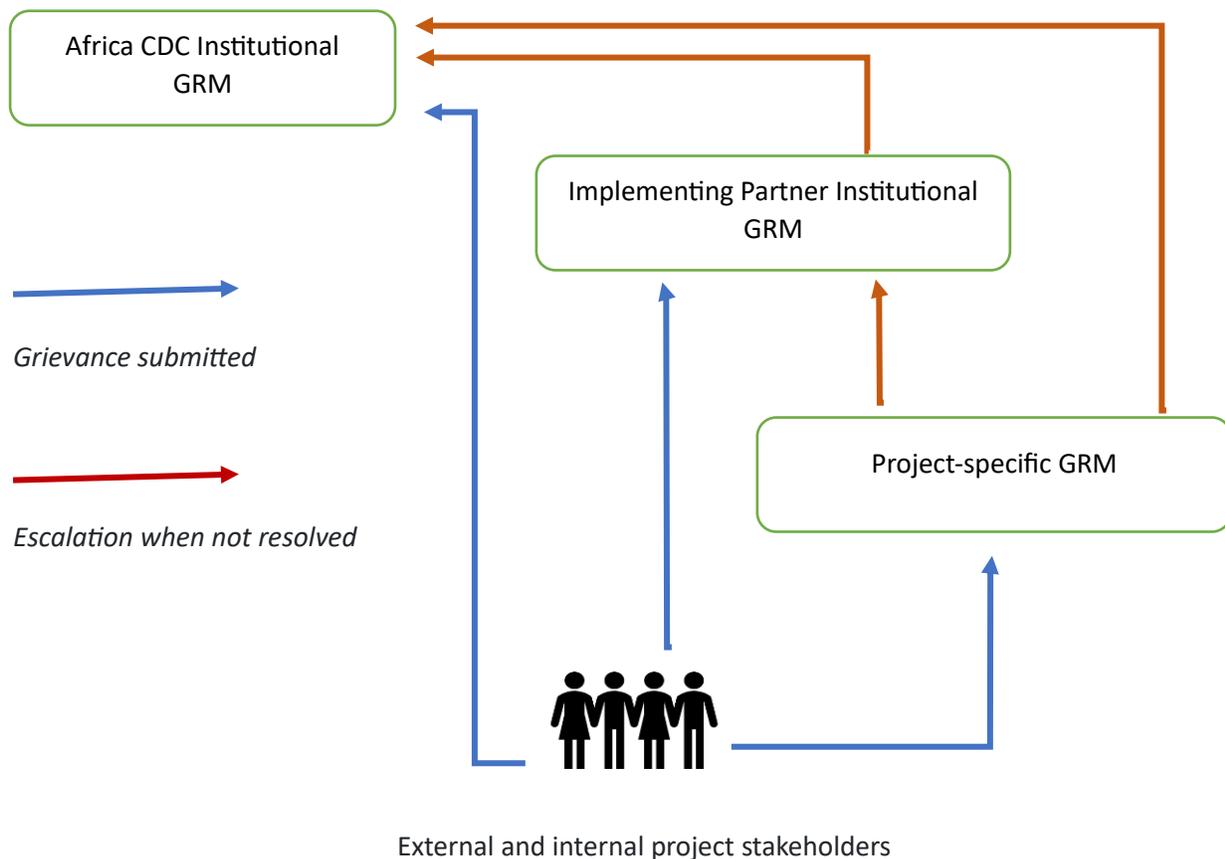


DIRECTIVE ON GRIEVANCE REDRESS MECHANISMS

Introduction

1. A significant component of Africa CDC's work is undertaken through projects implemented directly by Africa CDC or through Implementing, Partners. While the objectives of projects are aimed at producing positive impacts, they may also give rise to uncertainties, unintended consequences or actions not compliant with Africa CDC policies. A grievance redress mechanism (GRM) is a set of arrangements that enable any affected stakeholders to seek information, raise concerns or report grievances concerning projects and to seek redress when they perceive a negative impact has arisen from the project activities. This directive focuses on those communications which are grievances.

2. As illustrated in the simple overview below, GRMs come in different forms. In all cases, Africa CDC's Institutional GRM is available to receive grievances from stakeholders for all Africa CDC projects and activities. Depending on the particular characteristics of a project, this may be supplemented by an Implementing Partner's own Institutional GRM if that exists, or by project-specific GRMs which may be tailored specifically to the project's scope, structure and risks and may incorporate existing local or community dispute resolution mechanisms.



3. Effectively addressing grievances from people impacted by Africa CDC projects is a core component of managing operational risk. Addressing grievances early ensures they do not expand and become disputes that are difficult to manage. It can also result in collaborative problem-solving. A GRM is part of a broader stakeholder engagement process that supports project success.

4. The objectives of this Internal Directive are to establish minimum requirements for GRMs in Africa CDC projects, to explain Africa CDC's Institutional GRM, to provide guidance on the assessment of Implementing Partner Institutional GRMs, and to provide guidance on the design and implementation of project-specific GRMs.

Definitions

Grievance

5. In the context of situations where a project stakeholder seeks redress, a grievance is a complaint concerning one or more aspects of project implementation where the stakeholder considers they and/or others are being negatively impacted. These might arise from unintended consequences of project decisions, or from failure to properly apply Africa CDC policies and commitments, such as adhering to environmental, social and governance standards. They are part of a broader set of communications from stakeholders who may have questions about project implementation, or wish to raise potential concerns that become apparent during implementation. A comprehensive GRM ensures that there is one or more channels for all such communications and a method for addressing them in a timely manner.

6. The risks and types of grievances that may arise in projects varies according to the scope of projects. However, even technical assistance projects can potentially have impacts giving rise to grievances.

Some examples of potential sources of project-related grievances

- Project-financed cross-border transportation of infectious substances does not comply with WHO guidelines and regulations.
- Construction activities associated with expanding national or regional laboratory capacity cause environmental annoyance to neighboring communities.
- Pandemic preparedness and response capacity building activities are perceived to ignore marginalized communities.
- Project-related activities disrupt the delivery of other routine health services at clinics and medical centres.
- Personnel hired on projects by sub-implementing entities report do not receive wages in accordance with their contracts, or work without contracts.
- Personnel hired on projects receive inadequate measures to manage occupational health and safety risks, e.g. lack of appropriate personal protective equipment.

7. For the purposes of this Directive, grievances are distinct from allegations of fraud, other types of corruption, sexual exploitation and abuse and harassment. The latter are classified as misconduct which if proven are subject to disciplinary actions and third party sanctions, and are handled through a different, carefully regulated process overseen by the African Union Office of Internal Oversight (OIO) which has the mandate to investigate such allegations. GRMs may be a channel for receiving such allegations, in which case they are promptly referred to OIO for review. Also, in the course of reviewing grievances, misconduct may be identified which should be promptly referred to OIO for review.

Institutional GRM

8. An Institutional GRM is a set of processes established by Africa CDC or its Implementing Partners on a permanent basis, for use by any stakeholders at any time to communicate questions, concerns or grievances related to projects being implemented by the institution. The processes are not specific to a particular project. In each case the steps for handling and referring these communications and monitoring their resolution; the staff and management responsibilities; and oversight arrangements should be well defined.

Project

9. A project is a set of tasks that must be completed within a defined timeline to accomplish a specific set of goals. Much of Africa CDC's work is governed by project documents agreed with funding partners and Implementing Agencies which establish project administration and accountability requirements. While projects may address specific aspects of Africa CDC's mandate, some institutional capacity building projects cover the entire organization.

Project-specific GRM

10. A project-specific GRM is one established specifically for a project, in addition to any Institutional GRM that may be used. They include features tailored to the project and have a definite lifespan linked to the project implementation period. Their advantage is to allow for grievances (or uncertainties and questions that if unanswered may become grievances) to be dealt with in close proximity to the stakeholders, by those most familiar with the projects and in the best position to quickly act if corrective measures are needed. Project-specific GRMs may encompass existing local dispute resolution processes, established in the project location by host communities or authorities. These help the project-specific GRM to adapt local cultural approaches that contribute to effective problem solving.

Project stakeholders

11. Project stakeholders may be:

- external – such as beneficiaries in the general population, local communities affected by project activities (including their representatives from civil society organizations), vendors and short term contractors, Implementing Partner staff, and local government authorities including regulatory agencies in the case of environmental, social and governance safeguards; or
- internal – Africa CDC staff at headquarters, in the Regional Coordinating Centres or hosted at country level. They will be prominent stakeholders in those projects which are focused on Africa CDC's own internal capacity building.

Project documents

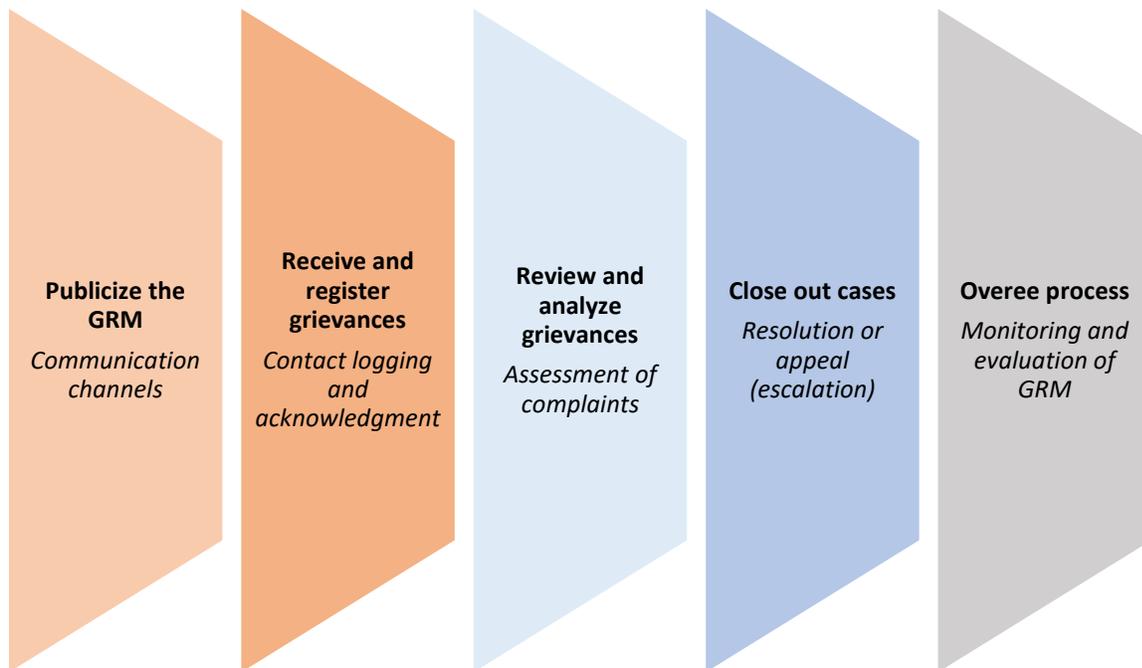
12. References in this Directive to project documents include Funding Agreements, Grant Agreements, Project Agreements and approved Project Implementation Manuals.

Minimum Requirements for GRMs

General requirements

13. Africa CDC will ensure that project stakeholders are made aware of and have easy access to communication channels to raise questions, concerns or grievances about Africa CDC projects or its activities in general, including on a confidential basis. For projects, this should be part of a broader stakeholder engagement process that starts with project design and development. The requirements should be defined in the project documents, and will include the Africa CDC Institutional GRM but may also be supplemented by an Implementing Partner Institutional GRM or by a project-specific GRM.

14. The Africa CDC Institutional GRM will, and Implementing Partner Institutional and project-specific GRMs that are engaged for projects must, ensure that the following key elements are addressed:



15. Africa CDC will ensure that grievances submitted to its Institutional GRM are logged, acknowledged in a timely fashion, referred to appropriate levels of technical or operational expertise for attention, monitored for timely response, and subject to a closure procedure to ensure that any issues identified are resolved or escalated when necessary. Where project-specific or Implementing Partner

Institutional GRMs are engaged, Africa CDC will ensure, for reporting and accountability purposes, that information is sufficiently reported to it on the above steps taken through these GRMs.

Escalations and referrals

16. Africa CDC's Institutional GRM will include a process whereby grievances that cannot be resolved in the initial technical or operational review are subject to further independent review. A second level review will be undertaken by an Africa CDC Grievance Committee. Where the concerned funding partner also has a grievance review mechanism, there can be a further review by that partner's mechanism if the grievance has not been resolved through the Grievance Committee. Where project-specific or Implementing Partner Institutional GRMs are engaged, the process for escalation of unresolved grievances from the project-specific GRM to the Implementing Partner Institutional GRM and to the Africa CDC Institutional GRM will be defined in the project documents.

17. For communications which are ultimately determined not to be associated with an Africa CDC project or activity, the GRM engaged will provide clear explanation to the person originating the question, concern or grievance and if possible provide advice on where they should redirect their communication and assistance with such referral.

Planning for use of project-specific and Implementing Partner Institutional GRMs

18. Project preparation will include assessment of the need for project-specific GRMs, and whether the Africa CDC Institutional GRM will be supplemented by that of the Implementing Partner.

19. In determining whether a project-specific GRM is needed, project staff should consider:

- potential project risks given the size, scope and locations of a project. This should be done in conjunction with project risk analysis and risk management planning during project preparation. Projects that are geographically dispersed, in sensitive locations, involve construction affecting local communities, involve vaccinations and other health interventions with general or target populations, or include the handling of hazardous materials are examples where project-specific GRMs may be warranted.
- Funding partner requirements. Some partners have stakeholder engagement and GRM policies which they apply to funding above certain budget amounts or for projects identified as having potentially significant environmental, social and governance safeguard risks. In such cases they may mandate project-specific GRMs.
- Linkage to existing local dispute resolution mechanisms. Project-specific GRMs may utilize such mechanisms, which may be established at national or sub-national level by sub-implementing entities, local communities or local authorities. At community levels there may be dispute resolution procedures which reflect generally accepted local customs.

20. In determining whether the Institutional GRM of the Implementing Partner will be engaged, Africa CDC project staff will assess the design and effectiveness of the GRM to ensure that, just as for Africa CDC's Institutional GRM, grievances are systematically logged, acknowledged in a timely fashion, referred to appropriate levels of technical or operational expertise for attention, monitored for timely response, and subject to a closure procedure to ensure that any issues identified are resolved or escalated when necessary. Where an Implementing Partner GRM has been used in other projects, its performance

should be taken into account. These assessments should be recorded as part of the project planning process and incorporated into project proposals.

Reporting and accountability

21. Where project-specific or Implementing Partner Institutional GRMs are used for Africa CDC projects, a process will be put in place for capturing information for reporting to Africa CDC, to ensure oversight and accountability for effective decentralized grievance resolution and redress.

22. Africa CDC will prepare, at least on an annual basis, an analysis of the volume of GRM communications including those from its own Institutional GRM and, those relating to its projects from Implementing Partner GRMs and from project-specific GRMs; types of grievances received; timeliness of handling; status of grievance resolution and any themes that have required/ will require training, procedural or other systemic changes to avoid recurrence. This analysis will be reviewed by Africa CDC’s management team to support any related decision-making and will be communicated to the Governing Board as part of Africa CDC’s accountability reporting. The analyses will also support any reporting to funding partners on handling of grievances related to their projects.

Elements of the Africa CDC Institutional GRM

23. Africa CDC’s institutional GRM comprises the following elements:

<i>Element</i>	<i>Responsibility</i>
1. Africa CDC specific	
General Africa CDC channels for receiving requests for information, concerns or complaints about its policies, procedures, or staff conduct, particularly from external stakeholders. These take the form of email, phone or social media platforms as advertised on the Africa CDC website. Communications are screened and grievances referred to the Africa CDC Grievance Focal point for further action. The website provides comprehensive information on how grievances will be handled.	Communications and Public Information Division
The Africa CDC Grievance Focal Point maintains a grievance log, refers the information to appropriate experts within Africa CDC for review, monitors and follow up on the status of reviews and their closure, and prepares analyses, at least annually, for CDC management on the operation of the GRM.	Until such time as Africa CDC’s own Internal Oversight Office is established as envisaged in the new organization ¹ , the Grievance Focal Point will be in the Office of the Deputy Director General.

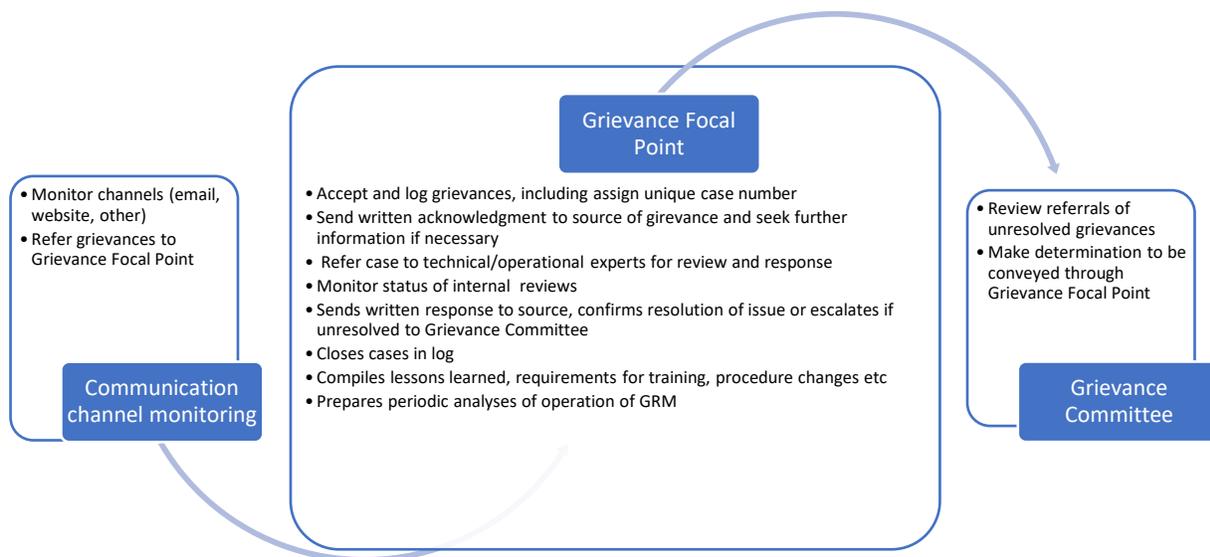
¹ At which time consideration will also be given to establishing a dedicated hotline managed by IOO for submitting project grievances.

An Africa CDC Grievance Committee reviews grievance cases received through Africa CDC channels or escalated from Implementing Partners or Project-specific GRMs, that have been referred by the Grievance Focal Point to Africa CDC technical and operational levels but not been resolved.	Membership appointed by the Director General
Worker Grievance Redress Mechanism (WGRM) established under the multi-year World Bank-funded <i>Support Program to Combat Current and Future Public Health Threats</i> to address labor and working conditions grievances for Africa CDC internal stakeholders (those with Africa CDC/AU contracts) and contractors hired through project implementing entities. While set up under this specific project, its scope effectively covers all Africa CDC staff and project contractors.	WGRM Focal Point and for escalation if needed to the Africa CDC Human Resources Directorate ² .
2. African Union (AU) mechanisms:	
Dispute mediation services for AU staff.	Ombudsman
The AU staff grievance handling and appeal process, including review by an AU Grievance Panel, in the African Union Staff Regulations and Rules. This is an alternative to the abovementioned WGRM as well as a point for escalation of unresolved grievances at that level from Africa CDC/AU staff.	Administration and Human Resources Management Directorate
African Union hotlines for reporting misconduct and other concerns. Instances related to Africa CDC which are determined to be more appropriately handled as grievance cases will be referred to the Africa CDC Grievance Focal Point.	African Union Office of Internal Oversight (OIO)

Grievance handling process

24. An overview of the grievance handling process is summarized below:

² The framework and requirements for the WGRM are set out in section 9 of the Labour Management Procedures Report (2022) prepared for the *Support Program to Combat Current and Future Public Health Threats*.



25. Responsibilities for interactions during the course of the review with persons or groups communicating grievances will be determined on a case-by-case basis. This may include the technical or operational experts assigned to the review, or the Grievance Focal Point. In all cases the Grievance Focal Point will ensure that actions taken and resolutions achieved are documented in a final exchange of communications or co-signed minute with the source of the grievance, which is filed for future reference.

26. The Grievance Focal Point will be responsible for providing a written response as soon as possible to the complainant, acknowledging receipt and detailing the next steps Africa CDC will take (with a delay of no more than 5 working days). The complainant should be given the unique case reference number for his/her logged grievance. While the time delays for review and resolution of grievances will vary depending on the nature of the grievance, the Grievance Focal Point should ensure that complainants are regularly kept informed of progress.

Guidance for development of Project-specific GRMs

Overarching principles

27. An adequate project social and environmental impact assessment process is essential to the success of a grievance mechanism, because it helps determine how project scale and impact, stakeholder composition, and other project factors will influence the design of the grievance mechanism and resources allocated for implementation. The need for and simplicity or complexity of the project-specific GRM will

be a function of the risks identified in the assessment and number/type of stakeholders expected to be affected.

28. For external project stakeholders in local communities and beneficiary populations especially, project-level grievance mechanisms will work if the target audiences perceive it as trustworthy and responsive to their customary ways of resolving problems. If they do not understand the process, find it too complex (or, alternatively, too simplistic for the nature of the issues), culturally inappropriate, not easily accessible, costly to them, and nontransparent, they will not see a benefit and will not use the mechanism.

29. In the context of public health emergency response projects, development of project-specific GRMs should accompany the design of the Risk Communications and Community Engagement pillars of these projects.

Communication channels

30. There should be provision for an easily accessible and well publicised (in local languages) set of standing communication channels for the project (for example email, telephone/SMS, web form, postal address, physical address for face-to-face contact). Where the project is dispersed in multiple locations (multi-country, multi-province) the need for replication at each location should be considered. The communication channels may be project-specific or ones already established by local sub-implementing agencies. Standing channels may be supplemented by periodic community consultations and other meetings where there is an opportunity for concerns and complaints to be submitted. Where stakeholder analysis warrants, communication approaches in traditional or culturally relevant formats or alternative measures for illiterate or marginalized stakeholders should be considered.

31. Anonymous communications should be permitted but it should be made clear that absent sufficient information, grievances may not be resolved. Contact information from the person lodging the grievance should be encouraged, including maintenance of confidentiality where this is requested.

32. Information on how to communicate grievances should be accompanied by comprehensive information on how grievances will be handled, including the escalation process if they cannot be resolved through mediation efforts at the local level or because of their higher risk nature they are automatically referred beyond local project staff. This includes escalation for review by relevant experts in the Implementing Agency and/or Africa CDC Regional Coordinating Centres and headquarters. While grievance resolution closest to stakeholders is encouraged, stakeholders should be made aware of Institutional GRMs also available.

Contact logging and documentation

33. Responsibilities for systematically monitoring communication channels should be established and performance of the role regularly assessed.

34. All communications at the initial point of contact, regardless of the channel used, should be logged in an electronic or physical register by the person(s) responsible for monitoring communication channels. This should include a unique case reference number, the date of receipt of initial and follow up information, the person making the communication if known (with appropriate measures for confidentiality), the type of communication (e.g. information request, concern, grievance) and nature of

the grievance, location of the actions giving rise to the grievance, when resolved, nature of the resolution, and when escalated if not resolved. Grievances which can be resolved on the spot to the satisfaction of the complainant, including those submitted in community consultations and meetings, should nonetheless be logged to recognize responsiveness.

35. Written communications and responses should be maintained on a dedicated confidential electronic or physical file. Where grievances are submitted orally, these and any oral responses should be written down and maintained on this file. The logs should be regularly reviewed by senior project management and their agency management to ensure responses and grievance resolution are timely.

Assessment of complaints

36. Grievances that cannot be resolved on the spot should be directed to a grievance focal point who will have a set number of days to assess the issue and provide a written response to the complainant, acknowledging receipt and detailing the next steps it will take (one week or less is recommended). The complainant should be given the unique case reference number for his/her logged grievance.

37. The assessment of the grievance complaint should include a risk assessment. It is anticipated that the majority of issues raised will be informational in nature or feedback that requires small course corrections; these low risk cases should generally be handled locally. Allegations of misconduct or violations of safeguard procedures by project staff, contractors and vendors present high reputational risks and indicate potentially high fiduciary risks requiring greater expertise and independence to review and are typically candidates for escalation to Implementing Agency or Africa CDC Institutional GRMs. Ideally, the person(s) assessing the complaints will have been involved with (or aware of) the risk assessment process that may have been completed prior to putting in place the project GRM. Some training may be required to ensure staff implementing the GRM are aware of what would constitute a higher-risk issue for the project and which entity should handle such a complaint.

38. The project-specific GRM should include a system of classifying the type of communication and identify the experts who can review and prepare responses. There should also be confirmation that grievances lodged are not under review through other mechanisms such as the Implementing Agency or Africa CDC Institutional GRMs.

Resolution or appeal

39. Following review of the grievance, the complainant should be offered option(s) for resolution of their issue. Where there is an agreement with the complainant on how the grievance will be resolved, the project-specific GRM procedure should require that a written record be drafted and signed by both complainant and project representative. After due implementation of the agreed actions, a new written record should be signed stating that the grievance has been resolved. All supporting documents of meetings needed to achieve resolution should be part of the file related to the grievance.

40. Where an agreement has not been reached, the project-specific GRM should offer the complainant an avenue for appeal. This would normally be the Implementing Agency or Africa CDC Institutional GRM.

Monitoring and evaluation

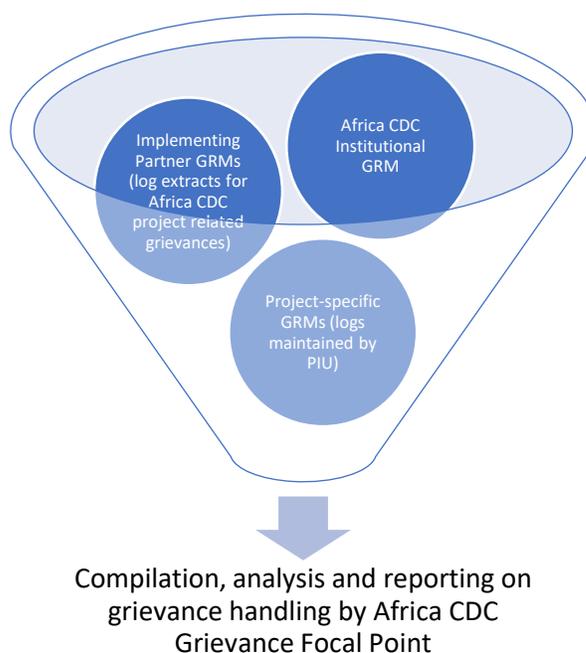
41. There should be appropriate oversight for the project-specific GRM by the Implementing Partner if applicable, and by the Africa CDC project team. Periodic reporting requirements (content and frequency) on the operation of the project-specific GRM should be defined in the project documents, and monitored. This should ensure information is provided on the volume of GRM communications, including grievances submitted in periodic stakeholder meetings as well as those received through other channels; types of grievances received; timeliness of handling; status of grievance resolution and any themes that have required/ will require training, procedural or other systemic changes to avoid recurrence. For periods where no grievances are reported a report confirming this should be required.

Documenting arrangements

42. The proposed arrangements for project-specific GRMs should be set out in project planning documents and included in project proposals.

Reporting and Evaluation the Performance of GRMs

43. Information about the nature and recurrence of grievances should become part of monitoring project impacts, ongoing stakeholder consultation, and disclosure. As indicated earlier, grievances concerning Africa CDC projects and activities may be communicated in different ways at either Africa CDC, Implementing Partner or project levels. The graphic overview below illustrates how reporting on the performance of GRMs and lessons learned involves aggregating information from all GRMs through which grievances are handled:



Management reports for review by Africa CDC senior management, and input into accountability reports to Governing Board

Reports for funding partners on grievances received and handled on projects they are financing.

44. The effective operation of GRMs will be included in the scope of independent project evaluations.

Review of the Directive

45. From time to time, the Office of the Deputy Director General will review this Directive, in light of implementation experience, evaluation findings and future organizational developments, and where necessary propose revisions to the Director General.