



NIGERIA HUMAN CAPITAL OPPORTUNITIES FOR PROSPERITY AND EQUITY – GOVERNANCE (HOPE-GOV)

GRIEVANCE MECHANISM MANUAL

2026

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Acronyms

ADR	Alternative Dispute Resolution
BVN	Bank Verification Number
DLIs	Disbursement Linked Indicators
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
FP	Focal Person
FCT	Federal Capital Territory
GBV	Gender-Based Violence
GDP	Gross Domestic Product
CRA	Child Rights Act
GRC	Grievance Redress Committee
CSOs	Civil Society Organizations
GRM	Grievance Redress Mechanism
GM	Grievance Mechanism
HOPE-GOV	Nigeria Human Capital Opportunities for Prosperity and Equity Governance
IEC	Information, Education and Communication
IPF	Investment Project Financing
KPIs	Key Performance Indicators
LDP	Land Development Plan
LMP	Labour Management Procedure
M&E	Monitoring and Evaluation
NIN	National Identity Number
NGOs	Non-Governmental Organizations
NPCU	National Program Coordinating Unit
NPHCDA	National Primary Health Care Development Agency
OHS	Occupational Health and Safety
HR	Human Resource
PAP	Program Affected Persons
PCC	Public Complaints Commission
PDO	Program Development Objective
PforR	Program for Result
PHC	Primary Health Care

PSC	Program Steering Committee
PSS	Psycho-Social Support
SERVICOM	Service Compact
SEA	Sexual Exploitation and Abuse
SSC	State Steering Committee
SSO	Social Safeguard Officer
STC	State Technical Committee
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TA	Technical Assistance
UBEC	Universal Basic Education Commission
VAPP	Violence Against Persons Prohibitions
WB	World Bank

DEFINITION OF TERMS

In this Grievance Mechanism Manual, unless the context otherwise requires, the following terms shall have the meaning attached to them:

HOPE-GOV: Nigeria Human Capital Opportunities for Prosperity and Equity Governance is a Program designed by the World Bank to strengthen financial and human resources management in the Education and Health care sector in Nigeria. This Program is implemented in 3 Results Areas.

World Bank: This is officially known as one of the Bretton Woods Institutions. Its two lending arms are the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA). The Organization is owned by 174 Countries. Its role is to provide loans, credits, and grants to Member Countries to support their economic development, reduce poverty, and improve standards of living.

Results Areas (RAs): Refer to the associated area of outputs or outcomes for which a role is responsible. It is a defined space where efforts are focused on producing specific results in the HOPE-GOV Program. HOPE-GOV Program focuses on 3 Results Areas, namely: RA1 Increased availability and effectiveness of financing for basic education and primary healthcare service delivery, RA2 Enhanced transparency and accountability for basic education and primary healthcare financing and RA3 Improved recruitment, deployment and performance management of basic education teachers and primary healthcare workers by federal, state and local governments.

Program: This is a set of related measures or activities with a particular long-term aim. It is a set of projects funded and implemented by the World Bank to achieve specific development goals and objectives in Nigeria.

Grievance: This is a real, supposed, or perceived injustice, wrongdoing, or unsatisfactory situation that inflicts pain, hardships and suffering on a person with a high possibility of increasing the person's vulnerability. Grievance forms legitimate grounds for complaints and redress.

Program Grievance: This refers to all Program-related complaints or concerns officially expressed by the Program Affected Persons or anyone who feels that he/she has been or will be adversely impacted negatively by the design and implementation of the Program.

Grievance Mechanism: This is the instrument, method or process put in place to receive, investigate and redress complaints or grievances from individuals, groups or communities who are adversely affected by Program activities and operations.

Program GM Focal Point/Person(s): This is a well-established, functional and fully equipped designated Program GM Office(s). GM focal persons are individuals or officers designated to receive, investigate and redress complaints.

Gender-Based Violence: This refers to violence or acts inflicted or directed on person(s) or groups based on sex or gender identity. Gender-Based Violence is rooted in cultural bias Centred on structural inequality, power imbalance and patriarchy. GBV includes physical, verbal, emotional, psychological and sexual violence.

Sexual Exploitation and Abuse: Sexual Exploitation is an actual or attempted misuse of one's position to gain sexual favors. Sexual Abuse is the actual or threatened physical intrusion of a sexual nature, either by force, unequal power or coercive condition.

Sexual Harassment: This is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that causes offence or humiliation. These are comments that are offensive, humiliating, intimidating and hostile in nature. SH includes verbal, visual, physical and any conscious or unconscious sexual behavior as a result of program implementation. Regardless of the type of harassment, it creates an environment of fear and intimidation that can lead to long-term feelings of vulnerability, trauma, anxiety or depression in the affected individual or groups.

GBV/SEA/SH Survivor: This is a person who is going through or has gone through the recovery process of short or long-term effects of Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment.

Survivor-Centered Approach in GBV/SEA/SH handling: This refers to all support focused on prioritizing the rights, safety, needs, wishes and general well-being of a Survivor. Intervention in the best interests of the Survivor promotes the fundamental rights of the Survivor to make decisions around accepting services, referrals, and how the information shared is utilized, documented and shared with others; informed consent of the survivor.

GBV/SEA/SH Reporting Channel: This is the first point of login of GBV/SEA/SH reporting in the Program, which is often carried out by the GM Focal Point. However, considering the sensitive nature of the GBV/SEA/SH cases, specialized and confidential handling within the GM Focal Point is strategic.

GBV/SEA/SH Service Providers: These are accredited Public and Private Institutions that offer specialized and timely support to the GBV/SEA/SH Survivor, which is necessary for the Survivor to return to normal life. The support to be provided to the GBV/SEA/SH Survivor includes, but not limited to, Healthcare, Legal, Security, Education and Skills Development, Counseling, and Psycho-social Support.

GBV/SEA/SH Referral Pathways: These are the network of Service Providers of GBV/SEA/SH Survivors aimed at providing prompt support to the Survivor through efficient Referral Pathways. A Survivor may be referred to other Service Providers to access further support.

FOREWORD

The Nigeria HOPE-GOV Program represents a significant milestone in Nigeria's journey towards sustainable development and human capital growth. By investing in education and healthcare, the Nigerian Government will not only improve the lives of millions of Nigerians but also lay the foundation for a more prosperous and equitable future.

The HOPE-GOV Program, with the support of the World Bank, will leverage on expertise, resources and innovative solutions to drive meaningful change. HOPE-GOV is designed to address the unique challenges facing Nigeria's education and healthcare sectors by focusing on transparency, accountability and results-driven approaches that will ensure resources are used effectively and efficiently. The Program will have a lasting impact on the lives of Nigerians.

The Program uses Investment Project Financing (IPF) at the Federal level and Program for Results (PforR) at the State level. To maximize the benefits and mitigate adverse impacts of the HOPE-GOV Program among relevant Stakeholders, the Program Grievance Mechanism (GM) has been developed.

The HOPE-GOV GM outlines what is expected of Program Stakeholders in redressing Program-related complaints or grievances. The GM Procedure is aimed at increasing the participation of the relevant Stakeholders through constant stakeholder and Citizen Engagement. The essence of such engagement is to ensure that the interests, expectations and concerns of Stakeholders are adequately captured and taken into consideration in the Program design and Implementation. The understanding of the citizens in the deployment of local context is seen to be a veritable tool in achieving a successful and sustainable development intervention. Program beneficiary's satisfaction through consistent Stakeholders and Citizen Engagement has been recognized by Development Partners as International Best Practice in program management.

The GM has been prepared to meet the World Bank Environmental and Social Framework (ESF) requirements and the Nigerian Government Laws, Policies and Procedures. The GM is to provide the framework for effective management of environmental and social issues associated with the HOPE-GOV Program. This Manual has specifically put in place a Response Protocol for addressing Sexual Exploitation and Abuse/Sexual Harassment; in view of its sensitive nature, to promote the utilization of a Survivor-Centered Approach in the redress of grievance.

This GM Manual is expected to be domesticated in line with individual socio-cultural peculiarities of States and FCT, which will strengthen the socio-cultural appropriateness and acceptability of the Manual.

Relevant Stakeholders are therefore, urged to comply and efficiently deploy the GM Manual for successful and sustainable Program implementation.

EXECUTIVE SUMMARY

The Nigeria Human Capital Opportunities for Prosperity and Equity Governance (HOPE-GOV) Program is aimed at improving access to better-quality basic education and primary healthcare services. HOPE-GOV supports these outcomes by strengthening upstream requirements for more effective service delivery, focusing on the efficient, effective, and accountable management of financial and human resources in these sectors. HOPE-GOV will reinforce the institutionalization of the timely publication of core fiscal data, improved budget credibility, procurement transparency, and payroll integrity. HOPE-GOV will deepen these reforms through a detailed and disaggregated focus on the basic education and primary healthcare sectors, following the fiscal management chain from planning and budgeting to downstream implementation, reporting, and oversight. Key assumptions underlying the theory of change include (i) sustained political commitment, broader government support, and economic stability, along with the existence of structured funds flow mechanisms for UBEC and BHCPF; (ii) states' capacity will be sufficiently built so that more states can meet the new guidelines and access education funds; that the overall window for education financing remains at 1% of GDP and that GDP will grow; (iii) citizens and representative groups receive capacity training to understand and question the financial reports, and that the states are able to prepare consistent and reliable data at a disaggregated level for health and education sectors; and (iv) there is a pool of healthcare workers with sufficient training to be deployed in PHCs.

The Program adopts the Financing Instruments of Program for Results (PforR) at the State/FCT level and Investment Project Financing (IPF) at the Federal level.

The Program Development Objective (PDO) is to support the Federal Republic of Nigeria in strengthening financial and human resource management in the basic education and primary healthcare sectors. Strengthening financial management is expected to enhance social contracts and citizens' trust in governments through the strategic allocation and expenditure of resources for basic education and primary healthcare. This can be achieved by increasing the availability and effectiveness of financing for these areas and improving transparency and accountability in these sectors, thereby boosting the efficiency of public expenditures in the targeted areas. Consolidating human resource management will improve human capital outcomes by increasing the recruitment, deployment, and performance management of teachers and primary healthcare workers.

To achieve the PDO, the Program aims to enhance results in the participating states across all three result areas (RAs).

- ⇒ **Result Area 1: Increased availability and effectiveness of financing for basic education and primary healthcare service delivery.** This results area will support the government in (i) enhancing states' access to UBE-IF resources; (ii) strengthening states' planning, budget preparation, and execution for basic education and primary healthcare; and (iii) improving budget preparation at the local government tier through the adoption of the national chart of accounts at that level of government.
- ⇒ **Result Area 2: Enhanced transparency and accountability for basic education and primary healthcare financing.** This result area will incentivize (i) the timely and consistent publication of citizen-friendly state basic education and primary healthcare budgets, budget

implementation/execution reports, and transfers; (ii) the timely publication of financial and performance audits for the basic education and primary healthcare sectors; and (iii) improved transparency through the publication of procurement processes in the two sectors. These actions will help monitor the use of financial resources for their intended purposes.

- ⇒ **Result Area 3: Improved recruitment, deployment, and performance management of basic education teachers and primary healthcare workers by federal, state, and local governments.** This result area will incentivize (i) the enhancement of state sector and workforce planning functions; (ii) the reduction of significant staffing gaps alongside improved deployment and management practices for basic education and primary healthcare workers; and (iii) the adoption of new or existing systems, such as the Central Bank of Nigeria’s Bank Verification Number (BVN) system and National Identity Number (NIN) platforms, to combat payroll fraud.

The Policy background on GM in Nigeria shows accountability and respect for human rights, such as freedom of expression of feelings or emotions and access to justice, which allows one to formally seek redress for complaints and grievances. These Laws, Policies and Guidelines promote strong stakeholders’ engagement needed for effective program implementation. These Laws, Policies, Guidelines and Government Approved Institutions include: the Constitution of the Federal Republic of Nigeria, 1999 (as amended); Arbitration and Mediation Act, 2023; Nigeria Freedom of Information Act, 2011; Nigeria Environmental Impact Assessment Act, 1992; Nigeria Urban and Regional Planning Act, Cap N138, 2004; Alternative Dispute Resolution (ADR); Public Complaints Commission, Law Courts, World Bank ESF, 2016: Environmental and Social Standard (ESS10); Stakeholders Engagement and Information Disclosure and Grievance Redress Mechanism Guidance Notes.

The development of the GM Manual for the HOPE-GOV Program is a key implementation requirement under the World Bank Environmental and Social Management Framework (ESMF) and the National Laws, Policies and Procedures. The ESMF and HOPE-GOV Stakeholders Engagement Plan (SEP) emphasizes the importance of transparent engagement between the implementing agencies and program stakeholders as an essential global best practice. A robust stakeholders’ engagement improves the environmental and social sustainability of the Program; advances program acceptability; and contributes significantly to successful program implementation. Stakeholders’ engagement helps in the development of strong, constructive and responsive relationships among Program Stakeholders.

The effective implementation of a GM becomes mandatory and constitutes a means for robust citizen engagement in the course of Program Implementation. It creates a platform for the mobilization, inclusion and participation of Program Stakeholders. GM facilitates smooth operations and ensures timely, fair and effective handling of Program-related complaints. The development of the GM Manual aids in curtailing the waste of resources associated with the external grievance system as it seeks amicable resolution to complaints while protecting the interests of the Program Beneficiaries and other Stakeholders. Thus, operationalization of the GM Manual minimizes the cost and risks associated with engaging external Grievance systems, including litigation.

A functional GM is strategic in the continuous engagement of the HOPE-GOV Program with relevant Stakeholders at the Local Government, State and Federal levels. The Program GM is expected to address issues around grievance management and clearly state the responsibilities and accountability framework of relevant stakeholders at various levels of GM implementation. The Program GM presents the protocol

for redressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), Environmental, Social, Fraud and Corruption complaints. The need for cultural appropriateness and specificity highlights the manual commitment to integrate local context, while aligning with global good practices on the GM system. The domestication of the GM Manual provides the opportunity to strengthen the existing mechanism at both the state and national levels.

CHAPTER ONE

1.0 INTRODUCTION

The Nigeria Human Capital Opportunities for Prosperity and Equity Governance (HOPE-GOV) Program and the Federal Government of Nigeria sought financial assistance from the World Bank Group to support the implementation of the Nigeria Human Capital Opportunities for Prosperity and Equity Governance Program. HOPE-GOV is the governance component of the World Bank's larger HOPE package for Nigeria. It is a Program-for-Results (PforR) operation with a small IPF/TA component designed to strengthen public financial management, accountability, and human-resource systems that support basic education and primary health services across participating states. At the Federal level, the Program uses Investment Project Financing (IPF), and at the State level, Program for Results (PforR) Financing Instruments. The Program is implemented by the Federal Ministry of Budget and Economic Planning (FMoBEP), in collaboration with the Federal Ministry of Education (FME), the Federal Ministry of Health and Social Welfare (FMOHSW), and participating states across all 36 states of Nigeria and the Federal Capital Territory (FCT).

HOPE-GOV is structured around **three main results areas** supported by a PforR and a small IPF for technical assistance (about US\$20m) to finance capacity building, systems upgrades and technical assistance to implement reforms that the PforR relies on.

- i. **Result Area 1: Increased availability & effectiveness of financing** for basic education and PHC (e.g., reforms to allocation formulas, predictability of transfers, linking resources to needs and performance).
- ii. **Result Area 2: Improved transparency & accountability** (public financial management reforms, reporting, e-procurement, greater fiscal transparency and tracking of UBE and BHCPF funds).
- iii. **Result Area 3: Improved HR management for teachers & health workers** (better recruitment, deployment, payroll integrity and performance management).

1.1 Structure of the Manual

The Manual consists of the following chapters:

Chapter One: Gives a detailed background to the Program

Chapter Two: Captures the Legal requirements from the government and from the World Bank

Chapter Three: Outlines the goals, objectives and scope of the GM. It also describes the features, potential grievances that could arise within the Program and possible solutions.

Chapter Four: Provides Grievances Procedure and Management.

Chapter Five: Presents details of Sexual Exploitation and Abuse/Sexual Harassment Response Protocol on Grievances Management.

CHAPTER TWO

2.0 LEGAL AND INSTITUTIONAL ARRANGEMENT

This chapter discusses the relevant National Laws, Policies and Guidelines as well as the World Bank Environmental and Social Framework. These documents emphasize the need for an effective GM in the program design and implementation. The GM provides for a strong stakeholder engagement system that promptly responds and resolves program implementation issues. The legal framework and related documents on GM in Nigeria guarantee respect for human rights.

2.1 National Laws on Stakeholders' Engagement

The National Laws on Stakeholders' Engagement emphasize the disclosure of information, citizens' engagement and pathways to redress grievances related to government actions, including the implementation of Development Programs. The relevant National Laws, Policies and Guidelines which are in agreement with World Bank Environmental and Social Framework include but not limited to the following:

- i. Constitution of the Federal Republic of Nigeria 1999 (as amended)
- ii. Freedom of Information Act, 2011
- iii. Environmental Impact Assessment Act, 1992
- iv. Violence Against Persons Prohibition Act, 2015
- v. Nigerian Urban and Regional Planning Act, Cap N138, 2004
- vi. Land Use Act, 1978
- vii. Child Rights Act, 2003
- viii. Arbitration and Mediation Act, 2023
- ix. National Gender Policy, 2006

2.1.1 Constitution of the Federal Republic of Nigeria, 1999 (as amended)

The Constitution of Nigeria promotes the socio-economic rights of all citizens, as enshrined in Chapter II as Fundamental Objectives and Directive Principles of State Policy. These rights include: the right to a safe and clean environment, the right to suitable and adequate shelter, the right to livelihood, and the right to adequate and quality food. Specifically, Chapter IV of the Constitution guarantees Fundamental Human Rights for all Nigerian citizens, while Section 20 of the Constitution emphasizes the protection of the environment to safeguard water, air, land, forest and wildlife in the common interests of the Public.

2.1.2 Arbitration and Mediation Act, 2023

This Act provides a framework for the resolution of disputes through arbitration, mediation and other forms of Alternative Dispute Resolution (ADR). The Law aims to promote peaceful, efficient and effective dispute resolution, thereby reducing lengthy and costly legal procedures.

2.1.3 Freedom of Information Act, 2011

The Freedom of Information Act stipulates the availability, accessibility and affordability of public records and information. The Act further ensures the protection of personal privacy, particularly of Public Servants, so as to guarantee freedom from payback for disclosing non-classified information. The Freedom of Information Act spells out:

- i. Disclosure of non-classified information to all Stakeholders.
- ii. The disclosure of the needed information is expected to be within the timeframe of 7 days.
- iii. Failure to disclose non-classified information may warrant redress, including legal proceedings at the Stakeholders' will.

2.1.4 Environmental Impact Assessment Act (EIA), 1992

The Act provides guidelines and procedures for Environmental Impact Assessment for Program involving up to 50 Hectares. The Act requires that the EIA should be inclusive and participatory of all relevant Stakeholders. This is to promote awareness and mitigate potential environmental and social risks.

2.1.5 Violence Against Persons Prohibitions (VAPP) Act, 2015

The VAPP Act was enacted as a result of reported gender-based violence and human rights abuses in Nigeria. The goal of the Act is to eliminate violence in private and public life. It prohibits all forms of violence against persons, provides maximum protection, effective remedies for victims, prescribes punishment of offenders and related matters. The Act provides legal protection and support to survivors during the implementation of the HOPE-GOV Program. It accentuates the Program Affirmative Action (PAA) on gender inclusion, especially as it relates to the principles of the Survivor-Centred approach in the management of GBV/SEA/SH.

2.2 Policy Framework on Grievance Mechanism in Nigeria

The Policy Framework on GM in Nigeria centers on government-approved public and private Institutions with the capacity to address public complaints and grievances. These Institutions are:

- i. Alternative Dispute Resolution
- ii. Public Complaints Commission
- iii. Law Courts

2.2.1 Alternative Dispute Resolution (ADR)

The integration of the Alternative Dispute Resolution (ADR) principles in the GM manual is in line with the provisions of the Arbitration and Mediation Act, 2023. The ADR's concern is to reduce the huge bureaucracy, litigation cost and other logistics of the Law Courts in redressing grievances, thereby promoting peaceful resolution of conflict among stakeholders. The ADR is established at all levels of

GM process in the State. This is to encourage the aggrieved to adopt a faster, free and inclusive redress to complaints. The ADR lies at the core of GM of the HOPE-GOV.

2.2.2 Public Complaints Commission (PCC)

The Public Complaints Commission (PCC) Act, 2004 mandates the Commission to thoroughly investigate received complaints. At the State level, the Commission is headed by a Commissioner. The Commission has the responsibility of an Ombudsman to adjudicate on complaints received. The Ombudsman performs its roles based on the peculiarity of the State and FCT.

2.2.3 Economic and Financial Crimes Commission

The Economic and Financial Crimes Commission (EFCC) is a Nigerian government agency established under the EFCC (Establishment) Act of 2004, mandated to investigate, prosecute, and prevent economic and financial crimes, including money laundering, terrorism financing, advance fee fraud, and corruption. The Act grants the EFCC broad powers to trace, freeze, seize, and forfeit criminal assets, prosecute offenders across a wide range of financial offenses, and coordinate with international bodies such as the FATF.

2.2.4 Independent Corrupt Practices and Other Related Offences Commission

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) was established by the Corrupt Practices and Other Related Offences Act of 2000, making it Nigeria's primary anti-corruption agency with both repressive and preventive roles, including the power to investigate, prosecute, and educate the public on corruption-related offenses. Allegations of corruption can be reported directly via email, phone, or through NGO-run platforms such as Bribe Nigeria and Egunje. While the ICPC focuses primarily on public sector corruption, its jurisdiction overlaps with that of the EFCC, and both agencies operate within Nigeria's broader anti-corruption legal framework, anchored on the UNCAC, ratified in 2004.

The Economic and Financial Crimes Commission, the Independent Corrupt Practices Commission, and the Nigeria Police will handle all investigations of fraud and corruption. Under the Program, the World Bank will be apprised by the NPCU at the earliest opportunity of any allegations of and complaints about fraud and corruption related to the Program activities. NPCU will send to the World Bank a signed submission documenting all integrity concerns and declaring any relevant formal reports, investigations and prosecutions. The signed submissions shall be made every six months as part of the semi-annual progress reports using a template agreed with the World Bank. Where there are no known allegations or complaints, a statement to that effect shall be included in the submission. Additional mitigation measures will involve the implementation of GRMs by the implementing agencies. Participating states will be required to document all complaints received and are expected to resolve and provide feedback to the complainants. A report on the GRM activities should form part of the Program Progress Report submitted to the bank biannually.

2.2.5 The Nigeria Police Force

The Nigeria Police Force (NPF) is governed by the Nigeria Police Force (Establishment) Act of 2020, which replaced the older Police Act of 2004 and mandates the Force to prevent and detect crime, protect human rights, and maintain public order in line with the Nigerian Constitution and the African Charter on Human and Peoples Rights. The Act introduced key legal protections for suspects, including the right to remain silent, the right to legal representation, prohibition of torture and inhumane treatment, and a ban on arrests solely for civil wrongs or breaches of contract. Oversight of the NPF is provided by the Nigeria Police Council and the Police Service Commission, while the Act also established a Police

Complaints Response Unit to address misconduct and introduced community policing provisions to strengthen accountability and public trust.

2.3 World Bank Environmental and Social Framework

The World Bank ESF Environmental and Social Standard (ESS1-10); Stakeholders' Engagement and Information Disclosure emphasize the significance of open and transparent engagement between the Borrower and Program Implementation Entities. A key requirement, therefore, is the Stakeholders Engagement Plan (SEP) which is an essential component of International best practice in project management. In explicit terms, the World Bank ESF; ESS10 expects the Borrower to:

- i. Engage with all the Stakeholders throughout the Project Cycle;
- ii. Provide the Stakeholders with readily available and accessible information;
- iii. Consult with the Stakeholders in an approach considering cultural specifics without interference, intimidation, coercion, manipulation and discrimination.

2.3.1 The World Bank Anti-Corruption Guidelines

The World Bank's Anti-Corruption Guidelines form a comprehensive framework designed to prevent and combat fraud and corruption in Bank-financed projects.

The Guidelines define five categories of prohibited conduct:

Corrupt Practice: the offering, giving, receiving, or soliciting of anything of value to improperly influence the actions of another party. This covers kickbacks and bribery. Bona fide social development contributions, customary corporate hospitality (within internationally accepted standards), and reasonable travel/entertainment expenses consistent with applicable law are generally excluded.

HOPE-GOV are required to take active steps to prevent and address fraud and corruption, including raising awareness among project implementers, including anti-corruption clauses in agreements with sub-recipients of loan proceeds, and taking appropriate action when violations are identified. Recipients who are sanctioned by the Bank may have their agreements terminated by the Borrower.

Fraudulent Practice: any act or omission, including misrepresentation, that knowingly or recklessly misleads a party to obtain a financial or other benefit or to avoid an obligation. Simple negligence does not meet this threshold.

Coercive Practice: impairing or harming, or threatening to impair or harm, any party or their property to improperly influence their actions. This includes bid rigging and actions taken in furtherance of corrupt or fraudulent practices but excludes hard bargaining or the exercise of legal remedies.

Collusive Practice: an arrangement between two or more parties to achieve an improper purpose, including improperly influencing the actions of another party. This typically covers bid rigging in public procurement.

Obstructive Practice: deliberately destroying, falsifying, altering, or concealing evidence material to a World Bank investigation, making false statements to investigators, or taking actions intended to impede

the Bank's access to required information. Legitimate exercise of legal rights (e.g., attorney-client privilege) does not constitute obstruction.

2.4 Institutional Arrangements and Roles

2.4.1 National Level

The National Program Coordination Unit (NPCU), housed within FMOBEP, is the primary institution responsible for managing GM. The NPCU designates:

- E&S Officer (GM Focal Point): Responsible for day-to-day GM operations, including receiving, logging, sorting, tracking, and reporting on all grievances. The E&S Officer coordinates escalation, investigation, and resolution of complaints.
- NPCU Coordinator: Provides oversight and approves resolutions for complex or escalated grievances.

2.4.2 State Level – Program Focal Persons

Since there are no dedicated Program Implementation Units (PIUs) at the state level, Program Focal Persons designated by each participating state are responsible for:

- Receiving and documenting complaints raised at the state level.
- Forwarding complaints to the NPCU GM Focal Point within 48 hours of receipt.
- Participating in investigations and resolution processes as relevant to their state.
- Sharing E&S updates and grievance data with the NPCU regularly.

2.5 Grievance Review Committee

For complex, escalated, or unresolved grievances, a Grievance Review Committee (GRC) is convened at the NPCU level. The GRC is composed of:

- The NPCU Coordinator (Chair)
- The E&S Officer (GM Focal Point)
- A representative of the relevant implementing ministry (FME or FMOHSW, as applicable)
- An independent representative from civil society (where feasible)

The GRC meets within 10 working days of a grievance being escalated to it.

2.6 World Bank

The World Bank task team reviews GM operations during implementation support missions, monitors whether the GM is operational and responsive, and checks GM data in Program progress reports. The World Bank's Grievance Redress Service (GRS) is also available as a parallel channel.

CHAPTER THREE

3.0 Context of Program Grievance Mechanism

The establishment of a Grievance Mechanism (GM) is a legal covenant under the Financing Agreement (Schedule 2, ESCP Action 10.2) and the Environmental and Social Commitment Plan (ESCP). The NPCU is required to establish, publicize, maintain, and operate the GM no later than three months after the Program Effective Date, and to maintain it throughout project implementation.

This GM Manual provides detailed procedures for receiving, registering, processing, and resolving complaints and grievances related to the HOPE-GOV Program, as required by World Bank Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. It also recognizes and leverages existing Government grievance mechanisms at the federal and state levels.

A key Program results indicator requires that 80 percent of complaints received under the GRM are addressed within 3 months by the Program closing date (June 2029).

3.1 Overview of the GM

A Grievance Mechanism is a system by which queries or clarifications about a project are responded to, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively. The GM is a system that enables Program Affected Persons (PAP), individuals, groups and communities to submit complaints directly to program implementers when they feel that the program has or is most likely to have adverse effects on them and/or their environment.

The GM at the operational level is designed to provide an early warning and timely response system that brings complaints to the attention of management for prompt action before escalation. The GM is not a substitute for community engagement, but an essential element of the program with a focus on respect for the rights of those negatively affected by the program design and implementation. The Federal Government is expected to provide the overall Technical Guidance and Support to the States and FCT. The program is committed to grievance management in a fair, timely and transparent manner. The scope of the GM covers the grievance-related issues across the Three (3) Results Areas with the associated DLIs, including SEA/SH complaints. This is to reduce risks and contribute to effective and sustainable program implementation anchored on beneficiary satisfaction.

The Grievance Mechanism aims to:

- Provide an accessible, transparent, and effective system for receiving and resolving complaints and grievances from communities, individuals, and Program workers affected by or concerned about HOPE-GOV activities.
- Ensure that grievances are handled promptly, fairly, and without retribution, at no cost to the complainant.
- Recognize anonymous complaints and treat them with equal seriousness as identified complaints.
- Strengthen accountability and trust between the Program implementing entities, participating states, and affected communities.

- Ensure special, confidential, and survivor-centered handling of sensitive complaints, including those related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).
- Generate data and learning to improve Program implementation and social performance.
- Complement and strengthen existing government grievance systems at federal and state levels.

3.1.1 Principles of Grievance Mechanism

The use of GM principles are strategic in the effective grievance redress among relevant HOPE-GOV Stakeholders. The principles of GM include:

- i. **Legitimacy:** This is enshrined in the legal framework that promotes trust and confidence among relevant stakeholders. Trust and accountability ensure fair conduct of the grievance process without any interference.
- ii. **Accessibility:** The Grievance Mechanism should be accessible to all program stakeholders and efforts should be made to provide additional assistance to those who may have barriers in accessing the GM. Those with such barriers may include vulnerable groups, people with limited awareness of the GM process, language, geographical location, low educational level and fear of reprisal. The GM should be made accessible to all persons irrespective of their sex, age, ethnicity, disability and vulnerability. Communication should also be provided in a language and manner comprehensible by the aggrieved person.
- iii. **Predictability:** This is the ability of the GM to precisely provide a well-known process within a timeframe for the different stages of the GM process as well as the expected outcome and the means of verification. This principle ensures that grievances are received and redressed with accuracy, promptness and within the prescribed timeframe.
- iv. **Equitability:** Fairness and objectivity are essential in grievance redress among stakeholders to promote inclusive and participatory program implementation. This involves categories such as men, women, the elderly, and people with special needs. Inequality and partiality remain obstacles to the delivery of an efficient GM implementation.
- v. **Transparency:** This encompasses the provision of adequate information to all stakeholders, so as to strengthen trust and credibility in the GM processes.
- vi. **Human Rights:** The GM recognizes all relevant Human Right Laws and ensures that these Rights are appropriately captured within the local context. Inclusive participation in a GM procedure remains significant in achieving a redress mechanism that is acceptable to all PAPs. The rights of vulnerable persons and groups such as women/men, children, persons with special needs, the elderly, widows, marginalized people, IDPs, poor households etc., should be at the Centre of the GM procedure in compliance with global best practices.
- vii. **Fairness and Justice:** To ensure that grievances are addressed in a fair and just manner, providing equitable resolutions for all parties involved.
- viii. **Accountability:** To maintain accountability throughout the grievance resolution process, keeping all aggrieved persons, groups or communities informed about the procedures, progress, outcomes

and holding responsible individuals/institutions accountable for addressing and resolving grievances promptly and appropriately.

- ix. **Independence and Neutrality:** To operate with objectivity without bias and emotional attachment.

3.2 Scope of Grievance Mechanism

This GM covers grievances related to:

- The HOPE-GOV PforR Program activities in all 36 states and the FCT.
- The IPF Technical Assistance component implemented by the NPCU.
- Activities of consultants, Independent Verification Agencies (IVAs), Monitoring and Evaluation firms, and other contracted parties under the Program.

Who may submit a grievance:

- Communities and individuals who believe they are adversely affected by HOPE-GOV Program activities.
- Program workers (direct, contracted, and primary supply workers), including consultants engaged under the IPF component.
- Civil society organizations and community groups.
- Any person or entity with a concern related to the Program.

Complaints that fall outside the scope of HOPE-GOV will be redirected to the appropriate government authority or mechanism.

3.3 Types of Grievance under the Program

Grievances under this GM are categorized as follows:

Category A – Program Implementation Concerns: Issues related to program design, DLI achievement processes, resource allocation, transparency of federal and state funding for basic education and primary health care, procurement irregularities, or quality of technical assistance activities.

Category B – Labor and Working Conditions: Issues related to working conditions, occupational health and safety, discrimination, code of conduct violations, unfair treatment of Program workers (including consultants and IVA staff), and violations of the Labor Management Procedures (LMP).

Category C – Stakeholder Exclusion or Discrimination: Concerns about exclusion of certain communities, states, or groups from Program benefits, consultation processes, or decision-making; discriminatory practices related to gender, ethnicity, religion, or disability.

Category D – Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH): Allegations of sexual exploitation, abuse, or harassment linked to the Program. These are handled through a dedicated, confidential, survivor-centered process (see Section 5).

Category E – Issues of Fraud and Corruption reported in the course of program implementation

Category F – General Inquiries and Information Requests: Requests for information about the Program, its activities, eligibility criteria, or progress. These are not formally tracked as grievances but are responded to promptly.

CHAPTER FOUR

4.0 GRIEVANCE MANAGEMENT PROCEDURE

4.1 Program Grievance Mechanism Communication Channels

The HOPE-GOV GM provides multiple, accessible channels for submitting complaints. All channels are communicated to stakeholders through social media, program documents, state ministry notice boards, and public disclosure events. Contact information is displayed prominently at the NPCU offices, state program focal persons' offices, and in Program documents.

Complainants may submit grievances anonymously. Anonymous grievances are treated with the same seriousness as identified complaints.

Channel	Details
Dedicated Email	hopegovcomplaints@nationalplanning.gov.ng
Dedicated Phone/Hotline	09099223053
Written Letter	Addressed to: The GM Focal Point, NPCU, Federal Ministry of Budget and Economic Planning, Plot 31010 Adekunle Fajuyi Street, FCT, Abuja
Verbal/Walk-In	Grievances tendered through personal visits by the general public to fill out a standard form made available at relevant offices across the diverse Program GM levels. NPCU offices, FMOBEP, Abuja; or State Program Focal Persons in participating state ministries
Suggestion/Complaint Boxes	Installed at NPCU offices and state ministry offices of participating states
Social media	Program social media channels as HOPEGOV on (FACEBOOK), HOPE-GOV on Instagram, HOPEGOV on LinkedIn, and @ HOPE_GOV on X
Existing Government Channels	SERVICOM, State-level public complaint bureaus, ombudsman offices, and sector-specific grievance systems
HOPE Gov Website	Yet to be developed

4.2 Grievance Handling Procedures

Step 1: Grievance Intake and Registration

Timeframe: Within 48 hours of receipt

Upon receipt of a grievance through any channel, the NPCU GM Focal Point or State Program Focal Person:

- Logs the complaint in the Grievance Register (a central, secure database maintained by the NPCU), assigning it a unique tracking number.
- Records: date received, channel of receipt, name of complainant (if provided), contact information (if provided), category of complaint, summary of the complaint, location/state.
- Forwards state-level complaints to the NPCU GM Focal Point within 48 hours.

Step 2: Acknowledgement

Timeframe: Within 2 working days of receipt

The GM Focal Point sends a written acknowledgement to the complainant (where contact information is provided), confirming:

- Receipt of the grievance.
- The unique tracking number.
- The expected timeframe for response.
- The appeals process should be available if the complainant is unsatisfied with the outcome.

Step 3: Sorting and Categorization

Timeframe: Within 3 working days of receipt

The GM Focal Point categorizes the complaint (Categories A–F per Section 3.3) and determines:

- Whether the complaint falls within the scope of HOPE-GOV.
- The appropriate level for resolution (NPCU level, state level, or GRC).
- Whether the complaint requires referral to a specialized service (e.g., SEA/SH service providers).

Non-program-related complaints are redirected to the relevant authority, with written notification to the complainant.

Step 4: Verification and Investigation

Timeframe: Within 10 working days of receipt for routine complaints

The GM Focal Point leads or coordinates the investigation, which may involve:

- Review of Program documents and records.
- Consultation with relevant NPCU staff, state focal persons, and implementing ministries.
- Site visits or interviews where necessary.

The investigation is documented in the Grievance Register.

Step 5: Resolution and Response

Timeframe: Within 21 calendar days of receipt for routine complaints; within 60 days for complex complaints

A proposed resolution is formulated by the GM Focal Point (or GRC for escalated cases) and communicated in writing to the complainant. The response includes:

- Summary of the investigation findings.
- Proposed resolution or corrective action.
- Timeframe for implementing the resolution.
- Information on the appeals process.

Step 6: Implementation of Resolution

Timeframe: As specified in the resolution

The agreed corrective actions are implemented, monitored, and documented. The Grievance Register is updated with the resolution status.

Step 7: Closure and Feedback

Timeframe: Upon complainant satisfaction or exhaustion of appeals

Once the resolution is implemented and the complainant is informed, the case is formally closed in the Grievance Register. Feedback is sought from the complainant on their satisfaction with the process and outcome. Cases are closed with the complainant's acknowledgement where possible.

Step 8: Appeals Process

If the complainant is not satisfied with the proposed resolution, they may:

- First Appeal: Submit a written appeal to the NPCU Coordinator within 15 working days of receiving the resolution. The GRC reviews the case and provides a final decision within 15 working days.
- Second Appeal / External Recourse: If still unsatisfied, the complainant may submit complaints to:
 - The relevant government oversight body or public complaints commission at the state or federal level.
 - The World Bank's Grievance Redress Service (GRS) at <https://www.worldbank.org/GRS>.
 - The World Bank's Accountability Mechanism at <https://accountability.worldbank.org>.
 - The relevant national courts of law.

The NPCU documents all appeals and their outcomes in the Grievance Register.

4.3 Expected Timelines for Program Grievance Mechanism

The Principles of GM emphasize prompt handling of complaints as a precondition for effective GM implementation. Timely response to grievances is mandatory on all GM officers. This boosts trust and beneficiaries' satisfaction in the process. The Table below shows the approximate timeframe for addressing GM activities

Table 2: Timelines for Program Grievance Mechanism

S/N	Activities	Timeline
1.	Receipt and Logging of Complaint	Daily
2.	Acknowledgement of Complaint	Within 48 hours of receipt of the complaint
3.	Assessment of Complaint	Daily
4.	Complaints resolved without further investigation	3 days from receipt of the complaint
5.	Complaints resolved with investigation	5 days
6.	Additional investigation	An additional 10 days
7.	In-depth investigation	15 to 45 days
8.	Notification of resolution to the agreed body	5 days

S/N	Activities	Timeline
9.	Implementation of the resolution	5 days
10.	Resolution/Referral/Closure	Not more than 90 days
11.	Monitoring, closure, and follow-up actions (to gauge satisfaction with the GM process and further necessary actions)	20 Working days

CHAPTER FIVE

5.0 MONITORING AND EVALUATION AND COMMUNICATION REQUIREMENT FOR THE PROGRAM GM

Effective M&E is required throughout the implementation of GM, including GBV/SEA/SH-related complaints and at different levels of the HOPE-GOV program. A robust M&E system is important in making an informed decision on future policies and guidelines by policy-makers and actors. Monitoring and reporting promote the seamless operation of GM, which is further strengthened through frequent supervision and monitoring missions by the NPCU. The HOPE-GOV States focal person is required to submit a quarterly report to the NPCU.

5.1 Program GM Monitoring Agencies

The Program GM requires diverse levels of monitoring, which includes:

- (a) State, through the HOPE GOV Focal Point
- (b) Federal
 - NPCU
 - Third Party Monitoring (CSO as independent monitors),
 - Independent Verification Agent

5.2 Quarterly and Annual Key Performance Indicators for Monitoring and Evaluation of the GM

The Key Performance Indicators (KPIs) for monitoring, as stated in the project documents, are mandatorily required to be reported upon regularly at a specified period. Generally, the program GM indicators include, the number and nature of grievances received, investigated, resolved, and/or referred.

Table 5.1: Key Performance Indicators for Monitoring and Evaluation of the Program Grievance Mechanism

S/N	Item	Objective	Suggested Indicators
1.	Quarterly review of quantitative indicators	<ul style="list-style-type: none"> ▪ To ascertain if grievances are properly classified ▪ Recognize emerging trends and issues in grievance ▪ Ensure grievances are being appropriately addressed 	<ul style="list-style-type: none"> ▪ Number and types of grievances received ▪ Number and types of open grievances received ▪ Timeline for closure by grievance level and type of grievance ▪ Recurring grievances from the same source
2.	Annual review of Grievance Mechanism	<ul style="list-style-type: none"> ▪ Ensure compliance with the Grievance Mechanism 	<ul style="list-style-type: none"> ▪ Compliance with GM procedure ▪ Completeness of grievance log

S/ N	Item	Objective	Suggested Indicators
		<ul style="list-style-type: none"> ▪ Track the progress of the Grievance Mechanism ▪ Review and improve grievance procedure 	<ul style="list-style-type: none"> ▪ Number of received grievances (type and level) ▪ Timeline for closure of grievance (type and level) ▪ Recurring grievances from the same stakeholders ▪ Recurring grievances from diverse stakeholders ▪ Qualitative assessment of acceptability and trust through stakeholder engagement

5.2.1 GM Specific Indicators

Key Performance Indicator:

80% of complaints received under the GM are addressed within 3 months by the Program closing date (June 2029).

Intermediate Outcome Indicators

- Number of public grievances/issues received within a reporting period (e.g. monthly, quarterly, or annually)
- Number of grievances/issues addressed as per the grievance procedure
- Number of grievances/issues under investigation
- Number of recurring grievances

5.2.1.1 Data Collection Tools

The following tools will be used to collect information on the implementation activities of the disbursement link indicators.

- a. Grievance/issue reporting form
- b. Grievances/issues register (logbook)
- c. Monitoring (cross-cutting) checklist
- d. Monitoring prose reports

Grievance/Issue Reporting Form

This is the first entry point for issues and complaints, where the complainant is issued a GM complaint form to fill in the details of his/her case. This form can also be completed on behalf of unlettered Walk-in complainants or those remote complainants who might have reported by Phone or email. These forms are in the appendix (Form 001 to Form 007).

Grievances/Issues Register (Logbook)

GM Register is the repository of grievances/issues that have been logged (Within its Timeline specific to the demand of the DLI) into the Database and passed to the respective Desk Officer as reported in the Reporting Form

Table 5.2: Structure of General GM Register

Field	Entry
Case Number	
Date Received	
Channel of Receipt	
Complainant Name	
Contact Information	
State / Location	
Gender of Complainant	
Category	
Summary of Complaint	
Date Acknowledged	
Assigned to	
Investigation Notes	
Proposed Resolution	
Date Resolution Communicated	
Complainant Response	Satisfied / Appealed / No Response
Date Closed	
Status	Open / Resolved / Closed / Appealed
Notes	

Table 5.3: Sample on excel template

Issue ID	DLI	Issue	Description	Date Reported/ Documented	Date Logged	Responsible Officer	Date of Last Status on Under-Investigation	Date Resolved	Date Referred	Institution Referred To	Date Closed	Timeline	Remark

5.3 Suggested Report Outline for State Level Operation

- a. Dates of visits, locations and staff present
- b. Grievance on process observed
- c. Findings from beneficiaries, resolutions of cases and follow-up (summary of the report)
- d. Areas of good practice
- e. Areas needing improvement
- f. Recommendations.

5.4 Follow-Up Stage

GM Follow-Up activities are strategic towards gauging the level of beneficiaries' satisfaction with the process. Follow-up activities by HOPE-GOV GM Officer (E&S Officer) are necessary to determine the transparency and consistency of the GM, especially how it identifies emerging issues and documents lessons learnt. Relevant follow-up activities may include visits and electronic interactions with Stakeholders.

5.5 Beneficiaries Satisfaction Survey

The Beneficiaries Satisfaction Survey enables the program stakeholders to assess the level of acceptability (GM process, resolution and referral) of the GM by PAP. As such, determine the sustainability of the program and guide the review of existing GM guidelines.

5.6 Grievance Mechanism Cost Elements

GM cost elements are as follows:

- i. Domestication and production of the Manual
- ii. Dissemination of Manual
- iii. Training and Capacity Building
- iv. Simple Desk-Level GM Beneficiaries Satisfaction Survey
- v. Provision of a Dedicated Hotline
- vi. Set up and equip the GM Desk at the DP (Laptops, Tablets, Phones, etc.)
- vii. Operational Cost for Field Visits.

5.7 Capacity Building and Training

The NPCU will organize training on the GM for:

- NPCU E&S Officer and staff (within 4 months of Program Effectiveness or upon hiring, whichever is earlier)
- State Program Focal Persons (during state-level orientation sessions)

- Contractors and IVA staff (during induction)

Training will cover:

- Overview of the HOPE-GOV GM and its procedures
- Ethical and safe handling of SEA/SH complaints and referral pathways
- Use of the Grievance Register
- Reporting requirements
- Non-retaliation principles
- Labor Management Procedures and the worker grievance process

The World Bank task team will support capacity building on GM operations as part of implementation support activities.

5.8 Grievance Mechanism Communication Plan

The communication plan describes the approach to be taken in communicating and collaborating with stakeholders on the Grievance Mechanism of the HOPE-GOV Program. This plan will facilitate effective and coordinated communication between the stakeholders and the general public on standard procedures of GM before and during program implementation.

The objective of the communication plan is to spell out strategies for the implementation of GM information dissemination, sensitization, capacity building, stakeholders' engagement, monitoring and evaluation, feedback and follow-up activities. The Program GM communication plan is expected to have communication channels rich enough to benefit the different levels of HOPE Program Beneficiaries. The GM communication plan is set up to provide the target audience and stakeholders with the necessary and adequate information on the HOPE Program implementation.

5.9 Disclosure and Communication

The NPCU will ensure broad disclosure and communication of the GM through:

- Display of GM contact information (email, phone, postal address) at NPCU offices, state program focal persons' offices, and state ministries of Budget, Education, and Health in all participating states.
- Inclusion of GM information in all Program documents and progress reports.
- Communication through Program social media channels.
- Information leaflets and brochures in English and major Nigerian languages (Hausa, Yoruba, Igbo), made available at state-level program offices and public events.
- Orientation of state desk officers and focal persons on GM channels and procedures.

The GM Manual itself will be publicly disclosed on the FMOBEP website and shared with the World Bank for disclosure on its external portal, consistent with the World Bank's Access to Information Policy.

CHAPTER SIX

6.0 Sexual Exploitation and Abuse (SEA), and Sexual Harassment GM

Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) are concepts commonly used to describe a broad spectrum of sex related offences used in the management of GM cases. GBV is violence targeted at person(s) because of their gender and it affects disproportionately. SEA refers to any form of actual or attempted abuse of a person due to their position of vulnerability, differential power, trust and sexual orientation. Sexual exploitation is profiting monetarily, emotionally, socially, or politically from the sexual misuse of others, while sexual abuse is the actual or threatened physical intrusion of a person's sexual nature, either forcefully or under unequal or coercive conditions. Similarly, SH means making physical advances or unwelcome and inappropriate sexual gestures towards a person or group of persons.

These interrelated concepts are often rooted in power imbalances and harmful gender stereotypes that affect both sexes. The sensitive nature of GBV/SEA/SH in the traditional GM procedure necessitates comprehensive handling under the HOPE-GOV program GM system. One of the comprehensive strategies is the Survivors-Centered Approach, which is an acceptable framework for handling GBV/SEA/SH GM cases.

6.1 Guiding Principles on Survivor-Centered Approach

SEA/SH Survivors are not homogeneous, but heterogeneous groups reflecting persons with different ranges of experiences, interests and needs. Survivor-Centered Approach prioritizes the choices, interests, and needs of the survivor as well as positioning the survivor at the center of the desired support and intervention. Survivor-Centered Approach promotes recovery, reduces the risk of further harm and reinforces their self-worth and determination to make informed decisions. The application of the principles of Survivor-Centered Approach aids the focal persons in offering individualized support and interventions to the survivor.

The Survivor-Centered Approach is based on four guiding principles: safety, confidentiality, respect and non-discriminatory.

6.1.1 Safety

The principle of safety emphasizes physical safety and security; psychological/emotional safety; and mutually assessed and agreed with the survivor. The possibility of exposure to further harm or risk to the survivor and family underscores the need to support their safety.

6.1.2 Confidentiality

The principle of confidentiality focuses on allowing the survivor who owns the story to decide what to do with the story, obtain informed consent of the survivor before further support; it is the survivor's right to choose whom to share or not to share the story with. Lack of confidentiality will most likely expose the survivor and the family to further risk and cause the survivor to lose interest in the support. The GMO should demonstrate sufficient discretion and only share the necessary information, even with the informed consent of the survivor.

6.1.3 Respect

The principle of respect ensures the participation of survivors in the process. Therefore, efforts should be made to treat the survivor with dignity and respect. GM acknowledges the survivor as the primary actor, hence strongly recommends respect for the survivor's interests, choices and wishes.

6.1.4 Non-Discriminatory

Non-discriminatory approach emphasizes equal and fair treatment to the survivor irrespective of sex, ethnicity, age and disability. The GM recognizes the possibility of being biased and prejudiced; hence, it strongly recommends treatment devoid of sentiments, emotions, and stereotypes.

6.2 What Constitutes GBV/SEA/SH in the HOPE-GOV Program

- Abuse of power to obtain sexual favour
- Rape
- Sexual Assault
- A sexual relationship with a minor
- Sex-related Human Trafficking
- Physical assaults of a sexual nature, including patting, touching, pinching, kissing or any other gesture against the body of another person
- Sexual Harassment
- Sexual proposal or barriers to career progression because of sex
- The use of work-related threats or rewards to solicit sexual favour
- Sexual comments, stories, and jokes
- Reported and unwanted social invitations for dates or physical intimacy
- Sending of sexually explicit messages
- Display of sexually explicit materials
- Sexually suggestive gestures and comments
- Child pornography
- Intimate partner violence and others

6.3 Response Protocol for GBV/SEA/SH

Key provisions for SEA/SH complaints:

- Dedicated intake: SEA/SH complaints may be submitted through any GM channel. Complainants should be assured of strict confidentiality.
- No mandatory reporting: The survivor's choices and safety take precedence at all times.
- Confidentiality: Information about SEA/SH cases is restricted to only those staff who absolutely need to know for referral and response purposes.

- Referral: Upon receipt, SEA/SH complaints are immediately referred to relevant Gender-Based Violence (GBV) service providers in the relevant state or at the federal level, including health services, psychosocial support, legal aid, and safe shelter, as available.
- Non-investigation by NPCU: The NPCU GM does not conduct investigations into SEA/SH allegations. Its role is referral to competent authorities and GBV service providers.
- Survivor-centered documentation: Minimal, anonymized records are maintained to track referrals without compromising survivor safety.
- No retaliation: Any form of retaliation against SEA/SH survivors or persons who report such cases is strictly prohibited.

The NPCU E&S Officer will be trained in safe and ethical handling of SEA/SH complaints in line with the World Bank ESF Good Practice Note on SEA/SH in Human Development Operations.

6.5 GBV/SEA/SH GM Sanction and Disciplinary Measures for Program Staff

The GBV/SEA/SH GM sanction and disciplinary measures have a singular objective to discourage these unlawful act(s). Staff guilty of such an offence is liable to sanctions and disciplinary measures. The gravity of the offence determines the nature of the sanction and referral to law enforcement agents. Possible administrative sanctions include:

- Verbal and written warning as may be appropriate;
- Reduction of remuneration;
- Adverse performance evaluation;
- Suspension; and
- Dismissal.

6.6 SEA/SH Referral Pathway

Upon receipt of an SEA/SH complaint:

- Assure complainant of confidentiality and non-retaliation.
- Immediately refer to the GBV service provider in the relevant state (health, psychosocial, legal, shelter).
- Document anonymized referral records only (no full investigation by NPCU).
- Follow up on service access, if the survivor consents.
- Report to NPCU Coordinator (anonymized) and include in GM data (without identifying details).

7.0 LABOUR GRIEVANCE MECHANISM

Program workers, including NPCU direct staff, IVA consultants, and other contracted personnel, have access to a dedicated Labor Grievance Mechanism consistent with World Bank ESS2 and the HOPE-GOV Labor Management Procedures (LMP).

Key features:

- Workers may submit labor-related grievances (working conditions, OHS, contract disputes, Code of Conduct violations, discrimination, forced or child labor concerns) through any GM channel or directly to the NPCU GM Focal Point.
- Grievances are treated confidentially and without fear of retaliation.
- The LMP sets out detailed procedures for the Labor GM, including OHS incident reporting, Code of Conduct enforcement, and disciplinary processes.
- The Labor GM is described to all Program workers during induction and is made available in writing.

Where contractor staff are engaged, contractors are required to maintain their own labor grievance mechanisms consistent with the LMP, subject to monitoring by the NPCU.

8.0 LINKAGE TO THE WORLD BANK GRIEVANCE REDRESS SERVICE

Communities and individuals who believe they are adversely affected by HOPE-GOV, as defined by applicable World Bank policies and procedures, may also submit complaints directly to:

- World Bank Grievance Redress Service (GRS): <https://www.worldbank.org/GRS>. The GRS ensures that complaints are promptly reviewed to address pertinent concerns.
- World Bank Accountability Mechanism (AM): <https://accountability.worldbank.org>. The AM houses the Inspection Panel (which determines whether harm occurred due to Bank non-compliance) and the Dispute Resolution Service (which provides communities and borrowers with the opportunity to address complaints through dispute resolution).

Complaints to the GRS or AM may be submitted at any time after concerns have been brought directly to the World Bank's attention and Bank Management has been given an opportunity to respond. These are parallel channels and do not replace the HOPE-GOV Program GM.

APPENDIX 1: GM REPORTING TEMPLATES



Federal Ministry of Budget and Economic Planning

Nigeria Human Capital Opportunities for Prosperity and Equity Governance Program

Grievance Form

Form 001:

Complaint Receipt Form

Date: ----- Complaint No: -----

Point of Complaint: ----- Medium of Complaint: -----

Personal Data of the Complainant (Please tick where appropriate)

Name (Optional): ----- Sex: Male/Female

Marital Status: Single/Married /Divorced/Widowed Age: -----

Occupation: -----

Contact Address: -----

Home Address:----- Location of Complainant -----

Phone no /Mobile: ----- Email Address: -----

Description of the Complaint or Grievance

List and attach supporting documents (if any)

i. -----

ii. -----

iii. -----

Complainant (if a third party, please give full names below)

Signature/Thumb Print.....

Date -----



Federal Ministry of Budget and Economic Planning

Form 002

Complaint Acknowledgement Form

(To be completed by the GM Officer to reaffirm the complaint status and give advice on the next-steps of action)

Complaint No: -----

A. Complainant Details (or Third Party):

Name (Optional): -----

Sex: Male/Female

Age: -----

Occupation: -----

Contact Address: -----

Home Address:----- Location of Complainant -----

Phone no /Mobile: ----- Email Address: -----

Date of initial Complaint -----

B. Brief description of the Complaint or Grievance and request for supporting document

C. Details of the next Appointment to map the Resolution Plan

Date: -----

Venue -----

Time -----

HOPE-GOV Focal GM Officer

Name -----

Signature -----

Date-----



Federal Ministry of Budget and Economic Planning

Form 003

Desk Review on Internal and Administrative GM Plan

Complaint No.....

State the characteristics (Personality) of the complainant (Please tick appropriately)

- Program Implementation Team
- Program Affected Persons (PAPs)
- Funding Agency
- Implementing Agency (Site Managers)
- Administrative and Management Officers
- Any other characteristic of complaint (If yes, please specify) -----

Illustrate specific or direct area(s) of complaint (please tick appropriately)

- | | |
|---|---|
| <input type="checkbox"/> Environmental degradation | <input type="checkbox"/> Sexual Exploitation and Abuse |
| <input type="checkbox"/> Land Acquisition | <input type="checkbox"/> Delay in the execution of the intervention |
| <input type="checkbox"/> Gender inequality | <input type="checkbox"/> Administrative and Management Issues |
| <input type="checkbox"/> Displacement and Habitation | <input type="checkbox"/> Elite capture |
| <input type="checkbox"/> Fraud and Corruption | <input type="checkbox"/> Stipend/Transfer issues |
| <input type="checkbox"/> Exclusion and Discrimination | <input type="checkbox"/> Targeting of Beneficiaries |
| <input type="checkbox"/> Gender-Based Violence (GBV) | <input type="checkbox"/> Loss of Vegetation and Economic Trees |
| <input type="checkbox"/> Others: (please specify) | |

What is the status of the Complaint? (Please tick appropriately)

- Resolved/Closed
- Referred

Outline the next-steps of actions following receipt of Complaint

- i.**
- ii.**

- iii.
- iv.
- v.

State your recommendation(s) on the complaint or grievance and the way forward

.....
.....

Prepared by:

HOPE-GOV Focal GM Officer

Name ----- Signature ----- Date.....

Recommended action(s) approved by: HOPE-GOV Technical State Officer

Name ----- Signature ----- Date.....



Federal Ministry of Budget and Economic Planning

Form 004

Grievance Redress Committee Meeting Procedure

(Attach Minutes of meeting/action(s) taken)

Complaint No: -----

Highlight the Key decisions of Grievance Meeting (s)

- i. -----
- ii. -----
- iii. -----
- iv. -----
- v. -----

What is the status of the resolution of the Complaint? *(Please tick appropriately)*

Resolved/Closed

Referred

If referred, state recommendation/next line of action (s):

.....

Action Approved by:

HOPE-GOV Focal GM Officer

Name: ----- Signature: ----- Date: -----



Federal Ministry of Budget and Economic Planning

Form 005

Monthly Report on GM Cases

(To be completed by GMO)

State:

Delivery Platform.....

Information on Complaints or Grievances

Type of Grievance	No of Complaints received	No of Complaints investigated	No of Complaints Resolved/Closed	No of Complaints Referred	Remarks

Action Approved by:

HOPE-GOV Focal GM Officer

Name: ----- Signature: ----- Date: -----



Federal Ministry of Budget and Economic Planning

Form 006:

Gender-Based Violence/Sexual Exploitation and Abuse/Sexual Harassment Grievance Redress

(Tick appropriately the option of your choice please)

A. Establishment of Allegation Status

Verified Unverified

Tick appropriately

B. Details of Care and Support given

- Counselling
- Psycho-Social Support
- Sheltering
- Medical Services and Health Care
- Investigative Services
- Financial and monetary support
- Others

C. Details of Survivor's Referral to relevant Service Provider (with consent of the Survivor)

- Established GBV Entity
- GBV/SEA/SH Committee or Association
- Sheltering
- Medical Services and Health Care
- Investigative Services
- Financial and monetary support
- Others

GBV Officer

Name -----

Signature -----

Date -----



Federal Ministry of Budget and Economic Planning

Form 007

Quarterly Report on GM Cases

(To be completed by the HOPE-GOV Focal Officer)

State:

Period of Reporting: -----

Information on Complaints or Grievances

S/N	Delivery Platforms	Types of Grievance	No of Complaints received	No of complaints investigated	No of Complaints Resolved/Closed	No of Complaints Referred	Remarks

Report prepared by

HOPE-GOV Focal Officer:

Name: ----- Signature: ----- Date: -----

Report Endorsed by:

HOPE-GOV PC Officer

Name: ----- Signature: ----- Date: -----

Table 5 Sample Grievance Report Summary Sheet for Result Areas

ISSUES	STATUS	UNIT OF MEASURE	VALUE	<i>REFERENCE GUIDE</i>
GRIEVANCES	REPORTED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues reported as received through either a Walk-in complainer or by Phone or email. The list is to be provided by the focal officer to the HOPE-GOV Officer
	LOGGED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues logged (Within its timeline, specific to the demand of the DLI) into the Database and passed to the respective Desk Officer as reported in the Reporting Form. The list is to be provided by the focal officer to the HOPE-GOV Officer
	UNDER INVESTIGATION	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that are under investigation (Not exceeding the timeline specific to the demand of the DLI) as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	RESOLVED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been resolved (Not exceeding the maximum timeline or as specific to the demand of the DLI) as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	REFERRED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been referred (Not exceeding the timeline specific to the demand of the DLI) due to its being beyond the jurisprudence of the HOPE-GOV program to handle, as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	CLOSED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been closed (Not exceeding the Maximum Timeline of 90 days or as specific to the demand of the DLI) due to its being beyond the jurisprudence of HOPE-GOV Program to handle as it's shown by its status in the logged/reported record. The list is to be provided by the focal officer to HOPE-GOV Officer

Note: Other RAs’ summary sheets are in the Appendix

ISSUES	STATUS	UNIT OF MEASURE	VALUE	<i>REFERENCE GUIDE</i>
FRAUD AND CORRUPTION	REPORTED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues reported as received through either a Walk-in complainer or by Phone or email. The list is to be provided by the focal officer to the HOPE-GOV Officer
	LOGGED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues logged (Within its timeline, specific to the demand of the DLI) into the Database and passed to the respective Desk Officer as reported in the Reporting Form. The list is to be provided by the focal officer to the HOPE-GOV Officer
	UNDER INVESTIGATION	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that are under investigation (Not exceeding the timeline specific to the demand of the DLI), as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	RESOLVED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been resolved (Not exceeding the maximum timeline or as specific to the demand of the DLI) as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	REFERRED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been referred (Not exceeding the Timeline specific to the demand of the DLI) due to its being beyond the jurisprudence of the HOPE-GOV Program to handle, as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer
	CLOSED	No.		Data for this indicator should be obtained from the GM Register as the total number of GM issues that have been closed (Not exceeding the Maximum Timeline of 90 days or as specific to the demand of the DLI) due to its being beyond the jurisprudence of the HOPE-GOV Program to handle, as shown by its status in the logged/reported record. The list is to be provided by the focal officer to the HOPE-GOV Officer



FEDERAL MINISTRY OF BUDGET AND ECONOMIC PLANNING

NIGERIA: HUMAN CAPITAL OPPORTUNITIES FOR PROSPERITY AND EQUITY - GOVERNANCE (HOPE GOV)
PROGRAM

(P181476)

CODE OF CONDUCT

On

Sexual Exploitation & Abuse (SEA) and Sexual Harassment (SH)

I, _____ (name of employee), acknowledge that preventing Sexual Exploitation & Abuse and Sexual Harassment (SH) are important. SEA/SH activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or termination of employment. All forms of SEA/SH are unacceptable on the work site, in offices, and in neighbouring project communities. Prosecution of those who commit SEA/SH will be followed as appropriate according to applicable laws. I also acknowledge the need to maintain peaceful relationships and interactions with residents of project areas.

Specifically, I agree that while working on the HOPE-GOV Program, I will:

- Maintain conflict-free relationships with officers and residents of Program areas when such relationships and interactions become necessary.
- Consent to police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards women, children, or men that is inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate.
- Not participate in sexual activity with children, including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence.
- Not engage in sexual favours or other forms of humiliating, degrading, or exploitative behaviour.
- Not have sexual interactions with officers, members of the communities surrounding the workplace, and workers' camps that are not agreed to with full consent by all parties involved in the sexual act. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Report to GRM any suspected or actual SEA/SH, whether in my company or not, or any breaches of this code of conduct.

Concerning children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children’s images for work-related purposes”).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour that is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labour laws in relation to child labour.

Use of children’s images for work-related purposes

When photographing or filming a child for work-related purposes, I must:

- Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this, I must explain how the photograph or film will be used.
- Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

I understand that it is my responsibility to use common sense and avoid actions or behaviour that could be construed as GBV or SEA or breach this code of conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein, and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signed by _____
(Employee)

Title: _____

Date: _____

Signed by _____
(Employer/NPCU)

Title: _____

Date: _____