

GRIEVANCE REDRESS MECHANISM FOR ENVIRONMENTAL AND SOCIAL RISK COMPLAINTS AND CONCERNS

Introduction

The Grievance Redress Mechanism for E&S complaints and concerns establishes clear guidelines for effectively managing and responding to complaints associated with the implementation of projects and programs funded by DBN.

DBN recognizes that PFIs (customers) are the backbone of its operations, and that the highest standard of customer service must be offered before, during, and after the client has accessed services from the Bank.

This Grievance Redress Mechanism (GRM) supplements the Bank's other Customer Complaints Procedures. It is aimed to be a guide to the stakeholder consultation and grievance redress processes across the life of DBN-funded Projects and during the implementation of the Environmental and Social Management Plan (ESMP).

Policy Approach:

1. Through this policy, DBN puts in practise its commitment to fostering stakeholder consultation and grievance redress processes across the life of DBN funded Projects and during the implementation of the Environmental and Social Management Plan (ESMP).
2. It also establishes a dedicated channel or contact person for stakeholders, ensuring that their queries are directed efficiently and receive timely responses.
3. DBN recognizes that sustainable development is now widely accepted as the preferred development paradigm and that the financial sector has an important role to play by ensuring that financing resources are invested in a way that supports the preservation of a clean environment and earth's natural resources, as well as ensuring people, workers, and communities are not harmed and treated fairly and equitably.

Objectives of the Policy:

The specific objectives of the GRM are:

- To provide stakeholders with the opportunity to raise comments/concerns.
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of the effectiveness of the mechanism.
- To ensure that comments, responses, and grievances are handled in a fair and transparent manner, in line with the applicable reference framework.
- To work as a risk management tool by hedging the Bank's reputational risk.

Scope and Eligibility

The GRM will apply to all concerns raised in relation to the adverse Environmental and Social (E&S) impacts in relation to all DBN financed or co-financed programmes and projects. The procedure will not apply to complaints related to unsuccessful funding outcomes.

Types of Complaints

This GRM will be made available to parties who have grievances arising from activities related to the project's implementation. These grievances could be related, but not limited to:

- Environmental, social, health, and safety.
- Service Delivery.
- Gender Bias.
- Labour, compensation, and any issues that may arise due to interactions between the labour workforce and host communities.
- Resettlement-related grievances, such as the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts, and timing of compensation, amongst others, will also be handled by this process.

Grievances will be deemed non eligible if:

- i. Complaints submitted 2 years after the funded project or programme has been closed.
- ii. Complaints submitted 2 years after the date that the complainant became aware of the negative impacts by a Bank funded project or programme.

Process and Suggested Timeframes for Grievance Redress

S/N	Process	Duration (Working Days)
1	Receive and register grievance	Within 3 Days
2	Acknowledge, assess grievance, and assign responsibility	Within 7 Days
3	Development of response	Within 3 Days
4	Implementation of response if agreement is reached	Within 2 weeks
5	Close grievance	Within 5 Days
6	Initiate grievance review process if no agreement is reached at the first instance	Within 2 weeks
7	Implement, review, recommendation, and close grievance	Within 2 weeks

Whom To Submit Complaints and By Whom

DBN provides multiple channels for stakeholders to submit their grievances, ensuring accessibility and convenience. The complaints can be submitted via:

- I. Email the complaint to info@devbankng.com.
- II. Submit the complaint online by filling the online complaint form on DBN web page for Complaint mechanism for projects and programmes; or
- III. Hotline: +234 209 904 0000.

Monitoring and Evaluation

All grievances and complaints including suggestions/comments on the GRM will be monitored on a quarterly basis or as may be deemed necessary depending on prevailing circumstances. Monitoring and evaluation criteria will include the following:

- Number and description of the grievances registered over a specified time frame.
- Percentage of complaints resolved, and percentage that resorted to legal route.
- Time taken to resolve the complaints against the GRM time stipulations.
- Number of complainants by gender.
- Percentage resolutions.
- Ongoing efforts towards resolutions.
- Status of implementation of ongoing resolutions.

Annually, the report describing the work of the GRM will be published in the Bank's Website and Annual Report. The level of detail provided with regards to any individual grievance will depend on the sensitivity of the issues and stakeholder concerns about confidentiality, while providing appropriate transparency about the activities of the GRM. The report will also highlight key trends in emerging conflicts, grievances, and dispute resolutions.

Executing Entities

The Bank shall expect that all its PFIs /Executing entities include GRM in projects financed and overseen by DBN. The PFIs/Executing Entity will be responsible for informing project-affected parties about its Accountability and Grievance Mechanisms as it will be the first point of contact. The PFIs/Executing entity should therefore be able to provide a copy of grievance and response to the Bank which response should propose a process for resolving the conflict.

Affected Communities and other interested stakeholders may raise a grievance at any time to the Executing Entity or directly to the Bank. The Bank reserves the right to review the executing entities GRM.