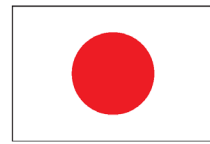




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مسار فلسطين التراثي
Palestinian Heritage Trail



من الشعب الياباني
From the People of Japan

Palestinian Heritage Trail: Increased Economic Opportunities and Improved Livelihood for Fragile Communities (P170706)

Project Grievance Mechanism Guideline Beneficiaries/Community level

April 2023

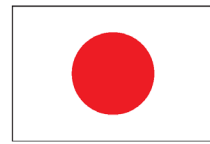


Table of Contents

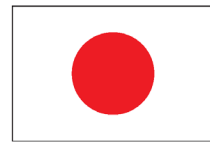
Abstract.....	3
Definitions.....	4
Procedures for receiving and handling complaints/grievance.....	5
1. Receiving Complaints/ grievance.....	5
1.1 Methods for filing complaints	5
1.2 Types of complaints.....	5
2. Complaint handling.....	6
2.1 Procedures for Filing Grievances.....	6
2.2 Registering Grievances	6
2.3 Referral and Examination of Grievances	7
2.4 Notifying the complainant.....	8
2.5 Closing the Complaint.....	8
3. Additional Dispute Resolution Scheme	8
3.1 Internal Dispute Resolution Scheme	9
3.2 External Dispute Resolution Scheme.....	9
4. Repotting.....	9
5. Roles and Responsibilities:.....	9
ANNEX I: Complaints Entry Form.....	11
ANNEX2: Acknowledgement of Complaint Reception Form	14
ANNEX 3: Request for Additional Information Form.....	15
ANNEX 4: Response Form	16
ANNEX 5: GM System Log.....	17



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Palestinian Heritage Trail



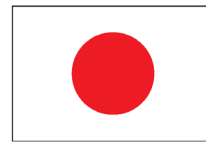
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Abstract

The “Increased Economic Opportunities and Improved Livelihood for Fragile Communities along the Palestinian Heritage Trail (PH Trail) in the West Bank” project funded by the World bank (WB) and implemented by Palestinian Heritage Trail (PHT). The project aims to benefit about 3,000 beneficiaries, including Palestinian individuals present in about 50 fragile communities along the PH Trail across all the West Bank. There will be a special focus on women and youth since they will constitute more than 50% of the beneficiaries. Secondary beneficiaries would include the walkers and visitors, newly hired workers, apprentices, and other communities and firms that purchase the improved products or get the improved services.

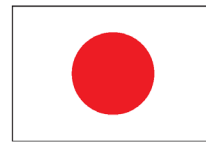
It is expected to receive complaints from beneficiaries and affected communities during the project’s activities implementation. Therefore, a system for filing and handling project’s complaints established to formalize the process.

For the complaint to be effective, it is necessary to follow clear and smooth administrative procedures to optimize the process of handling complaints from the reception to the completion or closure, as well as providing sufficient time and effort. This guideline will provide a detailed procedure for submitting and handling complaints from beneficiaries.



Definitions

- **Complainant:** Any PHT stakeholder including staff, founders, partners, beneficiaries, service providers and others that are directly or indirectly benefiting from PHT work and projects, i.e., local communities include guides, homestays, and women centers, as well as landowners. An individual, group or organization that submits a complaint.
- **The complaint:** A statement (written or electronic document or verbal) or expression of displeasure concerning an impact or effect arising from a PHT project or sub-project as unsatisfactory or unacceptable to the complainant. It is submitted by the complainant that reports a wrong behavior or shortening to perform a service or taking an action that one of its employees was supposed to do, or regarding any form of discrimination or violation of the legislation in force, and it shall be submitted to the Project Management Unit (PMU) or any Palestine Heritage Trail (PHT) team members through the identified channels below.
- **The project:** “Increased Economic Opportunities and Improved Livelihood for Fragile Communities along the Palestinian Heritage Trail (PH Trail) in the West Bank” project.
- **Competent Authority:** The Environmental and Social (ES) Specialist and the Project Manager will manage the GM in close coordination with the Executive Director of the PMU.
- **Grievance Log:** A database for keeping the record of the complaints received, resolved and closed.
- **Severe Incident:** A severe incident is an incident that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g., fatality, GBV, forced or child labor.
- **Feedback** is any positive or negative informal statement of opinion about someone or something. It is an opinion shared for information or as part of the ongoing dialogue with partners, hikers, or other stakeholders on project activities – but not with the intention of lodging a complaint. Feedback does not require the use of the procedures below and PH TRAIL doesn't need to reply formally.



Procedures for receiving and handling complaints/grievance

The following procedures aim to organize and facilitate the process of receiving and handling complaints related to the project or its components in order to develop the provision of the best service to the local community and to correct any harm to citizens within the various procedures, rules and regulations.

1. Receiving Complaints/ grievance

The Executive Director of PHT is assigned to receive complaints related to the project. The complaint should be related to the project components and/or to its implementation and management.

1.1 Methods for filing complaints

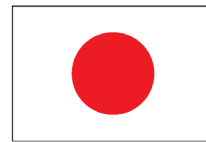
Complaints shall be filed using one of the following methods:

- Electronically: by downloading and filling the “Complaints Form” using the following link: <https://phtrail.org/complaint-mechanism/> and send it back through the following channels:
 - a. Scanned copy if sent via email using the following email address: complaints@phtrail.org.
 - b. If handed in person: form must be filled and submitted to the Executive Director, to the following address (Al-Karameh Street, near Beit Sahour Municipality – Beit Sahour, Bethlehem).
- For Verbal complaint:
 - a. By calling the following number 02 277 5045 and asking for Executive Director (excluding sensitive complaints). Sensitive complaints will only be received sealed in writing or meeting with the Executive Director.
 - b. Meeting in person with: Samah Qumsieh, Executive Director.

Where possible it is desirable that complaints are submitted in writing by the complainant. Should the complainant not wish to comply with this request and submit the complaint verbally, then the complainant information and the details of the complaint should be entered in the GM Log/Tracking Matrix (Annex 5).

1.2 Types of complaints

- Complaints related to project components and/or to its implementation and management.



- Complaints related to GBV cases including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH).
- Other ethical complaints related to fraud, corruption related to project activities, and complaints related to child labor.

2. Complaint handling

2.1 Procedures for Filing Grievances

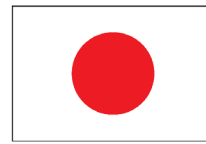
- The complainant fills in the designated form (Annex 1) in writing and signs it or fills it electronically including all personal information and details of the complaint.
- The complainant encloses all copies of documents which may support the complaint.
- If the complainant chooses to file his/her complaint verbally, the complaint focal point must register the complainant information and details of the complaint into the system. The complainant will receive a reference number to track his/her complaint.

Submitting Anonymous Grievances

If the complainant chooses to keep his/her identity confidential, the ESO will register the details of the complaint into the system and inform the complainant of the grievance procedural scheme. The GM system will include an anonymous complaint reporting process as some complainants may choose to file a complaint anonymously. Channels to accept and respond to anonymous grievances will be communicated to project affected parties during the consultation meetings and throughout project implementation. Anonymous complaints should provide factual details and specific allegations of misconduct or serious wrongdoing related to any of the project activities. The GM staff shall explain to the complainant about the procedure to inform him/her of the solution.

2.2 Registering Grievances

- The PHT Executive Director will enter the complaint into the GM Tracking Matrix/log.
- The GM Tracking log tracks the status of all complaints.
- The GM Tracking log records the following information:
 1. Complaint Reference Number
 2. Name of complainant (Optional)
 3. Submittal date
 4. Method of receipt
 5. Confirmation that a complaint is acknowledged
 6. Complaint status



7. Brief description of Complaint
8. Follow-up responsible
9. Action taken: (Including remedies / determinations / result)
10. Date of finalization of complaint.

Original documentation must be kept on file.

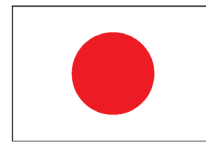
2.3 Referral and Examination of Grievances

In order to effectively follow up on complaints related to the project and its activities, and ensure that none of the complaints is lost, the executive manager transfer all related complaints to the ES Specialist for following up. The ES specialist will ensure that the form is filled in accurately. The complainant receives a receipt or a confirmation email of acknowledgment with a reference number to track the complaint (Annex 2).

Once the grievance has been verified as legitimate, the ES Specialist at the PHT will inform the complainant that an investigation is underway within four business days. The complainant shall be informed of the estimated duration for resolving the complaint which is no later than thirty working days from the date of receipt of the complaint. Where the complaint is unlikely to be resolved within the estimated duration, the ES Specialist must promptly contact the complainant to request additional time and explain the delay. If the complaint is not resolved after the two-week period, the ES Specialist will refer the complaint to the Project Manager to take the appropriate measures.

The ES Specialist will then follow the steps below:

- Verify the validity of the information and documents enclosed.
- Ask the complainant to provide further information if necessary (via the Request for Additional Information Form, Annex 3).
- If the complaint is about SEA/SH, the complaint will be referred to the General Director of PHT.
- If the complaint is about other ethical issues, the complaint will be referred to ES Specialist.
- If the complaint is about the Project team, the ES Specialist will adhere to the following procedures:
 1. Refer the complaint to the Project manager for investigation. Project manager will examine the complaint and consult with the relevant Activity Lead or other related staff.



2. Person/s in charge in the relevant activity shall conduct due diligence/visits for verification, if necessary, and prepare recommendation to the Project Manager of actions to be taken and of any corrective measures to avoid possible reoccurrence.
3. All investigation communications between project staff and the complainant shall be done through ES Specialist if it is not a sensitive complaint.
4. ES Specialist shall inform the Executive manager at the PIA within ten business days, about the action taken and of any recommendations for corrective measures to avoid possible reoccurrence.
5. have the PIU Manager signature for approval.

The General Director shall approve the decision and the Executive manager shall register the decision and actions taken in the GM Tracking Matrix.

2.4 Notifying the complainant

The ES specialist shall notify the complainant of the decision/solution/action immediately either in writing or sending the complainant a text message. IF the complainant is unreachable by writing, he/she could be reached by phone.

When providing a response to the complainant, the ES specialist must include the following information:

- A summary of issues raised in the initial complaint.
- Reason for the decision.

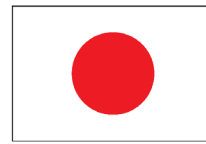
2.5 Closing the Complaint

A complaint is closed in the following cases:

- Where the decision/solution of complaint is accepted by the complainant, the ES Specialist shall close the complaint and sign the outcome and date in the Complaint log Register matrix.
- A Complaint that is not related to the project or any of its components.
- A Complaint that is being heard by the judiciary.
- A malicious complaint.

3. Additional Dispute Resolution Scheme

Where the complainant is not satisfied with the outcome of his/her complaint, the following procedures shall be considered:



3.1 Internal Dispute Resolution Scheme

The ES Specialist shall review the complaint and where the complainants are not satisfied with the resolution provided by the Project ES Specialist, the ES Specialist shall advise the complainants to re-address the issue to the PIU Manager if the procedure is not satisfactory to the complainant, the ES Specialist shall advise the complainant to readdress the issue with Executive Director.

3.2 External Dispute Resolution Scheme

In case the complainants are not satisfied with the internal procedures for handling complaints, the outcomes of the complaints or for any unhandled complaints, ES Specialist shall provide information on the complainant's right to refer their complaint to any external dispute resolution party including the judiciary.

4. Reporting

The ES Specialist in PHT shall review the Complaints Register regularly for the purpose of providing analysis and reports on complaints to the Project manager and to the World Bank periodically.

The report shall include number of complaints received, handled and closed. It shall also include analysis on systemic and recurring problems. This will assist the project management in determining the cause of complaints and whether remedial action is warranted.

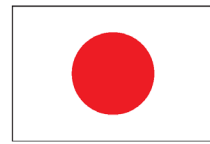
Periodic Reporting shall be as following:

- A monthly report by the ES Specialist to the Project Manager and Executive Manager.
- The ES Specialist to report to the Bank according to the ESCP and agreements.

5. Roles and Responsibilities:

The Executive Director

- Act as Complaints Focal point
- Receive complaints.
- Register and Manage PHT GM Tracking Matrix.
- Provide complainants with an acknowledgement and a complaint number.
- Verify and approve the ES Specialist information and decisions before being communicated with the complainant.
- Investigate complaint cases related to Project Manager.



- Forward complaints related to the WB project to the ES Specialist.

The ES Specialist

- Register and Manage WB Project GM Tracking Matrix.
- Verify the validity of the information and documents enclosed.
- Ask complainants to provide further information if necessary.
- Report complaints and complete complaint forms.
- Conduct due diligence/visits for verification of complaints, if necessary.
- Refer the complaint to the Project Manager for investigation. (If needed)
- Communicate information and decisions with Executive Director acting as Complaints Focal point for approval.
- Communicate information and decisions with complainants.
- Provide regular reports on complaints to Project Manager.

Project Manager

- Request relevant staff input.
- Provide guidance on escalations.
- Provide final conclusions, recommendations, and required corrective measure on complaints.

General Director

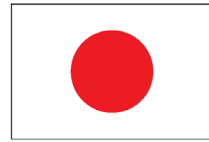
- Provide guidance on escalations.
- Investigate SEA/SH, other ethics complaints and escalated cases sent directly to the Ethics or Safeguarding functions by the client.
- Work with Project Manager and team on escalated cases to the WB.



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Palestinian Heritage Trail



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From the People of Japan

ANNEX I: Complaints Entry Form

📍 Al Karamah Street, Beit Sahour
☎ +970 (0)2 277 5045
🌐 www.phtrail.org



مسار فلسطين التراثي
Palestinian Heritage Trail

Complaints Entry Form / استمارة تقديم الشكوى

Palestinian Heritage Trail Union is always ready to hear from you if a complaint exists. Please fill this form with accurate details about the incident you would like to report and send it to the following email address: complaints@phtrail.org. We will follow up with your complaint within 7- 10 working days.

اتحاد مسار فلسطين التراثي جاهز دائماً إلى سماع شكواكم ان وجدت. نرجو منكم تعبئة النموذج المرفق بكافة المعلومات الدقيقة المتعلقة بتفاصيل الواقعة التي ترغب بالتبليغ عنها وارساله إلى البري الإلكتروني التالي: complaints@phtrail.org. سوف نتابع معك خلال سبعة إلى عشرة أيام عمل.

YOUR INFORMATION	معلومات شخصية
Complainant First Name: _____	الاسم الأول لمقدم الشكوى: _____
Complainant Family Name: _____	اسم العائلة لمقدم الشكوى: _____
Gender: _____	الجنس: _____
Email: _____	البريد الإلكتروني: _____
Phone: _____	رقم الهاتف: _____
Town/Village: _____	المدينة أو القرية: _____
Address: _____	العنوان: _____

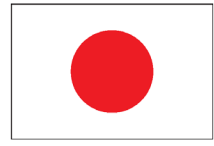
Description of complaint	وصف الشكوى
Date of the reported incident: _____	تاريخ الحادثة: _____
Location of incident: _____	مكان وقوع الحادثة: _____
Nature of the Complaint: Operational or Sensitive <input type="checkbox"/> Operational: PH Trail work as projects or trail <input type="checkbox"/> Sensitive: Code of Conduct	طبيعة الشكوى: تشغيلية أو حساسة <input type="checkbox"/> الشكوى التشغيلية هي الشكوى المتعلقة بعمل المؤسسة في المشاريع وتطوير المسار والتدريبات <input type="checkbox"/> حساسة
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____



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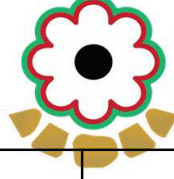


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🌐 www.phtrail.org



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Palestinian Heritage Trail

Name of party you are complaining about: _____ _____ _____	اسم الجهة الذي تودون الإبلاغ عنها: _____ _____ _____
If person, name of the person that you are reporting and place of work: _____ _____ _____	إذا كان شخص، اسم الشخص الذي تودون الإبلاغ عنه ومكان عمله: _____ _____ _____
Attachments and documents of the complaint: _____ _____ _____	الوثائق والملحقات التي تدعم الشكوى: _____ _____ _____

* If the application is not complete, the complaint will be dismissed

* By signing you declare that all the information you have entered is truthful and accurate

* اي طلب غير مكتمل يعتبر لاغياً

* عبر توقيعك على هذه الشكوى، أنت تعلن أن المعلومات التي أدخلتها صحيحة ودقيقة

Signature

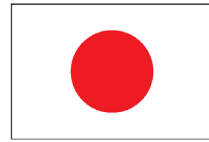
التوقيع



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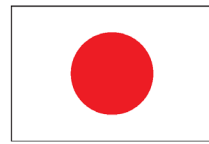
For the use of Palestinian Heritage Trail	لإستخدام مسار فلسطين التراثي
Name of the employees who received the complaint	اسم الموظف مستلم الشكوى
Signature of the employee who received the complaint	توقيع الموظف مستلم الشكوى
Complaint receipt date	تاريخ استلام الشكوى
For the use of the official responsible for handling the complaint	لاستخدام الشخص المسؤول عن متابعة الشكوى
Recommendations regarding the complaint	توصيات متعلقة بالشكوى
<input type="checkbox"/> Rejected <input type="checkbox"/> Accepted	<input type="checkbox"/> مرفوضة <input type="checkbox"/> مقبولة
Justifications for rejecting the complaint	سبب رفض الشكوى
Signature of individual responsible for handling the complaint:	توقيع الشخص المسؤول:
Date:	التاريخ:



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ANNEX2: Acknowledgement of Complaint Reception Form

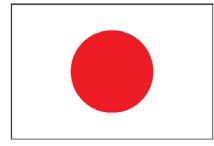
Complainant Name		اسم مقدم الشكوى
Complaint Number		رقم الشكوى
Nature (subject) of the complaint		طبيعة الشكوى
Date of submitting the complaint		تاريخ تقديم الشكوى
Follow-up date		تاريخ المتابعة
Relevant attachments (support documents)		المستندات الداعمة
Method of responding to the complaint		طريقة الرد على مقم الشكوى
Employee name		اسم الموظف
Employee signature		توقيع الموظف



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ANNEX 3: Request for Additional Information Form

نموذج استفسار عن معلومات اضافية

التاريخ:

الأخ المواطن / الأخت المواطنة/ السادة مؤسسة.....المحترم/ المحترمة/ المحترمين،

الموضوع: طلب معلومات اضافية حول الشوى رقم ()

تحية طيبة وبعد،

يهديكم اتحاد مسار فلسطين التراثي أطيب التحيات، وبناء على متابعة الشكوى رقم () المقدمة من طرفكم بتاريخ...../...../..... وموضوعها ، نرجو من حضرتك تزويدنا بالمعلومات التالية للمساعدة في معالجة الشكوى:

.....
.....
.....

مع فائق الاحترام والتقدير،

مسؤول الشكاوى

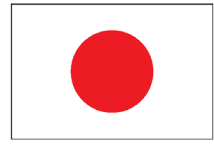
مدير المشروع



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ANNEX 4: Response Form

ابلاغ رد لمقدم الشكوى

التاريخ:.....

الأخ المواطن / الأخت المواطنة/ السادة مؤسسة.....المحترم/ المحترمة/ المحترمين

الموضوع: ابلاغ رد حول الشكوى رقم ()

تحية طيبة وبعد،

يهدىكم اتحاد مسار فلسطين التراثي أطيب التحيات، وبناء على متابعة الشكوى رقم () المقدمة من طرفكم

بتاريخ...../...../..... وموضوعها

نود ابلاغكم بالرد الاتي:

.....
.....

مع فائق الاحترام والتقدير،

مسؤول الشكاوى

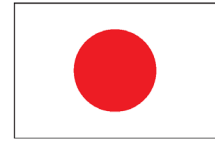
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ANNEX 5: GM System Log

ملاحظات	طبيعة الرد	تاريخ اغلاق الشكوى	جهة المتابعة	موضوع الشكوى	تفاصيل حالة الشكوى**	حالة الشكوى*	طريقة الاستلام	تاريخ تقديم الشكوى	مقدم الشكوى	الرقم التسلسلي	الرقم

* حالة الشكوى: مقبول / مرفوض
** تفاصيل حالة الشكوى: قيد المتابعة / متعثرة / مغلقة / مرفوضة