social Risk Management – GRMs must remain active throughout implementation, allow anonymity, and be monitored.	requirement for GRM functionality beyond the ESIA phase; lacks defined mechanisms for ongoing redress.	GRM for all project phases, with multiple entry points for complaints and ongoing monitoring mechanisms.
Labour Relations Act (1996) – Provides formal structures for resolving disputes between workers and employers.	OS2: Labour and Working Conditions – Requires internal worker grievance procedures to address workplace disputes and promote fair conditions.	Lacks clarity on GRM scope for temporary workers or project-based employment; no requirement for external monitoring.	Implement a parallel internal GRM for workers, accessible to subcontracted and temporary labour, with anonymous reporting options.
Occupational Safety, Health and Welfare Act (1997) – Protects workers' rights to report unsafe conditions without retaliation.	OS2: Labour and Working Conditions – Promotes safe working environments and mechanisms to report violations or health hazards.	The Act does not define how safety grievances should be addressed within a development project's broader GRM.	Incorporate occupational health-related reporting into the GRM and ensure workers are informed of these rights.
Land Acquisition and Compensation Act (2017) – Permits grievances regarding compensation but with limited process clarity.	OS5: Involuntary Resettlement and Land Access – Requires fair, independent, and transparent grievance resolution for land and resettlement disputes.	No requirement for an independent review process, appeal mechanisms, or enforcement timelines.	Create a dedicated GRM track for resettlement-related grievances with appeal rights and third-party review if required.
Public Procurement and Disposal of Assets Act (2017) – Provides redress in procurement matters only.	OS1 & OS2 – Require GRMs to address a range of environmental, labour, and social grievances beyond procurement.	Does not provide for grievances related to environmental, labour, or community impacts.	Extend GRM coverage beyond procurement to include environment, health, labour, and community grievances.
National Environmental Policy (2004) – Encourages establishing mechanisms for environmental grievance handling.	OS1: Environmental and Social Risk Management – Requires legally binding, monitored, and well-resourced GRM systems.	The policy is non-binding and lacks legal enforcement, with no assigned institutional responsibilities.	Convert policy intent into binding GRM procedures with clearly assigned roles, responsibilities, and performance indicators.
Access to Information Act (2017) – Promotes access to public information, enabling	OS10: Stakeholder Engagement and Disclosure – Requires early dissemination of GRM information in	Implementation is weak in rural areas due to language and literacy barriers.	Disseminate GRM procedures through local radio, visual tools, community meetings, and in local

transparency in grievance procedures.	accessible formats and languages.		languages to ensure accessibility.
No national-level external grievance mechanism for project-affected persons	AfDB Independent Recourse Mechanism (IRM) – Provides a formal channel for complaints if a project violates the ISS.	Absence of an independent, national-level body for escalating unresolved grievances.	Inform stakeholders about the IRM and include IRM referral information in all GRM outreach materials and protocols.

5. MAJOR ENVIRONMENTAL AND SOCIAL (E&S) RISKS AND IMPACTS OF THE PROJECT

The rehabilitation and modernization of the Kapichira and Nkula Falls Hydropower Stations involve a range of environmental and social (E&S) risks and impacts that span the entire project lifecycle—from identification through construction, commissioning, and into operation. These risks require a robust and responsive Grievance Redress Mechanism (GRM) to ensure that concerns from stakeholders and project-affected persons are addressed transparently, timely, and effectively.

5.1 KEY E&S RISKS BY PROJECT PHASE

5.1.1 Project Identification Phase

During the identification phase, the project faces challenges such as limited stakeholder awareness, circulation of misinformation, and heightened community anxiety related to possible land access restrictions or displacement. These conditions can lead to grievances arising from insufficient or poorly conducted consultations, lack of access to clear and timely project information, and early fears regarding livelihood losses or interference with culturally significant sites. Ensuring early, inclusive, and transparent engagement is crucial to mitigate these concerns and establish community trust from the outset.

5.1.2 Construction Phase

This is the most impact-intensive phase of the project, with environmental, social, labour-related, and cultural risks likely to surface simultaneously. Environmental risks include increased dust, noise, and vibration from machinery, improper waste handling, runoff, and potential degradation of aquatic ecosystems along the Shire River. Social risks involve disruptions to access for fishing, farming, water use, and local infrastructure, coupled with increased road traffic and public safety issues. Labour and human rights risks are also elevated, particularly concerning recruitment transparency, fair compensation, worker treatment, and the potential for gender-based violence, sexual harassment, child labour, and human trafficking. Additionally, the construction phase can bring about cultural and community risks, especially if works encroach upon land of cultural or spiritual value, or if tensions arise between contractors and local communities. Grievances during this phase are likely to center on environmental degradation, unsafe working conditions, unfair employment practices, and social or cultural alienation.

5.1.3 Commissioning and Operational Phases

While typically less intensive than construction, the commissioning and operational phases can still generate risks that necessitate an active GRM. These include temporary disturbances due to testing, continued environmental emissions, and lingering safety hazards. Communities may have high expectations for improved services or tangible project benefits, and delays or unmet outcomes can trigger dissatisfaction. Grievances at this stage often relate to delays in benefit realization, poor communication regarding project timelines, and continued health or safety concerns. Ensuring effective communication and managing expectations through clear stakeholder engagement is essential for maintaining community support throughout the operational life of the project.

5.2 COMMON AND ANTICIPATED GRIEVANCE CATEGORIES

Based on these risks, likely grievances during implementation include:

- General dissatisfaction with project implementation
- Lack of meaningful consultation or advance notice before project activities
- Perceived unfairness in employment opportunities
- Use of disrespectful or intimidating language by project staff
- Sexual harassment, GBV, exploitation, or child labour
- Environmental nuisances such as dust, noise, and waste
- Corruption or theft
- Contractor-community conflicts or misconduct

Stakeholders commonly expect the following in response to their grievances:

- Prompt acknowledgement and follow-up
- Honest answers and transparency on project activities
- Apology or corrective action where applicable
- Compensation or remedial support
- Assurance that their concerns are taken seriously and addressed fairly

5.3 GRM RESPONSE AND IMPLEMENTATION

EGENCO is committed to ensuring that all grievances are resolved equitably and in good faith through a negotiated, consensus-based approach between the project team and affected parties. A grievance log will be maintained at the community, district, and national levels, with records centrally held by the Project Implementation Unit (PIU) for monitoring and reporting.

The GRM will utilize multiple accessible channels for grievance uptake, including:

- Telephone, SMS, and WhatsApp
- Suggestion boxes
- Email and formal letters
- Verbal reports to local Grievance Redress Committees (GRCs)
- Mobile-based grievance reporting applications

6. GRIEVANCE REDRESS MECHANISM OBJECTIVES AND PRINCIPLES

6.1 OBJECTIVES

With a specific focus on both components 1 and 2, this GRM is aimed at attaining the following objectives:

- i. Reduce conflict, risk of undue delay and complications in project implementation
- ii. Ensure that the rights of affected parties are respected
- iii. Identify and respond to concerns, dissatisfactions and unintended impacts of the projects on individuals
- iv. Enhance effective communication, participation, involvement, support and benefit of stakeholders in the project
- v. Provide an accessible process to receive grievances, dissatisfaction, concerns or feedback from project affected people (or those likely to be affected), and the general public so they are dealt with in an early, transparent and fair manner

The GRM is designed in a way that it can be used at any level by relevant project stakeholders.

EGENCO will monitor and ensure that all Project stakeholders, Surrounding Communities, partners, Contractors, Sub-contractors and beneficiaries make effective and efficient use of this GRM for successful implementation of the project and the benefit of Malawi.

6.2 PRINCIPLES FOR EFFECTIVE GRIEVANCE REDRESS

The following principles provide a framework by which EGENCO and its Contractors and subcontractors shall redress grievances, arising from implementation of the projects supported by the African Development Bank:

- i. **Accessibility:** Grievance Redress Mechanism (GRM) shall be accessible to anyone who wants to lodge a complaint or provide feedback. EGENCO and all project partners shall provide assistance to those who face barriers of language (or by translating documents to local language), literacy, awareness, cost or fear of reprisal. The GRM shall be easily accessed and shall be used by all stakeholders as well as any person that may need to use it for any of their concerns; without discrimination on any basis (e.g. sex, age, health, marital status, religion, race,

political affiliation or tribe);

- ii. **Predictability:** GRM shall have clear procedures with time frames for each stage and shall present the results to be expected;
- iii. **Fairness:** GRM procedures shall be as fair as possible with confidentiality, impartiality, especially in terms of access to information and opportunities, for meaningful participation in the final decision;
- iv. **Confidentiality and Trust:** The GRM shall uphold the highest standards of confidentiality, particularly for sensitive complaints such as those involving GBV/SEAH. All grievance handlers will maintain discretion to protect the identity, dignity, and safety of complainants. Building trust in the process is essential to ensure that individuals feel safe and confident to come forward with their concerns without fear of retaliation or exposure.
- v. **Rule of Law:** Outcomes of the GRM shall be consistent with the Malawi Constitution, laws and international standards on human rights. The GRM shall not restrict access to other redress mechanisms that the communities and stakeholders have access to or decide to access;
- vi. **Transparency:** GRM procedures and outcomes shall be widely publicized to all concerned. All supporting documents of meetings needed to achieve resolution shall be part of the file related to the complaint;
- vii. **Capability:** EGENCO and its implementing partners shall provide the necessary technical, human and financial resources to deal with the GRM issues at stake. All costs for the grievance mediation process will be paid by the EGENCO and respective implementing partners under the Rehabilitation and Modernization of Kapichira I and Nkula B;
- viii. **Feedback:** GRM shall serve as a means to channel stakeholders' feedback to improve project outcomes for the people;
- ix. **Human dignity:** GRMs shall recognize the inherent dignity and the equal and inalienable human rights of all individuals;
- x. **Equity and justice:** GRM shall recognize that equality between individuals may

require acknowledging their differences and taking positive action, including empowerment, in order to promote equitable tenure rights and access to land and other resources for all (women, men, youth, the vulnerable and marginalized people) within the national context;

- xi. **Gender equality:** GRM shall ensure equal rights of women and men to the enjoyment of all human rights, while acknowledging differences between women and men and taking specific measures to accelerate de facto equality when necessary. Women and girls shall have equal tenure rights and access to land and other resources, as well as employment regardless of their civil and marital status;
- xii. **Accountability:** GRM shall hold individuals and committees responsible for their actions and decisions according to the principles of the rule of law. Where the complainant does not accept the mediation option or if he/she does but a resolution agreement is not reached, the complainant may seek redress through the courts of law or other mechanisms available at the country level;
- xiii. **Consensus and negotiations** are central to addressing grievances and therefore, effective sensitization and awareness of Surrounding communities and workers on their rights and their commitments to the country as citizens should be emphasized. Negotiations and conflict resolution between EGENCO and project implementing partners and the project beneficiaries to achieve consensus are crucial to the success or failure of any project. Key players, during the negotiations and conflict resolution, shall include the Government, local leaders, workers and the project implementing partners. As a guiding principle, emphasis shall be placed on simplicity and proximity of the conflict resolution mechanisms to the affected persons and the general public and the following shall be noted:-
 - Negotiation and agreement by consensus will provide the best avenue to resolving any grievances expressed by the individual landowners or households affected by sub projects;
 - EGENCO and the project implementing partners shall ensure that the main parties involved achieve consensus freely. The relevant representative and

EGENCO shall clearly advise the workers and stakeholders, as to who is responsible for the activity and the procedure for handling grievances or compensation claims;

- If a suitable solution to grievances is not found, the EGENCO and the project implementing partners shall defer the concerned project activities until consensus is reached;
- The mediation process will be implemented according to traditional methods of mediation/ conflict resolution. The resolution will then be documented on the relevant consent forms and verified

6.3 POTENTIAL USERS OF GRM

The potential users of this GRM includes PIU, GRM Committees, contractors, consultants, suppliers of goods and services, project related workers, the communities around the project impact areas, the general public and all other stakeholders.

7. GRIEVANCE REDRESS MECHANISM PROCESS

7.1 PROJECT GRM PROCESS

The Grievance Redress Mechanism (GRM) ensures that concerns, complaints, and disputes related to the Kapichira I and Nkula B Hydropower Projects are addressed promptly, transparently, and fairly. The mechanism is accessible to all stakeholders, including affected communities, workers, and vulnerable groups. It complies with African Development Bank (AfDB) Integrated Safeguards System (ISS, 2023) requirements and ensures accountability throughout the project cycle.

7.1.1 Step-by-Step GRM Procedure

7.1.1.1 Publicizing the Grievance Mechanism

The Project Implementation Unit (PIU), in coordination with EGENCO and its contractors, shall proactively inform all affected communities and stakeholders of the GRM's existence, structure, and procedure. This includes:

- Dissemination of information on grievance channels through public consultations,

fliers, posters, radio messages, community meetings, and stakeholder workshops.

- Clear guidance on where and how complaints can be submitted.
- Communication will be carried out in appropriate local languages and formats, ensuring accessibility to all, including women, vulnerable groups, and those with limited literacy.

7.1.1.2 Grievance Intake, Registration, and Tracking

Grievances will be submitted verbally, in writing, by phone, or electronically to the Social and Gender Safeguard, GRM Focal Points, or any designated grievance handler. Upon receipt:

- Each grievance will be formally logged in the Grievance Register and assigned a unique tracking number.
- Basic information will be recorded including the complainant's name (or anonymous), contact information, date, location, nature of the complaint, and receiving officer.
- The complainant will be issued an acknowledgment receipt within seven (7) working days.
- The GRM officer shall begin tracking the grievance to ensure timely resolution.

7.1.1.3 Review and Investigate Grievances

Upon receipt of a grievance, the Project Implementation Unit (PIU) shall promptly review and investigate the complaint to fully understand the circumstances and determine an appropriate course of action. This process includes the following steps:

Screening and Categorization:

- The grievance will be screened to determine if it falls within the scope of the project-level GRM.
- Complaints will be classified by type, such as environmental, social, labor, and gender-based violence/sexual exploitation and abuse/sexual harassment (GBV/SEAH)-related issues.

- The severity of grievance will be assessed and categorized as minor, moderate, or major.
- Eligible grievances will proceed with detailed investigation, while ineligible grievances will be recorded with clear justification and referred to relevant external authorities or support agencies. The complainant will be informed of this decision.

Investigation and Assessment:

- The PIU officer will gather as much information as possible from both the initial receiver of the complaint and the complainant to gain a comprehensive understanding of the grievance.
- When necessary, the safeguard specialist and relevant PIU personnel will conduct site visits to assess the issue firsthand and collect photographic evidence, especially in cases involving physical damage such as to crops, houses, or community infrastructure.
- Input will be sought from key stakeholders including EGENCO staff, contractor personnel, and community representatives to clarify facts and perspectives.
- The complainant will be informed of the expected timeframe for grievance resolutions to ensure transparency and manage expectations.
- All findings and relevant details of the investigation will be documented and entered the grievance database for tracking and follow-up.

7.1.1.4 Developing Resolution Options, Response and Closure

- The Project Implementation Unit (PIU) will develop resolution options in consultation with relevant parties based on the findings of each grievance investigation. These options will aim to be fair, timely, and culturally appropriate.
- The PIU will prepare a formal written response to the complainant. This response will outline:
 - The findings of the investigation,
 - The proposed corrective or remedial actions,
 - The timeline for implementation of the resolution.

- Throughout the grievance resolution process, the PIU or designated officer will maintain regular communication with the complainant. Updates will be provided in a respectful manner and in a language and format that is accessible and appropriate to the individual.
- The PIU will ensure that additional care is taken when dealing with vulnerable or marginalized groups, so that they fully understand the process and feel supported.
- If the complainant accepts the proposed resolution:
 - The grievance will proceed to closure,
 - A Grievance Closure Form will be signed by the complainant and responsible parties,
 - The grievance will be recorded as “Closed” in the Grievance Register, and all documentation will be filed securely.
- If the complainant does not accept the resolution, the grievance will be escalated to a higher-level appeals committee or relevant external mechanism in accordance with the project’s established procedures.
- The PIU will review closed grievances periodically to extract lessons learned and will use this feedback to improve project implementation, stakeholder engagement, and grievance handling processes.

7.1.1.5 Appeal and Escalation

If the complainant is dissatisfied with the resolution:

- The case is escalated to the District-level GRM Committee or the national-level Committee
- A second review is conducted within 15 working days;
- Outcomes are communicated to the complainant.

Complainants also retain the right to pursue legal or traditional resolution avenues.

Table 2 below summarizes the required timeframe for the resolution of grievances that may arise at the project.

Table 2: Grievance Redress Management Timeframe

	Process	Time frame
1.	Acknowledge receipt of grievance	Within one week of receiving the grievance
2.	Assessment of grievance	Within two weeks of receiving the grievance
3.	For grievances where the investigation is more time consuming, the grievant should be informed of the situation and the timeframe to be followed	Within three weeks
4	Closure and Resolution Signing	Within 5 weeks of receiving the grievance (within 7 days after resolution is reached)

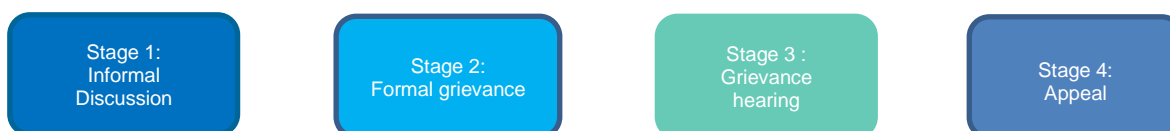
7.2 THE WORKERS GRM PROCESS

7.2.1 WGRM Stages

It is important to have a dialogue first and use informal discussion in resolving disagreements or disputes with workers to ensure mutual understanding and ensure a cordial working relationship.

WGRM will have 4 main stages namely informal discussion, formal grievance, grievance hearing and appeal in the sequence as stipulated in figure 1 below.

Figure 2: WGRM stages





Stage 1: Dealing with the Grievances Informally/ Dialogue

If employees have a reasonable grievance or complaint regarding their work or the people they work with they will have to, wherever possible, start by entering a dialogue with their manager or with a fellow employee one is aggrieved with. It may be possible to agree a solution informally between worker and manager. This makes it more likely that disputes can be resolved quicker and closer to the source of the problem and less likely that they escalate into intractable problems. If discussions with line managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure. For example, a designated manager (normally from the HR department, hereafter the “grievance manager”) or the social safeguard will call the employee to an informal meeting, within a week after receiving the complaint, to discuss the employee’s grievance. The employee shall have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. After the meeting, the HR or social safeguard will give the employee a decision in writing, within 14 days determined period. If the employee is not satisfied with the discussion, they may wish to raise the matter formally.

Even through the informal resolution of grievance all grievances shall still be recorded and resolutions signed off to ensure transparency, accountability and monitoring of the grievances.

Stage 2: Formal Grievance/Lodging a Complaint

If the matter is serious and/or the employee wishes to raise the matter formally, they will file the grievance in writing with the relevant Workers Grievance Redress Committee or through the key personnel of the WGRC (HR or social safeguard). For example, if the issue concerns the implementing agency the complaint should be lodged with Implementing agency WGRC unless the key personnel are compromised then it can be lodged through

the OE WGRC or its key personnel. Where the complaint is against the OE, the grievances can be lodged with the Client and where the client is compromised external measures can be sought such as the district or national labour offices or the ombudsman.

At each level of Workers Grievance Redress Committee, there will be a Grievance Log and Resolution Form to record the complaint. Each grievance will be assigned a number. Secretary of the Committee will complete the Form or will help the complainant to fill in the Form. Both the Secretary and the Complainant and their witnesses (one for the Committee and one for the Complainant) will sign the Form (Complaint section of the Form) to confirm that what has been recorded is true reflection of the grievance as reported by the Complainant. A copy of the Form shall be forwarded to the project Implementation Unit for record purposes.

Stage 3: Grievance Hearing (*Assessment, Analysis, Response and Closure*)

- i. Once a grievance has been lodged the Workers Grievance Redress Committee will meet within 7 days of receiving a complaint, to consider the grievance and provide a response to the complainant.
- ii. The committee shall assess whether the complaint or grievance is related to project activity project or not. For non- Project-related grievances, the Committee will advise appropriate institutions with which to lodge the complaint.
- iii. For Kapichira I and Nkula B Rehabilitation and Modernization Project complaints or grievances, the WGRC shall conduct an investigation to determine whether the complaint is indeed genuine and the outcome shall be communicated to the complainant within 14 days from the day of the complaint. If the case requires more investigation, it could with justification be extended to 21 days but the complainant will have to be informed about the proceedings.
- iv. During assessment, when it is noted that the grievance is criminal in nature like sexual exploitation, the complainant will be encouraged to allow support to be taken to the clinic within 24 hours and administered PEP upon consent if it is defilement within 72

hours as well as to report the issue to the nearest Police Station. However, such reporting and measure will be advisory but the victim will in a position to decide the method they feel comfortable with.

- v. Where it has been established that employee has a case to answer before the WGRC, a letter of memorandum shall be issued to the concerned employee. This letter shall contain a clear statement of the charge, vetted by the committee with further and better particulars enough to enable the employee understand the allegation levelled against them. Further, the communication shall contain date, time and place of the hearing of the disciplinary charge stated and the fact that they have the right to bring their witness and a representative to the hearing.
- vi. The employee or both complainant and accused shall be given seven (7) days after the employee has received the communication. This is to allow the employee to have ample time to prepare for their case.
- vii. The hearing shall be held after receiving written representation for the employee
- viii. The employee shall have the right to bring a witness and shall be allowed to state his/her defense before the WGRC
- ix. If an employee refuses to attend the disciplinary hearing the committee shall proceed with the hearing and make recommendation accordingly. However, if the employee requests to postpone the hearing date, they shall be requested to put it in writing with the reasons there of.
- x. The employee shall; be informed the outcome of the hearing within fourteen (14) days after the hearing. the Committee shall be required to complete Resolution section of the Grievance Log and Resolution Form to provide clear decision that has been arrived at in respect to the complaint. A copy of the Form shall be forwarded to the Project Implementation Unit for **record** purposes.
- xi. If an employee is dismissed, it must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal. Therefore, it is incumbent upon the Contractors to ensure that they have a disciplinary procedure and Code and standards which the employees are aware of. Each contractor will be required to

produce this procedure to ensure that employees are not treated unfairly.

- xii. If the complainant is satisfied with the resolution, the complainant shall be required to sign the Closure section of the Grievance Log and Resolution Form to confirm that the response is satisfactory and that the grievance is resolved and closed. Where the grievance involves two parties (e.g. a project contractor and a worker or a community or in case of corruption allegations), both the Complainant and the 'Accused', shall be required to sign the Closure section of the Grievance Log and Resolution Form. A copy of the form shall be forwarded to the Project Implementation Unit for record purposes. An electronic database will be established for this purpose.

Stage 4: Appeal

If the complainant or the accused is unhappy with the grievance decision and wishes to appeal, they should let the manager/ employer know. The Complainant or the 'Accused/Respondent', shall be required to sign the Appeals section of the Grievance Log and Resolution Form to confirm intention to appeal to the next higher Grievances Redress Committee within 7 days of receiving response from the Grievance Redress Committee. The Committee shall retain a copy while another copy will be given to the complainant to present to the appeal Committee (the next higher Committee). A copy of the Form shall be forwarded to the Project Implementation Unit for record purposes.

The higher Committee from the contractor WGRC is the OE and then the client/EGENCO to which the grievance will be referred and it shall handle the grievance as explained in Stage 3 above (Stage 3: Grievance Hearing; *Assessment, Analysis and Response*).

Every effort should be made to secure a resolution in the best interests of the worker(s) and the company. After the meeting at the client WGRC, the grievance committee will give the employee a decision. This decision is final within the terms of the company's internal grievance mechanism.

If the employee is not satisfied with the projects internal system they may refer the complaint

or grievance to external measures amongst which are the labour ministry/inspectorate (or other appropriate administrative body) or an “ombudsman”, who operates independently of company management, to carry out the functions of hearing and deciding on appeals, mediation and finding resolution as specified in the national law.

7.2.2 Collective Grievances and Disputes resulting from the negotiations of Collective agreements

The contractor and implementing partners will have to make provision for workers to have their own worker’s committee/ organization which shall be entitled to negotiate with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it. The employer and the workers union shall have their own procedures guided by the labour management procedure and the GRM that will have to be followed. Their agreement shall state how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal issues that are not resolved through consensus.

7.3 HANDLING GENDER BASED VIOLENCE (GBV), SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARRASMENT (SH) GRIEVANCES

As indicated in 4.0 the project interventions may lead to sensitive grievances such as gender-based violence, defilement, sexual harassment, and sexual exploitation and abuse. Therefore, the project has developed a GBV/SEA/SH Action plan that will be adopted by all implementing partners. EGENCO has also recruited professionals, and has trained medical personnel that deal with psycho-social support at its clinic. The project will also engage a GBV service Provider that will train the GRCs on how to handle such sensitive cases. Nevertheless, GBV, SEA, and SH cases are very sensitive as there are risks of stigmatization, rejection and reprisals against survivors as such some victims choose not to report. In addition, some people in the communities as well as employees may be in dire need of financial assistance and accept exploitation as a norm for financial gain. This creates and reinforces a culture of silence so

victims and survivors may be reticent to approach the project directly. As such the GBV, SEA, SH mechanisms will ensure the use of multiple reporting mechanism as stipulated in 6.6, all GRCs will be trained on how to handle GBV,SEA, and SH cases to ensure people's information is handled with confidentiality and also that is victim centered.

7.3.1 GBV/SEA/SH GRM Processes

The GRM will use the following processes below;

- i. Once a GBV/SEA/SH case has been reported the point of entry will review the case and institute an interview within 5 days for minor cases and within 24 hours for sexual, physical assault or rape cases to obtain a detailed statement of allegations to facilitate a preliminary inquiry. Those that can write may fill in the grievance forms in Annex 3 while for those that cannot write the CGRC or point of entry may assist with the victims' narration in filling in the forms. These will be done without coercion, threats, or promises of leniency. During the interview the team will;
 - Ascertain the views of the victim as to what outcome he/she wants
 - ensure that the victim understands the company's procedures for dealing with the complaint including timelines
 - discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
 - keep a confidential record of all discussions
 - respect the choice of the victim
 - ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework
- ii. The GRC or point of entry shall inform complainant on confidentiality and obtain consent from the complainant for information to be made available to EGENCO, African Development Bank and the GBV Service provider within 24 hours.

- iii. Once a case has been reported and recorded the designated officers will immediately do a risk assessment and devise a protection plan as per individualized needs within 24 hours. This protection plan may include taking the victim with their consent for medical examination within 24 hours and administer PEP within 72 hours in case of rape, temporary shifting the accused or the complainant to another work area or making provision for temporary shelter to the victim if the complainant wishes so until the investigation is concluded.
- iv. The GRC's or GBV safeguard shall write an advisement to the complainant and the alleged perpetrator to refrain from talking about the issue during the investigation. Nor should the parties engage in any intimidating or harassing conduct towards each other during and after investigation
- v. Upon receiving the written representation from the accused the CGRC with the contractors GBV Specialist will constitute a disciplinary panel consisting of a minimum of 5 panelists amongst them shall be the GBV Specialist. All panelists would have been pre-chosen and indicated in their GBV/SEA/SH action plan and pre-trained of how to handle GBV/SEA and SH cases. A panelist will be required to declare conflict of interest and recuse himself or herself upon the receipt of an invitation to hear a GBV/SEA/SH case, or before the commencement of any such hearing. All panelists shall also make an oath of confidentiality before commencing the hearing
- vi. The disciplinary panel shall convene two weeks after being constituted to hear the case, and will make a decision soon after the hearing.
- vii. If the panel finds that the harassment took place, they shall decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- viii. if it cannot determine that the harassment took place or there is no merit in, the complainant will be subjected to disciplinary action where the sanctions will apply.

This will only be applicable after legal counsel in exceptional cases where there is sufficient evidence to believe that the complaint was explicitly force and motivated by intent to harm the other employee.

- ix. The safeguard Officers shall follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- x. A record of all actions taken and it shall be ensured that they are kept confidential
- xi. Both the victim and the harasser will be informed of the progress of the issues by the human resource officer (HRO) and the SGSS.
- xii. The victim shall be given an opportunity for psychosocial support from a trusted professional of their choice which the employer of the victim or of the perpetrator shall pay for

7.3.2 Outside complaints mechanisms

- If one of the parties is not satisfied with the resolution of the case by the committee, the concerned party will be referred to a legal court which will be in a better position to resolve the issue.
- Or a person who has been subject to sexual harassment can also make a complaint outside of the company. They can do so through the legal framework – i.e. employment tribunal, ombudsperson, police

7.4 ALTERNATIVE GRIEVANCE AND FEEDBACK REPORTING ROUTE

Notwithstanding the GRM process described in Steps 1-3 above, some grievances can be lodged directly with the Project Implementation Unit in Blantyre. Individuals, Communities and Stakeholders are also free to report anonymously through the Project Coordinator (for the attention of the Social Safeguards Specialist). The PIU will facilitate the redress process by engaging relevant Committees and following Steps described above.

The grievances and feedback can be lodged in any major languages of Malawi and through

any of the following 4 methods/channels:

a. In Person

By visiting EGENCO Project Offices located at Kapichira. A Suggestion Box will also be available at EGENCO Project Offices and all project sites where grievances/feedback can be deposited anonymously.

b. Through Post Office

- c. By sending a letter in any major languages of Malawi to the following Address: The Chief Executive Officer

EGENCO (Chayamba Building)

P.O. Box 1567

Blantyre Malawi

**Attention: The Social Safeguards and Gender Protection Specialist –
Kapichira I and Nkula B Rehabilitation and Modernization Project**

c. By Phone

By calling the following Number +265 885275969 **OR**

By sending WhatsApp to the following Number +265 888879555

d. By Email

By sending an email to the following Address: ceo@egenco.mw

e. By Tip Off Anonymous (for Confidential and sensitive matters)

By calling the following Toll Free line: 847 and explain the nature of the grievance and register with a 5 digit confidential personal identification number.

- f. Grievance Boxes which will be placed at project sites, EGENCO clinic, EGENCO primary school, nearing primary schools and public facilities such as clinics.
- g. Direct to AfDB grievance reporting mechanism

7.5 ACCESS TO EXTERNAL GRIEVANCE REDRESS SYSTEMS

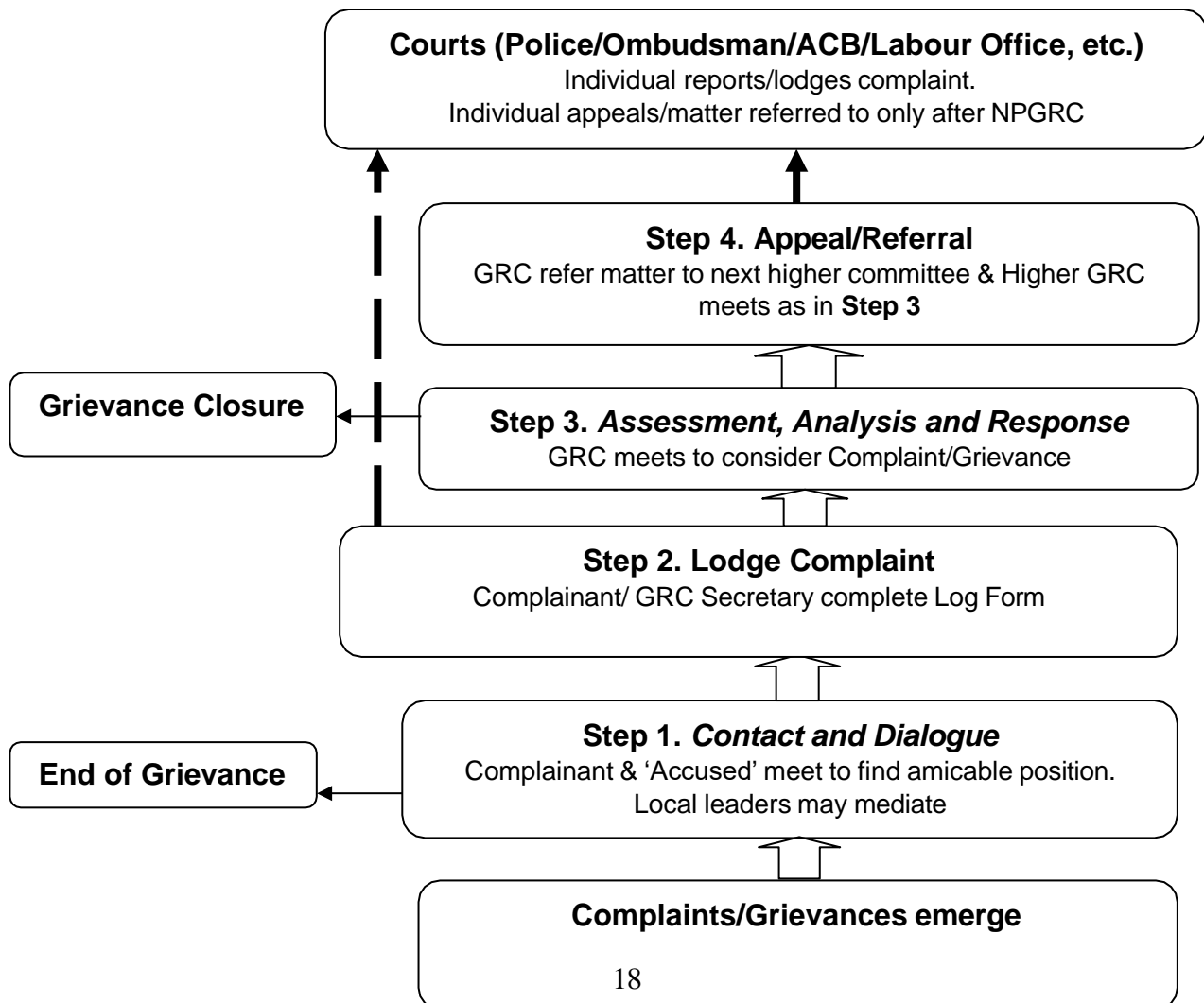
In the event that the matter at the NGRC cannot be resolved or the resolution is unsatisfactory

to the complainant, the complainant is at liberty to explore any other means outside this articulated procedure for Kapichira I and Nkula Rehabilitation and Modernization Project only when these internal remedial processes have been exhausted. The complainant can launch the matter in the formal judicial system or with the African Development Bank Grievance Redress System or Independent Inspection Panel of the African Development Bank or indeed any other legitimate alternative means available to them.

The PIU will also ensure that communities and individuals in project locations are aware of African Development Bank Grievance Redress System. The PIU will disclose a simple system of submitting issues of concern through letters. People who believe that they are adversely affected by project activities carried out by communities or any other project staff may submit complaints (through letters/phones) to Grievance Redress Service (GRS) African Development Bank Malawi office. The system ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may also submit their complaints to the Bank's independent Inspection Panel, after having brought the complaint to the attention of International Development Association through Malawi Country Office. Information on how to submit complaints to the Bank's Grievance Redress Service and the Bank Inspection Panel will be disclosed to the public during various project meetings with stakeholders and community sensitization meetings.

For information on how to submit complaints to the African Development Bank's corporate Grievance Redress Service (GRS), all stakeholders will be encouraged to visit: <http://www.worldbank.org/GRS> while for information on how to submit to the African Development Bank Inspection Panel, stakeholders will be encouraged to visit www.inspectionpanel.org. However, if the complaint is criminal in nature, then the complainant will be allowed to proceed seeking redress through the normal criminal procedure system available in Malawi.

Figure 2: THE GRIEVANCE MANAGEMENT PROCESS



7.6 GRIEVANCE RECORD MANAGEMENT

To ensure effectiveness of the GRM, EGENCO shall keep consolidated records of all grievances arising from the project. A database shall be created by EGENCO which shall mainly be managed by the Owners engineer Social Expert who shall consolidate all grievances at sub-project level and EGENCO's Social and Gender Specialist shall take part in the consolidation, monitoring grievances received and resolved and also provide oversight in grievance redress. EGENCO shall put grievance and resolution in database for analysis. This will enable EGENCO

as well as the OE to have record of the grievances in real time and easily managed as it will go straight into one database. The grievance record will contain

- i. the name of the grievant;
- ii. the date when the matter occurred and reporting;
- iii. nature and description of the complaint;
- iv. immediate action and any follow-up actions taken; and
- v. the final resolution; and how and when this decision was communicated to the complainant (See Annex 2)
- vi. Complainant resolution signature or thumbprint

Personal data shall be kept confidential unless required to disclose to authorities. Quarterly as per projects agreement EGENCO will be carrying out social audits of grievances and resolutions. EGENCO will also during stakeholder engagements report to the communities and other interested stakeholders during stakeholder on how it responded to certain grievances of interest if such need arises.

All the records will be made available to the Third-Party Monitoring team for Audit or if the complainant requires a copy of the grievance and its resolution.

7.7 GRIEVANCE MITIGATION MEASURES

As much as grievances cannot be completely eliminated from project implementation, they can be minimized by undertaking some measures to prevent their occurrence. Many grievances arise because of misunderstandings, lack of information, delayed, inconsistent or insufficient information. The following measures will therefore be taken to prevent and minimize the occurrence of grievances during project implementation.

a. Provision of timely and sufficient information to communities

Accurate and adequate information about the project and subprojects and its activities, impacts, remedial measures and an appropriate implementation schedule will be communicated to the communities accordingly through continuous stakeholder

consultations carried out by the PIU. The grievance redress mechanism will form part of the pre-implementation awareness activities to let the community know how they can voice their concerns. Grievance redress mechanisms both at village levels and area levels will be formed at the beginning of the project using the existing village and area development structures. These committees will be trained to disseminate information about the project to the rest of the communities. A combination of information, education and communication materials (IEC) will also be used to disseminate information to the communities. This will include banners, posters, leaflets, branded materials, billboards, community radios, mobile public address system and such other means. So, the information on the steps to be followed by complainants and GRCs in reporting and handling the grievances will be incorporated in the process of mobilizing and creating awareness of the project.

b. Meaningful community consultations

Kapichira I and Nkula Rehabilitation and Modernization Project through the PIU will inform community representatives about the GRM and explain the various ways of accessing it. A range of mitigation measures to reduce potential negative environmental and social impacts of project activities on communities will be discussed and agreed upon with community representatives as an integral part of project implementation. Discussions with Traditional leaders and various focus group discussions will be conducted on a monthly basis. The process of meaningful community consultation and dialogue will continue throughout the implementation of the project. It is envisaged that the sharing of information, reporting on project progress, providing community members with an opportunity to express their concerns, clarifying and responding to their issues, eliciting communities' views and receiving feedback on interventions will assist in reducing possible grievances.

c. Capacity Building for staff and contractors

i. Awareness and Staff Orientation

All Kapichira I and Nkula Rehabilitation and Modernization PIU staff and Contractors will be provided with adequate information such as project design, activities, implementing

schedules, and institutional arrangements as well as enhanced skills in effective communication and interpersonal skills in order to understand community dynamics and processes. Some of the skills to be imparted will include negotiation and conflict negotiation skills, building trust and maintaining good rapport with the communities. It is believed that empathizing with communities and their needs as well as providing relevant timely information on the project and responding effectively to the needs and concerns of the community members will help avoid misunderstandings and solve issues before they degenerate to become grievances.

It will also be emphasized that field staff and Contractors should provide regular feedback on their interactions with the community to the PIU. The capacity building and community consultations will consider various needs of all special and vulnerable groups like women and people living with disabilities and they shall be carried out as per Stakeholder Engagement Plan (SEP).

ii. Training

In addition all staff from direct, temporary, contractual and permanent taking part in the project shall be trained in national environmental and Social Policies, EGENCO policies that will be effected and have been included in some action plans such as the recruitment plan and GBV/SEA/SH action plan, African Development Bank Environmental and Social Safeguard policies, social and environmental screening, all necessary African Development Bank checklists and the developed approved safeguarding implementation plans to ensure all implementers are in sync with what is expected of them in the project.

The GRC's, safeguards both from the contractor and consultant and site supervisors shall be the main target to be trained on how to handle and address grievances. They will be trained on how to handle grievances mainly related to; Recruitment/ employment and discrimination; Workers' rights and conditions; Workers' relationships; Environmental related; Occupational health and safety; Code of conduct and repercussions for misconduct; GBV, SEA and SH issues; Forced labor; Child labour; Gender awareness and discrimination; Grievance

arrangements for Project workers; Involuntary resettlement; Trafficking in persons; Issues that may be linked to labour influx; Road traffic management; Community health and safety including probable diseases and mitigation strategies; cultural heritage, risks and impacts; chance find and other possible grievances that might arise from implementation of the project. Furthermore, the trainings will focus on Grievance Redress Mechanism (GRM) process, roles and responsibilities of the committees, how to run an effective and efficient mechanism as well as how to handle sensitive matter. Each workshop will have no more than thirty participants. In case of extra participants, extra workshops will be conducted. The proposed training plan will focus on:

- Objectives, purpose and limitation of the GRM;
- Project impacts and possible grievances that may arise in the project
- GRM procedures and how to handle GBV/SH/SEA/VAC issues and workers grievances;
- Training on how to use GRM tools such as the grievance form application, uploading and use for reporting
- Workers' rights, code of conduct and disciplinary procedures

Table 3: Awareness, Capacity Building and Training Plan

No.	Description of Training	Training Module	Responsibility	Timeline	Frequency	Participation
1	1-day GRC orientation meeting	<ul style="list-style-type: none"> Objectives, purpose and limitation of the GRM; Project impacts and possible grievances that may arise in the project 	EGENCO	2 weeks after approval of GRM plan	Twice a year	Community GRC, District GRC
2	2 days training	<ul style="list-style-type: none"> GRM procedures and how to handle GBV/SH/SEA/VAC issues and worker's grievances; Training on GRM tools such as the grievance form application, uploading, use for reporting and logbooks 	-EGENCO -GBV Service Provider	2 weeks after approval of GRM plan	Twice a year	District GRC, Community GRC, Workers GRC
3	2 days training	<ul style="list-style-type: none"> Objectives, purpose and limitation of the GRM; Project impacts and possible issues upon which people can complain on GRM procedures and how to handle GBV/SH/SEA/VAC issues and worker's grievances; Training on GRM tools such as the grievance form application, uploading and use for reporting Workers' rights, code of conduct and disciplinary procedures 	-EGENCO -District Labour Officer -GBV Service Provider	<ul style="list-style-type: none"> Project impacts and workers' rights, code of conduct and disciplinary procedures at the beginning of the project 	Once a year	Project Staff including Project Manager, Environment and Social Safeguards Specialists

No.	Description of Training	Training Module	Responsibility	Timeline	Frequency	Participation
				<ul style="list-style-type: none"> GRM after approval 		
4	two day awareness workshop	<ul style="list-style-type: none"> Project impacts and possible issues upon which people can complain on GRM procedures and how to handle GBV/SH/SEA/VAC issues and worker's grievances; Training on GRM tools such as the grievance form application, uploading and use for reporting Workers' rights, code of conduct and disciplinary procedures 	-EGENCO -District Labour Officer -GBV Service Provider	As soon as they are contracted on site	once a year	Project implementing partners such as Project E&S safeguards specialists, Contractors, subcontractors, consultant, etc.
5.	One day community sensitization meeting	<ul style="list-style-type: none"> GRM, Recruitment/ employment and discrimination; Environmental related; Occupational health and safety; GBV, SEA and SH issues; Forced labour; Child labour; Gender awareness; Involuntary resettlement; Trafficking in persons; Issues that may be linked to labour influx; Road traffic management; Community health and safety 	EGENCO OE and Contractor/Sub contractor	Every 3 months		Community members, traditional leaders and other local stakeholders

No.	Description of Training	Training Module	Responsibility	Timeline	Frequency	Participation
		including probable diseases and mitigation strategies; cultural heritage; chance find <ul style="list-style-type: none"> • Roles and responsibilities of the Community, contractor, EGENCO and other stakeholders in the project 				

8. INSTITUTIONAL ARRANGEMENT

8.1 THE IMPLEMENTATION STRUCTURE AND HIERARCHY

There will be three levels in the grievance management procedure. The first level being the Community Grievance Redress Committee (CGRC), then the District Grievance Redress Committee (DGRC) and the last one will be the National Grievance Redress Committee (NGRC) after which external remedies will be sought if the complainant is still not satisfied. At Community level there will be two (2) GRC's that will have to address the nine (9) villages from 2 sections from Nkula & Kapichira Hydro-plant areas. Some Community GRCs may be created if need be, if the project expands its interface with the community that require more man power. At national level the GRM will be spearheaded by the Project Implementation Unit (PIU) with the Social and Gender Specialist as the focal point. There will also be a Workers Grievance Redress Committee (WGRC) which shall be responsible for all employment related grievances between the various Contractors and their Workers. Table 4 below presents the composition of the various GRM Committees at

Community,

District and National level and figure 1 illustrate the

institutional arrangements and process in place from entry to closure of grievances.

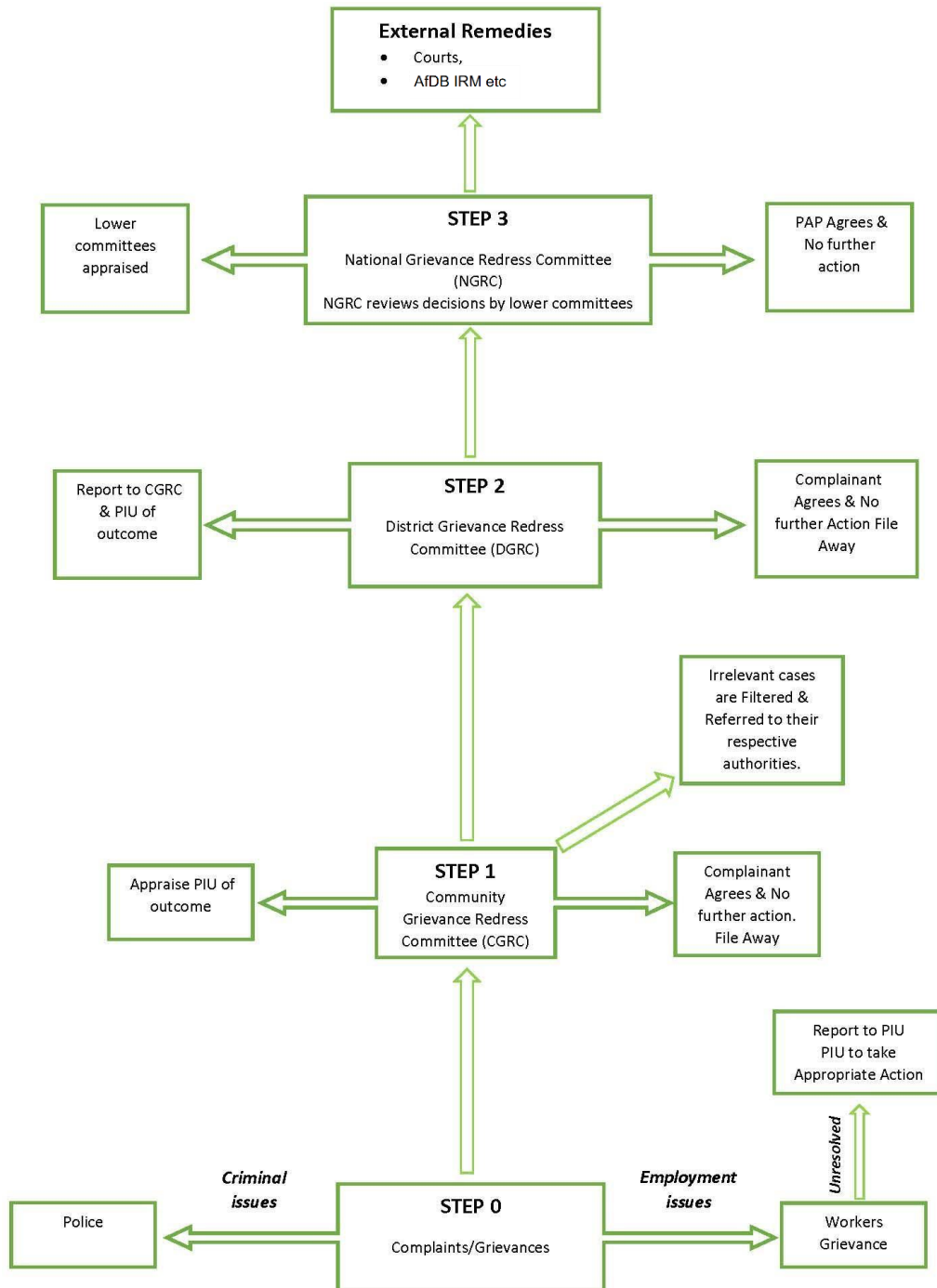
Table 4: Membership Composition of the GRM Committees

Community Level	Contractor (Workers GRC)	District Level	National Level
<p>The composition of 8 to 10 members with at least 40% representation of either sex</p> <ul style="list-style-type: none"> Youth Representative Women Representative Faith-based Representative Community member representative Member from community policing Social welfare Community Development Officer Child Protection Officer GBV Champion 	<p>A total of 6 to 10 members with a representation of not less than 40% of either sex.</p> <ul style="list-style-type: none"> Workers Representatives Contractor Representative (ESHS Personnel) Gender champion/expert Consulting Engineer Representative 	<ul style="list-style-type: none"> District Environmental Officer Director of Public Works, District Gender Officer Social Welfare Coordinator/Officer, District Lands Officer, District Labour Officers, HIV and AIDS Officer Energy NGO Representative and 	<ul style="list-style-type: none"> EGENCO PIU specialists necessary as per grievance Ministry of Energy Ministry of labour Ministry of Justice and constitutional affairs Ministry of Lands and urban development Ministry of Gender, Children, Disability and Social Welfare

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<ul style="list-style-type: none"> • HIV and AIDS/Health Surveillance Assistants 	<ul style="list-style-type: none"> • Service providers (Including GBV SP) • Human Resource Officer/ Labour expert 	<ul style="list-style-type: none"> • Police Officer (from Victim Support Unit) • Police Officer (From Community policing department) • Clinician/ pyscho-social provider/ councillor from victim support unit • Child protection officer • Magistrate 	
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Figure 1. THE GRM STRUCTURE AND HIERACHY



8.2 THE ROLES AND RESPONSIBILITY OF GRCS'S IN GRIEVANCE REDRESS PROCESS

The project shall use a multi-tier grievance mechanism as outlined below. The composition of the grievance redress committees is outlined in Annex 1.

8.2.1 National Grievance Redress Committee

The main role and responsibility of the NGRC shall be but not be limited to;

- i. Providing oversight for the grievance process including review of all grievances, trends, time frames, and opportunities for improvement
- ii. Monitoring and documenting grievances and resolution processes
- iii. Probing on grievances that have overstayed to mitigate escalation of unresolved grievances
- iv. Reviewing grievance details and background information, including notes/ resolution methods and reports from DGRMC per specific grievance case
- v. Grievance resolutions with assistance from specialist government officials and providing feedback to complainants
- vi. Referring unresolved grievances to the Ministry of Justice.

8.2.2 District Grievance Redress Committee

The role and responsibility of the DGRMC shall be but not be limited to;

- i. Building capacity of CGRC and WGRC on GRM;
- ii. Investigating the facts and circumstance of grievances referred from CGRC and WGRC; and facilitate and mediate resolution of the grievance;
- iii. Taking necessary follow-up action and documenting the grievance and the agreements reached
- iv. Referring to NGRC all unresolved grievances at Community and District level;

8.2.3 Community Grievance Redress Committee

- i. Recording all grievances as reported to them from complainants
- ii. Referring non-project related grievances to appropriate authorities
- iii. Summoning all concerned parties for hearing;
- iv. Investigating the issue, facilitate and mediate resolution of grievance;
- v. Providing feedback to the complainant and ensure reporting to the DGRMC;
- vi. Documenting status of the grievance and its resolution;
- vii. Referring unresolved grievances to the DGRMC for resolution with appropriate documentation and justification for reference

8.2.4 Workers Grievance Redress Committee

The Workers Grievance Redress Management Committee (WGRC) roles and responsibilities include but are not limited to;

- i. Recording all grievances as submitted to them by complainants;

- ii. Vetting all received grievances and consider their appropriateness for resolution under this GRM. If the grievance is not within jurisdiction of the committee, it shall be referred to the appropriate authority
- iii. Summoning all concerned parties for hearing
- iv. Investigate the issue, facilitate and mediate resolution of grievance
- v. Documenting status of the complaint and its resolution;
- vi. Referring the grievance to the Owners engineer and or PIU for resolution with appropriate documentation and justification for reference if the case is unresolved;
- vii. Providing feedback to the complaining party and ensure reporting
- viii. Sensitizing workers on GRM.

8.2.5 Project Implementing Unit

EGENCO is the project Implementing Unit (PIU) in the Project. Therefore, EGENCO together with the projects implementing partners, will be responsible for the implementation, management and monitoring of the GRM. EGENCO has engaged professional that will have the responsibility of ensuring that the GRM is functional. Table 5 below illustrates the roles and responsibilities of the personnel for the operationalization and functionality of the GRM.

Table 5: Roles and Responsibilities of PIU Personnel

Position	Key Roles and Responsibilities
Project Manager	<ul style="list-style-type: none"> • Ensure project compliance with this GRM Procedures and Provisions. • Ensure the GRM Manual is operationalized, and its operations are adequately financed. • Assigns responsibility to Social and Gender Safeguards Specialist to ensure grievances are resolved as per the Procedure. • Facilitate collaboration of the Safeguards Team with other Stakeholders
Social Inclusion and Gender Manager	<ul style="list-style-type: none"> • Establishing a project grievance mechanism, and document a project-level grievance management procedure, based on the African Development Bank Grievance Redress Mechanism standards. • In coordination with the Social Safeguards Specialist to determine the scope or mandate for the consultant's Social Expert to resolve grievances based on first assessment. • Ensuring external stakeholders are involved in the design and development of the project grievance mechanism.
Social and Gender Specialist	<ul style="list-style-type: none"> • Primary responsibility is to manage the implementation and management of the CGRC, WGRC and their resolution procedure. • Playing an oversight role to ensure that the grievances on project are resolved according to this procedure. • Ensuring that all complaints, investigation processes and their resolutions are documented • Supporting the project manager in the development of a project grievance mechanism based on

Position	Key Roles and Responsibilities
	<p>this manual.</p> <ul style="list-style-type: none"> • Facilitate trainings, workshops and sensitizations for the Grievance Redress Mechanism. • In collaboration with Consultant’s Social Expert, manage the Grievance Redress Mechanism and tasks include: <ul style="list-style-type: none"> ➤ Informing communities how to access the mechanism. ➤ Conducting first level review. ➤ Keeping complainants informed of the status of any lodged complaints. ➤ Tracking and reporting on grievances. ➤ Management of grievance process including collation of all grievances from various registration channels. ➤ Investigation of grievances as required, engaging other functional staff. ➤ Report on status of grievances and performance of the GRM
Communication Expert	<ul style="list-style-type: none"> • Ensure all stakeholders are aware of project activities to mitigate misunderstandings • Responsible for communication with the public and other major stakeholders

9. MONITORING AND EVALUATION OF COMPLAINTS

Monitoring, reporting, and documentation are essential for ensuring the functionality, transparency, and continuous improvement of the Grievance Redress Mechanism (GRM) during the implementation of the Kapichira I and Nkula Rehabilitation and Modernization Project.

9.1 ROLES AND RESPONSIBILITIES

1. The Office of the Social Safeguards of the Kapichira I and Nkula Rehabilitation and Modernization PIU will be responsible for:

- Collecting monthly reports detailing the number and status of complaints, types of grievances, levels (community, district, national), and phases (e.g., planning, construction) from the District Social Development Officer.
- Facilitating the resolution of outstanding issues that fall under EGENCO PIU's responsibility.
- Organizing and conducting capacity building activities for all GRM committees (CGRC, DGRC, NGRC) to enhance effectiveness and responsiveness.
- Monitoring the functionality and efficiency of the GRM system across all tiers.
- Producing monthly trend analysis reports highlighting emerging grievance patterns and lessons learned from resolution efforts at various project sites.

2. The Supervising Engineer (SE) will be responsible for:

- Collecting monthly reports from CGRCs at the community level and DGRCs at the district level, capturing complaint types, status, and actions taken.
- Reviewing and analyzing resolutions to determine adequacy and responsiveness of the GRM.

- Monitoring the functionality and effectiveness of the GRM and the implementation of the GBV Action Plan.
- Producing independent monthly reports and providing actionable recommendations to improve GRM performance and stakeholder confidence.

9.2 PROCEDURES FOR TRACKING COMPLAINTS

To ensure comprehensive documentation and follow-up, the project will implement the following mechanisms:

- Standardized Grievance Registers at all committee levels (CGRC, DGRC, NGRC) to log all complaints.
- A Centralized Digital Database managed by the PIU Social Safeguards to consolidate information from all levels, track grievances, update statuses, and analyze grievance trends.
- Complaint Forms and Case Files (in hard and soft copies) completed upon intake to document the complainant's identity, location, nature of complaint, steps taken, and outcomes.
- Photo and GPS Evidence where applicable, especially for grievances involving property (e.g., assets, crops) or environmental damage.

Key

Performance

Indicator:

- ✓ 100% of grievances logged into the central database within 72 hours of receipt.

9.3 MONITORING INDICATORS

The project will track and assess GRM performance Monthly using the following quantitative, measurable, and verifiable Key Performance Indicators (KPI's) indicated in table 6.

Table 6: Monitoring Key Performance Indicators

Indicator	Target
% of grievances acknowledged within 5 working days	100%
% of grievances resolved within agreed timeframe (e.g., 21 days)	≥ 90%
% of complainants satisfied with grievance resolution	≥ 80%
Total number of grievances received monthly (disaggregated by type and location)	Baseline established in Month 1
% of unresolved grievances pending beyond 30 days	≤ 5%
% of GRC's (CGRCs, DGRCs, NGRC) operational and trained GRM procedures	100%
Number of GBV-related complaints appropriately referred and addressed	100%

The PIU and Independent Observer will jointly validate these indicators using grievance logs, investigation summaries, and stakeholder interviews.

9.4 PERIODIC REPORTING

To ensure transparency, accountability, and informed decision-making, the GRM will incorporate a structured reporting mechanism to regularly update all key stakeholders, including donors such as the African Development Bank (AfDB). These periodic reports will document the nature, frequency, and resolution status of grievances, as well as provide trend analyses and recommendations for continuous improvement. The reporting schedule as outlined in table 7 will be adhered to strictly, with defined responsibilities and submission deadlines

to maintain consistency, enable prompt response to systemic issues, and strengthen stakeholder confidence in the effectiveness of the grievance redress mechanism.

Table 7: Reporting Mechanism

Report Type	Submitted By	Frequency	Recipients
Monthly Summary Report	PIU Social Safeguards	Monthly (by 5th)	AfDB, EGENCO Executive
Supervising Engineer Report	Supervising Engineer	Monthly (by 10th)	AfDB, PIU, Ministry of Energy
Grievance Trend Analysis Report	PIU	Quarterly	EGENCO Executive, GRCs
Annual GRM Evaluation Report	PIU + SE	Annually	Public Disclosure, AfDB

9.5 LESSONS LEARNED AND ADAPTIVE IMPROVEMENTS

Both the PIU and the Independent Observer will document lessons learned based on:

- Recurrent or systemic complaints.
- Complainant feedback and satisfaction levels.
- Effectiveness of corrective actions.

Annual GRM reviews will be held with participation from CGRC, DGRC, and NGRC representatives to discuss challenges, success stories, and needed adjustments. Adaptive Measures May Include:

- Revising intake procedures.
- Updating GRM communication materials.
- Conducting refresher training for GRCs.

Key	Performance	Indicator:
✓ At least 2 recommendations per quarter implemented within 60 days.		
✓ 1 annual learning and adaptation workshop conducted with over 90% GRC attendance.		

10. BUDGET

To ensure the effective implementation, functionality, and sustainability of the Grievance Redress Mechanism (GRM) for the Kapichira I and Nkula Rehabilitation and Modernization Project, adequate financial, human, and logistical resources will be allocated. The Table 8 below outlines indicative costs associated with core GRM components, including training, awareness campaigns, operational expenses, documentation, and independent oversight.

Table 8: GRM budget Estimate (Over 3-Year Period)

Component	Activity	Estimated Cost	Equivalent in	Remarks
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		(USD)	MWK	
1. GRM Operational Setup	Establishment and equipping of CGRCs, DGRCs, and NGRC	18,000	31,257,000	Stationery, registers, signage, grievance boxes
	Development and printing of GRM tools/forms	8,000	13,892,000	Physical forms, logbooks, filing folders
2. Capacity Building & Training	Training for GRM Committees (CGRC, DGRC, NGRC, WGRC)	25,000	43,412,500	Annual sessions, materials, venue, meals
	SEA/SH-specific training for focal points	15,000	26,047,500	In line with AfDB ISS/OS requirements
3. Awareness & Community Sensitization	Public campaigns (radio, posters, meetings)	20,000	34,730,000	IEC outreach for inclusive access
4. Monitoring & Reporting	Routine monitoring, field visits, data collection	18,000	31,257,000	Transport, allowances, tools
	Independent Observer Institution Fees	10,000	17,365,000	Third-party audits
	Quarterly & Annual Reporting Costs	9,000	15,628,500	Printing & dissemination
5. Documentation & Learning	Grievance logbook printing, archiving	5,000	8,682,500	Secure physical storage
	Midterm and endline GRM evaluations	12,000	20,838,000	Lessons learned, system improvements
Contingency (10%)	For unforeseen costs	14,000	24,311,000	Adjusted yearly
Total Estimated Budget	For 3-year manual GRM implementation	\$154,000	267,620,000 MWK	

11. CONCLUSION

The establishment and institutionalization of the Grievance Redress Mechanism (GRM) for the *Kapichira I and Nkula B Hydropower Stations Rehabilitation and Modernization Project* reflect a firm commitment to stakeholder engagement, accountability, and inclusive development. Anchored in Malawi's national legal and policy framework and aligned with the African Development Bank's Integrated Safeguards System (ISS, 2023), the GRM provides a transparent, culturally appropriate, and accessible platform for receiving, documenting, addressing, and resolving grievances at all stages of the project lifecycle. It is envisaged that the operationalization of this mechanism will not only help prevent the occurrence of grievances but also ensure that any issues that do arise are managed effectively and efficiently, thereby supporting the smooth and timely implementation of the project.

By integrating multi-tiered redress structures spanning community, district, and national levels and including a specialized mechanism for GBV/SEA/SH-related cases, the GRM ensures that all grievances, particularly those from vulnerable groups, are addressed promptly and fairly. A digitized tracking system, dedicated personnel, clear reporting lines, and regular performance monitoring strengthen the system's responsiveness and sustainability. Capacity building, stakeholder sensitization, and ongoing learning are embedded to enhance trust and long-term functionality. Through continuous monitoring, data-driven improvements, and third-party oversight, the GRM supports conflict prevention, fosters transparency, and reinforces the project's legitimacy and development effectiveness.

ANNEX 1: COMPOSITION OF GRCS

1.1. NATIONAL PROJECT GRIEVANCE REDRESS COMMITTEE (NPGRC)

Members

- a) Chairperson – Project Manager
- b) Monitoring and Evaluation Specialist - Secretary
- c) Representative of Electricity Users – National Level
- d) Ministry of Lands – Director Level (only if it's a land related issue)
- e) Communications Specialist
- f) Environmental Specialist
- g) Gender and Social Inclusion Manager
- h) Social Safeguards Specialist
- i) Human resource Manager/ Regional Labour Officer

Ex-Officio

- j) District Commissioner
- k) T/A or GVH from where the grievance originated
- l) A Representative of the Contractor/OE where applicable

1.1.1 DISTRICT GRIEVANCE REDRESS COMMITTEE (DGRC)

Members

- a) District Director of Planning – Chair
- b) District Labour Officer
- c) Lands/Environmental Officer
- d) Representative of Electricity Users
- e) District Energy Officer
- f) Gender, Social & Welfare Officer
- g) Youth Organisation Representative
- h) Faith Based Organisation Representative
- i) Representative of Community Grievance Committee
- j) Representative of surrounding community

Ex-officio

- k) T/A or GVH where the grievance originated from



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l) Where applicable – a representative of a contractor/OE

1.1.2 COMMUNITY GRIEVANCE REDRESS COMMITTEE (CGRC)

Members

- a) Community representative
- b) Representative of Electricity Users in the Area
- c) Representative of Community Policing
- d) Women Representative
- e) Youth Representative
- f) Faith Based Organisation Representative
- g) Representative of Community Based Organisation
- h) Gender Based Violence Champion

Note: Chairperson and Secretary will be chosen among themselves

Ex-Officio

- i) VG or GVH where the grievance originated
- j) T/A or GVH as applicable
- k) Representative of a Contractor where applicable

1.1.3 WORKERS GRIEVANCE REDRESS COMMITTEE

Members

- a) Three worker representatives
- b) PIU representative
- c) Supervising Engineer representative
- d) Contractor representative

Note: Chairperson and secretary will be chosen among themselves

ANNEX 2: KAPICHIRA I AND NKULA REHABILITATION AND MODERNIZATION PROJECT GRIEVANCE LOG/ GRIEVANCE RESOLUTION FORM

Annex 2.1. GRIEVANCE/FEEDBACK LOG IN

	Project District & Area	
	Date	
No	Grievance No.	

1	GRM level (select as appropriate)	1. Community Grievance Redress Committee 2. District Grievance Redress Committee 3. Workers Grievance Redress Committee (WGRC) 4. National Grievance Redress Committee
2	Name of the GRC (Name as appropriate)	
3	Person Recording Grievance/Feedback	
3.1	Name of Person	
3.2	Position in GRC	
3.3	Phone Number	
4	Person reporting grievance/feedback	
4.1	Name of Person	
4.2	Aggrieved or Representative?	
4.3	Role in Kapichira I and Nkula Rehabilitation and Modernization Activities	

4.4	Phone Number	
5.	Details of Grievance/Feedback	
6	Has the Grievance/Feedback been reported elsewhere? If yes, give details?	
7	Has the Grievance/Feedback been referred from elsewhere? If Yes, give details	
8	Initial Assessment of the Case	1. Accepted and to be handled by GRC 2. Referred to police/Court, others 3. Rejected, lacks credibility/substance



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9	Signatures	
9.1	Signature of Person Recording/GRC	
9.2	Signature of Person Reporting	
10	Name & Signature of Witness	
10.1	For the Complainant	
10.2	For the alleged perpetrator	
11	Dated Grievance/Feedback recorded	

Annex 2.2. ASSESSMENT, RESPONSE AND CLOSURE

No	Grievance No.	
11	Composition of GRC Assessing the 'Case'	
	Name of GRC Member	Position in the GRC
12	Case Assessment Approach (Specify as appropriate)	1. GRC Meeting 2. GRC confirmation visits 3. Hearing with the complainant 4. Full hearing with alleged accused party 5. Other investigations (Specify)
13	Details of GRC Response/Resolution	



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14	Response/Resolution Decision	1. Case resolved, closed 2. Case referral (Specify)
15	Signatures	
15.1	GRC Chair/Representative	
15.2	Aggrieved person/Representative	
15.3	Accused person/Representative	
16	Name & Signature of Witness	
16.1	For Aggrieved party	
16.2	For Accused party	
17	Date of Response/Resolution	

ANNEX 3: SEA/SH-SPECIFIC INCIDENT REPORTING FORMS

Annex 3.1. SEA/SH Incident Intake Form (*Strictly Confidential*)

Note: This form will be completed by a trained **Gender-Based Violence (GBV)/SEA/SH Focal Point** only. It must **not** be shared outside designated safeguarding channels and should follow a survivor-centered and trauma-informed approach.

Section	Details
Project District & Location	
Date of Report	
SEA/SH Incident ID No.	
A. Reporter Information	
Relationship to Survivor (e.g. self, family member, third party)	
Name (if consented)	
Age	
Gender	
Phone/Contact	



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Consent to record identity and details?	<input type="checkbox"/> Yes <input type="checkbox"/> No
B. Incident Description (summary only)	
Type of Incident	<input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Other (specify)
Alleged Perpetrator	<input type="checkbox"/> Contractor/Worker <input type="checkbox"/> Community Member <input type="checkbox"/> Staff/PIU <input type="checkbox"/> Unknown
Incident Location	
Brief Description of Incident (as voluntarily disclosed)	
Date of Incident	
Was the survivor referred to support services?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, specify (medical, psychosocial, legal)	
Does the survivor want to file a formal grievance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Confidential Case Code (to protect identity)	
C. Immediate Actions Taken	
Support Provided (e.g., referral, safety plan, psychosocial support)	
Referral Agencies Contacted (specify)	
Name & Signature of SEA/SH Focal Point	
Date Form Completed	

Annex 3.2. SEA/SH Incident Investigation and Resolution Form (*Restricted Access*)

Section	Details
SEA/SH Incident ID No.	
Investigation Team Members	(At least one female and one safeguarding-trained member)
Method of Investigation	<input type="checkbox"/> Survivor Interview <input type="checkbox"/> Witness Interview <input type="checkbox"/> Documentation Review <input type="checkbox"/> Site Visit
Outcome Summary	
Was the complaint substantiated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Inconclusive
Actions Taken	<input type="checkbox"/> Sanctions/Disciplinary <input type="checkbox"/> Contract Termination <input type="checkbox"/> Law Enforcement Referral <input type="checkbox"/> Other
Referral to Services	<input type="checkbox"/> Health <input type="checkbox"/> Legal <input type="checkbox"/> Psychosocial <input type="checkbox"/> Shelter
Safeguard Improvement Recommendations	
Feedback to Survivor (in survivor's preferred format and language)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Signature of Lead Investigator	
Date of Case Closure	



ELECTRICITY GENERATION COMPANY (MALAWI) LIMITED