

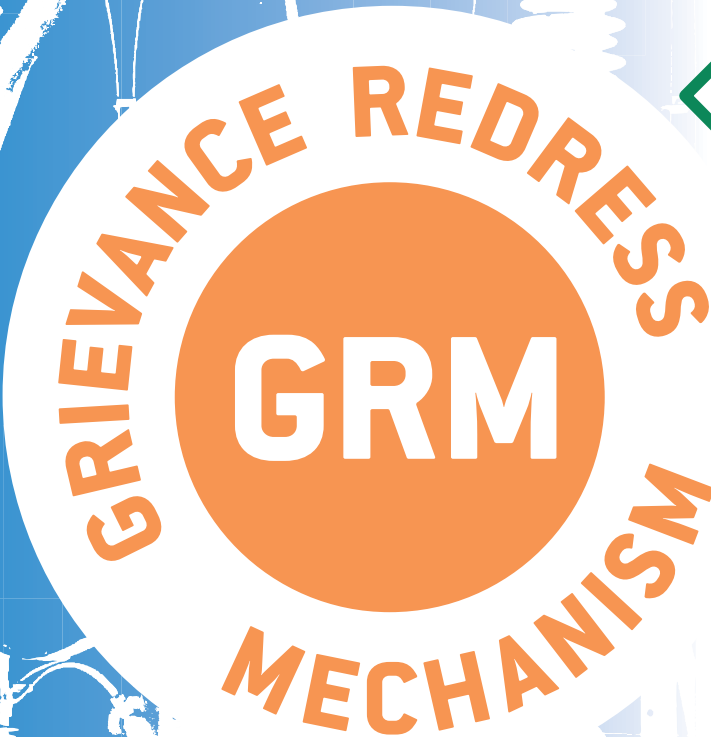
GAMBIA RIVER BASIN
DEVELOPMENT
ORGANISATION

ORGANISATION
POUR LA MISE EN VALEUR
DU FLEUVE GAMBIE



Energy Project

THE GAMBIA • GUINEA • GUINEA-BISSAU • SENEGAL



www.pe-omvg.org

A photograph of Mr. El Hadji Lansana Fofana, OMVG High Commissioner, speaking at a podium. He is wearing a blue cap with a logo, glasses, a yellow shirt, and a patterned blazer. The podium is equipped with several microphones, some with 'GRTS' logos. In the background, other men are visible, some wearing traditional headwraps. The scene appears to be outdoors during a formal event.

Mr. El Hadji Lansana Fofana, OMVG High Commissioner, at the ceremony to launch Interconnection works in The Gambia (Soma) in February 2019

- NOVEMBER 2019 -

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GLOSSARY

Conciliation Commission - A mechanism guided by the national laws of all OMVG (Gambia River Basin Development Organisation) member States and established by the administrative authority in order to collect, assess and handle litigations according to existing national laws. It is established pursuant to an order issued by the administrative authority and comprises a governor, a sub-prefect, a prefect, a mayor, a head of district, and an officer of the relevant LCMC, which acts as secretariat to the Committee.

Company - The entity or entities, directly or indirectly in charge of the realization of works and the implementation of the OMVG Energy Project.

Registration - The process which consists into registering in the GRM that an appeal has been received and that it abides by all set criteria.

Assessment of the eligibility - The process which aims at deciding whether a registered appeal should be subjected to a compliance review and/or to a problem-solving Initiative, or if it cannot fit to any of the mentioned processes.

Problem-solving Initiative - The process implemented in order to contribute to the resolution of some problems leading to an eligible appeal, including mediation, conciliation, facilitation of dialogue or investigation carried out independently to state the facts.

Working days - The working days in the target countries of the project.

Civil Society Organization - Any entity or association or group which gathers around itself the civil society and representing a whole series of specific interests. It includes community organizations, village associations and non-government organizations.

The concerned Parties - The parties which are directly interested in an appeal are not limited to the only Plaintiff, or, if any, the authorized representative, but they also extend to the relevant department, and the client.

The Plaintiff(s) - The person (s) or the organization (s) which, depending on the situation, files the complaint with the GRM.

Based complaint - When the complaint is based on a harm brought to anyone, which will basically lead to the change, the adjustment of a situation. It becomes therefore part of an approach of rehabilitation.

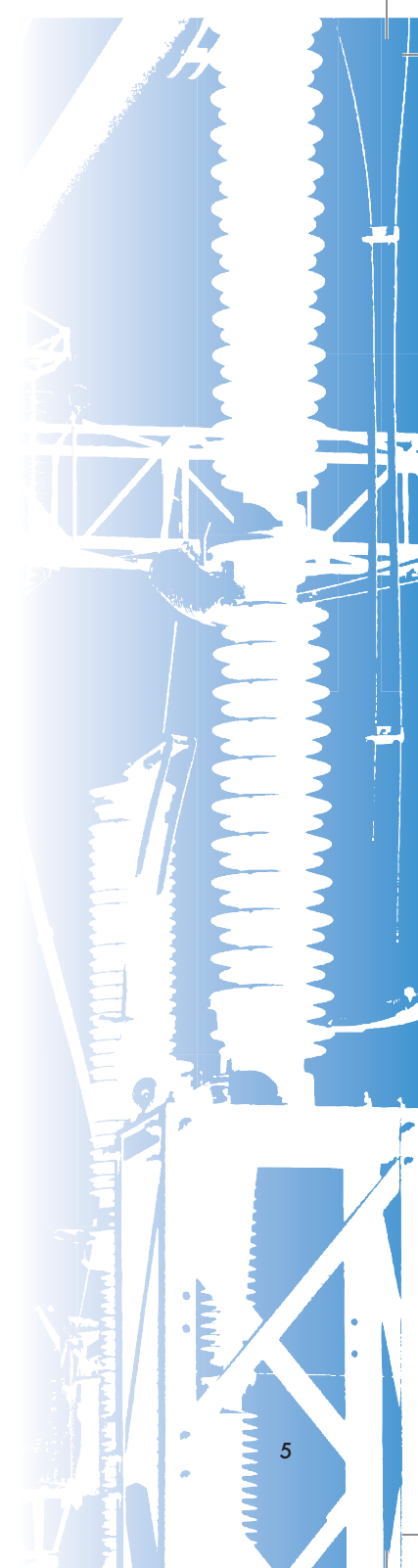
Non-based complaint - When the complaint is based on a rumor or a perception, or when it is filled with inaccuracies, or based on a comment, view, or an anonymous request (not signed).


Complaint - When a feeling of discontent related to some dissatisfaction on an event, a person, a service or a human conduct is voiced.

Judicial proceedings - The complaints received in the framework of a statement of offence proceedings or judicial proceedings cannot be processed because the judicial process cannot be interrupted. The citizen has to claim his right to a judge.

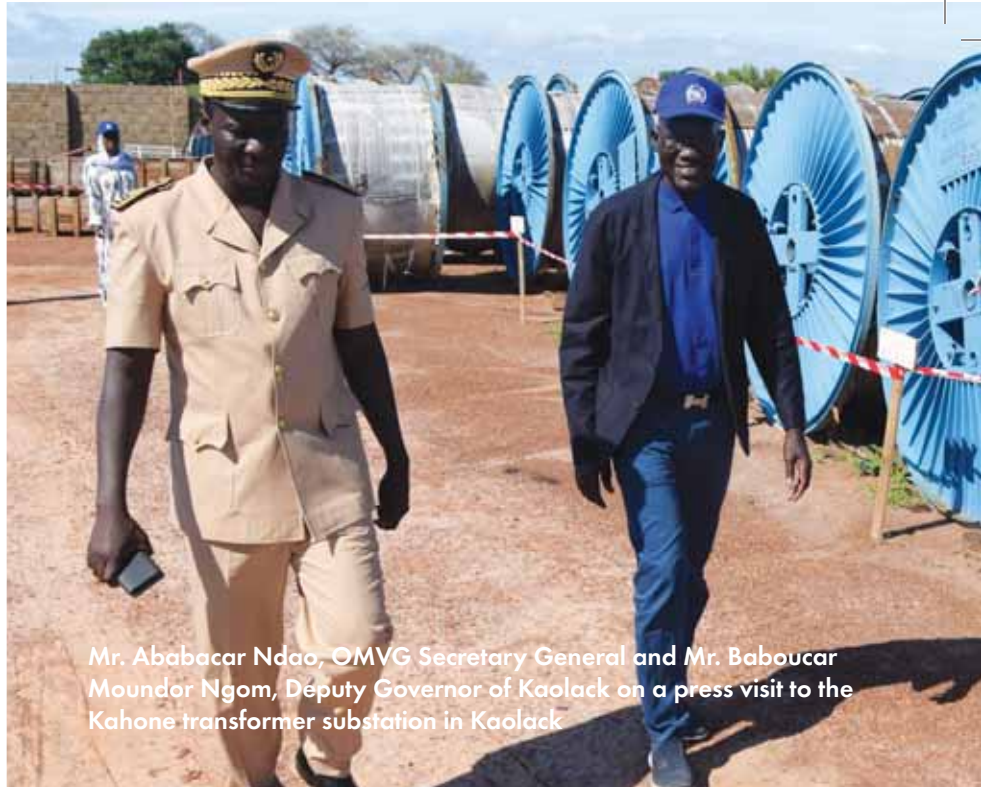
Information request - A request for information that can be answered, at first contact, by the department concerned and does not usually require any follow-up.

Request for service - A request which involves the intervention of the company. This refers to an immediate or time-fixed change of situation and which remedies a temporary harm. For instance, it can be the repair of a potable water pipe, the electric network, a network object, the noise pollution, etc.

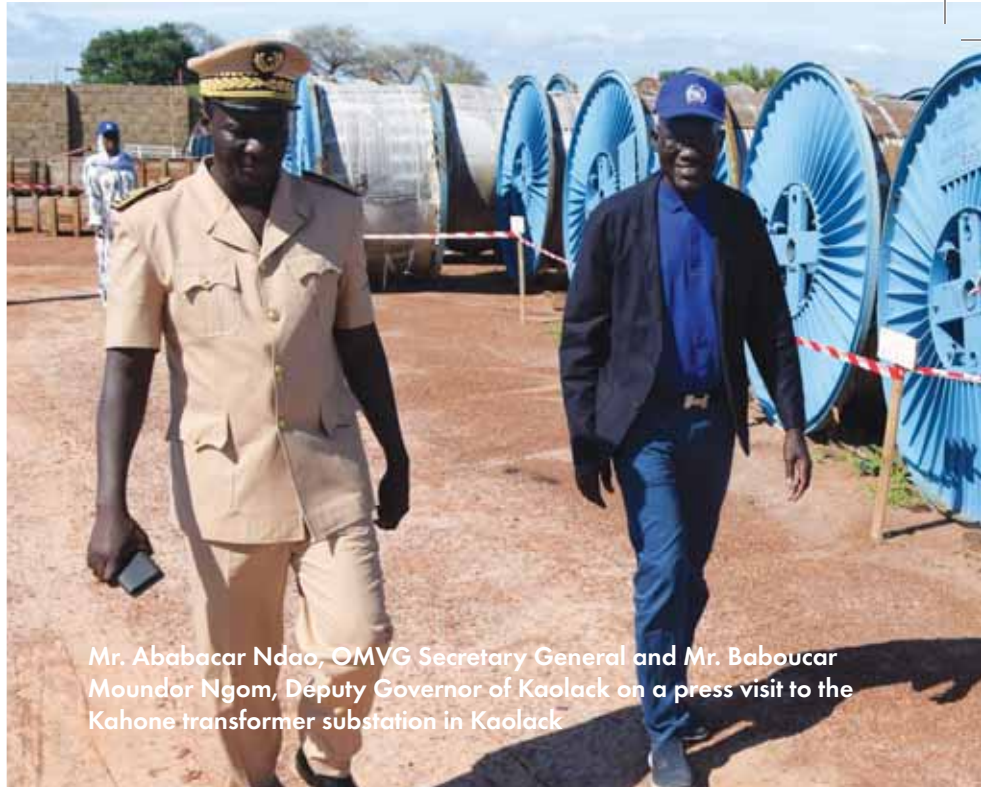




Dr Cheikh Taliby Sylla, Minister of Energy and Hydraulics of the Republic of Guinea unveiling the Energy Project's inaugural plaque in Linsan



Mr. Ababacar Ndao, OMVG Secretary General and Mr. Baboucar Moundor Ngom, Deputy Governor of Kaolack on a press visit to the Kahone transformer substation in Kaolack





The first towers of the interconnection line installed in Tambacounda



Visit of the administrative authorities of Tambacounda to the transformer substation



Information session for the People Affected by the Project in Bafata, Bissau-Guinea



Payment of compensation to People Affected by the Project in Farafenni, The Gambia



Members of the National Follow up Committees and of the Local Steering and Monitoring Committees

FOREWORD

In accordance with the recommendations of the existing specialized bodies, this document provides a detailed description on the functioning of the Grievance Redress Mechanism (GRM) implemented by the OMVG Energy Project.

As illustrated in the diagram below, the Grievance Redress Mechanism presented in this document, deals with all complaints lodged by persons affected by the activities of the Energy Project. It also describes the process used by the Company to handle the complaints submitted by workers and populations living around the working site. It specifies all the measures and procedures to be implemented by the Energy Project to help the potential Plaintiffs prepare and file their complaints.

As for the gender-based violence (GBV), the Energy Project will work with the existing specialized bodies in order to deal with such issues and provide some support to gender-based violence victims while making sure they are taken care of, according to the principles of confidentiality, safety and non-discrimination.

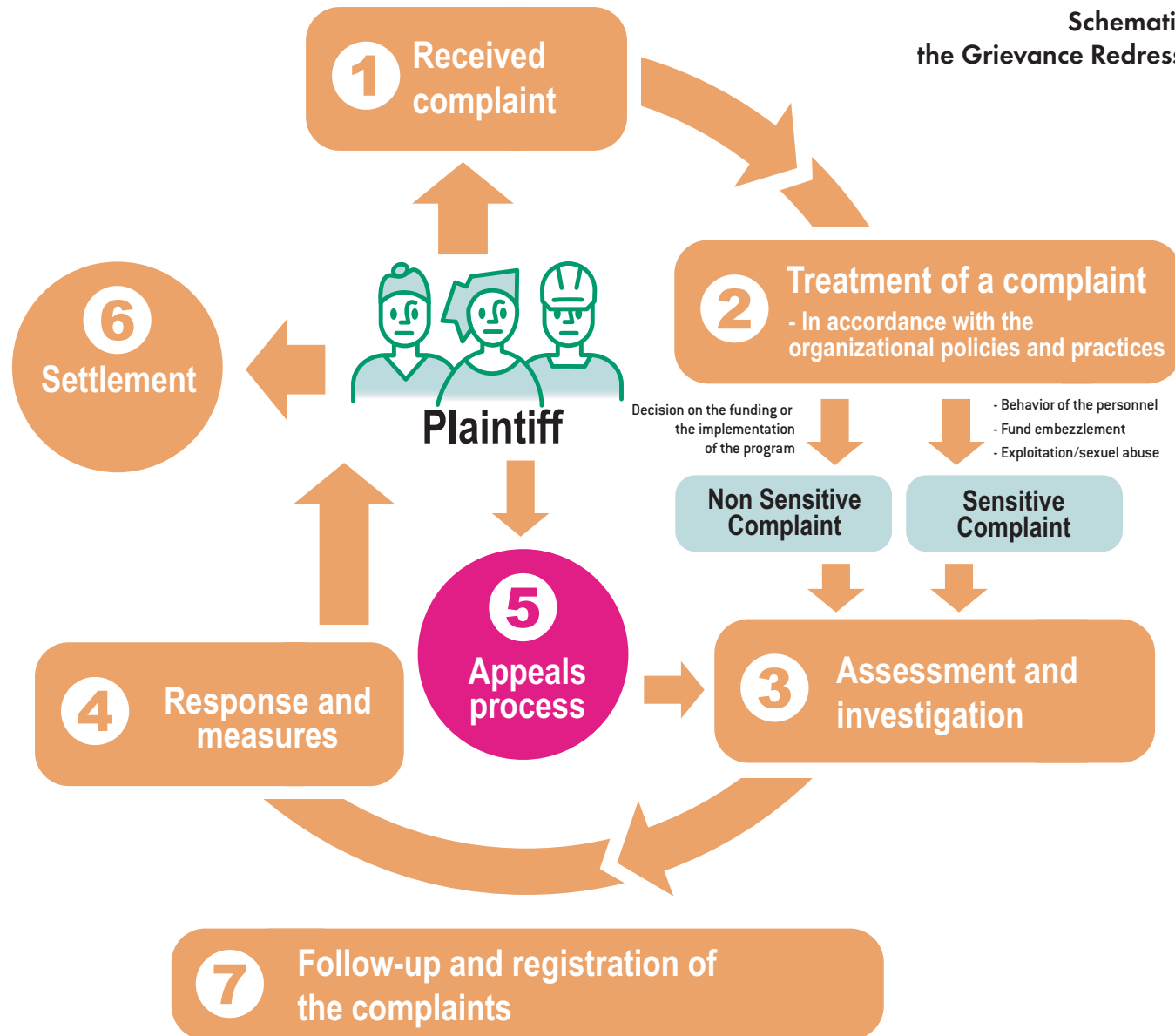
The Grievance Redress Mechanism described in this document will enable to meet the expectations of the citizens and the employees from the contracting companies and to correct, if necessary, the activities of the Energy Project which have a negative impact on the environment or the individuals.



IMPORTANT

If he/she so wishes, the plaintiff may refer the matter directly to the administrative and judicial authorities of his/her country without resorting to this GRM. Even in the event of a referral to the GRM, the Plaintiff may, at any time, file a complaint to the administrative and judicial authorities of his/her country.

Schematic drawing of
the Grievance Redress Mechanism





OVERVIEW OF THE ENERGY PROJECT

The Gambia River Basin Development Organization (OMVG) is a regional institution which includes four member-states: The Gambia, Guinea, Bissau Guinea and Senegal.

The OMVG High Commission is the implementing agency of the integrated development programs and projects devised by the four member-States for a proper and coordinated exploitation of the hydro-electric resources in the basins of the Gambia river, the Kayanga Géba and the Koliba-Corubal.

On February 4, 2017, in Kaléta, Guinea, the OMVG launched its ambitious project with the support of the member-States and the technical and financial partners.

The project envisions the construction of an interconnection line connecting the four member states' electricity networks and a hydroelectric installation in Sambangalou, Senegal.

The main goals of the project are:

- To provide Member States with clean, renewable and low-cost energy.
- To boost the electricity market through the sharing of the hydro-electric resources of the sub-region and the integration of the means of electricity and the transmission of electrical energy.
- To reduce significantly fossil-fuel consumption while protecting the environment.
- To contribute into the sub-regional integration and to promote the economic development of the sub-region.
- To improve the well-being of the populations.

The Energy project is structured around 2 technical components: a transmission line (Interconnection) and a hydroelectric installation in Sambangalou.

INTERCONNECTION LINE 225 kV

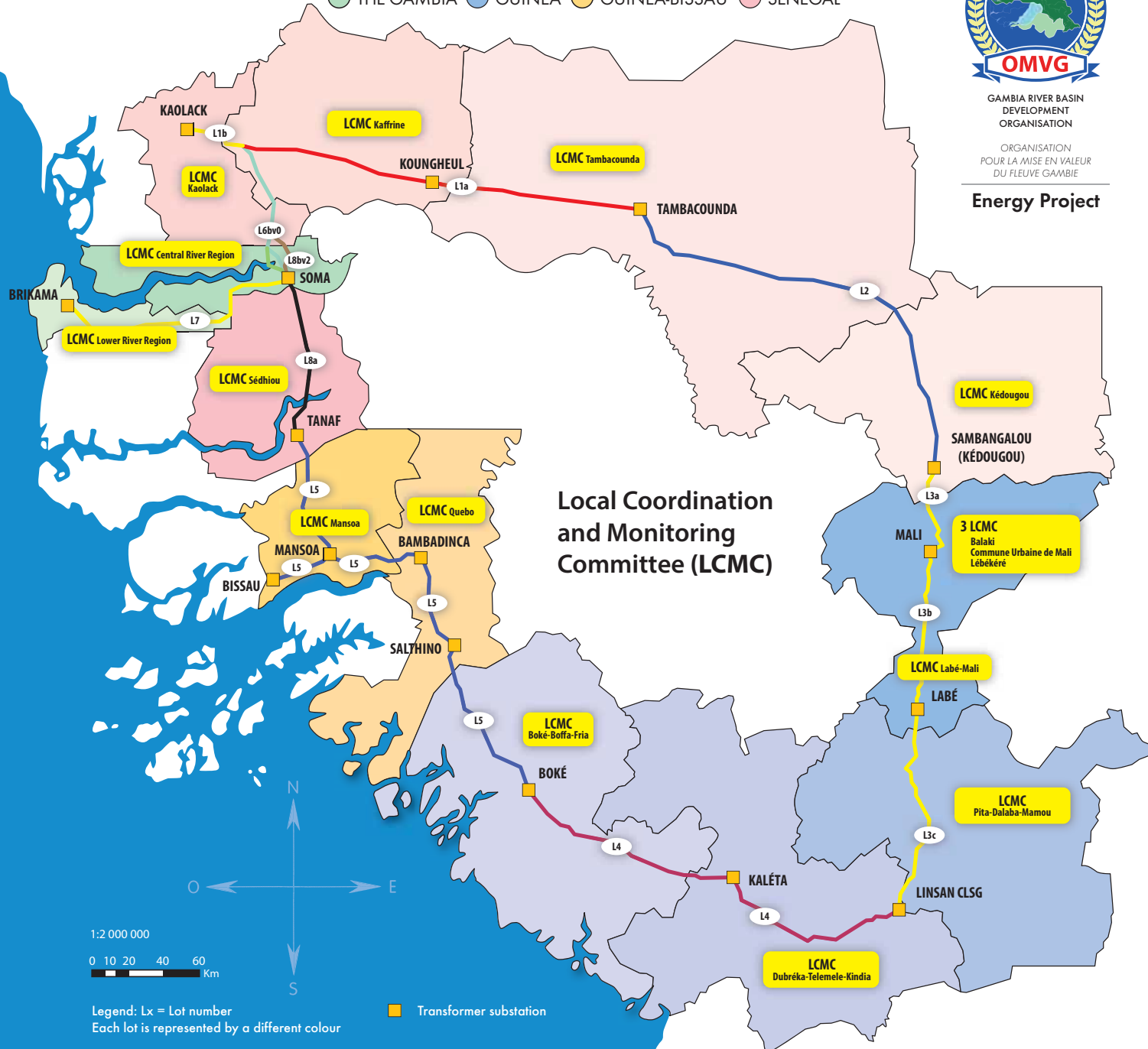
THE GAMBIA GUINEA GUINEA-BISSAU SENEGAL



GAMBIA RIVER BASIN
DEVELOPMENT
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POUR LA MISE EN VALEUR
DU FLEUVE GAMBIE

Energy Project





THE ENVIRONMENTAL AND SOCIAL CONCERNS AT THE HEART OF THE ENERGY PROJECT'S ACTION

In accordance with the guidelines of the World Bank with regard to the environmental and social framework, the project is classified in the B category with requires the establishment of the following OP/ BP safeguard policies:

- 4.01. Environmental assessment
- 4.04. Natural habitats
- 4.11. Physical cultural resources
- 4.12. Involuntary resettlement
- 4.36. Forests

In order to address the environmental and social concerns, the Energy project has formulated some documents and taken some safeguard measures:

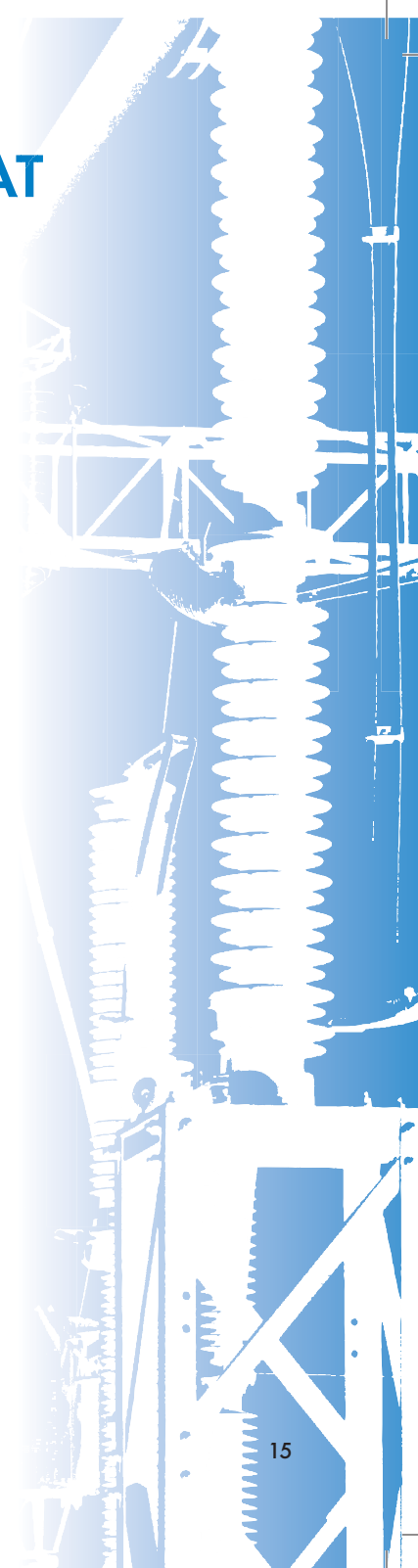
- Environmental and Social Impact Assessment (ESIA)
- Resettlement Policy Framework (RPF)
- Resettlement Action Plan (RAP)
- Environmental and Social Management Plan (ESMP)
- Work Site Environmental and Social Management Plan (ESMP-WS)

The Energy Project Management Unit, the four national Follow up Committees and the sixteen Local Coordination and Monitoring Committees established by the project are entrusted to support the implementation and the monitoring of the environmental safeguard measures stated in these documents.

To align with the new Environmental and Social Framework (ESF) of the World Bank which entered into force on October 1, 2018 (OP 4.12, Standard 10, part C), a Grievance Redress Mechanism (GRM) was established by the Project.

In order to extend its reach, including a better dealing with gender-based violence (GBV) and other offences, to adapt it to the local context and to give it a participatory approach (with the establishment of the Grievance Redress Mechanism at all levels, the GRM has been improved and simplified.

This document, which appears to be more accessible, efficient, secured, equitable, transparent, and respectful, at its best, of the local cultures, describes an improved and simplified GRM used by the Energy Project.





1 - WHAT IS A GRIEVANCE REDRESS MECHANISM?

A Grievance Redress Mechanism is « a mechanism which enables to address the questions or to provide clarifications on the project in order to solve the implementation issues and to handle efficiently the voiced grievances».

In the legal sense, a complaint is an expression of dissatisfaction about the level or the quality of the provided support, which is related to the actions or inactions of the personnel or the volunteers of a project which generates directly or indirectly some anguish, an abuse of right on anyone.

In the framework of the OMVG, the complaint will be any action or information related to the implementation of the Project which causes a moral, financial or judicial harm to anyone. Its general objective consists into requesting and encouraging the participation of the beneficiary communities to the implementation of the project (men, women, boys, girls) in a secured and adapted way.

The GRM is an essential practice in order to establish a good relationship with the stakeholders including the project's staff such as the Consulting Engineer, UGP, OMVG, the companies on the one hand and the People Affected by the Project, the workers, the surrounding populations and the inhabitants on the other. It serves as a tool for good governance and accountability with regards to the latter. Furthermore it is used to improve the results of the projects by providing more predictable and appropriate responses focusing on the concerns of the citizens.

The management of the GRM falls within the responsibility of the Environment Division of the Project's Management Unit, which relies on the Local Coordination and Monitoring Committees, the HSE officials at the site work, the National Monitoring Committees at the national level and on the Consulting Engineer and the OMVG (High Commission and UGP) at the regional level.

2 - WHAT ARE THE POTENTIAL GROUNDS FOR COMPLAINTS?

The grounds for complaints may stem from environment and security related issues on the one hand, and from social matters on the other (compensation and resettlement). Henceforth, the improved GRM enables it to handle complaints related to some offences (sexual or fraudulent).





- A bad understanding of the RAP implementation process
- A lack of information
- The feeling of being badly treated with regard to others
- A dispute between compensated individuals or groups on the ownership of a property (two or more individuals claim the ownership of a same property)
- Discrimination in the access to compensations or supports, especially affecting women
- A gap in the public consultation process
- An error in the assessment of the refunded expenses to the Person affected by the Project
- A claim about the scale of compensation
- Error or disagreement in the identification and the assessment of a plot of land or other properties
- A disagreement between a landlord and an exploitant related to the resettlement
- A disagreement on the resettlement measures, for instance on the type of the proposed habitat or on the characteristics of the resettlement plot
- A discrepancy between the implemented actions in the framework of the RAC and what the PAP understood during the planification stage
- Degradation of the agricultural lands or of a facility during the construction activities
- Work site accident or incident, occurring during construction works, affecting the personnel or the population
- Social conflicts related to the exploitation of water
- Social conflicts related to the spread of social or gender inequalities in the recruitment of the local manpower
- Consequences in the implementation of the income-generating activities funded by the Energy Project or the non-utilization of the local manpower
- Disagreement between a worker and an employer (i.e the companies in charge of the realization of the works)





- Dumping of liquid and solid waste in the nature
- Non-compliance with the procedures outlined by the ESMP and the ESMP-SW
- Dust generation
- Noise and olfactory pollution
- Degradation of the life quality and the environment
- Site works' waste accumulation
- Risk of pollution for water and land resources
- Traffic diversion and congestion
- Dangerous situations which can lead to accidents (non-compliance with speed limitation around populated area, non-secured working areas, defective signalling)
- etc.





- Abuse, exploitations and sexual violence
- Sexual harrassment in the workplace
- Fraud and corruption
- etc.



3 - WHAT ARE THE CORE PRINCIPLES OF THE GRIEVANCE REDRESS MECHANISM?

The individuals who wish to file a complaint or to voice a concern would not trigger the process unless they are sure that their complaints will be handled in a fast and fair way without any risk or fear of reprisals on themselves or on anyone else.

To ensure that a redress mechanism is efficient and trustworthy and that it is used, the **8 core principles** should be respected in order to handle the complaint according the good practices.

8 CORE PRINCIPLES

- 1 PARTICIPATION**
To ensure the participation of all groups involved and well integrated in the Project
- 2 CONTEXT AND RELEVANCE**
To adapt to the local context and to comply with the local governing bodies and to follow the framework of the project
- 3 SECURITY**
To carefully estimate the potential risk for the people who file a complaint or the concerned individuals to ensure their protection
- 4 CONFIDENTIALITY**
To guarantee the confidentiality of the procedures for the people who file a complaint or the concerned individuals and to limit the number of people which have access of sensitive information
- 5 RESPECT**
To respect the wishes, choices, the rights and the dignity of the people who file a complaint, their physical and moral integrity, their private life etc., without discrimination
- 6 NON-DISCRIMINATION**
Not to marginalize anyone because of his/her ethnic, religious, social, economic background, his/her gender or age, to handle with the same care all the complainants
- 7 TRANSPARENCY**
To inform the people who wish to file a complaint about the process to follow by communicating on the object and function of the CRM
- 8 ACCESSIBILITY**
To allow the CRM to reach as much people as possible including the marginalized, the vulnerable, the non-literate

* All the complaints should be done, either in a written way for the literate Plaintiff or through a person chosen by the non-literate Plaintiff and duly signed and documented.

4 - WHAT ARE THE RELEVANCE AND THE ADVANTAGES OF THE GRIEVANCE REDRESS MECHANISM?

IMPORTANCE

- To address the needs of the neighbouring populations, to treat and to settle their claims
- To propose a receptacle to the requests and suggestions of the neighbouring populations, and therefore to improve the citizens involvement in the Project
- To improve the relationship between Project and the beneficiaries
- To promote transparency and accountability
- To mitigate the potential risks related to the implementation of the Project
- etc.

ADVANTAGES

FOR THE PROJECT

- To provide to the PMU some information which will help its implementation in a transparent way
- To establish, through the settlement of conflicts, a relationship of trust between the Project and its beneficiaries
- To give an overview on the efficiency of the project through the data related to the complaints
- To help into identifying and settling quickly the problems before they spread or escalate and become difficult to fix
- To limit the negative potential impacts and to work out appropriate pre-emptive and correcting measures

ADVANTAGES

FOR THE BENEFICIARIES

- Establish a forum and a body to voice the complaints
- To give access to a transparent system for complaints settlement
- To facilitate information access
- To provide the beneficiaries with a reliable tool to challenge an action or program already implemented by the project
- To improve the services and optimize the satisfaction of the beneficiaries

5 - WHAT ARE THE DIFFERENT TYPES OF COMPLAINTS?

All the complaints are admissible and the Conciliation Committee will deal with all the appeals. However, the handling of the complaints will be done in different ways in accordance with the type of the complaints.

There are **two types of complaints**:

1

The **non-sensitive** complaints which is made of two distinctive forms being all related to activities which are part of the implementation of the environmental and social management plan



The **"PAP" Complaints** related to compensation, resettlement and the restoration of the livelihood or the environmental impact of the works, etc.



The **"Companies" Complaints** related to work, health, security and the environment in the works site

2

The **sensitive** complaints



The complaints related to sexual abuse and exploitation, sexual violence, sexual harassment in the workplace fraud, etc.

5.1 - NON-SENSIBLES Grievance Redress Mechanism

The non-sensitive complaint handling system is made of **7 steps**:



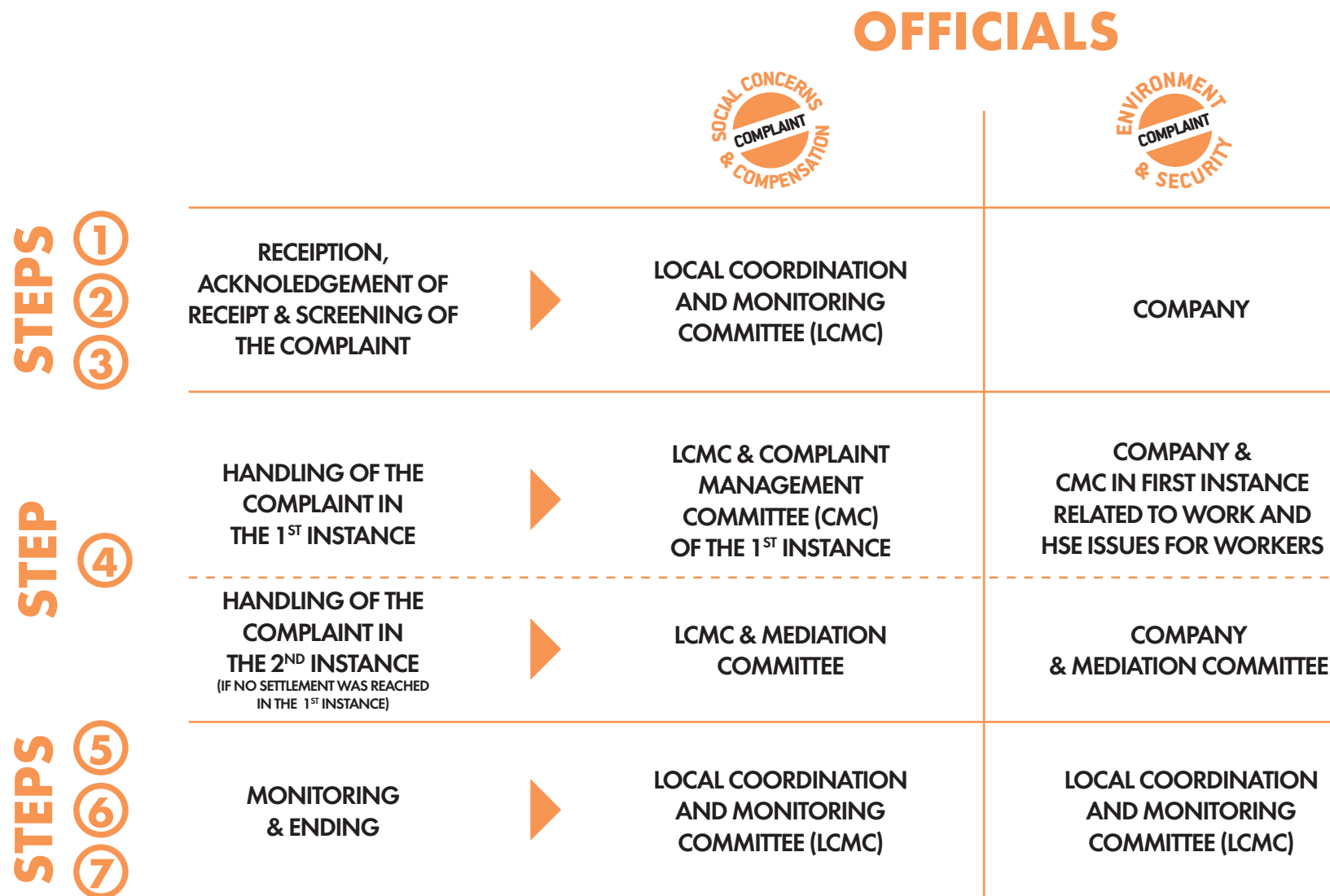
IMPORTANT

Along all the 7 steps of the non-sensitive complaint handling system, the monitoring and evaluation data are used to identify the constraints and to improve the operational procedures and their performance.

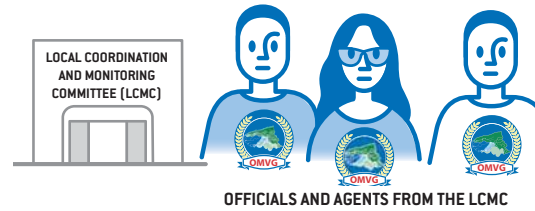
* Prior access to information related to the function of the submission and the handling of the complaints

The whole set of these 7 steps makes a complete mechanism for grievances' redress which involves **different actors and officials** depending on the type of the complaint.

Each step has to be reached in a **fixed and established time limit**



LOCAL COORDINATION AND MONITORING COMMITTEE (LCMC)



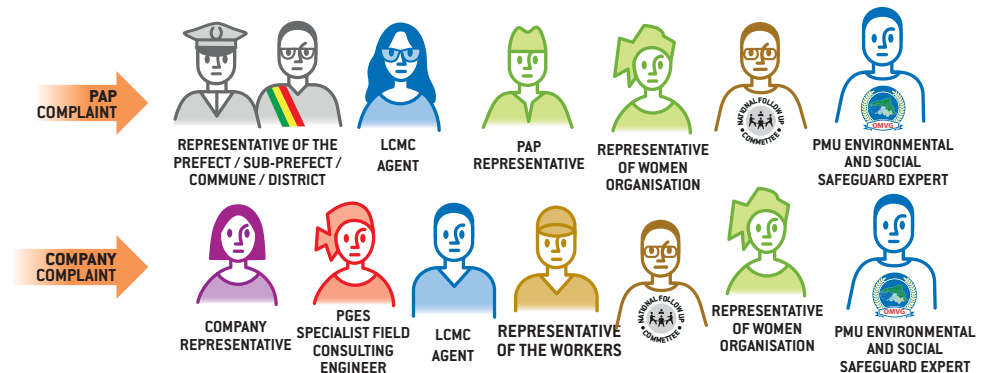
COMPANY



COMPLAINT MANAGEMENT COMMITTEE OF THE 1ST INSTANCE



MEDIATION COMMITTEE

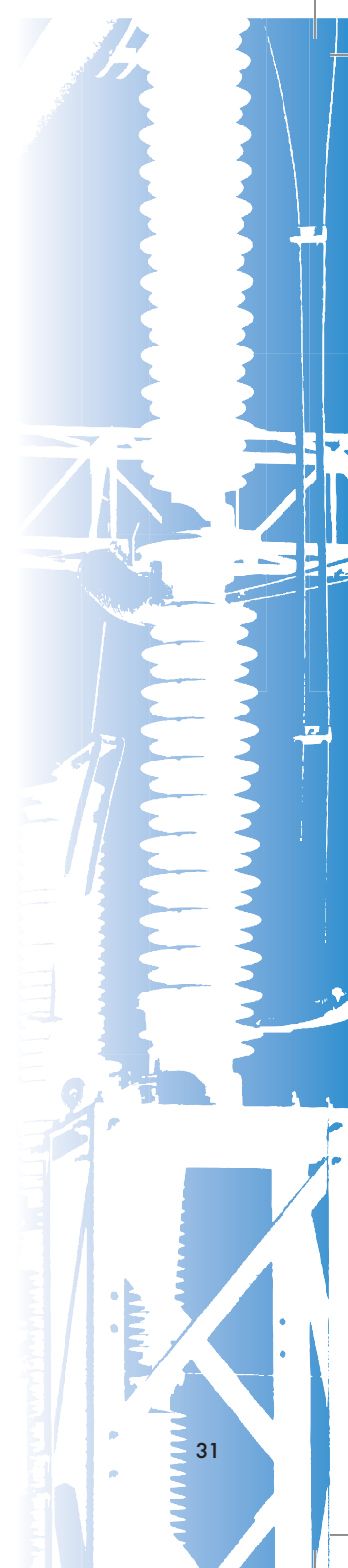






MEASURES, AUTHORITIES,
RESPONSIBILITIES, DEADLINES, PLACES,
FORMS AND MATERIALS, ...

... THE MAIN ILLUSTRATED STEPS OF THE
"NON-SENSITIVE" GRM



FORMULATION & FILLING OF THE COMPLAINT

3 possible ways

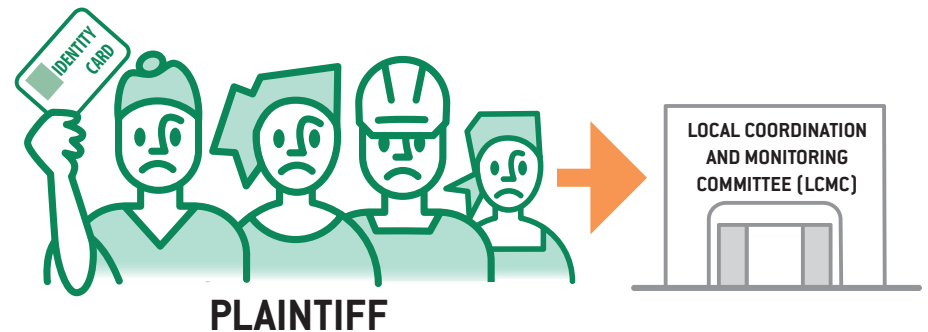
- Written (form)
- Telephone (SMS, toll-free number)
- Electronic (email, website)



The authorities or persons receiving complaints must ensure that illiterate persons are assisted by a person of their choice to fill in the form and register their complaint.

1

Withdrawal of the form from the concerned village chiefs, town halls, prefectures, sub-prefectures, departments, LMFC, NMC, PMU and contracting companies



Filling in the complaint form by providing the following information: last name, first name and telephone number of the complainant or a relative, name of the agent who drafted the complaint, date, time and place of filing the complaint, Description of the reason for the complaint as well as the proposed solution

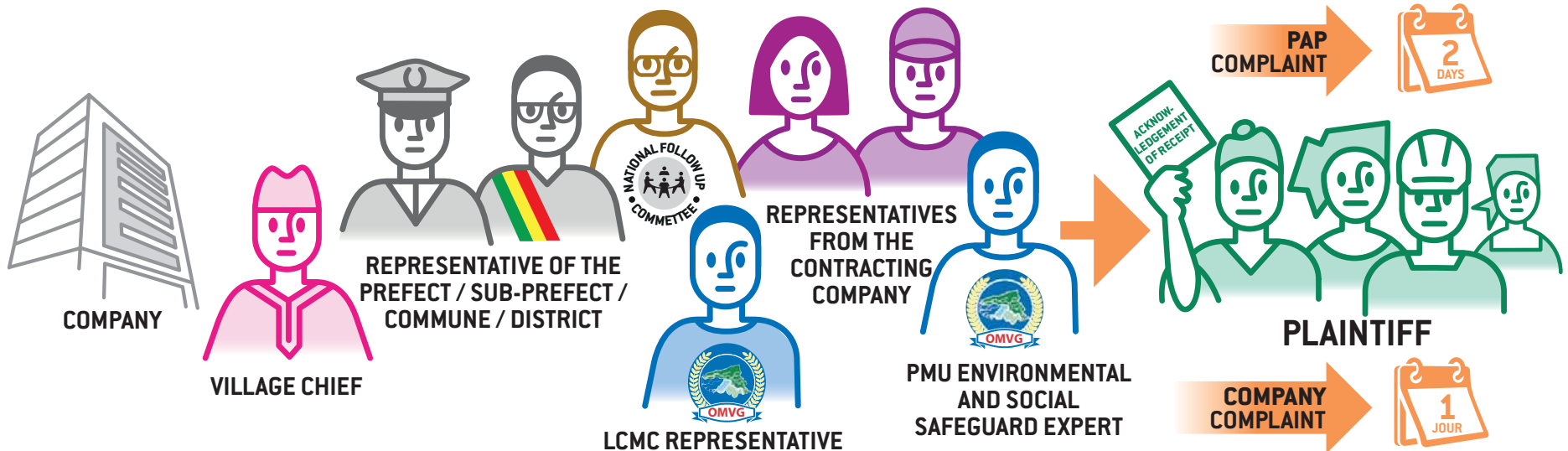
2

3

Filing the form directly with the LCMC or one of the authorities met during the withdrawal or send it by post or by electronic mail, call or send an SMS to the toll-free number set up or file the complaint via the website of the Energy Project PMU [website www.pe-omvg.org]

5

Delivery of an acknowledgement of receipt to the Plaintiff by LMFC



Except in the case of so-called sensitive complaints, anonymous complaints or those involving private litigation unrelated to the Energy Project will not be processed by the project. In addition, land disputes not specifically related to the project relocation process must be resolved by the relevant customary, administrative or judicial authorities.

4

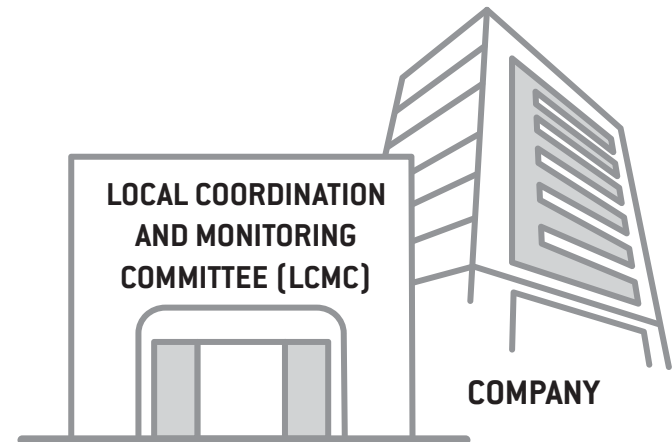
Registration of the complaint by the LCMC or authorized bodies / authorities in a complaint



SCREENING & PRELIMINARY EXAMINATION OF THE COMPLAINT



Particular attention to be paid by the LCMC or the company to complaints and claims from vulnerable persons



1

Screening of complaints by the LCMC Communication Officer or the Company's HSE Officer and classification according to the reasons for the complaints, the registration dates, the village's origin or other criteria

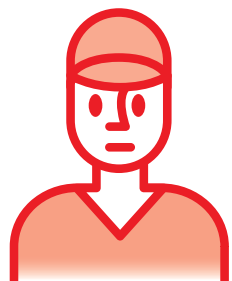


3

Examination of admissibility by the LCMC or Company officer, preparation and numbering of the complaint file



LCMC
COMMUNICATION OFFICER



COMPANY'S HSE
OFFICER



LCMC OFFICE



REPRESENTATIVE OF
THE CONTRACTING
COMPANY



PMU ENVIRONMENTAL
AND SOCIAL
SAFEGUARD EXPERT



PAP or Company complaints sent by e-mail or the Energy Project website are directly recorded, documented and examined by the PMU environmental and social expert. An acknowledgement of receipt of the email is sent to the complainant sender

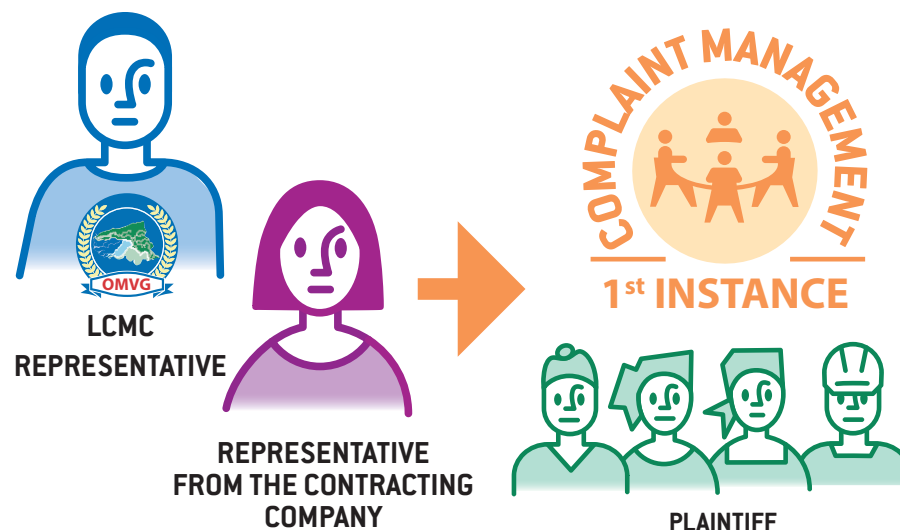
2

Transmission of the screened and classified complaints to the LCMC or Company manager

4

Filling the complaints monitoring database of the environmental and social unit of the PMU

PROCESSING OF THE COMPLAINT 1st INSTANCE



1
Transmission by the LCMC or
Company officer in charge of the
numbered complaint file to the 1st
Instance of Complaints Handling
Committee

2
Meeting of the 1st Instance of
Grievance Redress Committee,
review of the complaint file and
meeting with the complainant)



3

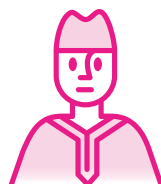
Preparation and drafting of the minutes of the decision of the 1st Instance of Committee and transmission of the minutes of the corrective measure(s) to the plaintiff(s)



PAP COMPLAINT



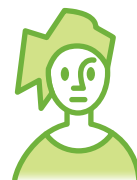
LCMC AGENTS



VILLAGE CHIEF



PAP REPRESENTATIVE



REPRESENTATIVE OF A WOMEN ORGANISATION

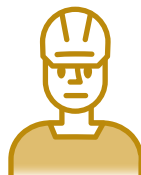


PLAINTIFF

COMPANY COMPLAINT



HSE OFFICIAL FROM THE COMPANY



SITE MANAGER



REPRESENTATIVE OF THE WORKERS



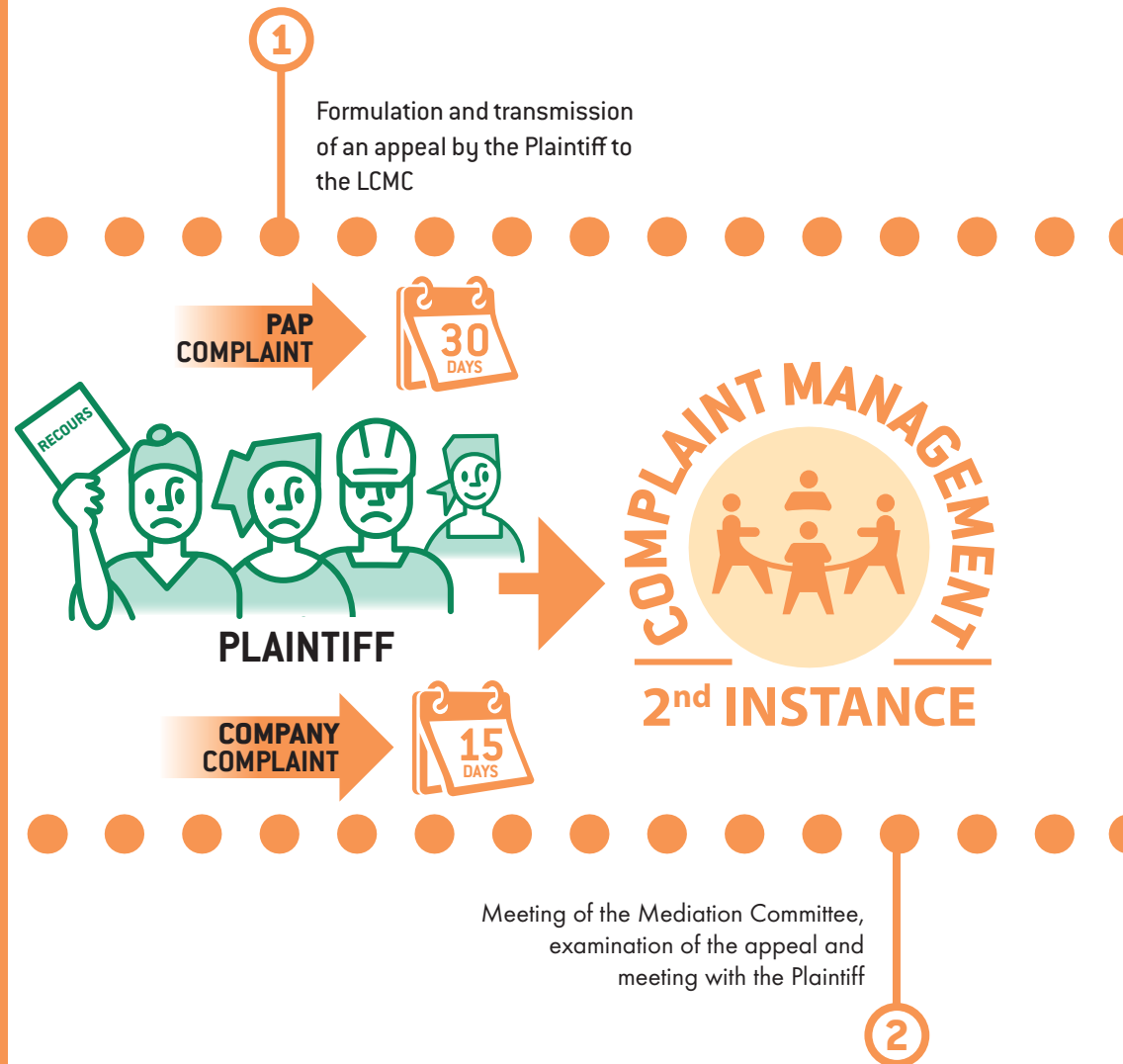
If the complainant is not satisfied, he/she will submit an appeal to the Mediation Committee at the level of the 2nd instance, chaired by a competent administrative authority which will examine the complaint with the other members of this body and for which the LMFC provides the Secretariat (SEE NEXT PAGE 39)

Acceptance of the 1st instance decision and the measure(s) decided by the complainant following the defined timetable (GO DIRECTLY TO PAGE 41)

4

In case of acceptance
at 1st instance,
go directly to page 41

PROCESSING OF THE COMPLAINT 2nd INSTANCE



3

Deliberation, preparation and drafting of the minutes of the Mediation Committee's decision and transmission to the complainant



PAP COMPLAINT



COMPANY COMPLAINT



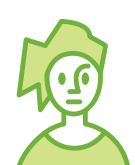
REPRESENTATIVE OF THE
PREFECT / SUB-PREFECT /
COMMUNE / DISTRICT



LCMC
AGENTS



PAP
REPRESENTATIVE



REPRESENTATIVE
OF A WOMEN
ORGANISATION



NATIONAL FOLLOW-UP
COMMITTEE



PMU ENVIRONMENTAL
AND SOCIAL
SAFEGUARD EXPERT



HSE OFFICIAL
FROM
THE COMPANY



PGES
SPECIALIST FIELD
CONSULTING
ENGINEER



LCMC
AGENT



REPRESENTATIVE
OF THE WORKERS



REPRESENTATIVE
OF A WOMEN
ORGANISATION



REPRESENTATIVE
OF A WOMEN
ORGANISATION



PMU ENVIRONMENTAL
AND SOCIAL
SAFEGUARD EXPERT



PLAINTIFF



In case the plaintiff is still not satisfied with the decision of the Mediation Committee in 2nd instance, he/she may refer the matter to the judicial authorities of his/her country

4

Acceptance of the 2nd instance decision and the measure(s) decided by the complainant following the defined timetable

IMPLEMENTATION & FOLLOW-UP OF DECISIONS



1

Preparation of a letter authorizing the implementation of the 1st or 2nd instance decision by the LCMC or Company officer



LCMC
OFFICIAL



COMPANY
OFFICIAL

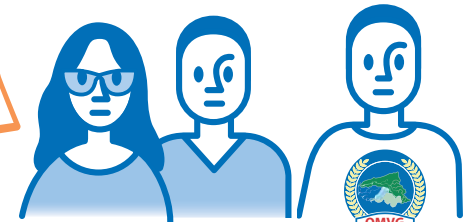


MEETING WITH THE PLAINTIFF



PLAINTIFF

PAP
COMPLAINT



LCMC AGENTS

PMU

COMPANY
COMPLAINT



OFFICIALS OF THE COMPANY

Implementation of the decision and implementation of corrective actions and measures in accordance with the timetable and the set deadlines

2



Deadline for the implementation of the 2nd instance decision



3

Follow-up of the implementation of 1st instance decisions and corrective measures at the field level and preparation of a field mission report

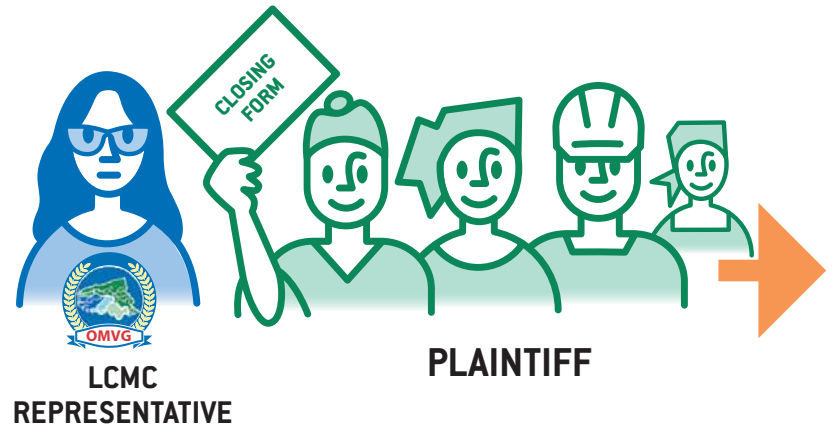


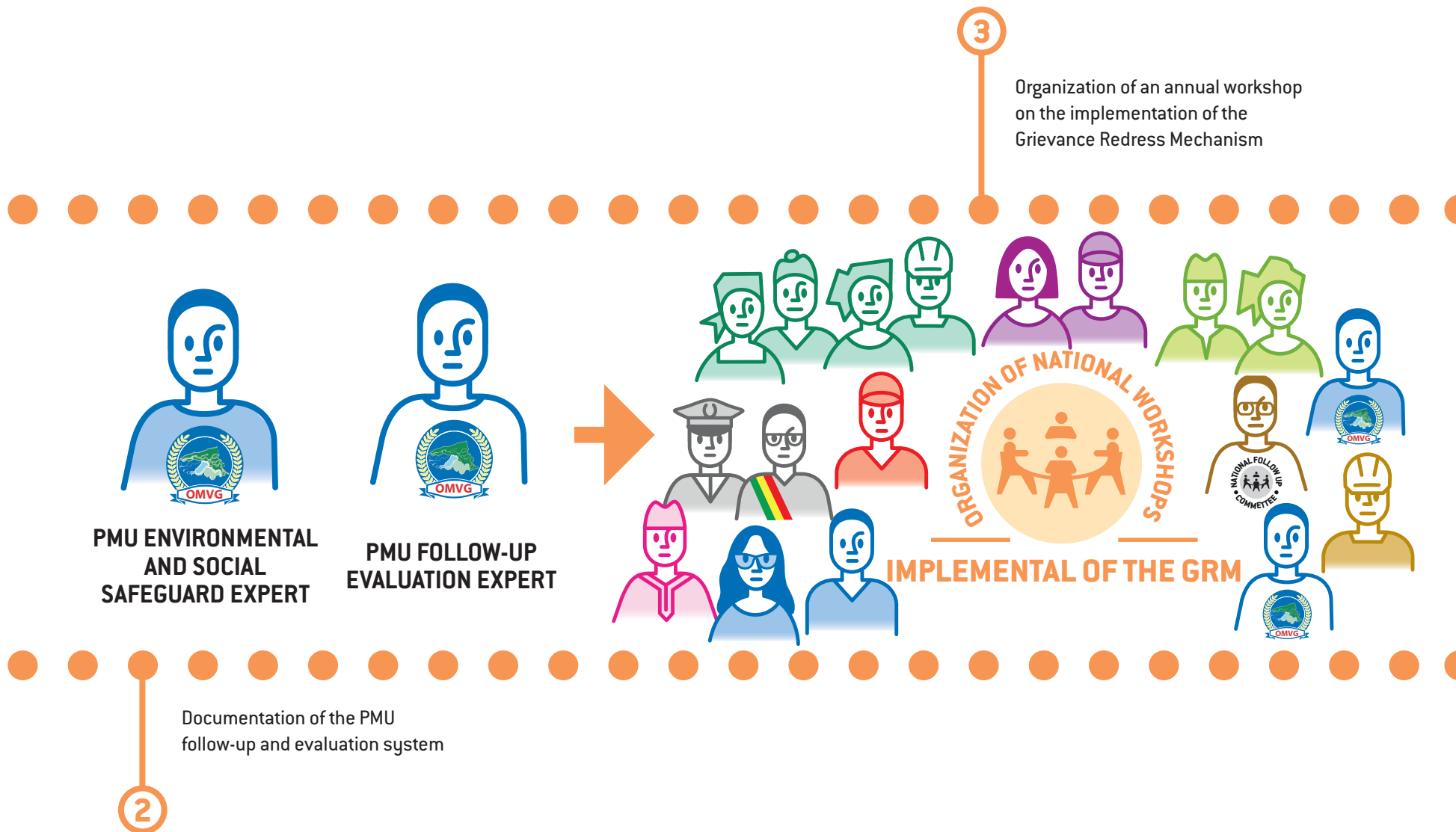
CLOSING OF COMPLAINTS & FOLLOW-UP EVALUATION OF THE GRM



1

Signature of a complaint closure form by the complainant and transmission to the LCMC





Information session, led by the Contractor's HSE Officer, on security measures to be observed on construction sites, mandatory for all visitors





Meeting with People Affected by the Project and locally elected officials during the press visit in Senegal



Handing over to local women of firewood cut at the Linsan substation site (Republic of Guinea)

5.2 - SENSITIVE Complaint Handling System

A sensitive complaint usually concerns cases of corruption, fraud, sexual exploitation or abuse, sexual harassment, marriage with children, rape, gross negligence, fraud, corruption or professional negligence.

Given the risks associated with raising sensitive issues, the Complaint Handling System must reassure Plaintiffs so that they can file a complaint safely using the survivor-based approach advocated by the World Bank.

By ensuring users that sensitive complaints will be treated confidentially and without reprisals, it is possible to guarantee Plaintiffs to have a certain degree of protection.

As with non-sensitive complaints, it is important that final beneficiaries, whether direct or indirect, are informed and sensitized about the Complaint Handling System and its functioning.



How to file a sensitive complaint?

There are different ways and means of filing a sensitive complaint by guaranteeing confidentiality to the Plaintiff.

- ① By establishing **suggestion boxes** accessible to the entire community where Plaintiffs can file anonymous or non-anonymous complaints in writing, at their choice,
- ② By dedicating **one hour per week** to Plaintiffs wishing to visit an organization's office and raise their concerns with a member of the staff responsible for complaint management,
- ③ By setting up a **toll-free number** where Plaintiffs can call to file an anonymous or non-anonymous complaint about the project (at their discretion),
- ④ By arranging **a period at the end of each community assembly** to allow Plaintiffs to share their concerns and complaints with local staff, mainly in private,
- ⑤ By establishing at each village level a **Complaints Committee** composed of local staff members and community representatives who will receive complaints/concerns from beneficiaries, and forward them to the Project Ethics Committee (see below the composition and the role of the Ethics Committee).



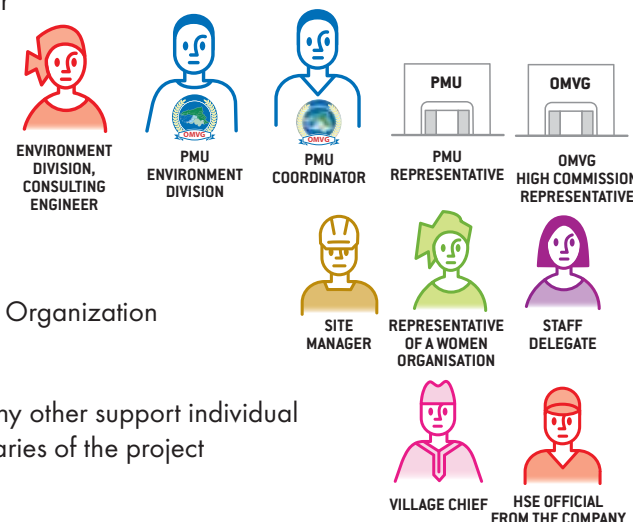
- In case of anonymous complaints, it is important that the Plaintiff provides as much information as possible in order to facilitate investigations without requiring additional research to return to him/her.
- Any person reporting a case of exploitation or any sexual or other abuse, acting in good faith, or who has cooperated in an investigation into such acts of alleged sexual violence, will be protected if necessary.

What is the system for handling sensitive complaints?

The Sensitive Complaints Handling System relies on two Complaints Reception Committees, one for **OMVG staff (Energy Project)** and the other for **constructors' staff** (companies) and on an **Ethics Committee** in charge of examining and screening complaints transmitted to it by the Complaints Reception Committees, forwarding them to legal means to provide an appropriate response according to the complaints types and finally notifying the Plaintiff (s) about the actions taken on their complaint.



- Environment Division, Consulting Engineer
- Project Management Unit (PMU)
- PMU Environment Division
- PMU Coordinator
- OMVG High Commission



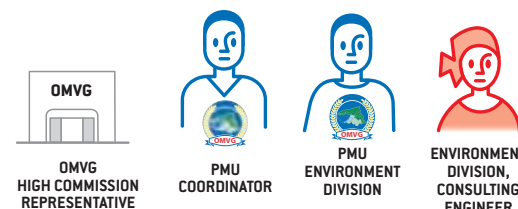
- Site manager
- Representative of a Grouping or Women Organization
- Staff delegat
- Local Human Resources Manager and any other support individual identified by the person and the beneficiaries of the project
- HSE official



- The Plaintiff has the option to denounce a situation to any of the members of the Complaints Receipt Committee based on the reliability granted to any of these members.
- The complaints reception committee must provide information on medical and social services for dealing with sexual violence and, in the case of a non-anonymous complaint, encourage the victim to go there in order to prevent unwanted pregnancy, sexually transmitted infections including HIV/AIDS or any other consequences of sexual abuse.



- OMVG High Commission
- PMU Coordinator
- PMU Environment Division
- Environment Division, Consulting Engineer



What is the return period after the filing of a sensitive complaint?

After the first screening, the Ethics Committee makes a announcement to the Plaintiff within **15 working days following the denunciation** on the action taken on his or her complaint (unfounded, founded and action will be taken, transmitted to the judicial authorities for investigation, etc.).

A second announcement is made to the Plaintiff **30 days later to inform him/her of the measures taken** (result of the preliminary investigation, etc.).



Any announcement relating to a sensitive complaint must be made in a confidential and secure way.

How does OMVG deal with sensitive complaint?



First of all, OMVG opens an investigation into alleged acts of sexual exploitation or abuse, sexual harassment, sexual violence, fraud and corruption with the aim of clarifying the facts.

Depending on the severity of the situation and the available evidence, OMVG may approach **national judicial authorities** to initiate criminal proceedings if necessary, and will cooperate with those authorities, using, inter alia, the **waiver of immunity** if necessary.

It is important that **the team in charge of investigations be different from the Complaints Reception Committee and the Ethics Committee**, in order to ensure more objectivity and transparency in the conduct of these investigations.

Once the investigation is completed, **the OMVG High Commissioner's Office and the representatives of the Technical and Financial Partners (TFPs) decide**, each at their own level, on **the procedure to be followed** with the possibility of **criminal proceedings at the national level**.

What are the disciplinary measures planned against persons subject to a sensitive complaint?

PERSONAL

EXTERNAL COLLABORATORS

If acts of sexual exploitation or abuse involve employees, OMVG will take actions on a case-by-case basis. If it is proven that the acts were committed, the OMVG will be empowered to take the following measures:

- Immediate termination of the contractual relationship (for those under an agreement that does not grant them the status of staff member or another collaborative agreement)
- Inclusion of a specific reference in OMVG's records to prevent persons subject to a sensitive complaint from applying for future offers and having other contractual relations with OMVG when it is proven that they have participated in acts of sexual exploitation or abuse, fraud, sexual harassment, child marriage, or have encouraged or tolerated such acts.



Non-denunciation, encouragement or tolerance of a sexual or fraudulent offence is punishable by disciplinary proceedings.



MEASURES, AUTHORITIES,
RESPONSIBILITIES, DEADLINES, PLACES,
FORMS AND MATERIALS, ...

... THE MAIN ILLUSTRATED STEPS OF
THE "SENSITIVE" GRM

FORMULATION & FILING OF THE COMPLAINT

4 possible ways

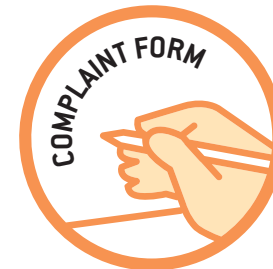
- Written (form, letter, suggestion box)
- Reception and listening (scheduling at the PMU and company level or during village community meetings)
- Telephone (toll-free number)
- Electronic (email, website)

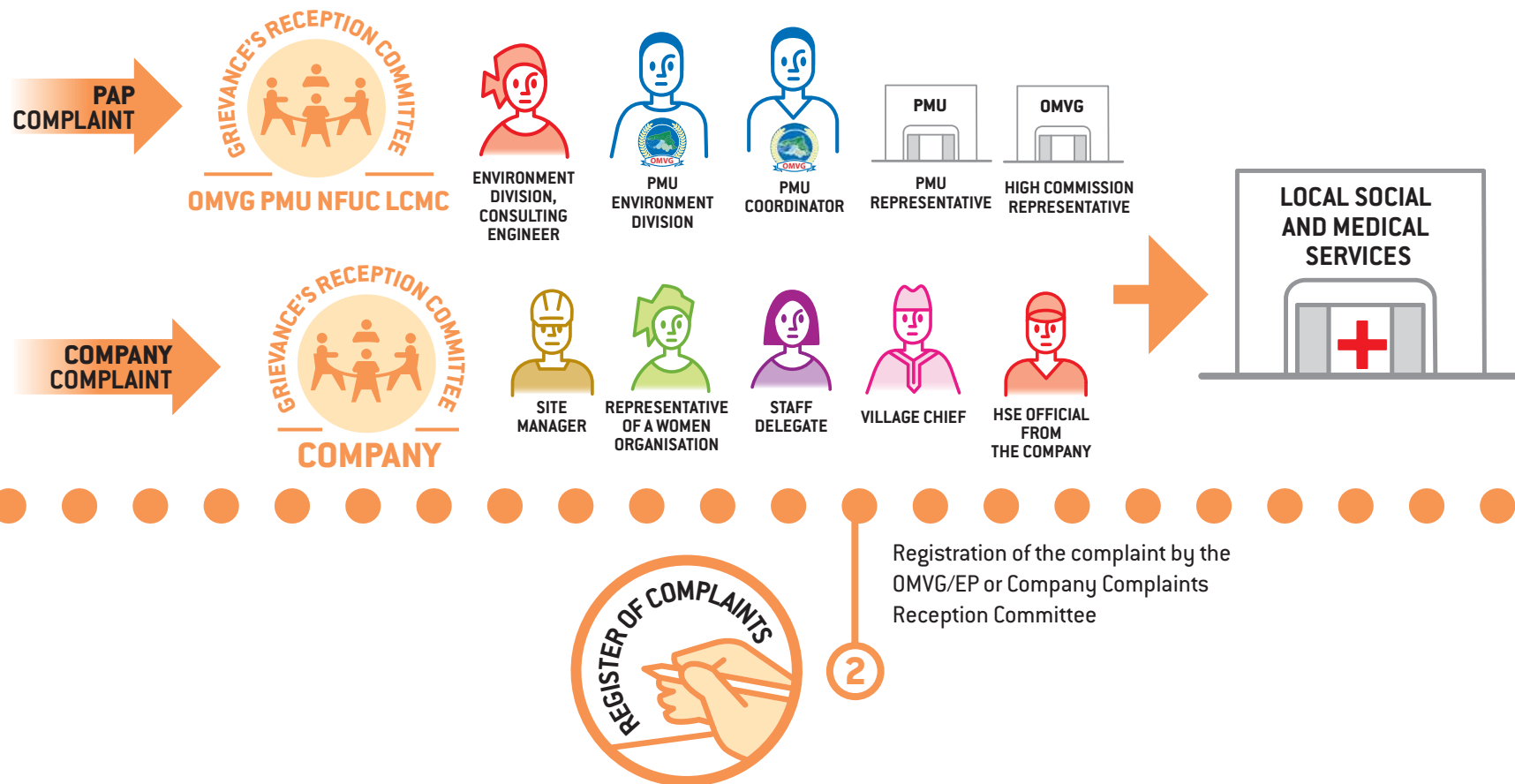
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Withdrawal and filling in of the complaint form or writing of an anonymous or non-anonymous complaint letter and physical filing by the Plaintiff or in a suggestion box (there are other possibilities for making a sensitive complaint: during welcome and listening sessions by calling a toll-free number or sending an SMS; by email or via the website www.pe-omvg.org) or by directly reporting the criminal situation to at least one member of the Complaints Reception Committee



PLAINTIFF





Information and orientation of the plaintiff to the medico-social services in the case of a non-anonymous complaint

TRANSMISSION, SCREENING & EXAMINATION OF THE COMPLAINT

PAP
COMPLAINT

COMPANY
COMPLAINT

1

Meeting of the OMVG-EP or
Company Complaints Reception
Committee



3

Receipt / examination of the
complaint by the Ethics Committee
and confirmation/rejection of its
sensitive nature



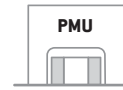
ENVIRONMENT
DIVISION,
CONSULTING
ENGINEER



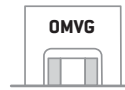
PMU
ENVIRONMENT
DIVISION



PMU
COORDINATOR



PMU
REPRESENTATIVE



HIGH COMMISSION
REPRESENTATIVE



SITE
MANAGER



REPRESENTATIVE
OF A WOMEN
ORGANISATION



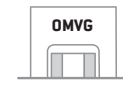
STAFF
DELEGATE



VILLAGE CHIEF



HSE OFFICIAL
FROM
THE COMPANY



HIGH COMMISSION
REPRESENTATIVE



PMU
COORDINATOR



PMU
ENVIRONMENT
DIVISION



ENVIRONMENT
DIVISION,
CONSULTING
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2

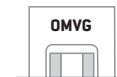
Transmission of the complaint registered by
the OMVG-PE or Company Complaints Reception
Committee to the Ethics Committee

COMPLAINT HANDLING & NOTIFICATION TO THE PLAINTIFF



1

After 15 days, information to the complainant on the action taken (unfounded, founded and action will be taken, forwarded to the judicial authorities for investigation, etc.).



HIGH COMMISSION
REPRESENTATIVE



PMU
COORDINATOR



PMU
ENVIRONMENT
DIVISION

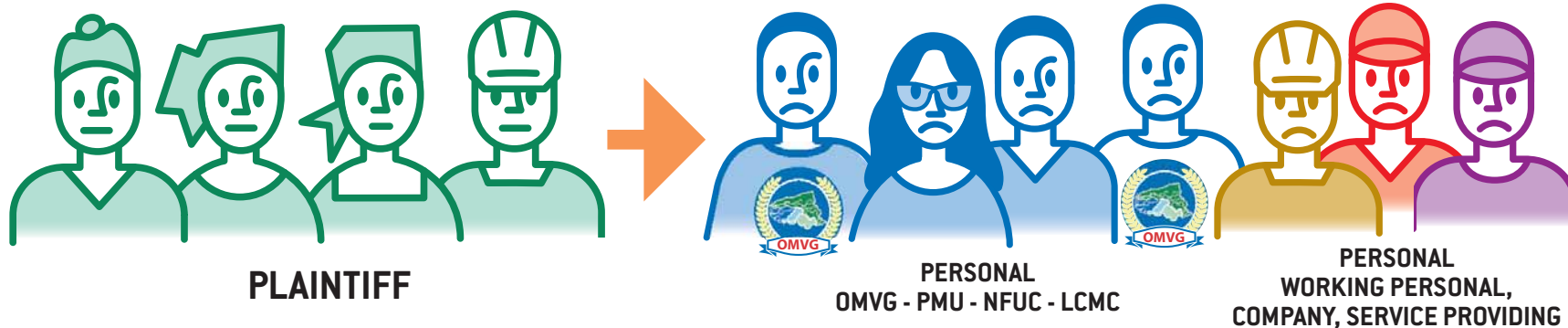


ENVIRONMENT
DIVISION,
CONSULTING
ENGINEER



3

Establishment of an OMVG team in charge of investigations, opening of the investigation, initiation of disciplinary procedures [related to the OMVG Internal Rules] and, if necessary, criminal proceedings at national level [blacklist, breach of contract, etc.]



LOCAL HUMAN RESOURCES MANAGER AND ANY OTHER SUPPORT INDIVIDUAL IDENTIFIED BY THE PERSONAL AND THE BENEFICIARIES OF THE PROJECT

Within 30 days, notification to the complainant of the actions taken [result of the preliminary investigation, etc.]

2





One of the storage sites for Interconnection construction equipment in Senegal

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POUR LA MISE EN VALEUR
DU FLEUVE GAMBIE

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ORGANIZAÇÃO
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