



FRILIA GRIEVANCE REDRESS MECHANISM TOOLKIT



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Introduction to the GRM Toolkit

The impacts of development projects vary with each stakeholder. Project Affected Persons (PAPs), Project Affected Communities (PACs), and other stakeholders should be able to express their concerns and grievances regarding each project through reliable, trustworthy, transparent, and cost-effective mechanisms that aim to find solutions that meet their expectations.

It is important to note that the FRILIA Grievance Redress Mechanism (GRM) Toolkit and associated templates are cross-cutting and apply to all other FRILIA components. The GRM toolkit provides an avenue for stakeholders to understand the concept of grievances and how to capture and respond to them. Additionally, it will help the Grievance Redress Committee (GRC) to aggregate and monitor grievances through the grievance escalation procedure while providing feedback and exploring alternative dispute resolution mechanisms.

Scope of the GRM Toolkit

The FRILIA GRM clearly articulates how grievances should be lodged, addressed, and resolved, as well as the committees responsible for managing such grievances. The FRILIA GRM does not seek to replace existing mechanisms but rather to complement the established channels for addressing grievances in Lagos State, prior to the final option of litigation.

These include channels such as:

- The Lagos State PforR SEP-GRM,
- The Systematic Property Registration Programme (SPRP) on GRM (Land Disputes Mediation Guidelines), and
- The Lagos Multi-Door Courthouse framework.

The scope for FRILIA grievance redress therefore includes:

- A GRM framework
- Institutional framework for addressing grievances
- GRM procedure
- Procedure for sorting, assessing, and processing grievances



- Procedure for monitoring and tracking grievances
- A feedback mechanism and timeframe for responding to filed grievances
- A reporting and dissemination system

GRM Framework

Introduction

The absence of a transparent, equitable, affordable, and culturally appropriate grievance mechanism can negatively impact the implementation and sustainability of FRILIA projects—especially at the community level.

The Lagos State Development Plan (LSDP) includes a grievance redress mechanism designed with multiple complaint points, having both first-level and second-level GRMs, and the option to escalate to the Lagos Multi-Door Courthouse or a court of law if resolution fails.

The existing Lagos State Geographic Information System (LAGIS) collaborates with LAGOSIPA to facilitate stakeholder meetings, which serve as a medium for collecting and addressing grievances.

The FRILIA GRM will provide a systematic procedure for managing grievances related to FRILIA projects. This toolkit offers the necessary guidance to help LAGIS manage and monitor all FRILIA-related disputes and ensure that:

- All stakeholders, including investors and communities, are involved;
- Different uptake points for grievance collection are explored; and
- The GRM is linked with relevant agencies for effectiveness and timely feedback.

What is a Grievance and a GRM?

A grievance is an expression of dissatisfaction or concern stemming from an actual or perceived impact of an action on an individual or group.

Grievance Redress Mechanisms (GRMs) are institutions, instruments, methods, and processes through which the resolution of a grievance is sought and provided.



In everyday human interaction, grievances and complaints are inevitable. Therefore, to manage stakeholder relationships and ensure the success of FRILIA investments, a GRM provides the entry and exit point through which complaints are voiced, managed, and resolved.

Objectives of the GRM

- To establish procedures and processes that capture, assess, and respond to concerns from project stakeholders and the general public throughout the project lifecycle.
- To provide and facilitate access to information about project implementation and address complaints, concerns, and grievances that may arise during project execution.
- To provide a forum for resolving disputes at the local level, reducing the likelihood of escalation.
- To ensure that the rights of affected parties are respected by enabling the public to raise concerns or objections about investment projects.
- To provide a cost-effective method for reporting grievances and resolving disputes relatively quickly.
- To reduce conflict during project implementation and operations.
- To ensure and promote transparency and accountability throughout the project's implementation.
- To identify and respond to unintended impacts of projects on individuals or communities.
- To facilitate cordial relations between project stakeholders—investors, implementers, and beneficiaries.

Principles of GRM

An effective GRM should be guided by the following principles:

- **Accessibility:** The GRM must be accessible to all stakeholders, regardless of their location, language, education, or income level.
- **Simplicity:** Procedures for filing grievances must be straightforward and easy to understand.
- **Fairness:** Grievances must be treated confidentially, assessed impartially, and handled transparently.



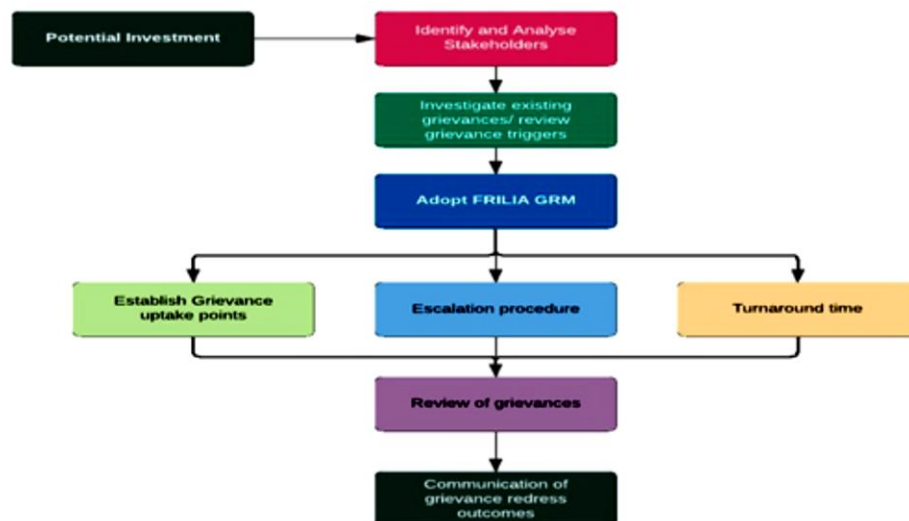
- **Timeliness:** All grievances, whether simple or complex, must be addressed and resolved promptly.
- **Inclusiveness:** Special attention must be given to ensure that poor and marginalized groups, including those with special needs, can access the GRM.
- **Responsiveness:** The GRM must respond effectively to the needs of all complainants. Officials handling grievances should be trained to take effective and prompt action.
- **Objectivity and Independence:** The GRM should operate independently of interested parties to ensure fair and impartial treatment of every case. GRM officials must have adequate authority to investigate and address grievances.

These principles align with FRILIA Principle 2.3, which emphasizes protecting rights through grievance redress mechanisms that provide accessible and affordable procedures for third-party settlement of disputes—including those arising from displacement or resettlement. These mechanisms should consider the availability of judicial recourse and community or traditional dispute resolution methods.

FRILIA GRM Approach

The FRILIA GRM approach is designed to address grievances that may arise during any stage of the investment process.

The process map (illustrated in the following figure) provides a guide for investors and project implementers in the application of the toolkit.





GRM Establishment during the Investment Process

In the LAGOSIPA investment process, particularly during Stage Two (Detailed Enquiry), where stakeholders are identified, it is important to investigate existing grievances and review potential grievance triggers. This stage helps to identify the different types of project-related grievances that could arise, in order to develop avoidance and mitigation measures.

Once this assessment is completed, a Grievance Redress Mechanism (GRM) must be formally established.

Once established, the GRM will apply throughout the subsequent stages of investment implementation and monitoring.

Priority of the GRM

The primary objective of a grievance mechanism, according to international best practices, is to prevent grievances from arising in the first place.

This is achieved by identifying the root causes of land-related and project-induced grievances and proactively addressing them before escalation.

Some common causes of land and project-related grievances include:

- Inadequate stakeholder engagement or consultation
- Compensation less than expected
- Delayed or partial compensation payments
- Impersonation of Project Affected Persons (PAPs)
- Speculative planting or construction aimed at inflating compensation
- Multiple and overlapping land claims
- Exclusion of certain assets (e.g., cultural sites or shrines) from valuation
- Disregard for cultural heritage or traditional practices
- Failure to meet local employment quotas
- Unfulfilled community development agreements or initiatives
- Damage to community infrastructure (e.g., schools, boreholes, health centers)



Mitigation Measures to Avoid Grievances

Where grievances cannot be fully avoided, mitigation measures should be developed and implemented to reduce both the frequency and impact of grievances.

The following table outlines examples of actions that can be taken to avoid or mitigate grievances during FRILIA-related investments in Lagos State.

Table 1: Actions that can be taken to avoid grievances

Potential Source of Grievance	Mitigation / Preventive Actions
Inadequate stakeholder engagement	Conduct inclusive and continuous consultations involving all community groups, including women, youth, and vulnerable persons. Ensure information is shared in local languages.
Compensation less than expected	Disclose valuation methodologies publicly; ensure independent valuation; involve community representatives in the valuation process.
Delayed payments	Prepare clear payment schedules; secure funding in advance; communicate timelines to PAPs transparently.
Impersonation of PAPs	Conduct verification exercises with local leaders; use biometric registration where possible; issue ID cards to legitimate PAPs.
Speculative planting / development	Enforce project cut-off dates and communicate them widely before valuation starts.
Multiple or overlapping land claims	Verify ownership through community land registers, traditional leadership, and Lagos State Land Bureau records.
Exclusion of assets (shrines, etc.)	Include cultural and spiritual assets in asset mapping; consult traditional leaders before valuation.
Disregard for cultural heritage	Engage traditional and religious leaders; respect local customs and sacred sites.
Local employment disputes	Establish local employment quotas; prioritize local hiring through transparent processes supervised by community representatives.
Community development project delays	Develop and disclose Community Development Action Plans (CDAPs) with timelines and budgets; involve communities in monitoring.
Damage to community infrastructure	Include replacement or repair costs in compensation plans; coordinate with the Lagos State Ministry of Works and Infrastructure.
Destruction of access routes	Identify and safeguard access roads during project planning; provide alternative routes where unavoidable.



ESTABLISHMENT OF A GRIEVANCE REDRESS MECHANISM

Basic Elements of GRM Design

A functional Grievance Redress Mechanism (GRM) must be designed to incorporate the following elements:

- A dedicated process or procedure to receive grievances, e.g., call center, complaint form, emails, text messages, WhatsApp, suggestion boxes, website, and local offices.
- Incorporate culturally appropriate methods of handling community concerns and disputes.
- The process must be simple, clear, accessible, and understandable to all affected communities at no cost.
- It must provide for anonymity, be secure, and prevent retribution or intimidation.
- It must have multiple levels of review and allow for appeals and recourse to the formal court system.
- It must have reasonable timeframes for acknowledgment, resolution, and feedback.
- It must demonstrate transparency, objectivity, and accountability in all its processes and outcomes.
- It must recognize the uniqueness and diversity of grievances; decision-making should therefore be flexible and context-specific.

b. Establishment of the FRILIA GRM Secretariat at LAGOSIPA

The FRILIA GRM Secretariat shall be established under the Lagos State Investment Promotion Agency (LAGOSIPA).

This secretariat will be responsible for the overall management, supervision, coordination, and monitoring of all FRILIA-related grievances in Lagos State. It will:

- Set up multiple grievance uptake points and channels, including verbal, written, telephone, text messages, WhatsApp, suggestion boxes, web portals, and emails across relevant institutions such as MDAs, LGAs, community liaison offices, and the Project Management Unit (PMU).
- Ensure that all complaints are logged, tracked, and categorized by type, source, and status in a central grievance database.



- Appoint a dedicated GRM Officer to manage the Secretariat, responsible for grievance logging, trend analysis, and preparing monthly reports to the PMU.
- Designate GRM Officers at established uptake points (e.g., LGA offices, MDAs, and community liaison offices) for coordination and timely reporting.

c. Establishment of the Grievance Redress Committee (GRC)

Based on the scope and nature of grievances, the Grievance Redress Committee (GRC) shall consist of at least five (5) members, including at least one female representative, drawn from the list below:

1. A representative from the FRILIA GRM Secretariat (LAGOSIPA) – *Secretary of the Committee*
2. A representative of the FRILIA Investor(s)
3. A representative from the Lagos State Ministry of Justice
4. A representative of the Project Host Community
5. A representative from the Lagos State Ministry of Physical Planning and Urban Development (MPP&UD)
6. A representative from the Lagos State Ministry of Agriculture
7. A representative from the Lagos State Environmental Protection Agency (LASEPA)
8. A representative of the traditional institution within the project area
9. A representative from Civil Society Organizations (CSOs), Community-Based Organizations (CBOs), or NGOs active in the project area

The GRC shall be chaired and supervised by the Deputy Program Manager, LAGOSIPA FRILIA PMU, while the Secretariat representative shall serve as the Committee Secretary.

The committee shall:

- Compile and review all grievances;
- Investigate and recommend actions based on the nature and severity of grievances;
- Convene meetings as necessary to address grievances; and
- Submit monthly grievance reports to the FRILIA GRM Secretariat for onward transmission to the FRILIA PMU.



Institutional Arrangement for Grievance Redress (Based on FRILIA Framework)

For the GRM to function effectively, a three-tier institutional structure shall be established as follows:

a. Community-Level Grievance Redress Unit (C-GRU)

This is the first level of redress for Project Affected Persons (PAPs), Project Affected Communities (PACs), beneficiaries, and other stakeholders.

Membership:

- Traditional/community leaders
- Women leaders
- Youth leaders
- Representatives of CBOs and CSOs
- Community Liaison Officer (CLO) representing the host community
- Local Government representative
- FRILIA GRM Officer (LAGOSIPA)

The C-GRU shall:

- Dedicate specific days for receiving and resolving complaints;
- Maintain a grievance register;
- Record all grievances received;
- Recommend necessary actions to address and resolve complaints promptly.

FRILIA Grievance Redress Procedure

The LAGOSIPA FRILIA Secretariat will take full responsibility for managing all FRILIA-related grievances during project implementation.

All grievances collected from the various uptake points shall be forwarded to the FRILIA GRM Secretariat for registration and sorting.

Depending on the type and severity of each complaint, the Secretariat shall forward cases to the relevant MDAs or authorities (e.g., Ministry of Agriculture, Ministry of Justice, LASEPA, or the Local Government Council).



Standard Timelines:

- Acknowledgment of grievance: within 48 hours of receipt
- Resolution of grievance: within 10 working days
- Feedback to complainant: within 14 working days

Escalation Process:

- Unresolved cases at the community or MDA level are escalated to the Grievance Redress Committee (GRC).
- If unresolved at the GRC level, cases will be referred to a Lagos State Multi-Door Courthouse for mediation.
- Only if mediation fails will the case proceed to formal litigation through the Lagos State Judiciary.

Figure 2: Summary of the FRILIA Grievance Redress Procedure

Step 1: Receipt and Acknowledgment of Complaint

Step 2: Registration and Categorization of Complaint

Step 3: Review, Assessment, and Referral to Appropriate Authority

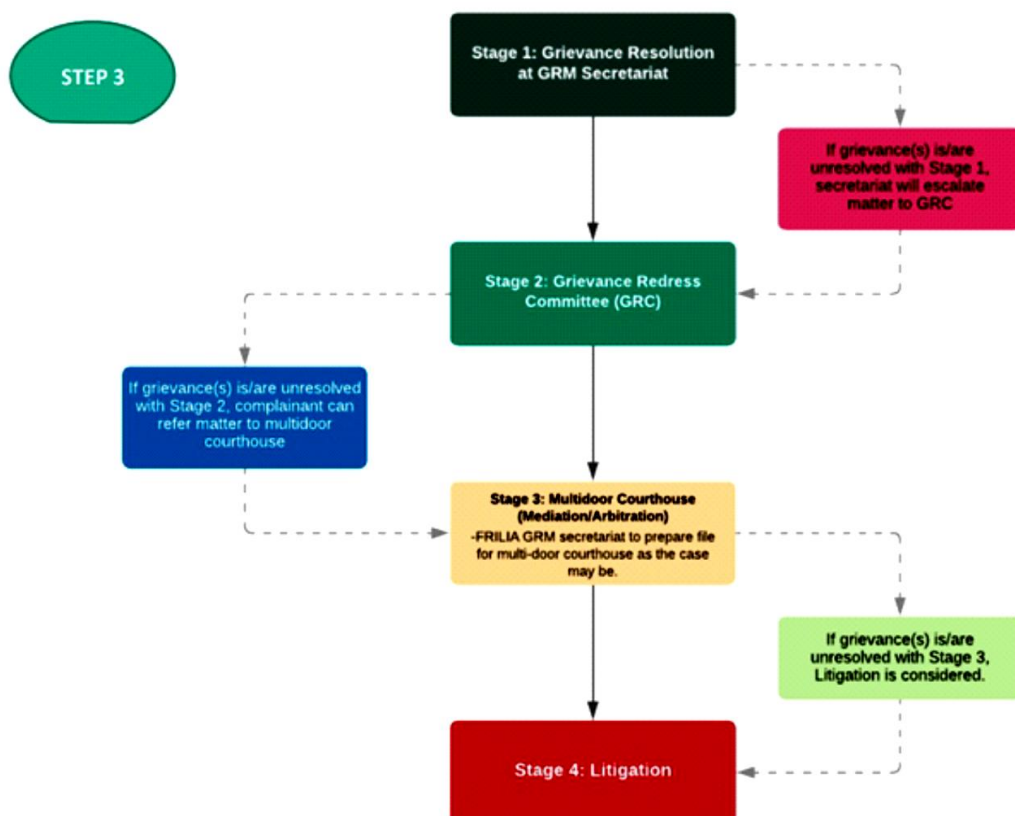
Step 4: Resolution and Implementation of Agreed Action

Step 5: Feedback to Complainant

Step 6: Escalation (if unresolved) to GRC → Multi-Door Courthouse → Court

Figure 2: Grievance Redress Procedure





Step 1: Grievance Receipt at the Uptake Points

- The FRILIA GRM Secretariat, domiciled at LAGOSIPA, will ensure that grievance collection and uptake points are established at the community level, in Local Government Area (LGA) offices, and within relevant MDAs.
- The Secretariat will establish accessible grievance channels, including suggestion and grievance boxes, a dedicated email address, hotline number, SMS line, WhatsApp, and a FRILIA website portal, alongside physical grievance desks in key institutions.
- The Secretariat will also establish a Community GRM Unit, serving as a community-level grievance uptake point.

The Community Grievance Officers will:

- Receive complaints through various channels — suggestion/drop boxes, verbal submissions, phone calls, or in writing via the Grievance Registration Form (GRM Template 1). This template will be translated into local languages (e.g., Yoruba) as required.



- Acknowledge all complaints and issue an Acknowledgment Form (GRM Template 2) in English or the preferred local language. Acknowledgments may also be sent via text message or phone call, based on the complainant's preference.
- Forward all registered complaints to the LAGOSIPA GRM Secretariat for logging, review, and monitoring.
- The GRM Officer at the Secretariat will also directly acknowledge and log complaints received through digital channels (email, phone, SMS, or the FRILIA web portal).

Step 2: Grievance Registration and Sorting at the GRM Secretariat

- Receive and register all grievances at the FRILIA GRM Secretariat (LAGOSIPA).
- Record and document each grievance in the FRILIA Grievance Logbook (GRM Template 3).
- Review all complaints to ensure proper categorization and completeness.
- Identify the relevant Ministry, Department, or Agency (MDA) responsible for addressing the specific grievance (e.g., Ministry of Justice, LASEPA, MPP&UD, or Ministry of Agriculture).
- Refer the grievance to the identified authority or, where appropriate, to the Grievance Redress Committee (GRC).
- Continuously monitor and track the grievance until resolution.

Step 3: Grievance Resolution and Escalation

All logged grievances must be processed through the following four (4) stages of resolution:

Stage 1: Grievance Resolution at the GRM Secretariat

- Assess the nature and cause of the complaint.
- Identify possible remedial actions or solutions.
- Engage in early resolution, mediation, or community-level arbitration where applicable.
- Implement agreed-upon solutions and document progress in the Grievance Logbook (GRM Template 3).
- Notify the complainant of actions taken via the Grievance Disclosure Form (GRM Template 4) or their preferred mode of communication.
- Close the case if resolved to the satisfaction of the complainant; otherwise, escalate to the GRC.



Stage 2: Escalation to the Grievance Redress Committee (GRC)

- The GRC reviews the grievance and assesses procedures previously taken at Stage 1.
- Record findings and resolutions in the Grievance Committee Proceedings Template (GRM Template 5).
- Explore and identify all feasible resolution options in consultation with the complainant.
- Convene meetings or hearings, as necessary, within the affected community.
- Implement resolutions and monitor compliance.
- Close the case upon satisfactory resolution, or escalate if unresolved.

Stage 3: Escalation to a Multi-Door Courthouse

- Unresolved grievances will be referred to an Alternative Dispute Resolution (ADR) system through the Lagos Multi-Door Courthouse, which provides mediation and arbitration services to ensure faster, community-sensitive resolutions.

Stage 4: Litigation

- If the grievance remains unresolved after mediation and arbitration, the case may proceed to litigation in accordance with Lagos State Judiciary procedures and the FRILIA legal framework.

GRIEVANCE REPORTING AND DISSEMINATION

Communication Strategy

To ensure transparency and understanding, the LAGOSIPA FRILIA PMU shall conduct awareness and sensitization campaigns on the GRM process for all project stakeholders, including MDAs, LGAs, traditional leaders, and community representatives.

- Awareness materials — such as leaflets, brochures, posters, and infographics — will be produced in English and Yoruba and distributed across project communities.
- These materials will be made available both physically (at LGA offices, community centers) and digitally (on websites, social media, and email lists).
- Training will be provided to GRM focal persons across participating Lagos State MDAs to enhance understanding and effective use of the GRM toolkit and templates.



Feedback Mechanism

The feedback process provides timely updates to complainants on the status of their grievances.

Key requirements include:

- All grievances must be acknowledged within two (2) working days of receipt.
- Verbal or physical grievances (in person or via phone) must be acknowledged immediately and documented.
- Written or electronic grievances (email, SMS, website) must be acknowledged within two (2) working days.
- The complainant must be updated on the status of the grievance within 10–14 days after initial receipt.
- All feedback and outcomes must be provided using the GRM Disclosure Form (GRM Template 4) or via the complainant's preferred communication channel (phone, text, or email).

Recording and Monitoring of Grievances

A comprehensive and easy-to-use Grievance Logbook (GRM Template 3) shall be maintained at the LAGOSIPA GRM Secretariat to serve as a centralized database for grievance tracking and resolution.

The logbook will:

- Record all registered grievances, their categories, resolutions, and status.
- Serve as the official grievance database for monitoring and reporting.
- Capture trends, identify recurring issues, and inform continuous improvements in FRILIA implementation.

Each community-level GRM Unit and MDA will submit monthly reports detailing grievances received, resolutions provided, and pending cases.



All Grievance Forms and correspondence shall be securely stored in both hard copy and electronic format to ensure transparency and accountability.

The LAGOSIPA GRM Secretariat will be responsible for analyzing grievance trends, compiling monthly reports, and sharing summaries with the FRILIA PMU and relevant Lagos State ministries for policy feedback and corrective action.

GRM Templates	
GRM Template 1	Grievance registration form
GRM Template 2	Grievance acknowledgement receipt
GRM Template 3	Grievance logbook
GRM Template 4	Grievance disclosure form
GRM Template 5	Grievance committee proceedings template



Template 1: Grievance Registration Form

Date: (dd/mm/yyyy)

Community:

Complainant's Details

Anonymous submission: Yes/No

Community Representative				Individual		
First Name		Last Name		Gender (M/F)		
Address:		Email address:				
Phone No				Age		
Acceptable Means of Identification presented				Ref No: (PAP assigned number if applicable)		
Place / Location of the issue of complaint: LGA: Project Site: Community:						
Detailed description of grievance/incident (including names of other persons involved (what happened, who caused the problem, what is the result of the problem):						
Past complaint and date complaint made (if any)				Past action(s) taken by the complainant (if any):		
Supporting Documents: (List and Attach letter/petition/documents detailing grievance information as submitted)						
Complainant's Signature				Date		
Received/prepared by				Date	Signature	



Grievance Acknowledgement Receipt (FRILIA GRM/01B)

Date of registering complaint (dd/mm/yyyy)				Place of registering complaint: Community/Town/LGA/City			
Mode of Receipt (please tick where applicable)	Letter	Verbal (walk-in)	Phone	SMS	Email	Suggesti on box	Others (Pls specify)
Details of Complainant:							
Name				Age		Gender (M/F)	
Residential Address							
Email Address				Phone No			
Supporting Documents submitted, If any							
Summary of Complaint							
Date to provide first feedback* to complainant (dd/mm/yyyy): (10-14 working days from receipt of grievance)							
Name of complaint receiving officer				Signature			

*The officer receiving complaint is responsible for follow-up on grievance internally and provide feedback to complainant



GRIEVANCE DISCLOSURE FORM (FRILIA_GRM/03)

Community/Town/LGA/City

Result of Grievance Redress

Complaint No		Date of complaint	
Name of the Complainant			
Complaint No:			
Next Action (s) taken:			
Summary of the Complaint			
Summary of final resolution			
Level of Redress:			
Name of complainant Signature:		Response of complainant to feedback	
		Satisfied	Not satisfied
Name of Grievance Handling Officer			
Signature		Date (dd/mm/yyyy):	

(Note: Copy to be sent to the complainant)



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

Date of Meeting	
Venue of Meeting	
Complaint Number	
Participants at the mediation (GRC Members)	

1. Name and gender of the complainant(s):
2. Date complaint was recorded:
3. Means of Identification of complainant
4. Address of complainant:
5. Complainant participated in mediation (*circle the relevant option*)? Yes or No
6. Summary of grievance/ Key discussions:
7. Complainants statement:
8. GRC recommendation(s):
9. Status of Grievance (*circle the relevant option*): Resolved or Unresolved
10. If Unresolved, Indicate Next Steps:

Male
Female

Project Beneficiary
Project Affected Persons
Project Executor
Project Implementer
Funding Agencies
Others

Community
MDA
GRC
Arbitration
Mediation
Litigation

Project implementation related
Social
Environment
Other

Resolved
Unresolved



FRILIA GRIEVANCE LOGBOOK

S/	Complaint	Received	Date	Type of	Name of Complainant	Gender	Contact	Category of	Details of Grievance	Mode of	Category of	Suggested Action/	Grievance	
	Number	By	received	Grievance			Number	Complainant		grievance	Grievances	Resolution	Status	Notes
2														
3														
4														
5														
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