



RURAL ELECTRIFICATION AGENCY

ENERGY = EMPOWERMENT = EFFICIENCY

NIGERIA ELECTRIFICATION PROJECT

**DESIGN AND ESTABLISHMENT OF A
GRIEVANCE REDRESS MECHANISM (GRM) FOR
THE NIGERIA ELECTRIFICATION PROJECT
(NEP)**

FINAL REPORT

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ABREVIATIONS

ADR: Alternative Dispute Resolution
CBO: Community-based Organisation
CCU: Customer Care Unit
CSO: Civil Society Organisation
DISCO: Distribution Company
PDO: Project Development Objective (PDO)
EEP: Energising Education Programme
E&S: Environmental and Social
ERGP: Economic Recovery and Growth Plan
ESS: Environmental and Social Safeguards
EUCS: Electricity Users Cooperative Society
FGD: Focus Group Discussions
FGN: Federal Government of Nigeria
FMEnv: Federal Ministry of Environment
GRM: Grievance Redress Mechanism
GRC: Grievance Redress Committee
KII: Key Informant Interviews
MD: Managing Director
NERC: Nigerian Electricity Regulatory Commission
NESREA: National Environmental Standards and Regulations Enforcement Agency
NEP: Nigeria Electrification Project
NEPA: National Electric Power Authority
PCC: Public Complaint Commission
PMU: Project Management Unit
REA: Rural Electrification Agency
SE: Stakeholder Engagement
ToR: Terms of Reference
UTH: University Teaching Hospital

EXECUTIVE SUMMARY

ES 1: INTRODUCTION AND BACKGROUND

This report is the Draft Final Report of the Grievance Redress Mechanism for the Nigeria Electrification Project (NEP).

There are three distinct investment components to the project:

Component 1 - Solar Hybrid Mini Grids for Rural Economic Development will provide subsidies and/or performance-based grants to private mini grid developers to build solar hybrid mini grids in unserved and underserved rural areas.

Component 2 - Standalone Solar Systems for Homes, Enterprises and Farms will provide market-based incentives to standalone private sector solar system providers to install solar home systems (SHS) for underserved households and SMEs in dedicated areas.

Component 3 - Power Systems for Public Universities and Teaching Hospitals will support the construction and operations of solar mini-grid for beneficiary universities and teaching hospitals. This component will be implemented by REA in collaboration with universities under the Energising Education Programme (EEP). Contractor(s) will be engaged directly by REA to construct the power systems under this component, which will then be operated by the universities.

The NEP Grievance Redress Mechanism (GRM) shall provide community members directly affected by its development activities with access to mechanisms for them to present their grievances and find solutions through avenues that are legitimate, reliable, transparent, cost-effective and easily accessible at the lowest level, without allowing them to escalate into unmanageable levels. This access will be all inclusive with consideration for people living with disabilities.

ES 2: STUDY AREA, SCOPE OF WORK AND EXPECTED OPERATIONAL OUTCOME

The Component 1 subprojects will predominantly focus on selected sites in rural areas in four states: Sokoto, Ogun, Niger and Cross River. The states present a wide range of physical characteristics with varying socio-cultural and socio-economic activities. Component 2 has a more national spread and will focus on market penetration of the grantees, while Component 3 will focus on seven Federal Universities and two Teaching Hospitals across the geo-political zones of the country.

The focus of the outcome of this consultancy service will be limited to the areas of operation of the NEP, and if applicable, to the terms of other projects of the PMU. The broad objectives of the assignment are to: Develop a Grievance Redress Mechanism for

the project, identify personnel required for collecting, analysing, collating and documenting complaints and other necessary information relating to project activities and to Support the NEP-PMU to operationalize the Feedback and Grievance Redress Mechanism.

The outcome will help to facilitate access to information for all stakeholders, enable more systematic identification and resolution of emerging issues and trends, resolve all emerging grievances in the project areas and provide channels for appropriate beneficiary feedback, including best practices, thus promoting programme ownership and avoiding litigation and project delays.

ES 3: POTENTIAL ISSUES AND COMPLAINTS

In the course of actualising the project objectives, it is anticipated that, among other likely issues, subprojects under Components 1 and 3 (Component 1: Solar Hybrid Mini Grids for Rural Economic Development and Component 3 Power Systems for Public Universities and Teaching Hospitals) will lead to the acquisition of land and various construction and installation activities, which could result in displacement of persons, restriction of access or loss of livelihood.

Other potential issues and grievances to monitor include:

- Equipment installation e.g. poles and cables running through or above homes and other privately-owned properties
- Environmental concerns due to presence of batteries and other equipment or waste management (e.g. battery disposal)
- Land acquisition, restriction of access and displacement
- Non-inclusion of community members in paid labour/workforce
- Non-inclusion of community members in decisions regarding design of the Mini Grid, its operation and billing process
- Existing political divisions in the communities and the consequent perception of project citing as more favourable to one divide
- Unrealistic Corporate Social Responsibility (CSR) expectations from the contractors by community members
- High cost of services e.g. community members are usually required to pay a one-off 'connection fee' covering cost of a breaker and cables to connect power from poles to the user's house or business premise
- Conflicts arising from by-passing meters to use free electricity

- Complaint related to High tariff
- Commercial electricity users having a higher tariff than others
- Prolonged downtime in electricity supply due to faulty equipment
- Delay in execution of project leading to breakdown of trust e.g delay in take-off after contractor has mobilised equipment to site
- Disruption of public access and disturbance resulting to loss of business days and associated income
- Disagreements over product warranty
- Accidents or injuries due to construction
- Loss of vegetation
- Potential risk of Gender based violence/sexual harassment of locals as a result of labour influx
- Potential risk of social conflict with communities as a result of labour influx, including forms of Gender Based Violence (GBV)

Interest Groups

The key interest groups in this regard are:

- Electricity Users' Corporative Societies (EUCS)
- Mini Grid Developers
- Relevant Local Government Authorities
- Solar Home Systems companies
- Community-based influencers supporting the project who are liable to be accused of benefit capture, exclusion and marginalization
- Touts seeking employment, extortion and opportunity for other vices around project site; capable of starting unprovoked conflict
- Local Vigilantes, Police, National Security & Civil Defence Corps
- Students
- Women groups
- Community Leaders
- Youth groups

- Persons whose properties are acquired, trespassed or damaged by project activities
- Local NGOs focused on Renewable Energy or Environment

Key vulnerable groups identified are:

- Employed labour from within the communities
- Women (especially girls and widows)
- Potential child labourers and hawkers
- Potential victims of GBV, sexual exploitation, harassment and abuse who are made vulnerable due to poverty and unemployment
- Unemployed youth open to violence

ES 4: EVALUATION OF EXISTING DISPUTE RESOLUTION SYSTEMS

During the NEPA era and up till date, there has always been conflict between members of the public and electricity providers. This is often a result of fallout of consumer – provider relations or due to the technical activities of the public power supplier, which could have adverse effects on private interests. This trend has been carried over to successor companies of NEPA and even to off-grid electricity suppliers. This further backs the need for an effective GRM in a project such as the NEP.

Existing structures for feedback or complaint uptake and redress in the Rural Electrification Agency (REA) are not suited to fit into the proposed NEP GRM, hence a framework that would leverage on structures such as the Electricity Users Cooperative Society (EUCS) in the beneficiary communities of Components 1 and 3 have been proffered for the GRM.

Alternative Dispute Resolution (ADR) institutions in the identified project states have also been built in, particularly the Citizens' Rights/Mediation Centres.

ES 5: PROPOSED GRIEVANCE REDRESS STRUCTURE

Component 1

The main institutional blocks for the Component 1 grievance redress structure are the Mini Grid Developers' Customer Care Unit, Electricity Users Cooperative Societies established in the beneficiary communities, the PMU Grievance Redress Committee (GRC), including the Zonal Liaison Officers, the Citizens Rights/Mediation Centres and

the law courts. Other institutions included specifically for cases of GBV/SEA are the departments of Women Affairs in the states Ministry of Women Affairs, women leaders in the communities, women's rights focused NGOs and the Police. These institutions will form the appeal levels from bottom up, feedbacks on the resolutions of grievances shall also pass through same channels to get to the complainant within the stipulated time frame.

The NEP PMU GRM Committee shall manage the entire mechanism, including the Social Safeguards Specialist as the key staff and the Environmental Specialist, Communications team and M&E Specialist as team members.

Uptake of complaints and grievances shall be done through:

- EUCS designated base or Secretaries
- Women leaders
- Traditional leaders
- Mini Grid Operator office
- PMU toll-free hotline and email addresses
- Town hall meetings (where available and regular as a tool for community development)

Modes of reporting grievances are:

- Written petitions
- Telephone hotlines
- Email
- Physical presentation of complaints

Dedicated telephone lines shall include:

- Mini Grid Developer Customer Complaint Unit (CCU)
- Community-based GRC (EUCS) secretary and chairman's telephone lines
- PMU hotlines

Component 2

Component 2 GRM Structure

An open market arrangement such as the bedrock of the NEP Component 2 mainly requires a traditional market system of customer service. This is more as the SHS companies will not be fronting as NEP or government sales agents during transactions.

The following strategies have been put in place to further mitigate the possibilities of any project threatening grievances sprouting up in the implementation phase:

- The application structure for interested companies clearly caters for environmental management by requiring evidence that environmental and social risks are mitigated.
- Products must also pass the NEP quality verification process and the Lighting Global standard.
- Evidence of ability to effectively provide pre- and post -sales service to acquired customers, including easy and practical warranty service.
- Must pre-qualify both company and product to claim grant as often as once a month.
- Claims are submitted online then installations of systems are verified by the Independent Verification Agents (IVA)

Core Institutions for the Component 2 GRM

- The SHS Operator Company
- The Independent Verification Agents (IVA)
- PMU GRM Team
- Ministry of Women Affairs, Women's Right Focused NGO and the Police
- Zonal Liaison Officers

Although all grievances shall be received, recorded and feedback given to complainant, only grievances presented by a certified SHS beneficiary, related to the project and within the product terms of warranty or sales agreement by the SHS company shall be prioritised for mediation by the Grievance Redress Committee (GRC). For such cases an immediate resolution could be provided and case closed.

Component 3

The likelihood of sabotage or other similar actions by competing interests and previously existing electricity distribution entities to the universities and health institutions are of higher concern to the GRM consultant under this component, especially as these actions

could be masqueraded as genuine grievances where there are none, which could ultimately cause delays for the project. This of course does not rule out potential issues regarding land acquisition, restriction or legacy land acquisition or any other grievances that may spring up.

Core Institutions

The core institutional blocks for the REA NEP Component 3 GRM Structure are:

- University Authority (office of the Vice Chancellor)
- Dean of Students' Affairs
- Teaching Hospital Authority (Office of the Chief Medical Director)
- Corporate Affairs/Public Relations Unit of Teaching Hospital
- Engineering Procurement and Construction (EPC) Contractors
- PMU Social Safeguards Specialist (GRM Coordinator)
- PMU Environmental Safeguards and M&E Specialist
- Ministry of Women Affairs, Women's Right Focused NGO and the Police
- Representative of the Head, NEP PMU
- Zonal Liaison Officer

Grievance Uptake Points:

Being a more academic environment, operators of the solar hybrid plants shall be mandated to display complaints procedures and available uptake channels for complaints in ways that are clearly visible to their customers, including on their websites, placement of grievance submission boxes at their office and via other communication channels, the same procedure shall be applied in the Students' Affairs Department of the universities and the Corporate Affairs unit of benefitting teaching hospitals for all to see. Any complaints pertaining to the project and its subprojects shall be channelled to this uptake points. All complaints shall be resolved and the customer notified **within 15 Days** of receipt of the complaint by the operator Customer Care Unit (CCU). Where additional time is required, the complainant is updated of actions being taken within **every 7 Days** until the complaint is resolved. Where either the customer or the operator are not satisfied with the resolution by the CCU, the complaint is referred to the NEP community-based Grievance Redress Committee (GRC) through the committee Secretary or to the NEP Project Management Unit (PMU) GRC, as the case may be.

Composition of the central Grievance Redress Committee for component 3

- PMU GRM Team
- Representative of the Head, NEP PMU
- Representative of the Component Coordinator

The Component 3 Community-based GRC

The GRM Coordinator at the PMU shall ensure that a community-based GRC is constituted in each benefiting university/teaching hospital and shall refer any minor grievances or misunderstanding submitted to the PMU directly via the publicised NEP hotlines, emails etc to the appropriate community-based GRC, such grievances shall first be certified as relating to the implementation of the EEP. The Secretary of the community-based GRC shall receive and record all grievances. Feedback from the community-based GRC to a complainant **shall not exceed 7 work days**. A complainant who is not satisfied with the feedback on outcome of the mediation by the community-based GRC shall have their grievance reverted to the PMU GRC for mediation. A complaint referred back to the PMU GRC shall be mediated upon and feedback communicated to the complainant **within 14 days**. In the event that a complainant is still not satisfied with the mediation, the complaint is referred to the state Citizens' Rights/Mediation Centre in a state where such facility exists for Alternative Dispute Resolution. In a case where such a facility for ADR does not exist, a member of the Institute of Chartered Mediation and Conciliation (ICMC) of ranking not less than a 'Fellow' shall be engaged by the NEP or assigned holders to the rights of operation of the electrification project, in the case that the NEP has handed over the project, to mediate in the matter for not more than 14 days. Where the grievance is not resolved after this, the complainant shall be given the option of referral to a competent court of law outside the project.

Members of the community-based GRC under this component shall consist of:

- Representative of the office of the VC or CMD
- Bursar or Head of Accounts
- Dean of Students' Affairs Department OR
- Head of Corporate Affairs Unit of a University Teaching Hospital
- Representative of the Solar Hybrid plant operators

ES 6: GRIEVANCE REDRESS PROCEDURES

1. Receipt, Acknowledgement and Registration of Feedback or Grievance

2. Verification/Screening

Complaints in the NEP Component 1 GRM would be classified under the following categories.

Category 1: Exclusion claims

Category 2: Physical and/or economic displacements caused by land acquisition or any other project activities

Category 3: Billing, metering or cost of service equipment

Category 4: Security, Crime and Enforcement Issues (including GBV or sexual harassment)

Category 5: Labour issues

Category 6: Environmental Management lapses (including consequent mishaps)

3. Implementation and Case closing

4. Feedback

At the time of acknowledgement of the feedback or grievance, the complainant will be provided with the following information:

- (i) Grievance Reference Number to facilitate monitoring and reminders by complainants.
- (ii) Expected time of redress (As prescribed for each component).
- (iii) If not addressed within expected time, action to be taken by complainant

If the grievance is not redressed within the expected time, the complainant should be provided with the following information:

- (i) Information on reasons for delay
- (ii) Updated expected time of redress
- (iii) If not addressed within expected time, action to be taken by complainant

At the time of final redress, the complainant will be provided with information on

- (i) Final action taken for redress and
- (ii) Avenues for pursuing the matter further

ES 7: IMPLEMENTATION OF THE NEP GRIEVANCE REDRESS MECHANISM

Communicate to Build Awareness

1. Educating local people, contractors and mini grid developers about the grievance mechanism is an essential and on-going responsibility. It does no good to have a perfectly designed GRM that no one knows about.
2. For an effective operation of the Project GRM, the objectives of it, its procedures, available channels for submitting complaint and responsible officers will have to be properly communicated to those who will use it so that they will not only be eager to access it but also to own it, taking cultural peculiarity of each community into consideration.
3. There is the need for a sensitisation / validation forum with the various communities, to acquaint the stakeholders of the project with the guideline and workings of the GRM. This workshop will rally representatives of the states, local governments, traditional institutions as well as key groups and personalities in the project areas including community members.
4. Accessing the grievance redress system will depend so much on the level of awareness about the mechanism among potential users. This therefore will require both group and mass methods as well as all the media forms available.

Basic Communication Channels:

- Mass Media
- 'Face-to-face' Communication
- Social media
- Mid-Media and IEC Materials
- Grassroots Mobilisation

ES 7.1: TRAINING AND SUPPORT TO PARTICIPANTS

This will involve orientation and training for beneficiaries, GR implementers, relevant staff of the contractors, security personnel etc. and provision of external consultancy and support staff to strengthen organizational capacity.

The training requirements for the GRM are multifaceted, diverse and layered through the orientation and implementation phases.

Training Outlay

S/N	GR Implementer	Training
1	Social Safeguards Specialist (GRM Administrator)	Training in conflict resolution, Alternative Dispute Resolution (ADR) and grievance management. Members of the Chartered Institute of Mediators and Conciliators (ICMC)
2	PMU GRM Team (including GRM Administrator)	To include procedural training on receiving, registering, and sorting grievances; training in management of the grievance redress process (developing flow charts) particularly GBV/SEA related complaint, assigning roles, monitoring performance of staff dealing with complaints, and providing incentives.
3	Community-based Grievance Redress Committee (GRC)	Basic ADR “decide together” problem-solving skills. Skills for conducting receipt and registration, referral processes, communication to complainants, GR logging, monitoring and record keeping etc.
4	Secretary of the Community-based GRC	Effective communication, negotiation, and facilitation skills; problem solving; dispute resolution, decision making and their respective parameters, standards, and techniques
5	Mini Grid Operators Community Liaison officer	Effective communication, negotiation, and facilitation skills; problem solving; dispute resolution, decision making; and their respective parameters, standards, and techniques
6	Citizens’ Rights/Mediation Centres	ADR Training for staff lawyers. Membership of the Chartered Institute of Mediators and Conciliators (ICMC)

7	All GRM officers	Training on confidential, respectful and survival centred response to GBV complaints.
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ES 8: SUMMARY ACTION PLAN AND BUDGET ESTIMATE FOR IMPLEMENTATION

Project Management Unit and Mini Grid Developer:

Conduct All Preliminary Stakeholder Engagements/Awareness Building on GRM

Set up GRM (Social Infrastructure and Processes), including Grievance Redress Committees (set up and inauguration, with considerations for gender balance), Uptake points & materials, grievance drop boxes, registers, telephone hotlines, emails and publicity materials, including GBV related complaint uptake points.

Conduct training and capacity building for GRCs

Work with GBV Expert or Consultant to create all linkages and modalities for handling of potential GBV/SEA complaints

Initiate Grievance Redress Processes - Operate GRM

On-going monitoring, training and Capacity Building

Community-based Grievance Redress Committees:

Elect principal officers (consider gender balance)

Agree on meeting/mediation days, venues and other logistics requirements e.g. location of complaint drop boxes

Participate in training/capacity building sessions (including GBV case handling)

Receive work tools and materials from PMU

Initiate Grievance Redress Processes

Participate in monitoring and on-going trainings/capacity building

ES 8.1: BUDGET

A provisional budget estimate of twenty million, two hundred thousand naira (N20,200,000) is proposed as one-off budget for operationalizing the Grievance Redress Mechanism for the ear-marked states, as presented in this report. A summary breakdown is provided in 7.1.

CHAPTER 1

BACKGROUND

1.1 Introduction

In line with the Economic and Recovery Growth Plan 2017-2020 (ERGP) and the objectives of the Power Sector Reform Program (PSRP, Nigeria's Federal Government set out a series of medium-term structural reforms to diversify the nation's economy, including the expansion of power sector infrastructure as one of the top priorities. The ERGP recognizes the fundamental role of power to the development of all sectors of the economy, hence the push by government to actualise a spread in off-grid power supply through the Nigeria Electrification Project under the Rural Electrification Agency (REA). The Nigeria Electrification Project (NEP) will provide electricity access to serve households, enterprises, community facilities, and small businesses in a cost-friendly manner. A private sector driven initiative of government, it is expected that most of the power under the project will be generated by solar technology.

The NEP is nationwide in broad scope, and most of the earmarked project funds will be used to stimulate private construction and operation of off-grid electricity supply systems by providing financial incentives and technical support. Some of the project funds will be used to acquire, by competitive tender, supply systems for selected Federal universities.

There are three distinct investment components to the project:

Component 1 - Solar Hybrid Mini Grids for Rural Economic Development will provide subsidies and/or performance-based grants to private mini grid developers to build solar hybrid mini grids in unserved and underserved rural areas.

Component 2 - Standalone Solar Systems for Homes, Enterprises and Farms will provide market-based incentives to standalone private sector solar system providers to install solar home systems (SHS) for underserved households and SMEs in dedicated areas.

Component 3 - Power Systems for Public Universities and Teaching Hospitals will support the construction and operations of solar mini-grid for beneficiary universities and teaching hospitals. This component will be implemented by REA in collaboration with universities under the Energising Education Programme (EEP). Contractor(s) will be engaged directly by REA to construct the power systems under this component, which will then be operated by the universities.

For a project supported by the World Bank Group, the execution of which is likely to trigger the Bank's social safeguard policy, there is an urgent need to put in place corporate governance tools and mechanisms that will not only ensure project sustenance but will

maintain a social licence for the continuous execution of the sub-projects. In the light of these, an effective Grievance Redress Mechanism (GRM) becomes unavoidable for the project.

The NEP Grievance Redress Mechanism (GRM) shall provide people directly affected by its development activities with access to mechanisms for them to present their grievances and find solutions through avenues that are legitimate, reliable, transparent, cost-effective and easily accessible at the lowest level, without allowing them to escalate into unmanageable levels.

1.2 Project Description

Component 1: Solar Hybrid Mini Grids for Rural Economic Development

This consists of both solicited and unsolicited tracks. The solicited track will request proposals from private sector to bid for minimum subsidies required to deliver electricity services on commercial basis for 200 rural centres. Unsolicited track will develop a market-based approach to support eligible companies to expand their electrification business / projects in rural areas with Sub-component 1.A: Investments on Solicited Tracks and Sub-component 1.B: Investment on Unsolicited Track.

Component 2: Standalone Solar Systems for Homes, Enterprises and Farms

This will provide better energy services at lower cost using standalone solar system in different size and level of service. The solar market will be made up of two main business models i.e. Sub-component 2.A: Output Based Investment Fund and Sub-component 2.B: Market Scale-up Challenge Investment Fund. The Sub-component 2.C: Technical Assistance will help to mitigate market and regulatory barriers in form of financial support to the private sector.

Component 3: Energizing Education Programme (EEP)

This EEP initiative will provide off-grid captive power plants for the generation and provision of dedicated and uninterrupted power supply to thirty-seven (37) Federal Universities and seven (7) adjoining university teaching hospitals (UTHs) across the six Geopolitical zones in Nigeria.

The scope of the EEP project shall include the provision of streetlights within the university campuses, a renewable training program for electrical students as well as provide power to the rural communities surrounding the universities in the long run.

It will use off-grid system ranging from 1 MW to 10 MW and shall be implemented in phases.

The socio-economic benefits attached to this rural electrification access intervention are significant and largely impacts not just the power, education and healthcare sectors but also provides as a measure to ensure Nigeria achieves its targets as contained in Nigeria's Intended Nationally Determined Contributions (INDCs) under the Paris Agreement.

The EEP is a key programme to be developed towards achieving the objectives of the PSRP.

1.3 Study Area

The Component 1 subprojects will predominantly focus on selected sites in rural areas in four states: Sokoto, Ogun, Niger and Cross River. The states present a wide range of physical characteristics with varying socio-cultural and socio-economic activities. Component 2 has a more national spread and will focus on market penetration of the grantees, while the third component will focus on seven federal universities and two teaching hospitals across the geo-political zones of the country.

1.4 Scope of Work

The focus of the outcome of this consultancy service will be limited to the areas of operation of the NEP, and if applicable, to the terms of other projects of the PMU. The broad objectives of the assignment as contained in the ToR are to:

- i. Develop a Grievance Redress Mechanism for the project;
- ii. Identify personnel required for collecting, analysing, collating and documenting complaints and other necessary information relating to project activities
- iii. Support the NEP-PMU to operationalize the Feedback and Grievance Redress Mechanism

1.5 Expected Operational Outcome

The outcome will help to facilitate access to information for all stakeholders, enable more systematic identification and resolution of emerging issues and trends, resolve all emerging grievances in the project areas and provide channels for appropriate beneficiary feedback, including best practices, thus avoiding litigation and project delays. This, in the end will reduce costs and improve the quality of work.

In putting the grievance redress mechanism together for the REA NEP PMU, the consultant is required to broadly:

- Survey existing formal and informal GRMs in project beneficiary communities by evaluating the scope of these systems and identify the potential to build on them

while integrating them into the project's integrated GRM from communities to states, and to the REA.

- Develop operating procedures, guidelines, and flowcharts detailing how the grievance redress process will unfold within the project's operating structures, more broadly from community level to the REA system, and how it will be reported, monitored and recorded.
- Estimate the number of citizens that are likely to use the GRM and assess the resources human, financial, and technological—that are available (and may be required) for the GRM to function effectively within the project.
- Design approaches for REA to publicize the GRM system by working with REA to develop a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for improvement.
- Identify staff/units in the REA to manage the GRM system.
- Identify and describe the roles and responsibilities of private sector entities participating in the project (Mini Grid developers, SHS companies, contractors) in the structure of the overall GRM for the project.
- Evaluate dynamics working for or against the introduction of a grievance mechanism inside and outside the project and develop a GRM framework and plan.

1.6 Methodology

A multi-pronged qualitative method of data gathering was employed to arrive at various conclusions in this report, namely internal stakeholder engagement, key informant interviews (KII), periodic feedback meetings with NEP PMU and focus group discussions (FGD).

The work proceeded with the identification of relevant stakeholders. The first leg of it was carried out by gleaning through the project documents, including the Project Appraisal Document (PAD), Resettlement Policy Framework (RPF) and the Environmental and Social Management Framework (ESMF). This helped to draw up a list of internal stakeholders, mostly personnel of REA and all ancillary MDAs in the electricity sector mentioned in the documents. These primary stakeholders were then engaged in brainstorming sessions, to identify all stakeholders in the Project, followed by a classification of the stakeholders and then consultation in their various locations.

Key informant interviews were carried out among key stakeholders and knowledgeable selected primary stakeholders. It was meant to establish their understanding of the project, the concept of GR, their stake in the project, the existing method of dispute resolution among them as well as the role that their cultural background would necessarily play in any effort geared towards engaging them. The KII is also designed to help gauge the perception of potential persons affected by the project (PAPs) and their own involvement in the success or otherwise of the project.

The adoption of Key informant interviews (KII) is largely necessitated to understand the norms as well as ideas on grievance redress and stakeholder engagement in their locality. The Key informants were deliberately selected based on their ability to provide a unique perspective on the subject or issues under discussion and as well, their relationship with it. A semi-structured interview guide was used to elicit information from the respondents. These guides contained a substantive list of themes on the knowledge and awareness, attitudes and key influencers/mobilizers and determinants of attitudes and practices/initiatives, recommendations and suggestions.

The interviewers took care to record the responses of each of the participants and this formed the basis of the qualitative analysis. Responses to different questions were coded into categories and subcategories that related to the questions guiding the consultation.

1.7 Key Stakeholder Identification

This was done in two main stages. The first step was to glean from the various policy documents of the Project, the internal stakeholders. Identified internal stakeholders are those who are statutorily mandated to be involved, concerned and interested in the successful implementation of the project. The identified stakeholders are:

Federal Government of Nigeria

State Governments (beneficiary states)

Local Governments

Rural Electrification Agency

NEP PMU

The World Bank

Federal Ministry of Power, Works and Housing

Office of the Accountant General of the Federation

Federal Ministry of Environment

National Environmental Standards and Regulations Enforcement Agency (NESREA)

Nigeria Electricity Regulatory Commission (NERC)
State Ministries of Environment
State Environmental Agencies
Project Affected Persons (PAPs)
Traditional leaders of identified beneficiary communities
Vice Chancellors and Managements of beneficiary universities
Chief Medical Directors of beneficiary teaching hospitals
Engineering, Procurement and Construction (EPC) contractors
Independent Verification Agent (IVA)
Electricity Users Cooperative Societies
Association of Mini Grid Developers (AMDA)
Existing Women & Youth groups in affected communities
Civil Society/NGOs in the affected States
Media

CHAPTER 2

POTENTIAL GRIEVANCES AND INTEREST GROUPS

2.1 Potential Grievances

The NEP is designed to bring about positive social impacts like improved well-being of community members through provision of access to constant electricity and providing livelihood security for the overall populations in targeted areas. Though private sector driven, in the course of actualising these noble objectives, it is anticipated that, among other likely issues, subprojects under Components 1 and 3 (Component 1: Solar Hybrid Mini Grids for Rural Economic Development and Component 3 Power Systems for Public Universities and Teaching Hospitals) will lead to the acquisition of land and various construction and installation activities, which could result in displacement of persons, restriction of access or loss of livelihood.

The project activities will include the installation/construction of Mini Grid Systems, which are likely to have both temporal and permanent effects. Permanent effects will result in a loss of use of property, vegetation and land by the affected persons. Temporal effects will result to interruption in the current use of property or temporary loss of access to land as a result of the subproject activities. These are likely to occur during construction and rehabilitation of existing infrastructure.

Selected Mini Grid developers are expected to lead the land acquisition drive in their earmarked sites but would be strictly required to adhere to the NEP GRM. Although communities visited during the course of this exercise expressed appreciation and longing for the project, and in some cases expressed willingness to donate the required land, this does not eliminate the fact that people will be displaced, or their livelihoods interrupted. Therefore, displacement of people within the project areas is expected although it is not possible to determine the number of people that are likely to be impacted.

Other grievances are likely to come up in the following cases, or as a result of the following activities/inactivity:

- Equipment installation e.g. poles and cables running through or above homes and other privately-owned properties
- Environmental concerns due to presence of batteries and other equipment or waste management (e.g. battery disposal)
- Non-inclusion of community members in paid labour/workforce
- Non-inclusion of community members in decision regarding design of the Mini Grid, its operation and billing process

- Existing political divisions in the communities and the consequent perception of project citing as more favourable to one divide
- Unrealistic Corporate Social Responsibility (CSR) expectations from the contractors by community members
- High cost of services e.g. community members are usually required to pay a one-off 'connection fee' covering cost of a breaker and cables to connect power from poles to the user's house or business premise
- Conflicts arising from users by-passing meters to use free electricity
- High cost of tariff
- Commercial electricity users having a higher tariff than others
- Prolonged downtime in electricity supply due to faulty equipment
- Delay in execution of project leading to breakdown of trust e,g delay in take-off after contractor has mobilised equipment to site
- Disruption of public access and disturbance resulting to loss of business days and associated income
- Disagreements over product warranty
- Accidents or injuries due to construction
- Loss of vegetation
- Potential risk of Gender based violence/sexual harassment of locals as a result of labour influx
- Potential risk of social conflict with communities as a result of labour influx, including forms of Gender Based Violence (GBV)

2.2 Interest Groups

The key interest groups in this regard are:

- Electricity Users' Corporative Societies (EUCS)
- Mini Grid Developers
- Relevant Local Government Authorities
- Solar Home Systems companies
- Community-based influencers supporting the project who are liable to be accused of benefit capture, exclusion and marginalization
- Touts seeking employment, extortion and opportunity for other vices around project site; capable of starting unprovoked conflict
- Local Vigilantes, Police, National Security & Civil Defence Corps
- Students
- Women groups
- Youth groups
- Persons whose properties are acquired, trespassed or damaged by project activities

- Local NGOs focused on Renewable Energy or Environment

2.3 Vulnerable Groups

Key vulnerable groups identified are:

- Employed labour from within the communities
- Women (especially girls and widows)
- Potential child labourers and hawkers
- Potential victims of GBV, sexual exploitation, harassment and abuse who are made vulnerable due to poverty and unemployment
- Unemployed youth open to violence.



Pic 1: Sensitisation before selection of community members for KII, Malgam, Binji LGA, Sokoto



Pic 3: FGD with community youths, Ofonekom, Obubra LGA, C/River

CHAPTER 3

CONTEXT AND LEGAL/POLICY BACKGROUND TO GRM

3.1 Context

A locally based **Grievance Redress Mechanism** (GRM) provides a result-oriented channel by offering a reliable structure and set of approaches where local people and the project implementation unit can find effective solutions together. It is one of many social accountability instruments that can help enhance good governance in projects allowing for quick reforms in the areas where feedbacks and concerns from beneficiaries can impact a project or any of its components. The grievance redress mechanism is a citizen engagement system by which queries or clarifications about the project are responded to, problems with implementation are resolved, and complaints and grievances are addressed efficiently and effectively. The concept has evolved as a citizen engagement platform in World Bank projects over the years as a means of empowering stakeholders and especially beneficiaries of Bank projects.

A well-functioning grievance mechanism:

- Increases the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances
- Keeps ownership of the dispute in the hands of local people
- Offers an early, efficient, and less costly way to address concerns
- Promotes a more stable business climate for projects, that reduces risk and enhances accountability to the host communities

Without the feedback loop that a good grievance mechanism can provide, the PIU may miss crucial opportunities to identify ways to improve project operations.

3.2 Legal and Policy Background to GRM in Nigeria

The law courts at their different levels are the ultimate formal system for grievance redress in Nigeria. But the bureaucracy, the cost of litigation for both the aggrieved and the perceived aggressor, and the time-taking tendencies of the courts have always served as disincentives for most citizens seeking redress, which result sometimes in people either taking the laws into their hands, or resigning to a passive victim's position. Also, the social impact of litigation, especially among people living within the same communities or who still must maintain interactions after settlement or redress, makes a post-litigation life

together a new challenge. The law courts would have effectively adjudicated in matters, but social interactions and good neighbourliness would have been affected.

To address this effect of the justice system, state governments across the country have been encouraging redress seekers to adopt the Alternative Dispute Resolution (ADR) options for a quicker, more cost effective and more inclusive redress of grievances. This is in tandem with the provision of Arbitration and Conciliation Act, Chapter 19, Laws of the Federation of Nigeria 1990.

ADR is fast gaining acceptance in Nigeria, especially in the states that have established multi-door court rooms, which leaves litigants with the option of seeking redress in arbitration, (which, though not less bureaucratic, disposes of matters more swiftly) or mediation or conciliation, which are even cheaper. According to the law, while an arbitration award is final and binding and accepted as judgement, the result of mediation is open and contingent on the honour of the disputant. Alternative dispute resolution procedures are however non-binding but voluntarily accepted or negotiated solutions to disputes. (Rhodes Vivour, 2013).

For redress at the systems level, with a view to protecting citizens from official highhandedness and discourage official corruption in government, the Nigerian military government of old also set up a Public Complaints Commission, by the promulgation of Decree 31 of 1975, which at the advent of democratic administration became The Public Complaints Commission Act Cap P37 LFN.2004 (PCC Act). The law gives the power to the public Complaints Commissioner to investigate, based on any complaints lodged before her, any administrative action taken by any functionary or organ of government at any level of the federation that the complainants perceives impinges on their human rights as citizen.

The law was backed up by the 1999 Constitution of the Federal Republic in Section 315(5) which states that “Nothing in this Constitution shall invalidate the enactment of Public Complaints Commission Act, and the provisions of the Act “shall continue to apply and have full effect in accordance with their tenure and to the like extent as any other provisions forming part of this Constitution and shall not be altered or repealed except in accordance with the provisions of Section 9(2) of this Constitution”.

The Public Complaints Commission was set up to have offices and officers in every state of Nigeria, headed by an appointed commissioner as the custodian of the powers that the constitution granted, and act the role of the ombudsman across the country. But its presence in most states, even in the focal states of the NEP, is unknown to members of the communities. The roles of the ombudsman in any place where it is established vary from culture to culture. But its clear role of a place to seek official redress, protecting citizens from administrative malfeasance is universal.

The laws that set up the ombudsman in Nigeria also create a lot of limitations for it, which makes it less effective than required. Nothing compels any government office or official to grant redress to a grievant after investigation to confirm the complaints (Osakede & Ijimakinwa, 2014). To get redress through PCC, the grievant will need to rely on the goodwill of the offending party or resort to the law courts. The time that the process would take as well as the cost and the logistics implication of seeking out the commission, usually makes the option of the PCC unattractive to the redress seeker. A review of the operations of the ombudsman in Nigeria has therefore been recommended (Afegbua and Adejumo, 2015).

CHAPTER 4

EVALUATION OF EXISTING COMPLAINT AND REDRESS CHANNELS AND TOOL(S) AVAILABLE TO CITIZENS IN THE RURAL ELECTRIFICATION AGENCY (REA)

During the NEPA era and up till date, there has always been conflict between members of the public and electricity providers. This is often a result of fallout of consumer – provider relations or due to the technical activities of the public power supplier, which could have adverse effects on private interests. Unfortunately, during this period, conflict resolution was also not at its best. The challenge with this uncomplimentary relationship is that most electricity consumers have developed a ready-for-conflict attitude towards the electricity provider, leaving them with the difficult task of winning the consumer to the side of the provider. Some of these conflicts may also continue to afflict the successor companies to NEPA and even off-grid electricity providers.

Also, unlike what is obtainable in the relationship between electricity users and Mini Grid operators, the repealed National Electric Power Authority Act gave far reaching powers to NEPA, which if abused (as was indeed done at times) had the potential to adversely affect the interest of many of its stakeholders, including NEPA itself. For instance, as it regards land acquisition, the Act setting up NEPA provided an express power to acquire land needed for operations or expansion. The Minister of Power, after attempts to reach a settlement for any required piece of land is not achieved, may declare that the land is required for the service of the Authority, earmark an amount of money to be paid as compensation to the landowner, and then make use of that land. This was backed by the public interest acquisition provisions of the Land Use Act of 1978. Disputes coming out of such transactions were often in law courts for several years, especially where such a land in question belonged to a family and not an individual.

According to the NEP Project Appraisal Document, key Environmental and Social risks on the project are limited and their magnitude is mostly proportionate to the size of subprojects. However, these risks are systemic, and are expected to manifest themselves in all components. The most important are safe disposal/recycling of used batteries (both lead-acid and lithium ion), land acquisition/land use changes (with the exception of Component 2 where this is not expected), as well as risk of exclusion and community safety. Additionally, for Components 1 and 3, stress on local water use and supply, construction impacts and waste management (in addition to batteries) can become systemic risks. Community engagement and an effective GRM has been identified as critical for project sustainability.

4.1 Rural Electrification Agency (REA)

A review of the REA existing systems for uptake of complaints, feedback channels and method showed that there was largely no structured system or policy in place. Interviews with the relevant units and personnel revealed a widely held hope that the outcomes of this consultancy for the NEP would also be useful for adaptation by the REA.

There is a directorate of Promotions at REA, which leads the public engagements and marketing drives of the agency. The department, alongside an existing Communications Consultant, provides support to the NEP-PMU for engagement with stakeholders, especially project beneficiary communities.

4.2 Nigeria Electricity Regulation Commission (NERC)



Pic 2: Consultation with Asst. Gen. Manager Renewable Policy, Research & Strategy, NERC, Abuja

Section 24 of the NERC Mini Grid Regulations of 2016 sets out complaint procedures and guidelines for customers and establishes the standards for developers.

Every Mini Grid Operator is required to establish a Customer Complaint Unit (CCU) within its business premises, saddled with the responsibility of receiving and resolving complaints. The regulation also requires that the operator maintains a Customer Complaint Log for NERC review where and when necessary. The specified CCU shall be headed by a senior officer of the operator and shall have a central office in the Operator head office or more than one offices in different areas of operation.

Customers make written complaints or e-mails directly to the CCU or via a Community Power Committee. A Community Power Committee (CPC) is described in the regulations as a committee established by a community to coordinate all electricity customers, address enquiries and take up complaints where necessary.

The NERC regulations requires the Operator to display complaints procedures and available uptake channels on the operator's website and other communication channels. All complaints shall be resolved and the customer notified within 15 Days of receipt of the written complaint by the CCU. Where additional time is required, the complainant is updated of actions being taken within every **7 Days** until the complaint is resolved. Where either the customer or the operator are not satisfied with the resolution by the CCU, there is an Electricity Forum for customer complaints established by the Commission under the

NERC Customer Complaints Handling Standards and Procedures, which is empowered to resolve issues beyond the operator CCU.

There are Electricity Forums in the various states set up to resolve complaints for both On and Off-Grid power consumers and operators and their offices are publicized by the NERC and in the offices of Operators for the attention of customers. All decisions of the Forum are legally binding and are taken by majority of the members present at a hearing and signed by the Chairperson. The Mini Grid Operator is required to implement the decisions of the Forum within the time specified in the directive and to report its compliance or reasons for any delays within 5 working days.

A customer or Operator who is not satisfied with the decisions of the Forum may appeal to NERC within 10 days of the directive by the Forum. At the NERC there is a Dispute Resolution Mechanism in place consisting of a Dispute Resolution Counsellor and a Dispute Resolution Panel, following which a matter could then be taken before a court of competent jurisdiction by an unsatisfied party.

4.3 National Environmental Standards and Regulations Enforcement Agency (NESREA)

NESREA has responsibility for the protection and development of the environment, biodiversity conservation and sustainable development of Nigeria's natural resources in general and environmental technology including coordination and liaison with relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines.

The agency, which is the regulatory arm of the Federal Ministry of Environment, has offices in all the states of the federation which accepts environmental complaints from the public and investigates same. The state offices are manned by State Coordinators who report to the agencies headquarter in Abuja.

4.4 Alternative Systems of Grievance Redress Available and Utilised by the Public in Nigeria, Particularly in NEP Component 1 States of Cross River, Niger, Ogun and Sokoto

There are Formal and Informal systems.

4.4.1 Formal systems

Formal systems consist of the following:

- Court of law
- Citizens' Rights/Mediation Centres
- Legislature (House of Assembly)
- The Nigeria Police

- Public Complaints Commission
- National Human Rights Commission

4.4.2 Informal Systems

Major informal systems of dispute resolution include:

- Interpersonal and family level dispute resolution
- Traditional rulers and community heads
- Associations and Groups E.g. Electricity Users Corporative Society
- Religious leaders

4.4.3 Other informal systems

Other informal systems of dispute resolution, which are less visible are:

- Neighbourhood vigilante groups
- Age grade associations
- NGOs
- Professional unions e.g. Traders Unions, NURTW etc.
- Students' Union Government

A summary of the evaluation of these systems in the context of adoption or adaptation for the NEP GRM is presented below.

4.5 Evaluation of Some of the Existing Dispute Resolution Systems Available to the NEP in Project Communities

4.5.1 Weaknesses

Law Courts

Superficially, the formal law court system meets majority of the technical requirements for grievance redress. However, there is constant pressure on the courts and they are further limited in the areas of (i) Expensive cost for the services of qualified lawyers (ii) repeated delays and adjournment of sittings. The majority of persons interviewed in the course of this exercise find formal litigation in courts to be unattractive, cumbersome, technical, time-consuming and expensive; hence the increasing demand for Alternative Dispute Resolution (ADR) mechanisms. It is also established that a good number of Judges now prefer to direct some disputants and cases to Multi-Door-Court Houses for an attempt to settle via mediation and save all parties the time and the stress of prolonged litigation. The concept of the Multi-Door-Court, though a relatively new concept to Nigeria, is quickly gaining ground in the Nigeria judicial system and available in the Ministries of Justice in about two third of states, including in Ogun, Cross River, Niger and Sokoto states. It is when the parties fail to reach a resolution that the case is channelled back to the usual

courtroom for either a continuation of hearing or a fresh start, where mediation is the first point of call.

The Nigeria Police

When it comes to government sponsored project related complaints, the Police is mostly seen by the public as an appendage of the government in power and very often half-hearted or ineffective to provide sufficient and acceptable resolutions that would be favourable to the citizen. Several respondents attested to this. Even though the NEP has private sector actors in front, the obvious role of REA, coupled with a widely held perception that electricity supply is government business, operators are seen as operating with “orders from above”, as such the police is not often the best point of call for a project based complainant.

Traditional rulers & Systems

While this approach may be effective in the semi-urban areas where members of the community adhere to the general ethics and governance structure of communal living, it is often neither a popular nor effective tool for GR in the urban areas (such as state capitals), or in an academic environment like a university community. In other cases, where there are no assigned chiefs overseeing smaller groups or communities, the public perceives the main traditional monarch as too high an authority for the presentation of certain levels of complaints. People also prefer to move along with the times and would rather seek more modern approaches to grievance redress. Even more limiting here is the highly technical nature of the electricity industry; it is not everyone that can understand the intricacies and be able to adjudicate fairly.

4.5.2 Strengths

Electricity Users Cooperative Society (EUCS)

The Electricity Users Cooperative Society is an initiative of the REA NEP which is primarily aimed at mobilizing benefitting communities of the NEP Component 1 to achieve sustainability of electrification projects. Its goals are to create a forum and a platform to (i) Encourage all relevant stakeholders to work together to solve common community electricity issues (ii) Educate community members about energy conservation and efficiency (iii) Ensure that community members work together to protect electricity equipment against theft and/or vandalization and (iv) Enable community members to learn about productive usage of electricity. The EUCS is also intended to serve as a first point of contact for receipt and possible resolution of complaints presented by members. As the name implies, every electricity user in the community is welcome to join.

A vital objective of the NEP-PMU's community engagement and sensitisation, preparatory to project kick-off, has been the drive towards the formation of the EUCS in the project areas of influence. Community members in Component 1 beneficiary states signed documents indicating interest and intention to join the cooperative society in their communities and were sensitised on how to start meetings.

If supported with the right instruments and capacity building, the sheer proximity of such an association to the project beneficiaries as well as their ability to link the Mini Grid developers with the customers, makes the executive members of the EUCS viable as a hinge for the community level Grievance Redress Committee for Component 1.

Citizens' Rights and Mediation Centres

These Alternative Dispute Resolution centres are set up by state governments to provide free dispute resolution services for all and sundry, especially indigent or vulnerable residents like women, widows, students, the unemployed, retirees, the elderly and persons with physical disabilities, who may not have the wherewithal to pursue litigations or other capital intensive approaches to grievance resolution. The Centres are designed to assist disputing parties in arriving at amicable settlement through Alternative Dispute Resolution methods. They are most frequently manned by Directors sourced from the state ministries of justice and have a number of lawyers or trained ADR specialists who attend to complaints by members of the public. Lagos state was the first to set up a Citizens Mediation Centre in 1999. In 2015 alone 34,511 cases were received, 20,966 were successfully mediated and over N700,000,000 were collected by the centre on behalf of disputing parties. Following the success of the Lagos experiment, other states started to set up these centres side by side Multi-Door-Court Houses, for speedy dispute resolutions. These centres also exist in Ogun, Niger and Cross River states and are funded by state governments, donations from corporate organizations, NGOs and other donor agencies.

The Mediation process is guided by Conciliation Rules in the Third Schedule to the Arbitration and Conciliation Act Cap A 18 Laws of the Federal Republic of Nigeria, 2004. These centres should have been adequate to be adopted for the NEP GRM in the state project areas of influence, but are largely limited by factors like the need for on-going capacity building on ADR, operational funding and unavailability in some states, including Sokoto state as well as limited or no knowledge of the electricity industry.

Where they exist, the centres will however be suitable to serve as referral points for unresolved grievances from each project component before a complainant is left with the option of walking through a formal court door to seek legal redress.

CHAPTER 5

THE NIGERIA ELECTRIFICATION PROJECT (NEP) GRIEVANCE REDRESS MECHANISM

As a project-based mechanism, the NEP GRM is taking into cognizance the components and the subcomponents of the project design as well as the culture of immediate environments of the proposed project sites. The mechanism will assume responsibility for occurrences and issues that have direct relation to, or bearing on the activities that are being carried out for achieving the components and all the subcomponents of the project in the intervention sites. It must be noted that the NEP GRM does not apply in any way to matters predating the project in project areas of influence.

Developing a GRM for the NEP involved sets of activities. The first was to appraise the nature of project components and review the current situation of grievance handling in the beneficiary locations, through a review of extant literature on the social, and environmental contexts of the project and its various areas of influence. Already prepared policy documents for the project, such as the Environmental and Social Management Framework (ESMF) as well as laws, conventions and policies as they relate to development, especially World Bank projects were reviewed for this task. This was supported by consultations in the already identified project states among stakeholders, to reconfirm some of the findings in the literature as well as establish the variables that would determine the structure of the GRM and its key components.

The desk review established the socio-economic context of persons in the established project host communities and the un-established, as well as the legal and policy environment that necessitates the establishment of grievance redress mechanism for the project. The field consultations were done to appraise the prevalent situation around the project areas of influence, as well as to get understanding of the operational environment of the project and the issues that may emerge.

A tour of parts of the planned project areas of influence was also conducted to engage stakeholders on ground, gauge reactions and glean any emerging or potential grievance trends, this included visits to beneficiary institutions of the EEP phase 1. Contacts and respondents engaged included some key community members, legal institutions, women, youths and relevant government agencies and officials.

The field visits also enabled a hands-on appraisal of existing dispute resolution cultures in existence, as well as public understanding of likely grievances concerning the project.

5.1 GRM Framework

To ensure an effective operation of the GRM, potential grievances, tools for presentations and responding authority are classified according to the three project components below.

Component	Project intervention activity	Potential nature of grievances	Tools for presentation	Ultimate responding authority
1	Solar Hybrid Mini Grids for Rural Economic Development will provide subsidies and/or performance-based grants to private mini grid developers to build solar hybrid mini grids in unserved and underserved rural areas.	<ul style="list-style-type: none"> -Land related matters, including trespass e.g. poles and cables running through or above homes and private lands -Environmental concerns due to presence of batteries and other equipment -Waste management (e.g. battery disposal) -Non-inclusion of community members in paid labour/workforce -Perception of project citing as more favourable to one divide within a larger community -Unrealistic Corporate Social Responsibility (CSR) expectations from contractors -High cost of services 	Physical complaint, Written petitions, Official Emails, Phone calls & SMS to GRM hotlines, Use of designated drop boxes as well as channels for confidential and safe complaints for GBV/SEA related grievances	Mini Grid Developers, Head, NEP PMU

		<ul style="list-style-type: none"> -Conflicts arising from users by-passing meters to use free electricity -High cost of tariff -Commercial electricity users having a higher tariff than others -Prolonged downtime in electricity supply due to faulty equipment -Delay in execution of project leading to breakdown of trust -Gender based violence/Sexual exploitation of locals as a result of labour influx 	See 5.6.3 for more on GBV/SEA	
2	<p>Standalone Solar Systems for Homes, Enterprises and Farms</p> <p>Will provide market-based incentives to standalone private sector solar system providers to install solar home systems (SHS) for underserved households and SMEs in dedicated areas.</p>	<ul style="list-style-type: none"> -Supply of equipment considered by consumers as substandard -Insufficient sensitisation on the use of supplied equipment -Perceived lop-sidedness or bias in selection of beneficiaries 	Physical complaint, Written petitions, Official Emails, Phone calls & SMS to GRM hotlines	Head, NEP PMU, MD REA

3	<p>Power Systems for Public Universities and Teaching Hospitals</p> <p>Will support the construction and operations of solar Mini Grid for beneficiary universities and teaching hospitals. This component will be implemented by REA in collaboration with universities. A contractor(s) will be engaged directly by REA to construct the power systems under this component, which will then be operated by the universities.</p>	<p>-Accidents or injuries to student or community member as a result of construction works</p> <p>-Litigation by competing electricity DISCOs</p> <p>-Prolonged down time or power failure at critical periods</p> <p>-Gender based violence/Sexual Exploitation as a result of labour influx</p>	<p>Physical complaint, Written petitions, Official Emails, Phone calls & SMS to GRM hotlines</p> <p>See 5.6.3 for more on GBV/SEA</p>	Head, NEP PMU, MD REA
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Table 5.1: Potential grievances, presentations and responding authority

Diverse methods for reporting grievances that are culturally appropriate are to be used and they should permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion boxes, Email, toll-free telephone etc).

Avenues for verbal complaints are:

- Complaints to members of the local Grievance Redress Committee (GRC)
- Social Safeguards & Communications desks at the NEP-PMU
- Open community mediation sessions
- Operators' Customer Care Unit
- Town hall meetings

Avenues for written complaints are:

- Complaint Boxes in the community, operator's office or by hand
- Letters or Email to the NEP-PMU

Dedicated telephone lines shall include:

- Community EUCS secretary and chairperson's telephone lines
- NEP-PMU hotlines
- Operator Customer Care hotlines

An email feedback system shall be established at the PMU. This will link the GRM Coordinator with potential complainants. This email will be designed to auto respond/acknowledge complaint emails.

5.2 The REA NEP GRM Structure

It is very vital that the GRM covers the various project components. For a holistic and an effective approach to the formation of this GRM infrastructure, the consultant has taken into consideration the intervention activities across board and has visited the established beneficiary states.

Overall responsibility for the coordination of the REA-NEP GRM will lie with the Environmental & Social Safeguards (E&S) Unit at the PMU. The Social Safeguard will be responsible for the collection of grievances of higher severity that may come directly to the PMU office based on the procedure and grievance classification and framework below. However, the uptake of grievances and recording will be done at the communities' level, after the complaint has passed through the operator Customer Care Unit (CCU) and is not resolved.

Considering that the three project components have unique operational attributes, a one size fits all approach to the design of this GRM will not be effective, especially for uptake at the project beneficiaries' level.

5.2.1 Component 1 GRM Structure

Core Institutions:

The core institutional blocks for the REA-NEP Component 1 GRM are:

- Electricity Users Cooperative Society (EUCS)
- NEP Project Management Unit, including Zonal Liaison Officers
- Local Traditional Authority
- Operator Customer Care Unit (Mini Grid Developer)
- Nigeria Electricity Regulatory Commission (NERC)
- Citizens' Rights/Mediation Centres in beneficiary states
- NEP-PMU Social Safeguards Specialist (GRM Coordinator)
- Department of Women Affairs in the state Ministry of Women Affairs

- Women Leaders in the various beneficiary communities
- Women's right focused NGOs
- The Nigeria Police

Considering that there are minimum required standards for customer care by Mini Grid developers and operators prescribed and monitored for compliance by the Nigeria Electricity Regulatory Commission, and having in mind that the NEP seeks to entrench effective customer care services as prerequisite for selected developers, operators must ensure that they display complaints procedures and available uptake channels in ways that are easily accessible to their customers, including on the operator's website and other communication channels. All complaints shall be resolved and the customer notified within **15 Days** of receipt of the complaint by the operator Customer Care Unit (CCU). Where additional time is required, the complainant is updated of actions being taken within every **7 Days** until the complaint is resolved. Where either the customer or the operator are not satisfied with the resolution by the CCU, the complaint is taken up by the NEP community-based Grievance Redress Committee (GRC) or the NEP Project Management Unit (PMU) GRC, as the case may be. The NEP GRM as an instrument is utilised in cases where a project beneficiary (or beneficiaries) is not satisfied with the mini grid operator or company's handling of a grievance, where the mini grid operator or company, for any reasons, prefer that a complaint is specially mediated at a referral level outside its Customer Care Unit or where the aggrieved project beneficiary has no trust in the operator's customer service and prefers to go straight to the Grievance Redress Committee for redress. Gender Based Violence (GBV) and Sexual Exploitation/Abuse (SEA) complaints shall be **STRICTLY** handled as prescribed in **5.6.3** below.

The NEP Component 1 GRM structure shall consist of two main units, a community-based Grievance Redress Committee (GRC) and a Central Grievance Redress Committee based at the NEP PMU.

5.2.2 The Component 1 Community-based GRC

This unit of the NEP Component 1 GRM structure shall be established leaning on the Electricity Users Cooperative Societies (EUCS) in each proximate cluster of beneficiary communities or standalone community serviced by a Mini Grid and shall comprise of nominated executive members representing a well spread out demography, including women, youth and minority group representatives (where applicable). The nomination of members of the GRC shall involve a participatory process to take place in well publicised town hall meetings and driven jointly by the EUCS and representatives of the PMU. Local interest groups such as relevant NGOs/CSOs, respected citizens in the communities and reputable community associations shall also participate in the selection of the GRC members. A representative of the local traditional authority shall be included as a key member of the GRC.

The community-based GRCs will (through their secretaries) register reported grievances, categorise them in accordance with the grouping of grievances (as highlighted in the following framework) and refer them as appropriate, in accordance with the stipulated procedure and timelines. This processes and roles of implementers shall be further described below.

GRCs shall consist of an average of 7 to 8 members per Mini Grid serviced cluster, with 2-3 positions assigned to women. Communities with more residential quarters or population shall be considered and permitted to have one or two more members. A Chairman, Secretary and P.R.O shall constitute the ranking members of the GRC.

5.2.3 The NEP-PMU Grievance Redress Committee

A standing central Grievance Redress Committee shall be established within the NEP-PMU, chaired by the NEP Social Safeguards Specialist, and comprising mainly of:

1. NEP-PMU Environmental Safeguards Specialist
2. NEP-PMU Communication Specialist
3. NEP-PMU M&E Specialist
4. Energy Gender Specialist (if available)

Supported by a nominee each from:

4. Office of the Head, NEP-PMU
5. NEP-PMU Procurement Unit
6. Project Engineers
7. Office of the REA Director of Promotions
8. Zonal Liaison Officer
9. NERC

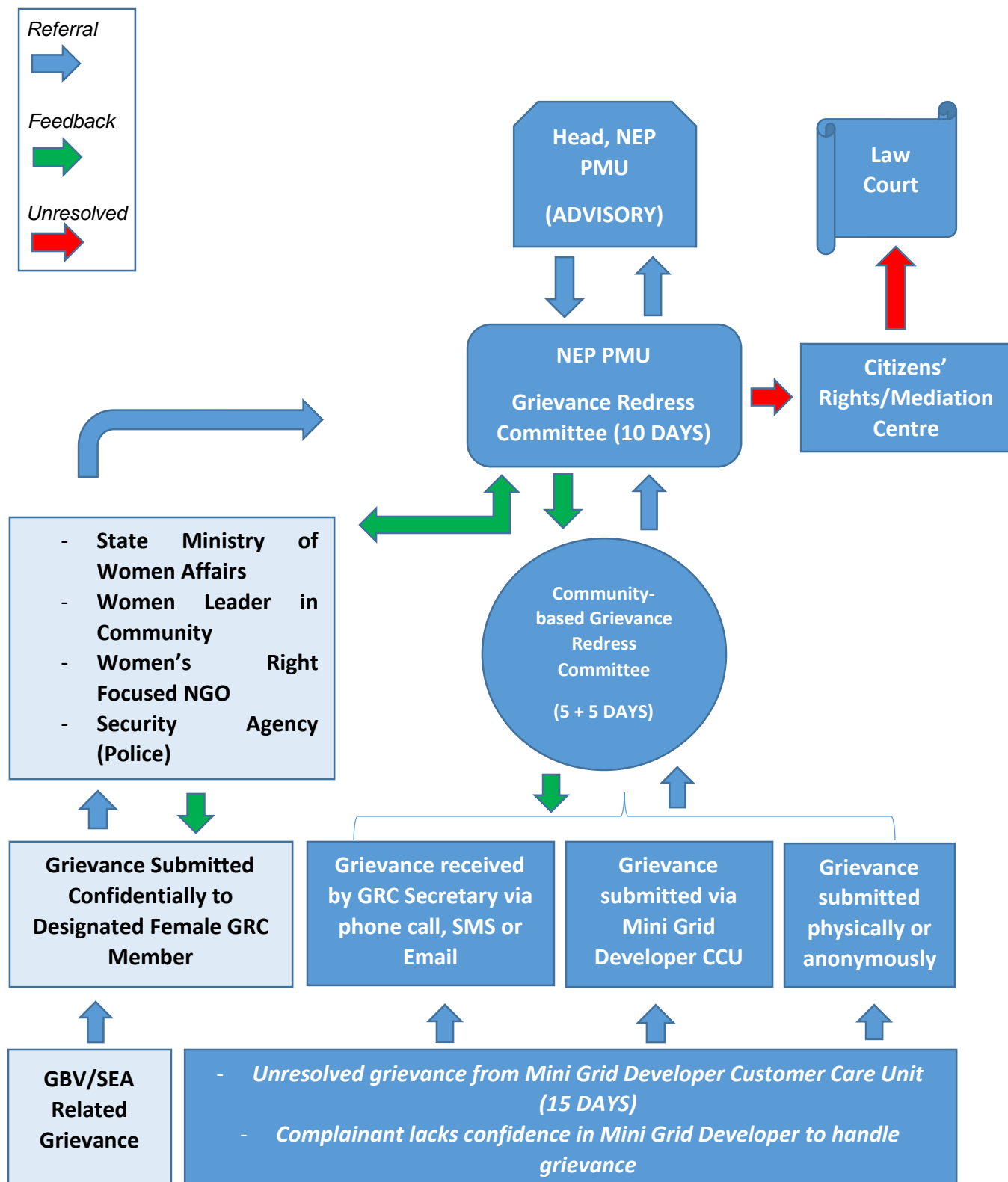
This committee shall be the apex authority of the NEP GRM, which will make recommendations for action to the Head of Project Management Unit in the case of issues of extreme importance, or make referral to the Citizens' Rights/Mediation Centre in the Ministry of Justice of an applicable state in the case of grievances that are either unresolvable at the committee level or found to be extraneous to the execution of the NEP.

5.2.4 Grievance Uptake Points

There shall be at least three major uptake points for grievances arising from the NEP Component 1 subproject activities:

- EUCS office or secretariat
- Mini Grid developers' office/site
- PMU
- NEP State Offices

Fig. 5.1: Component 1 GRM Structure



5.2.5 Roles and Responsibilities of Grievance Redress Implementers

The NEP GRM shall be driven and coordinated by the ESS and community relations' team comprising of the PMU Social and Environmental Safeguards specialists as well as the Communication and M&E specialists. However, it is essential to create a home or focal point for the GRM and integrate such into a Project's Management Framework. The Nodal officer or GRM Administrator shall be the Social Safeguard Specialist. The M&E officer shall be responsible for compilation and reporting of all beneficiary complaint and feedbacks tracked in the process of grievance reporting and redress by the central GRC. Additional support shall be provided to this team through external social experts and firms where and when required.

5.2.5(i) Responsibilities of the Social Safeguard Specialist/Grievance Redress Coordinator include:

- Coordination of the entire GRM
- Documentation of the GRC proceedings, decisions, and recommendations
- Registration of grievances using a prescribed form; Keep a log
- Facilitation and provision of information and services to resource persons as required by the grievance redress committee (GRC) to deal with reported grievances
- Maintenance of grievance-related documents, reports, and attendance and payment registers of GRC members
- Coordination of the grievance uptake channels, ensuring that they are adequately resourced
- Liaise with the Communications Specialist of the PMU for publicising the NEP GRM channels, structure and other essential project communication strategies
- Liaise with community-based GRC to track and record complaint and resolution reached
- Liaise with the Citizens' Rights/Mediation Centres in the project states, for possible referral of unresolved grievances and tracking of reported complaints
- Facilitating arrangements for field inspections
- Handling all payments and expenses related to GRM operations
- Providing feedback to affected persons and agencies involved in grievances
- Reporting progress to the PMU and World Bank in required formats

- Planning and executing GRM trainings
- Planning and executing GR evaluation and refining the GRM process for continuous improvements

5.2.5(ii) Roles and responsibilities of Mini Grid Developer Customer Care officer

- Operate and manage uptake points for complaints and resolving complaints
- Promptly refer grievances certified as UNRESOLVABLE to community-based GRC
- Monitor and provide feedback on environmental and social impacts and effectiveness of mitigation measures at community level
- Provide monthly/quarterly report on grievances to the PMU through the social safeguards specialist
- Partake in development and implementation of grievance prevention sub-plans

5.2.5(iii) Roles and responsibilities of the community-based GRC

- Settle disputes at community level
- Operate dedicated telephone hotline(s) for complaints
- Partake in training programs
- Partake in participatory planning with contractors for conflict prevention e.g. on-site food vendors plan, local labour engagement plan etc.
- Project information dissemination
- Coordination of town hall meetings and other stakeholder engagements

5.2.5(iv) Roles and responsibilities of the community-based GRC Secretary

- Manage day to day operations of GRC in project beneficiary community
- Arrange and partake in Grievance Resolution Sessions
- Register new complaints using agreed formats
- Manage complaint boxes and other grievance uptake channels
- Provide monthly/quarterly report on complaint to the PMU through the social safeguards specialist
- Facilitate pasting of posters, distribution of brochures and other information dissemination materials in communities

- Operate dedicated telephone hotline(s) for complaints

5.2.5(v) Roles and responsibilities of state Citizens' Rights/Mediation Centres

- Settle disputes that are referred from PMU
- Second arbitrators to Community-based GRC sessions when requested by GR Administrator

5.2.5(vi) Roles of the External Consultant

Relevant Consultants shall be engaged periodically (when necessary) for the following:

- Generate performance indicators for grievance redress at stages of project
- Develop reporting and management formats to support PMU ESS Team
- Conduct independent monitoring of GRM operation
- Support the development of Stakeholder/Beneficiary Engagement Plan
- Carry out Beneficiary Satisfaction Survey
- Work with communities in developing Grievance Prevention Plans

5.3 Stages of Complaints and Appeal Levels

An effective GRM must provide the opportunity for a complainant to seek a higher level of redress if they are not satisfied at the lower level. After a complaint is certified unresolvable by the Mini Grid Developer CCU, there are four levels of redress in the NEP Component 1 GRM. It is important to state that ANY complaint of GBV at any level of the GRM should immediately be referred to the stipulated GBV services providers with clear information provided on other available choices for referral, the decision for which choice to take should be left to the survival.

5.3.1 Referral to Community-based GRC Secretary

Complaints presented via any of the uptake channels in the community or from the Mini Grid Developer CCU are directed to the secretary of the community GRC. Where the issue bothers around basic lack of information by the complainant, the secretary is empowered to resolve it at that level by providing the required enlightenment. Where the secretary alone cannot resolve the complaint and a further confirmation is required, two or more members of the GRC are invited to hear the issue and provide redress **within 5 days**. Where the matter is not adequately resolved to the satisfaction of the complainant or the issue goes beyond correcting a misinformation and requires arbitration, the GRC secretary refers it to stage two, which is the *Community Mediation Session*.

5.3.2 The Community GRC Mediation Session

This stage in the grievance redress involves all members of the community GRC meeting with the complainant(s) to mediate and attempt to resolve the grievance. The GRC then refers the case to the PMU GRC if it is still not resolved ***within a further 5 days***. The community GRC mediation sessions are expected to resolve issues like trespass into private property by project activity, exclusion claims, labour or workforce related issues and any other grievances that could be nipped in the bud before they escalate.

5.3.3 Referral to the NEP-PMU Grievance Redress Committee

Typical cases that go beyond the community-based GRC could involve actions for (i) regulation of Mini Grid Developer activities and (ii) resettlement and compensation for damages (iii) Gender Based Violence (GBV) or sexual exploitation by Mini Grid Developer staff. The Social Safeguard Specialist registers the grievance and may resolve same if it is within his/her influence to do so, otherwise an expanded meeting of the central GRC is convened. The involvement of the Head, Project Management Unit (PMU) or any other project executives could be necessary when there is a need to get quick approvals and enforce contractor compliance in situations of contractor impunity, highhandedness, or in the case of GBV related complaints.

The PMU GRC is expected to finalise mediation on grievances ***within 10 working days***. The complainant/survivors confidentiality should also be kept in mind when reporting any incidences to the police or service provider.

5.3.4 State Citizens' Rights/Mediation Centre

Cases referred here are usually unresolved prolonged cases that is deemed fit for referral by the PMU GRC. The complainant is adequately briefed at this point of the need for a higher level of independent and transparent mediation.

In the case where a project beneficiary state does not have a citizens' mediation centre, an official letter shall be written by the PMU to the Registrar of the Institute of Chartered Mediators and Conciliators (ICMC) of Nigeria to second a reputable mediator, not lesser than a Fellow of the institute, to provide professional service on the case.

5.3.5 Law Court

The PMU is expected to exhaust all available avenues for settlement based on the principles of Alternative Dispute Resolution before allowing a complainant decide that they are not convinced about the resolution reached and would wish to take the matter up to a law court. Referral to a law court should ordinarily be done at the level of the Citizens' Rights/Mediation Centre.

The above steps are however not cast in stone, to prevent grievances from escalating and bringing delays to the project execution, a complainant could proceed to register a

case at the Community Mediation Session involving the full GRC, if they are not comfortable dealing with the GRC secretary or with the agreement of the secretary. A grievance may also go directly from the community to the PMU level if it is deemed as requiring urgent project or contractor correction. Cases of serious mishaps, accidents or fatalities will also be reported directly to the central GRC.

5.4 Conflict of Interest

Where a complaint has a member of the GRC as complainant, respondent, accused, party or is seen as having any form of conflict of interest, the affected member or members shall not participate in the mediation of such grievances. The decision shall be communicated to such a party and to the complainant in writing and be documented.

5.5 Voluntary Resignation of GRC Member

Where a member of the GRC at any level voluntarily withdraws their membership for any reasons, the GRM Administrator at the PMU shall be informed officially by the Chairman of the GRC or Secretary and an open consultation involving members of the community is held to nominate a replacement, who must be from the group/constituency the withdrawing member previously represented in the GRC.

5.6 Grievance Redress Procedure

Procedure for grievance redress are as follows.

5.6.1 Receipt and Registration of Feedback or Grievance

The first step for any project beneficiary or complainant to benefit from the NEP GRM is the presentation of a grievance or feedback at a grievance uptake point after the Operator CCU has failed to reach a resolution. The GRC Secretary will receive grievances from the complainant via the Operator CCU Officer, drop boxes placed at pre-arranged easy-to-locate points in the community, telephone calls, Email, physically/verbally etc and acknowledge. The complaint will then be registered and a logbook of grievances will be maintained. Cases related to GBV and personal details of the complainant will however, not be documented in the public grievance log book in case a GBV complainant decides to provide any information. The complainant/survivors confidentiality should be kept in mind when attending to any GBV/SEA related complaint. reporting any incidences to the police or service provider.

The receiver (preferably Secretary) will clarify primary information, register and acknowledge receipt of it to the grievant immediately or **within a maximum of 2 days**. The acknowledgement is to give the complainant assurance that the complaint has been received and is receiving necessary attention or has been resolved. The registration will capture the following data: Reference Number, Date of the feedback or grievance, Name of the complainant, Gender of complainant, Address, Contact Phone Number (& Email, if

applicable), Category of the grievance and Signature. A complaint or feedback can also be submitted anonymously or via a third party.

Complaints and feedbacks made in writing and those made verbally by persons that cannot read or write shall be transcribed by the receiver as appropriate and read back to the complainant to ensure agreement. All complaint submitted irrespective of its sources shall be acknowledged with a corresponding acknowledgement sent to the complainant.

5.6.2 Verification/Screening of Grievances

The receiver of grievance will then consult and make enquiries within the areas of grievance. The investigation will determine among other things whether the matter has any relationship with the Project or whether the level at which it is presented can handle it. In the case of GBV/SEA complaint, this will not be investigated but rather referred to the appropriate authority and GBV service provider around the project area. If the complaint is rejected, the complainant is informed of the decision and the reasons for the rejection within 2 days of registration of the complaint or feedback. Any complaint that is rejected shall have the benefit of a first hearing at the Community GRC level and then referred to the appropriate level/authority for redress.

Reasons why a complaint or feedback may be deemed not eligible and rejected include:

(i) The complaint does not pertain to the project (ii) The issues raised in the complaint does not fall within the scope of issues the grievance mechanism is authorized to address and (iii) The complainant has no standing to file e.g. not a member of the project community and not affected by the project activities.

Facts must be established against the interest and goal of the grievant, to build trust. Fact finding is essential to redress, but not applicable to GBV/SEA cases under this GRM. Grievances spring from differences in expectations, interests, knowledge or lack of it, needs and fears.

Complaints in the NEP Component 1 GRM should be classified under the following categories.

Category 1: Exclusion claims

Category 2: Physical and/or economic displacements caused by land acquisition or any other project activities

Category 3: Billing, metering or cost of service equipment

Category 4: Security, Crime and Enforcement Issues (including GBV)

Category 5: Labour issues

Category 6: Environmental Management lapses (including consequent mishaps)

5.6.3 Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)

All complaints related to GBV shall be treated in a private and confidential manner, limiting information to what the survival or complainant is freely willing to provide. A separate register shall be opened for this category of cases and shall ONLY be accessed by the community-based GRC secretary, the GRM coordinator at the PMU (and any female GRC member empowered to handle GBV cases where the Chairman and Secretary are all male). The complainant (if a survival) shall be attended to with empathy, assurance of safety and confidentiality. In the event that the complainant is not willing to divulge any information, this view should be respected by the GRM officer, and the complainant referred to the appropriate nearest medical centre, approved available GBV service provider or police, depending on the complainant's choice. Such a complaint should be reported to the World Bank Task Team as well by the PMU GRC.

Other considerations for the handling of GBV/SEA grievances include:

No GBV data on anyone who may be a survival should be collected without making referral services available to support them

All GBV complaint should be referred to the right service provider and other relevant institutions, information to be requested should be limited to:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning)
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor

5.6.4 Implementation and Case Closing

This is the period where the complaint or feedback passes through the full cycle and a feedback is agreed. The resolution of the committee at the various level is documented. Where there is need for external referral of the matter the complainant is appropriately guided on the next steps.

The result of the process can vary. The request of the complainant may be turned down, compensation may be recommended, or Management may simply apologise to the grievant. The Head, PMU, provides oversight for timely and adequate resolution.

5.6.5 Feedback

At the time of acknowledgement of the feedback or grievance, the complainant will be provided with the following information:

- (i) Grievance Reference Number to facilitate monitoring and reminders by complainants.
- (ii) Expected time of redress (Prescribed maximum time limit for redress is three months).
- (iii) If not addressed within expected time, action to be taken by complainant

If the grievance is not redressed within the expected time, the complainant should be provided with the following information:

- (i) Information on reasons for delay
- (ii) Updated expected time of redress
- (iii) If not addressed within expected time, action to be taken by complainant

At the time of final redress, the complainant will be provided with information on

- (i) Final action taken for redress and
- (ii) Avenues for pursuing the matter further

All responses to the complainant in a grievance redress process must be communicated in writing to the complainant. The officer responsible for the uptake of the grievances will follow up on the responding authorities for cases referred to be able to establish when each grievance has been resolved.

5.7 Component 2 GRM Structure

The NEP Component 2 is designed to enable households and micro enterprises access better energy services at lower average cost, by providing support to the private sector-led market for standalone solar systems. The structure permits flexibility, by allowing participating solar companies to design and run their business in the most viable ways, leveraging on natural market techniques.

An open market arrangement such as this would also require, first and foremost, traditional market systems of customer service. This is more so as the SHS companies will not be fronting as NEP or government sales agents during transactions.

5.7.1 Grievance Prevention Measures

To ensure that the subproject objectives are met and to prevent any incidents that may hamper effective operations of participating companies or by extension the PMU, the following strategies have been put in place.

- The application structure for interested companies clearly caters for environmental management by requiring evidence that environmental and social risks are mitigated.
- Products must also pass the NEP quality verification process and the Lighting Global standard.
- Evidence of ability to effectively provide pre- and after-sales service to acquired customers, including easy and practical warranty service.
- Must pre-qualify both company and product to claim grant as often as once a month.
- Claims are submitted online then installations of systems are verified by the Independent Verification Agents (IVA)

5.7.2 Core Institutions for the Component 2 GRM

The core institutional blocks for the management of any grievance that may arise as a result of the activities of a grantee and require NEP intervention are:

- The SHS company (grantee)
- The Independent Verification Agents (IVA)
- PMU Social Safeguards Specialist (GRM Coordinator)
- PMU Environmental Safeguards Specialist
- PMU M&E Specialist
- Representative of the Component Coordinator
- Representative of the Head, NEP PMU
- Zonal Liaison Officers
- Ministry of Women Affairs
- Women's Right Focused NGO
- Nigeria Police

The above institutions, with the exception of the SHS Company, Ministry of Women Affairs, Women's Right Focused NGO and the Nigeria Police, shall constitute the PMU GRC for component 2 and shall receive, log and mediate on grievances received directly or referred after the SHS Company has failed to reach a resolution with a complainant within the stipulated time. The company must ensure that customers are provided with sufficient information on after-sales services, including the company's complaints procedures and uptake channels, this information must be provided in ways that are easily accessible to their customers, including on product fliers, product manuals, website and other communication channels. All complaints shall be resolved and the customer notified **within 15 Days** of receipt of the complaint by the company. Where additional time is required, the complainant is updated of actions being taken **within every 7 Days** until the complaint is resolved. Where a customer is not satisfied with the resolution of a

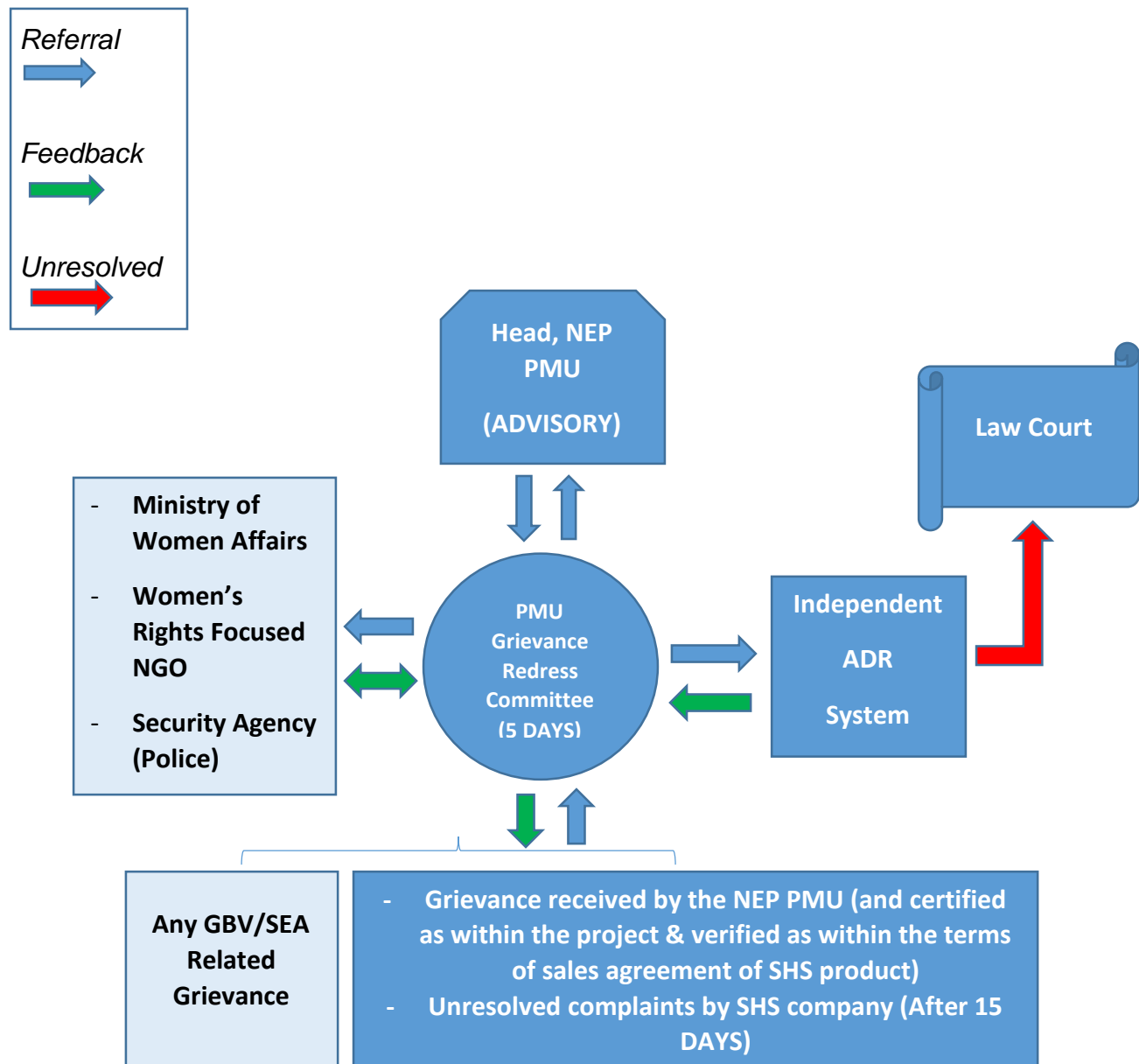
complaint and such a customer is aware that the SHS company is a beneficiary of the REA NEP, such a complainant is eligible to contact the NEP Project Management Unit (PMU) directly via the publicised NEP hotlines, email, written letter or physically for redress.

Although all complaints reaching the NEP PMU under this component shall be received, recorded and feedback given to complainant, only grievances presented by a certified SHS beneficiary, related to the project, and within the SHS product terms of warranty or sales agreement by the SHS company shall be prioritised for mediation by the PMU GRC. For other complaints, an immediate clarification and resolution that is acceptable could be provided and case closed. A representative of the SHS company is also invited to participate in the PMU GRC mediation if necessary. The NEP GRM Coordinator shall be responsible for recording and acting on complaints received at the PMU.

The GRC shall mediate and provide feedback on redress to the complainant ***within 5 days***. Where such a project beneficiary is not satisfied with the feedback and insists on seeking further options for redress, the option of an independent mediator sought from the Institute of Chartered Mediators and Conciliators (ICMC) (not less than the rank of a Fellow of the institute) is presented. Where the complainant is still not satisfied they are referred to seek higher redress in a competent court of law.

Although GBV/SEA related complaints are less likely to occur under this component, a pathway for the referral of any such grievances, if they are observed in any form, has been built into the GRM structure. On receipt of any such complaint by the PMU GRC, it is strictly subjected to the procedures enumerated in **5.6.3**, this may include potential grievances emanating from relationships between staff of an SHS company and the Independent Verification Agents.

Fig. 5.2: Component 2 GRM Structure



5.8 Component 3 GRM Structure

This component, otherwise referred to as the Energising Education Programme (EEP) is envisaged to have relatively limited grievances, especially as the project areas of influence are relatively smaller and a little regimented by authorities of the benefitting tertiary institutions. Land for the development of subprojects are expected to be provided by the institutions and within the campuses or hospitals, reducing social concerns like displacement and loss of sources of livelihood or vegetation. The project is also designed for hand over and to be sustained by the benefitting institutions after the NEP. This of course does not rule out potential issues regarding land acquisition, restriction, legacy land acquisition or any other such grievances that may spring up, especially as most universities in Nigeria are located side by side with communities.

The likelihood of sabotage or other similar actions by competing interests and previously existing electricity distribution entities to the institutions is a higher concern to the GRM consultant, especially as these actions could be masqueraded as genuine grievances, which could ultimately cause delays for the project. Communities around the universities and teaching hospitals who are underserved or without access to electricity could also put pressure on the project for inclusion, leading to grievances which may be considered extraneous to the NEP but directly impacting. This of course does not rule out potential issues regarding land acquisition, restriction or legacy land acquisition or any other grievances that may spring up.

Other potentials for grievance include the expected influx of staff of the EPC contractors and labourers into the university community, raising concerns of GBV and SEA of students, especially young school girls. Protests and demonstrations by students who may become agitated by poor electricity supply, perceived mismanagement of project infrastructure or delays in project completion is also not a negligible grievance factor.

5.8.1 Core Institutions

The core institutional blocks for the REA NEP Component 3 GRM Structure are:

- University Authority (office of the Vice Chancellor)
- Office of the Dean of Students' Affairs
- Teaching Hospital Authority (Office of the Chief Medical Director)
- Corporate Affairs/Public Relations Unit of Teaching Hospital
- Engineering Procurement and Construction (EPC) Contractors
- PMU Social Safeguards Specialist (GRM Coordinator)
- PMU Environmental Safeguards Specialist
- PMU M&E Specialist
- Energy Gender Specialist (if available)
- Representative of the Head, NEP-PMU

- Ministry of Women Affairs
- Women Focused NGO
- The Nigeria Police
- Zonal Liaison Officers

5.8.2 Grievance Uptake Points

Being a more academic environment, operators of the solar hybrid plants shall be mandated to display complaints procedures and available uptake channels for complaints in ways that are clearly visible to their customers, including on their websites, placement of grievance submission boxes at their office and via other communication channels, the same procedure shall be applied in the Students' Affairs Department of the universities and the Corporate Affairs unit of benefitting teaching hospitals for all to see. Any complaints pertaining to the project and its subprojects shall be channelled to this uptake points. All complaints shall be resolved and the customer notified **within 15 Days** of receipt of the complaint by the operator Customer Care Unit (CCU). Where additional time is required, the complainant is updated of actions being taken within **every 7 Days** until the complaint is resolved. Where either the customer or the operator are not satisfied with the resolution by the operator CCU, the complaint is taken up by the NEP community-based Grievance Redress Committee (GRC) or the NEP Project Management Unit (PMU) GRC, as the case may be.

Any emerging gender Based Violence (GBV) and Sexual Exploitation/Abuse (SEA) complaints shall be STRICTLY handled as prescribed in **5.6.3** above.

5.8.3 Composition of the PMU Grievance Redress Committee

- PMU Social Safeguards Specialist (GRM Coordinator)
- PMU Environmental Safeguards Specialist
- PMU M&E Specialist
- Representative of the Head, NEP-PMU
- Representative of the Component Coordinator

The PMU GRC shall log, investigate, mediate and provide feedback **within 14 days** in grievances certified by GRC members as serious or pertaining to the project governance and administration e.g. threat to project infrastructure. A complainant who is not satisfied by the outcomes of the mediation and feedback by the central GRC shall have the option of an independent mediator sought from the Institute of Chartered Mediators and Conciliators (ICMC) (not less than the rank of a Fellow of the institute) presented. Where the complainant is still not satisfied, they are referred to seek higher redress in a competent court of law.

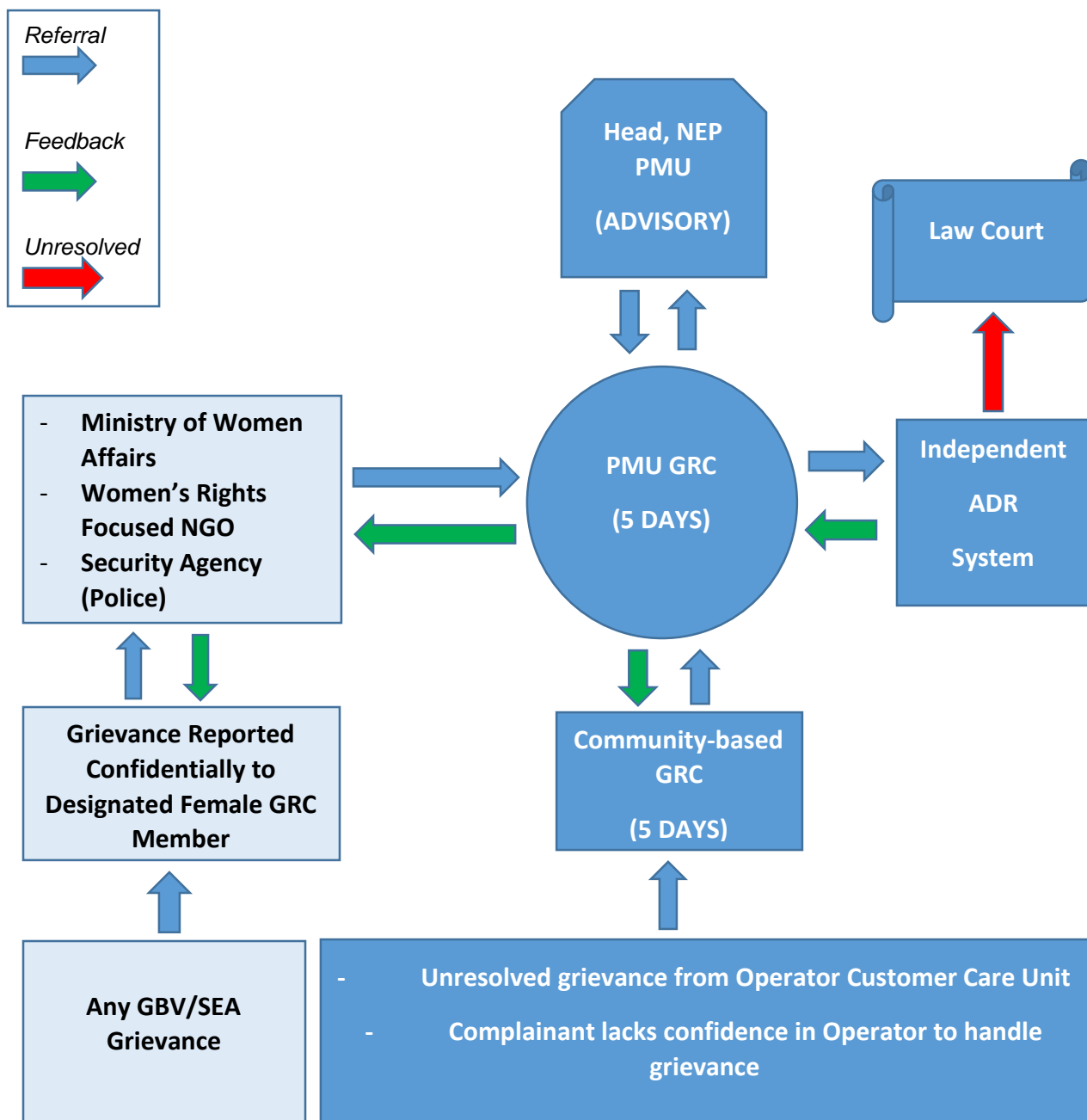
5.8.4 Community-based GRC

A community-based GRC shall be constituted in each benefiting university/teaching hospital, which shall receive, acknowledge and mediate on complaints that are not resolved by the operators and referred to it. The Secretary of the community-based GRC shall receive and record all grievances. Feedback from the community-based GRC to a complainant **shall not exceed 5 workdays**. A complainant who is not satisfied with the feedback on outcome of the mediation by the community-based GRC shall have their grievance referred to the PMU GRC. A complaint referred to the PMU GRC shall be mediated upon and feedback communicated to the complainant **within 5 days**. In the event that a complainant is still not satisfied with the mediation by the PMU GRC, the option of an independent mediator sought from the Institute of Chartered Mediators and Conciliators (ICMC) (not less than the rank of a Fellow of the institute) is presented. Where the complainant is still not satisfied they are referred to seek higher redress in a competent court of law.

- Representative of the office of the VC or CMD
- Bursar or Head of Accounts
- Dean of Students' Affairs Department
- Director, Department of Physical Planning/Works (where available or equivalent)
- President of the Students' Union Government (SUG)
- Representative of the Owner's Engineer (OE)

Considering that the subprojects under this component involves some level of construction and physical infrastructure installations similar to the NEP Component 1, relevant and applicable procedures for grievance redress, roles of common implementers and other variables under the Component 1 GRM structure shall be leveraged for the operationalizing of the EEP component grievance redress structure.

Fig 5.3: Component 3 GRM Structure



CHAPTER 6

IMPLEMENTATION OF THE NEP GRIEVANCE REDRESS MECHANISM

6.1 Communicate to Build Awareness

Educating local people and contractors about the grievance mechanism is an essential and on-going responsibility. It does no good to have a perfectly designed GRM that no one knows about

6.1.1 Communicating with Stakeholders/Beneficiaries

For an effective operation of the Project GRM, the objectives of it and procedures will have to be properly communicated to those who will use it so that they will not only be eager to access it but also to own it, taking cultural peculiarity of each community into consideration.

The goal of communicating the GRM to stakeholders is to create awareness at a general level, to build skills and capacity at leadership level as well as to cause adjustment in behaviours and attitudes at the level of all stakeholders with a view to entrenching inclusion.

To entrench this GRM as an efficient management tool for the NEP-PMU, a combination of methods and media should be employed. The communication plan must take into account the awareness creation and the behavioural change need of the stakeholders.

There is the need for a sensitisation forum with the various communities, to acquaint the stakeholders of the project with the guideline and workings of the GRM. This workshop will rally representatives of the states, local governments, traditional institutions as well as key groups and personalities in the project communities.

Accessing the grievance redress system will depend so much on the level of awareness about the mechanism among potential users. This therefore will require both group and mass methods as well as all the media forms available.

6.1.2 Basic Communications Channels

Mass Media: Findings of this study revealed that the greater number of stakeholders engaged get their information from the various media of mass communication, it is pertinent therefore to continue to engage stakeholders via the traditional media, especially electronic (local radio & TV).

‘Face-to-face’ Communication Channel: It is also clear that specific information about the state of the project in specific sites cannot always be captured through the mass media. A large part of information dissemination must be carried out by word-of-mouth in face to face encounters. This can be made possible by the periodic presence of project personnel in the communities for town hall meetings and other stakeholders’ forum.

Social media: The creation of online communities around the project to improve participation, inclusion and ownership should be encouraged and supported. Platforms like WhatsApp, Facebook, Twitter and other new media channels can be engaged to get information about the project out and attract discussions and contributions. For alerts and emergency communication, the use of targeted bulk SMS to stakeholders in the area concerned will be very valuable.

Project Website: All necessary information on the project activities for the consumption of the public, including avenues for grievance redress and feedback should be publicised on the project website

Mid-Media and IEC Materials: The use of outdoor advertisements, flyers, brochures, branded shirts and gift items, branded training materials with crafted messages is also very effective and should be explored.

Grassroots Mobilisation: The consultant observed an existing relationship between the PMU and the Component 1 project communities, including engagement with EUCS and State Energy Working Groups. Periodic telephone conversations with the leadership of communities and the GRC should be encouraged. Women and Youth leaders should be specifically targeted and encouraged to open up on issues affecting them with regards to the project.

6.2 Training and Support to Participants

This will involve orientation and training for beneficiaries, GR implementers/GRM officers, relevant staff of the contractors, security personnel etc. and provision of external consultancy and support staff to strengthen organizational capacity.

6.2.1 Conduct Training

The training requirements for the GRM are multifaceted, diverse and layered through the orientation and implementation phases.

The training requirements during the GRM introduction/orientation phase are:

- Orientation and training workshop for GRC members
- Preliminary training and capacity building for GR managers and implementers to launch GRM

- Training on GRM implementation and participation for other stakeholders, including contractor staff and other identified field workers

The training requirements during the implementation phase are:

- Continued training for beneficiaries and GRM users in the implementation phase
- Training and retraining of mediators of the states Citizens' Rights/Mediation Centres

An external consultant shall be identified to support these training prerogatives at different phases of project development. The outlay of the preliminary training program is elaborated below.

S/N	GR Implementer	Training
1	Social Safeguards Specialist (GRM Administrator)	Training in conflict resolution, Alternative Dispute Resolution (ADR) and grievance management. Members of the Chartered Institute of Mediators and Conciliators (ICMC)
2	PMU GRM Team (including GRM Administrator)	To include procedural training on receiving, registering, and sorting grievances; training in management of the grievance redress process (developing flow charts) particularly GBV/SEA related complaint, assigning roles, monitoring performance of staff dealing with complaints, and providing incentives.
3	Community-based Grievance Redress Committee (GRC)	Basic ADR "decide together" problem-solving skills. Skills for conducting receipt and registration, referral processes, communication to complainants, GR logging, monitoring and record keeping etc.
4	Secretary of the Community-based GRC	Effective communication, negotiation, and facilitation skills; problem solving; dispute resolution, decision making and their

		respective parameters, standards, and techniques
5	Mini Grid Operators Community Liaison officer	Effective communication, negotiation, and facilitation skills; problem solving; dispute resolution, decision making; and their respective parameters, standards, and techniques
6	Citizens' Rights/Mediation Centres	ADR Training for staff lawyers. Membership of the Chartered Institute of Mediators and Conciliators (ICMC)
7	All GRM officers	Training on confidential, respectful and survival centred response to GBV complaints.

Table 6.1: Training Outlay

6.3 Monitor, Report and Learn

The goal of ongoing monitoring is not only to improve the system, but also to improve the PMU capacity. Monitoring GRM will promote checks, stability and effective delivery of the project. Reporting GRM will help documentation of emanating issues from sites, best practices and improve organizational relationship with communities. Learning will showcase case studies, success stories, knowledge management and research. Energy Management Information System (EMIS) - database of NEP will be used to capture, archive, analyse and report data on GRM. Key officers to collect data report in real time to NEP GRM Committee will use data collection tools. Analysed data will be triangulated and used for planning, reprogramming, support policy development or review as well as decision-making.

The goal of on-going monitoring is not only to improve the system, but also to improve the PMU capacity.

6.4 Basic tips to aid implementation

- Create a grievance advisory committee: an oversight group with advisory authority, composed of PMU and community representatives who monitor performance and provide strategic advice about the grievance mechanism. Involve appropriate stakeholders and community members like complainants who have used the grievance process satisfactorily.

- Utilise internal PMU forums such as staff meetings, community relations meetings etc. to review the performance of the GRM. Do not censor or discourage discussion about the performance of the system and possible suggestions for changes in REA.
- Solicit input from community members and, where appropriate, engage them in deliberations on appropriate changes to the mechanism.
- Consider appropriate venues and processes to secure the best citizen suggestions on the functioning of the mechanism, and shape these according to local cultural norms.

6.4.1 Establish Clear Standards and Criteria for Evaluation

Identify which aspects of the grievance mechanism to evaluate: the whole mechanism, the performance or behaviour of implementers, the time required to process complaints, kinds of resolutions, patterns of settlements, structural issues posed by the system and its operation, settlement costs, and so forth. Questions should be developed in two broad areas: the performance of the grievance mechanism, and lessons related to NEP PMU operations that have emerged. Some possible questions to pursue are listed below.

6.4.2 Questions targeted to the grievance mechanism's performance

- How well is the system accomplishing its purpose and goals?
- Is the system making a difference? How?
- Is the mechanism saving money and reducing risk?
- Does the mechanism enable complainants to raise their concerns, engage in a fair process, and obtain a satisfactory settlement to their issues (when appropriate)?
- Where are the gaps? What works and not working?
- What types of problems is the system addressing?
- Do people know where to go? Is the mechanism accessible and easily understood?
- Do those who receive and register complaints document the complaints?
- Can complainants readily determine the status of their complaint and how the PMU is responding?
- To what extent is the system actually used by a wide cross-section of men, women, and youth from the beneficiary community?

- How well does the mechanism address the power imbalance between the project and complainant and assure that the complainant is not always merely receiving a judgment from the company?
- Does the mechanism provide adequate opportunities for face-to-face participation and discussion and joint development of mutually acceptable solutions to issues in question?
- Does the mechanism allow and facilitate, when appropriate, complainants' pursuit of external and independent means to redress their grievances?
- What conflict trends, community issues, and project operations could influence the kinds of conflicts that might be expected in the future?
- Is the grievance mechanism set up to handle such issues?
- What actions would increase effectiveness?

CHAPTER 7

SUMMARY ACTION PLAN, SOP AND BUDGET FOR IMPLEMENTATION

7.1 Project Management Unit and Mini Grid Developers:

- Conduct Preliminary Stakeholder Engagements/Awareness Building
- Preliminary Town Hall meetings and pre-implementation beneficiary engagement
- Identify and engage consultant or relevant staff to develop communication materials (TV/Radio, fliers, billboards, brochures, other awareness and instructive materials)
- Set up GRM (Social Infrastructure and Processes)
- Conduct office team meetings to assign roles
- Set up GRM desk office in PMU with a dedicated staff
- Disseminate GRM to mini grid developer customer care unit staff and management
- Ascertain any impediments to effectiveness within the mini grid developers and at the REA NEP PMU and correct
- Conduct Town hall meetings and EUCS meetings for preliminary briefing and participatory nomination of GRC
- Establish and inaugurate Community-based GRCs
- Support Community GRCs to establish complaints uptake channels
- Establish telephone hotlines, Internet, Email, Facebook, WhatsApp where applicable
- Develop grievance prevention sub-plans
- Conduct orientation training and capacity building for GRCs
- Create all linkages and modalities for handling of potential GBV/SEA complaints
- Initiate Grievance Redress Processes - Operate GRM
- On-going monitoring, training and Capacity Building
- Conduct ongoing consultations and community engagements
- Conduct Town hall community Briefing & Feedback sessions

- Facilitate workshop for participation and collaboration on project development plans, progress, challenges and complaints.
- Conduct mid-project beneficiary engagement to brief beneficiaries on activities and obtain open feedback from communities.
- Conduct post-project Beneficiary Engagement
- Maintain communication systems (local radio and TV jingles etc)

7.2 Community-based Grievance Redress Committees

- Elect principal officers
- Agree on meeting/mediation days, venues and other logistics requirements e.g. location of complaint drop boxes
- Participate in training/capacity building sessions
- Receive work tools and materials from PMU
- Initiate Grievance Redress Processes
- Participate in monitoring and on-going trainings/capacity building

7.3 Training and Capacity Building

- Continued training for beneficiaries and GRC users
- Training and retraining of mediators of the Citizens' Rights/mediation Centres
- ADR training for PMU In-house team
- ADR Training for GRC members

7.4 Monitor, Evaluate and Refine

- Conduct PMU GRM Team technical retreat to review successes and obstacles with the view to revising prescribed processes and update of budget
- Identify external consultant to conduct GRM user satisfaction survey
- Establish multi-layered M&E framework. Implement community/beneficiary Co-monitoring
- Conduct Town hall meetings and FGDs for GRM user feedback on performance
- Conduct regular BF and GRM evaluation retreats

7.5 Summary Budget Estimate for GRM

A provisional budget estimate of twelve million, three hundred and fifty thousand naira (N12,350,000) is proposed for operationalizing the Grievance Redress Mechanism presented in this report. A summary breakdown is provided in Table 7.1 below

TASK	AMOUNT	PERSON RESPONSIBLE
Preliminary stakeholder engagements/awareness building	1,500,000	GRM Coordinator, Mini Grid Developers, SHS Independent Verification Agent and EEP Operators
Orientation and training workshop, involving external consultant	4,000,000	GRM Consultant, GRM Coordinator, Head NEP-PMU
Preparation of communication materials (awareness and instructive materials), including complaint boxes	2,000,000	GRM Coordinator, Communication Consultant
Establish Telephone hotlines, Internet, Email, Facebook, WhatsApp portals and maintenance	500,000	GRM Coordinator, NEP Telephone Hotline Operators, Developers and Operators Customer Care Units, Community-based GRC Secretaries
Set up of GR infrastructure at NEP PMU, including meetings and logistics	200,000	Head NEP-PMU, GRM Coordinator
Funding of states Citizens' Rights/Mediation Centres for optimal support to GRM	2,000,000	Head NEP-PMU, GRM Coordinator
Procurement of Consultancy Services of Independent Mediators & Conciliators	3,500,000	Head NEP-PMU, GRM Coordinator
Logistic support to key community-based GRC members	1,500,000	GRM Coordinator, Developers and Operators

Maintenance of communication systems, including Radio and TV jingles where necessary	1,000,000	GRM Coordinator
ADR Training for GR Administrator	500,000	Head NEP-PMU
External consultant to conduct GRM user satisfaction survey and effectiveness of mechanism	2,000,000	Head NEP-PMU, NEP M&E Specialist, GRM Coordinator
Quarterly town hall meetings and FGDs for GRM user feedback on performance	1,500,000	Head NEP-PMU, NEP M&E Specialist, GRM Coordinator
TOTAL	20,200,000	

TABLE 7.1 – Summary budget for GRM

ANNEX 1

SAMPLE GRIEVANCE REGISTERING AND MONITORING FORM

Complainant Information (Person Reporting)

1. Name (Surname first):

2. Address:

3. Acceptable Means of Identification presented:

4. Gender:

5. Phone Number:

6. Email:

7. Category of complainant:

- Affected person/s (AP)
- Intermediary (on behalf of the AP)

8. Assigned Complaint Registration Code:

9. Complaint Details (Describe in summary):

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10. Complaint Presentation channel:

- Letter
- Phone call
- SMS
- Email
- Verbal complaint (walk-in)
- Suggestion box
- Others (specify):

11. Location of the issue specified in the complaint:

- LGA:
- Project Site:
- Community:

12. Short description of the factors causing the problem:

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13. Stakeholder/Person/agency accused of being responsible for grievance:

14. Past action/s taken by the complainant (if any):

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15. Details of the grievance uptake point (where this report is made):

Name of the person who received the complaint:

Position:

Date:

16. Action(s) taken by the grievance receiving officer:

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17. Next Actions taken:

Action 1	Action 2	Action 3	Action 4
Short Description	Short Description	Short Description	Short Description

Name of Action Officer	Name of Action Officer	Name of Action Officer	Name of Action Officer
Office	Office	Office	Office
Date	Date	Date	Date

18. Final Resolution

19. Proposed date of feedback to complainant:

20. Mode/Channel of feedback:

21. Officer completing the form:

22. Signature:

23. Date:

Sample Grievance Registration Form

Grievance Redress Registration Form

Date.....

Community:

Name of Complainant

Address

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Summary

of

Grievance

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Project Component:

Category of Grievance:

Supporting Documents:

Complainant Signature (Thumbprint)/Date:

Receiving Officer's Signature/Date:

ANNEX 2

FORMAT FOR RECORDING THE PROCEEDINGS OF GRIEVANCE REDRESS COMMITTEES (GRC)

1. Name of the complainant/s:
2. Date complaint was recorded:
3. Means of Identification of complainant
4. Address of complainant:
5. Date of mediation by GRC:
6. Complainant participated in mediation? Yes or No
7. Summary of grievance:
8. Complainants statement:
9. GRC recommendation:
10. Participants at the mediation (GRC Members):

ANNEX 3

PMU MONITORING FRAMEWORK FOR GRM

S/ N	OUTPUT	INDICATOR	SOURCES OF INFORMATION	FREQUENCY OF DATA COLLECTION	RESPONSIBLE ENTITY
1	Conduct Preliminary stakeholder engagements/awareness building	<p>Number of stakeholders' engagement meetings conducted</p> <p>Awareness building and communication materials (fliers, billboards, Bills, other awareness and instructive materials) distributed</p>	<p>Meeting minutes or reports</p> <p>Monthly reports of NEP Communication Specialist and GRM Coordinator</p>	<p>1st Quarter</p> <p>Monthly</p>	GRM Administrator, M&E officer

2	Set up GR mechanism	Community GRC established Complaints uptake channels set up: Complaint drop boxes, Telephone hotlines, Email, WhatsApp etc. in place	Reports with photographs submitted to the PMU monthly and to the World Bank quarterly	Monthly/ Quarterly	GRM Administrator, M&E Specialist
	Initiate and Operate GR mechanism	Town hall Community Briefing conducted as at when due Grievance receipt and registration (logging); screening; sorting; and feedback to complainants on grievances are being carried out on schedule Communication systems Radio , TV, posters, fliers etc. maintained and effective	Participation/co verage Photographic evidences Report submitted to the PMU monthly and to the World Bank quarterly	Quarterly	GRM Administrator, M&E Specialist, PM
3	GRM processes are working effectively and	Beneficiaries aware and encouraged to	Reports from In-house evaluation	Quarterly	M&E Specialist

	identifying needs for refinements and changes	participate in GRM Beneficiaries actively participating and using GRM			
4	Refinements and changes	Beneficiaries actively participating and using GRM	<p>Reports from In-house evaluation</p> <p>Results from GRM user satisfaction survey by external consultant</p> <p>Results from Independent survey and audit of GRM performance and effectiveness by external consultant</p>	Project mid-term review	<p>M&E Specialist</p> <p>External consultant</p>

ANNEX 4

KEY CONSULTATIONS BY CONSULTANT

S/No	NAME	ORGANISATION	DESIGNATION	CONTACT No.
REA				
1.	AYANG Ogbe	REA	Director of Promotions	08092292277
2.	OTUBU Anita	REA	Head of Special Duties (EEP Component Coordinator)	08138822835
3.	NWANDU Ifunanya	REA	SHS Component Coordinator	08177777447
NERC				
1.	SHITTU M.	NERC	General Manager, Consumer Affairs	07031022233
2.	Dr ABDUSSALAM Yusuf		Asst. General Manager Renewable Policy, Research & Strategy	08032907889
Federal Ministry of Environment				
1.	ODETORO K.	FMoE	Deputy Director	07032747723
Mini Grid Developers				
1.	Mr Odunaiya	Association of Mini Grid Developers	Secretary	08034078347






Sokoto State				
1.	Barr. Ifeanyiichukwu M.	Legal Practitioner/Mediator		08066954034
2.	IBRAHIM Muntari		NEP Coordinator	08096969797
3.	IBRAHIM Hauwa	Tudun Kose – Malgam Community	Women Influencer	09067892008
4.	DANKANI Mohammed	Soron Yamma Alela Community	Community Leader	08188019558
Ogun State				
1.	ADEBAYO ‘Bukoa	State Ministry of Justice	Staff Lawyer	08130745617
2.	BAMIDELE Adebayo	Ogun State Citizen’s Rights/Mediation Centre	Director	08035651377
2.	FALOLA Hassan	Eruku Community	Community Youth Leader	08067647349
3	KAYODE Toyin	Coker 3 Community	Community Women Influencer	
Cross River State				
1.	ATAMBI E.	Legal Practitioner/Mediator		07035754154
2.	IZAMA Pius	State Electrification Agency		08037577305
3.	Rev. Fr (Barr) John Ebebe	Citizens’ Rights Department	Director	08028523222
4.	Ebigha Goodness	Ofonkom Community	Youth Leader	09074015088
Niger State				
1.	ETSU Safiya	Ministry of Justice	Staff Lawyer	08065656666
2.	Dr LEMU Mustapha	State Energy Working Group	Chairman	08037313509

3.	TWAKI Rachel	State Ministry of Women Affairs	Asst. Director	08065562030
4.	MUNI Mohammed	Etsu Tasha Community	Community Leader	

ANNEX 5

ATTENDANCE SHEETS (FGD)

PARTICIPANTS ATTENDANCE SHEET Ifo L.G.A Ogun (Conceal) FGD

S/N	NAME	PHONE	SIGN
1.	Bidemi Sogbo	08136659112	
2.	Tide Mathew	08149275572	
3.	Sobowale Elijah	09034728949	
4.	Deborah Adetunji	08166215097	D.O
5.	SERAH DYEBOLE	08143023260	
6.	Asogbo Samson	08031314382	AKK
7.	Dikko Omlade	09039121269	
8.	Bunmi Akinwande	08125330823	B. Akinwande

PARTICIPANTS ATTENDANCE SHEET

Edasi L-GA (Etsu Tasha) FGD

S/N	NAME	PHONE	SIGN	
1.	Hajera Umar	-		F
2.	Fatima Liman	08168339951		F
3.	Akwai Ummi	-		F
4.	Salamatun Isq	-		F
5.	Aisha Mohammed	07055997706		F
6.	Bilkisu Ibrahim	-		F
7.	Aishatu Girms	-		F
8.	Fadi Akai	-		F
9.	Inaleya Ramatu	-		F
10.	Aminu Ahmed	-		F
11.	Hawa Surajo	-		F
12.	Raiciya Danlami	-		F
13.	Cumba Aishatu	-		F
14.	Talatu Dangwa	-		F

Obubra Local Govt.
(Ofonekom)

PARTICIPANTS ATTENDANCE SHEET

S/N	NAME	PHONE	SIGN
1.	Ikrom Francis	-	F.I.F
2.	Friday Efon	08022208960	
3.	Wisdom Isele	0709246031	lathibane
4.	Eelix Maxwell	0708169038	mfeleke
5.	Williams Isik	09014251718	Williamson
6.	Mary Eteng	-	Mary E
7.	Sarah Richard	09077903401	S.R
8.	Nyama Okon	08088685392	
9.	Daniel Obo	07082633807	Obobla

PARTICIPANTS ATTENDANCE SHEET

Binji LGA SOKOTO

S/N	NAME	PHONE	SIGN	
1	Lami Taniru	—		f
2	Aisha Yusuf	—		f
3	Fatima Mohammed	07066786664	fatima	f
4	Mursaina Lawali	08102731682		f
5	Sutara Altino	—		f
6	Nefira Bello	09072612174	Nefira	f
7	Amina Hali	—		f
8	Salamatu Abu	—		f
9	Zaharau Kabir	08138063920		f
10	Aisha sani	—		f
11	Jamila Sanusi	—		f
12	Hauwa Jemile	09080779016		f

PARTICIPANTS ATTENDANCE SHEET

Binji LGA SOKOTO

S/N	NAME	PHONE	SIGN	
1	Malam Muhammadu	07066786664	N.D	m
2	Sandy Sani	09038217772		m
3	Abubakar Lawali	07067545459		m
4	Garba Abubakar	08105419362	GA	m
5	Usman Hali	09036056775	Usman	m
6	Kasimu Abubakar	09037459346		m
7	Garba Umaru	—		m
8	Hassan Gado	08108197667		m
9	Murtala Bello	—		m