



Draft Grievance Manual for the Excellence in Learning in Liberia Project (P181455), Ministry of Education – Republic of Liberia

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ACRONYMS

Acronym	Meaning
CAP	Corrective Action Plan
CEO	County Education Officer
CRC	Convention on the Rights of the Child
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESMF	Environmental and Social Management Framework
ESRS	Environmental and Social Review Summary
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GPE	Global Partnership for Education
GRC	Grievance Redress Committee
GM	Grievance Mechanism
IDA	International Development Association
IEC	Information, Education, and Communication
KPI	Key Performance Indicator
MoE	Ministry of Education
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PDO	Project Development Objective
PIU	Project Implementation Unit
PPCA	Public Procurement and Concessions Act
PTA	Parent-Teacher Association
RCA	Root Cause Analysis
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMC	School Management Committee
UTN	Unique Tracking Number
WGM	Workers' Grievance Mechanism
WB	World Bank

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EXECUTIVE SUMMARY

The Excellence in Learning in Liberia (EXCEL) Project is a national education reform initiative implemented by the Ministry of Education (MoE) with financing from the International Development Association (IDA) and the Global Partnership for Education (GPE). With a total financing envelope of USD 88.7 million, the Project seeks to improve foundational learning outcomes and expand equitable access to quality primary education across Liberia's fifteen counties. Given its nationwide scope, decentralized implementation structure, and Substantial Social Risk classification under the World Bank Environmental and Social Framework (ESF), the establishment of a robust Grievance Redress Mechanism (GM) is both a legal obligation under the Financing Agreement and a central pillar of responsible project governance.

This Grievance Redress Manual provides the institutional, procedural, and operational framework for receiving, registering, assessing, resolving, and monitoring grievances arising from EXCEL implementation. The GM functions as a structured, non-judicial administrative mechanism designed to provide accessible and timely redress to project-affected parties while preserving the constitutional right to judicial remedies under Liberian law. It aligns with Environmental and Social Standards ESS10, ESS2, ESS4, and ESS5, as well as the Environmental and Social Commitment Plan (ESCP), including mandatory 24-hour notification requirements for severe incidents.

The mechanism applies to all project-related activities and is accessible to students, parents, teachers, school administrators, community members, contractors, consultants, and project workers. It addresses grievances relating to service delivery, school grants and resource allocation, infrastructure rehabilitation, environmental and community health impacts, labor and working conditions, procurement processes, misconduct, and allegations of gender-based violence, sexual exploitation and abuse, and sexual harassment (GBV/SEA/SH). Given the project's Substantial Social Risk rating, the Manual establishes a dedicated survivor-centered protocol for GBV/SEA/SH complaints, ensuring confidentiality, informed consent, referral to appropriate support services, and compliance with national legal requirements.

Institutionally, the GM operates through a three-tier governance structure aligned with Liberia's decentralized education administration. Grievances are first addressed at the school level, escalated to the county level where necessary, and further reviewed at the national level for high-risk, systemic, or sensitive matters. Severe incidents, including fatalities, serious injury, child abuse, forced labor, major environmental harm, or SEA/SH allegations meeting reporting thresholds, trigger immediate escalation and mandatory notification to the World Bank within 24 hours in accordance with ESCP commitments. The GM is supported by a centralized registry system, structured investigation timelines, performance indicators, and regular internal and external reporting. Monitoring mechanisms enable trend analysis, risk mitigation, and continuous institutional learning. Dedicated provisions are also established for a Workers' Grievance Mechanism consistent with ESS2 and Liberia's Decent Work Act, ensuring protection from retaliation and access to statutory remedies where required.

To ensure operational effectiveness and sustainability, the Manual integrates a nationwide awareness and capacity-building strategy encompassing school-level sensitization for students, parents, and SMC members; county-level rollout for DEOs and CEOs; contractor induction for workers and service providers; and teacher orientation for education staff. A structured annual operational budget supports awareness activities, training, hotline services, digital grievance tracking, referral pathway strengthening, and monitoring functions. Personnel costs for national-level safeguards staff are financed under the project's staffing arrangements. The EXCEL GM is not merely a safeguard compliance requirement; it is a governance instrument designed to strengthen transparency, accountability, and public trust within Liberia's education system. By embedding structured grievance handling within the Ministry's institutional architecture, the mechanism enhances risk management, improves service delivery oversight, and contributes to the broader objectives of the Education Sector Plan 2022–2027.

1. INTRODUCTION

1.1 Project Background

The Government of the Republic of Liberia, through the Ministry of Education (MoE), is implementing the Excellence in Learning in Liberia (EXCEL) Project, financed by the International Development Association (IDA) and the Global Partnership for Education (GPE). The total financing envelope amounts to US\$88.7 million (PAD Excel Project - World Bank, 2025a). The Project Development Objective (PDO) is: **To improve foundational learning and access in public primary schools and to strengthen the education system**

According to the Project Appraisal Document, the EXCEL Project is conceived as a systemic reform operation designed to address Liberia's persistent human capital constraints. Liberia's Human Capital Index stands at 0.32, indicating that children born today are expected to achieve only 32 percent of their productive potential due largely to deficits in education and health outcomes. While expected years of schooling are estimated at 4.2 years, learning-adjusted years of schooling are only 2.2 years, reflecting significant gaps in foundational literacy and numeracy. These structural challenges underscore the urgency of improving early grade learning outcomes as a pathway to long-term productivity and inclusive growth.

The project introduces a structured, evidence-based reform package organized under four interrelated components:

1. Improving foundational learning for all;
2. Improving access for all;
3. System strengthening to deliver foundational learning; and
4. Project management and technical assistance.

Interventions include curricular prioritization, structured pedagogy, teacher professional development, provision of teaching and learning materials, targeted infrastructure rehabilitation including WASH facilities, school grants, strengthened school management committees, and enhanced education data systems. Although implementation will be phased based on school readiness and infrastructure conditions, the project is national in scope, covering all fifteen counties of Liberia.

Approximately 2,337 public primary schools, an estimated 362,000 students and school personnel, and approximately 12,000 teachers and principals are expected to benefit directly from project interventions (World Bank, 2025a - EXCEL PAD).

1.2 Environmental and Social Context

The Environmental and Social Review Summary (ESRS) classifies the overall Environmental and Social Risk of the EXCEL Project as Substantial. The environmental risk rating is Moderate due to the limited scale of civil works, primarily rehabilitation and renovation within existing school premises. However, the social risk rating is Substantial, driven largely by the risks of gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), social exclusion of vulnerable groups, and institutional capacity constraints in monitoring and enforcement. Component 2 of the project will finance school-level rehabilitation works, including sanitation and WASH improvements. While impacts are expected to be localized and manageable, these activities require environmental and social screening and mitigation consistent with the Environmental and Social Management Framework (ESMF) and related instruments (World Bank, 2024). Moreover, Liberia's socio-economic context, characterized by disparities in access, high overage enrollment, gender gaps in completion rates, and barriers faced by children with disabilities requires careful management of inclusion risks and community engagement processes.

1.3 Legal and Institutional Basis for the GM

The establishment of a functional Grievance Redress Mechanism under the EXCEL Project is a legal obligation embedded in the *Financing Agreement, Schedule 2, Section IV.C* of the Financing Agreement requires that the Recipient establish the GM no later than one month from the Effective Date and maintain it throughout project implementation. Furthermore, the Financing Agreement requires preparation and disclosure of Labor Management Procedures within ninety days of effectiveness, reinforcing the need for worker grievance procedures consistent with ESS2 (World Bank, 2025a -EXCEL PAD).

The GM is required under the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (Stakeholder Engagement and Information Disclosure), which mandates accessible grievance mechanisms for project-affected parties. Additional relevance arises under ESS2 (Labor and Working Conditions), ESS4 (Community Health and Safety), and ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), all of which apply to the project. At the national level, the GM operates within Liberia’s environmental and regulatory framework, including the 1986 Constitution of Republic of Liberia, and Environmental Protection and Management Law (EPML) 2003 administered by the Environmental Protection Agency (EPA), which requires environmental and social compliance and oversight for applicable activities. The GM therefore serves as a complementary administrative mechanism that facilitates early resolution of grievances while preserving access to judicial remedies under Liberian law.

Institutionally, project implementation will be managed by the Ministry of Education through a Project Delivery Team (PDT), including environmental and social specialists, a Social and GBV specialist, and monitoring and evaluation personnel. The GM will form an integral part of this institutional architecture.

In the education sector context, grievances involving teachers and school administrators-especially those related to SEA/SH, child protection, or serious misconduct-also require coordination with the relevant statutory authority responsible for teacher management and discipline. The GM therefore functions as an intake, referral, and tracking mechanism and does not replace formal administrative or criminal procedures.

1.4 Alignment with the Education Sector Plan (ESP 2022–2027)

The EXCEL Project is anchored in Liberia’s Education Sector Plan (ESP) 2022–2027, which prioritizes improvements in access, equity, quality, governance, and system accountability. The ESP is informed by a comprehensive Education Sector Analysis and endorsed Partnership Compact arrangements with development partners (World Bank, 2025a- EXCEL PAD). Strengthening governance and accountability systems is a central pillar of the ESP. In this regard, the GM supports the broader reform agenda by enhancing transparency, strengthening community feedback loops, improving oversight of school grants and infrastructure investments, and ensuring that grievances related to service delivery, teacher conduct, social exclusion, or environmental impacts are addressed in a timely and structured manner. The GM therefore functions not merely as a compliance mechanism, but as a tool for institutional strengthening and participatory governance within the education system.

1.5 Rationale for the EXCEL Grievance Redress Mechanism

Experience from previous World Bank-financed projects within the Ministry of Education portfolio such as the Improving Results in Secondary Education (IRISE), Liberia Learning Foundations (LLF), and Getting to Best in Education (G2B) projects, demonstrates that structured grievance systems enhance transparency, mitigate conflict, and improve trust between implementing agencies and communities (MoE GM, 2022). These lessons inform the design of the EXCEL GM, which builds upon prior structures while aligning with the enhanced requirements of the ESF. Given the scale of the EXCEL Project, its nationwide implementation, its performance-based financing elements, and the substantial social risk rating, a robust and accessible GM is indispensable. The mechanism will provide channels for

receiving and resolving complaints at school, county, and national levels; incorporate confidential and survivor-centered pathways for SEA/SH complaints; integrate labor grievance procedures under the Labor Management Procedures; and support monitoring and reporting obligations under the ESCP. In this context, the GM serves as a core risk mitigation instrument, a governance strengthening tool, and a mechanism for safeguarding the rights and interests of project-affected parties across Liberia's fifteen counties.

2. LEGAL AND REGULATORY FRAMEWORK

2.1 Introduction

The Grievance Redress Mechanism (GM) for the Excellence in Learning in Liberia (EXCEL) Project is grounded in Liberia's constitutional order, statutory laws, administrative education framework, and international safeguard obligations under the World Bank Environmental and Social Framework (ESF). The GM operates as an administrative, non-judicial mechanism that facilitates timely and accessible resolution of project-related grievances while preserving the constitutional right of complainants to seek judicial redress. Its legal foundation ensures that grievance handling under EXCEL is not discretionary, but aligned with Liberia's rule-of-law framework and binding international commitments. This section outlines the constitutional, statutory, administrative, and international legal instruments that provide the normative and operational basis for the GM, and explains their relevance to EXCEL implementation.

2.2 Constitutional Foundations

The Constitution of the Republic of Liberia (1986) establishes the overarching principles of equality, due process, and access to remedy that inform the design and operation of the EXCEL GM. Article 2 affirms the supremacy of the Constitution and renders void any law inconsistent with its provisions. This establishes that the GM must operate in compliance with constitutional rights and cannot infringe upon fundamental protections. Article 11 guarantees equal protection of the law. In practical terms, this requires that the GM be non-discriminatory and accessible to all stakeholders, including women, children, persons with disabilities, and marginalized communities across Liberia's fifteen counties. Article 15 protects freedom of expression and the right to petition the Government for redress. The GM operationalizes this constitutional right within the context of the EXCEL Project by providing a structured administrative avenue through which individuals may raise concerns related to project activities. Article 20(a) guarantees due process of law. This principle translates into procedural fairness within the GM: complaints must be handled objectively, decisions must be reasoned, and complainants must be informed of outcomes. Article 26 affirms the right of access to courts. The EXCEL GM does not restrict or replace this right; rather, it provides an administrative platform for early resolution before judicial escalation becomes necessary. The constitutional framework therefore establishes the legitimacy and normative boundaries within which the GM operates.

2.3 National Statutory Framework

Liberia's statutory laws provide specific regulatory frameworks relevant to the types of grievances that may arise under EXCEL implementation. These laws inform the scope of the GM and guide referral pathways where appropriate.

Table 1: National Statutory Framework and Relevance to the EXCEL GM

Legal Instrument	Regulatory Scope	Relevance to the EXCEL GM
Judiciary Law (Title 17) and Civil Procedure Law	The Judiciary Law establishes the structure, authority, and jurisdiction of Liberia's courts, including the Supreme Court as the court of final appeal. The Civil Procedure Law governs procedures for filing and adjudicating civil claims.	These statutes confirm that the EXCEL GM operates as a preliminary, non-judicial administrative mechanism and does not oust the jurisdiction of the courts. Where administrative remedies are insufficient or disputed, complainants retain the constitutional right to pursue civil claims. Accordingly, the GM must maintain proper

		documentation, ensure procedural fairness, and preserve records in a manner consistent with potential judicial review.
Decent Work Act (2015)	Regulates labor relations in Liberia, including provisions on non-discrimination, occupational health and safety, employment termination, workers' rights, and labor dispute resolution mechanisms.	The EXCEL Project engages both direct and contracted workers under project components involving technical assistance and school rehabilitation (World Bank, 2025a). Consistent with Environmental and Social Standard 2 (ESS2), the GM includes a dedicated workers' grievance pathway aligned with the Decent Work Act. Labor-related grievances concerning wages, workplace safety, harassment, or unfair treatment may be resolved administratively and, where necessary, referred to statutory labor authorities.
Environmental Protection and Management Law (EPML)	Establishes the Environmental Protection Agency (EPA) as the national authority responsible for environmental regulation, compliance oversight, and environmental impact management.	The Environmental and Social Review Summary (ESRS) indicates that EXCEL finances limited rehabilitation works within existing school premises (World Bank, 2024). Although environmental risks are rated Moderate, localized impacts such as waste disposal, dust, sanitation issues, or minor construction disturbances may arise. Environmental grievances received through the GM may require coordination with the EPA where regulatory compliance concerns are implicated. The Environmental Protection Agency (EPA) retains regulatory jurisdiction over construction-related environmental complaints, including dust, waste disposal, and community disturbance. Where such complaints are received through the EXCEL GM, the Environmental/Social Specialist at the PIU level is responsible for coordinating referral to the EPA and monitoring follow-up action, as provided in Section 5.2
Children's Law (2011)	Provides statutory protection for children's welfare, safety, and development, including safeguards against abuse, neglect, and exploitation.	As EXCEL operates directly within public primary schools and affects children nationwide, grievance procedures must ensure alignment with child protection standards. Complaints involving child abuse, neglect, or exploitation must be handled with strict confidentiality and referred to appropriate national child protection and law enforcement mechanisms in accordance with the law.
Penal Law of Liberia	Criminalizes offenses including sexual violence, exploitation, corruption, fraud, and other criminal misconduct.	Grievances involving allegations of sexual exploitation and abuse (SEA), sexual harassment (SH), child abuse, or financial misconduct may constitute criminal offenses. The GM cannot adjudicate criminal liability; however, it must provide clear referral pathways to competent

		authorities while applying survivor-centered safeguards consistent with ESF requirements (World Bank, 2024).
Public Procurement and Concessions Act (PPCA)	Governs public procurement processes and establishes formal complaint mechanisms for bidders and contractors.	Procurement-related grievances, such as complaints concerning tender evaluation or contract award decisions must be addressed in alignment with statutory procurement complaint procedures. While the GM may receive such complaints initially, matters falling within the PPCA's formal jurisdiction must be referred to the appropriate statutory forum to ensure regulatory compliance.

2.4 Ministry of Education Administrative Framework

The GM is embedded within the statutory and administrative authority of the Ministry of Education (MoE). It is not a parallel structure, but an operational tool that strengthens existing governance systems within Liberia's education sector. The Education Reform Act provides the Ministry with authority over policy, regulation, supervision, and quality assurance in public education. Accordingly, grievances concerning instructional delivery, school administration, allocation of learning materials, and implementation of EXCEL interventions fall squarely within the Ministry's mandate. The GM serves as a formal administrative channel through which such concerns are documented and addressed within this statutory framework.

The Teacher Code of Conduct establishes professional and ethical standards for educators. Complaints involving misconduct, harassment, abuse of authority, or professional negligence may trigger disciplinary procedures under this Code. In such cases, the GM functions as an intake and referral mechanism, ensuring that allegations are formally recorded and processed through established administrative procedures. School Governance Regulations, including the role of School Management Committees (SMCs), underpin school-level accountability. As EXCEL strengthens school-based financing and community participation, grievances related to grant management, transparency, or stakeholder representation may involve these governance bodies. The GM provides a structured process for resolving disputes at this level, reinforcing accountability at the point of service delivery.

Teacher Code of Conduct complaints fall within the EXCEL GM only where the misconduct arises directly from EXCEL-financed activities (e.g., a teacher in an EXCEL-supported school abusing a grant-funded position). For general professional misconduct matters, the EXCEL GM acts as a referral channel to the MoE's relevant disciplinary board. The GM does not duplicate or replace those administrative accountability mechanisms; it ensures that affected parties have a documented intake channel and that referrals are tracked to resolution.

At the decentralized level, County Education Offices (CEOs) exercise supervisory authority over public schools. Their role within the GM reflects Liberia's decentralized administrative structure and ensures that grievances are first addressed at the closest appropriate level before escalation. This tiered approach enhances responsiveness, contextual understanding, and proportional resolution.

2.5 International and Donor Standards

The EXCEL GM operationalizes Liberia's obligations under the World Bank Environmental and Social Framework (ESF). The legal and institutional basis for the EXCEL GM, including alignment with ESS10 and the Financing Agreement, is set out in Section 1.3.

Liberia is a signatory to international conventions such as the Convention on the Rights of the Child (CRC) and CEDAW. These instruments reinforce non-discrimination and access to remedy principles relevant to grievance management.

2.6 Administrative versus Judicial Remedies

The EXCEL GM is a non-judicial administrative mechanism designed for efficiency, accessibility, and early resolution of disputes. It does not replace statutory or constitutional remedies. Complainants retain the right to:

- Seek judicial redress before Liberia’s courts;
- Refer labor disputes to statutory labor authorities;
- Submit procurement complaints under the PPCA framework;
- File complaints with the World Bank’s Grievance Redress Service or Inspection Panel (World Bank, 2025a - EXCEL PAD).

The GM therefore operates within a layered accountability structure that balances administrative responsiveness with preservation of formal legal rights.

3. OBJECTIVES, SCOPE AND GUIDING PRINCIPLES OF THE EXCEL GM

3.1 Purpose and Strategic Objectives

The Grievance Mechanism (GM) established under the Excellence in Learning in Liberia (EXCEL) Project is a formal administrative mechanism designed to receive, register, assess, and resolve complaints arising from project implementation. It is established in compliance with the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10), which requires Borrowers to provide an accessible and responsive grievance mechanism for project-affected parties. Beyond compliance, the EXCEL GM is conceived as a governance instrument that strengthens transparency, institutional accountability, and trust between the Ministry of Education (MoE) and stakeholders across Liberia's fifteen counties.

The strategic objectives of the EXCEL GM are fourfold.

- The GM aims to provide an accessible and fair administrative channel through which individuals and communities can raise concerns related to environmental, social, labor, procurement, or governance matters linked to project activities. This ensures that affected persons have a predictable pathway for redress without incurring the costs or delays associated with judicial proceedings.
- It functions as a risk mitigation mechanism under the project's Substantial Environmental and Social Risk classification. The Environmental and Social Review Summary (ESRS) identifies potential risks including gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), exclusion of vulnerable groups, and implementation capacity constraints. By enabling early detection and resolution of grievances, the GM reduces reputational, operational, and safeguard risks.
- It also contributes to institutional strengthening. Systematic recording and analysis of grievances provide valuable data that can inform management decisions, improve implementation strategies, and enhance oversight mechanisms within the Ministry. This aligns with the governance and accountability priorities articulated in Liberia's Education Sector Plan (ESP) 2022–2027.
- And finally, consistent with ESS2, the Worker's--- GM provides a dedicated channel for workers engaged under the project to raise concerns related to labor and working conditions. This ensures compliance with both the ESF and Liberia's Decent Work Act and supports fair and safe working environments.

The GM therefore serves not merely as a compliance requirement, but as a core component of responsible project governance.

3.2 Scope of Application

The EXCEL GM applies to all activities financed under the project and covers grievances arising from actions or omissions by the Ministry of Education, the Project Delivery Team, contractors, consultants, service providers, school management committees, and any entity directly engaged in project implementation. The mechanism is open to all project-affected parties, including students, parents and guardians, teachers, school administrators, community members, civil society organizations, direct project workers, contracted workers, and other stakeholders who believe they have been adversely affected by project activities.

While the EXCEL GM is project-specific in scope, it explicitly covers grievances arising from MoE actions or omissions taken in the context of EXCEL implementation, including decisions by MoE officials, misuse of project resources, or failure to follow agreed protocols. Accountability is enforced through the PIU GM Focal Point's authority to escalate unresolved national-level complaints to the World Bank under the ESCP reporting obligations.

The scope of grievances that may be submitted under the EXCEL GM includes, but is not limited to:

- Concerns regarding delivery of teaching and learning materials;
- School grant allocation, use, or management;
- Teacher conduct or professional development activities;
- Rehabilitation and renovation works financed under Component 2;
- Environmental and social impacts, including health and safety concerns;
- Exclusion of vulnerable groups, including girls, children with disabilities, and overage learners;
- Procurement processes or alleged misuse of funds;
- Labor-related complaints under ESS2;
- Allegations of SEA, SH, or other forms of misconduct.

Given the Substantial Social Risk rating of the project, special emphasis is placed on grievances related to GBV/SEA/SH and child protection concerns. Grievances involving SEA/SH, child abuse, or other serious misconduct are handled through confidential, survivor centered procedures and are not resolved through standard administrative grievance processes. Such cases are managed in accordance with the SEA/SH Action Plan and applicable national laws. GM Where allegations involve potential criminal conduct, the mechanism will facilitate referral to appropriate authorities while respecting confidentiality and informed consent.

As a disclaimer, the GM does not replace Liberia’s judicial system. Complainants retain the constitutional right to seek redress through the courts. Similarly, procurement-related complaints may be referred to the Public Procurement and Concessions Commission where appropriate. The GM operates as a non-judicial administrative platform designed to resolve disputes efficiently and proportionately while preserving formal legal remedies.

3.3 Guiding Principles

The EXCEL Grievance Redress Mechanism is founded upon a set of core principles that reflect the requirements of the World Bank Environmental and Social Framework (ESF), Liberia’s constitutional and administrative governance standards, and internationally recognized good practice in grievance management. These principles guide the design, operation, and continuous refinement of the mechanism. They ensure that grievance handling is not merely procedural, but anchored in fairness, accountability, and institutional integrity.

- 1. Accessibility and Inclusiveness:** The GM shall be accessible to all project-affected parties without discrimination. Accessibility extends beyond physical availability; it encompasses procedural simplicity, affordability, and cultural appropriateness. Given Liberia’s geographic dispersion, rural populations, and varying literacy levels, the mechanism will utilize multiple intake channels and ensure reasonable accommodation for vulnerable groups, including women, children, persons with disabilities, and marginalized communities. No fees or undue administrative barriers shall be imposed on complainants. Accessible channels include: (i) in-person submission to the School GM Focal Person or County DEO; (ii) a toll-free national complaints hotline (number to be finalized at project launch); (iii) written submission via postal mail to the PIU GM Focal Point; (iv) a digital submission portal (to be established); and (v) anonymous drop-boxes at school and county levels for those unable or unwilling to identify themselves.
- 2. Transparency and Predictability:** The GM shall operate in a transparent and predictable manner. Stakeholders will be informed of the existence of the mechanism, the procedures for submitting complaints, expected timelines for acknowledgment and resolution, and the criteria applied in decision-making. Clear communication reduces uncertainty, strengthens trust in public institutions, and mitigates perceptions of arbitrariness or bias.

- 3. Fairness and Impartiality:** All grievances shall be assessed objectively, free from conflict of interest, and based on verifiable evidence. Investigations will be conducted in a manner that ensures neutrality and procedural fairness. Decisions will be documented, reasoned, and communicated clearly. Where necessary, review by a Grievance Redress Committee enhances collective oversight and reinforces procedural integrity.
- 4. Timeliness and Responsiveness:** The GM shall ensure that complaints are acknowledged, investigated, and resolved within defined and reasonable timeframes consistent with ESS10 requirements (World Bank, 2025a). Prompt action is essential to maintaining stakeholder confidence and preventing escalation. Delays in grievance handling undermine the credibility of the mechanism and may exacerbate operational or reputational risks.
- 5. Confidentiality and Protection from Retaliation:** The integrity of the GM depends upon safeguarding complainants from harm. All grievances will be handled with appropriate confidentiality, particularly those involving sensitive matters such as sexual exploitation and abuse (SEA) or sexual harassment (SH). The mechanism will incorporate strict data protection procedures and survivor-centered approaches. Complainants, witnesses, and other involved parties shall be protected from intimidation, retaliation, or adverse consequences resulting from the submission of a complaint.
- 6. Proportionality and Escalation:** Responses to grievances shall be proportionate to their nature, severity, and potential impact. Minor operational issues may be resolved at the school or county level, while systemic, high-risk, or sensitive complaints may require escalation to national-level review. This graduated approach promotes efficiency while ensuring that serious matters receive appropriate scrutiny.
- 7. Continuous Improvement and Institutional Learning:** The GM shall function not only as a dispute resolution tool but also as a management feedback system. Aggregated grievance data will be periodically analyzed to identify recurring issues, implementation gaps, or systemic weaknesses. Insights derived from grievance trends will inform corrective actions, policy refinement, and adaptive management. In doing so, the GM contributes to strengthening governance and accountability objectives under the Education Sector Plan 2022–2027.

By embedding these requirements into a structured administrative system, the Ministry ensures compliance with safeguard commitments under the Financing Agreement and the ESCP. The GM thus functions as a central accountability pillar within the project's environmental and social risk management architecture.

4. INSTITUTIONAL ARRANGEMENTS AND GOVERNANCE STRUCTURE

4.1 Institutional Positioning of the GM within the EXCEL Project

The Grievance Redress Mechanism (GM) for the Excellence in Learning in Liberia (EXCEL) Project is institutionally embedded within the Ministry of Education (MoE) and implemented through the Project Delivery Team (PDT) established for project execution. The GM forms a core component of the project's Environmental and Social Risk Management System and is aligned with the Environmental and Social Commitment Plan (ESCP) and the requirements of the World Bank Environmental and Social Framework (World Bank, 2025a). The Financing Agreement mandates the establishment and maintenance of a functional grievance mechanism throughout the life of the project (World Bank, 2025a). Accordingly, the GM is not a parallel structure but an integrated administrative function within the Ministry's operational framework. It supports accountability across all four project components, including foundational learning reforms, infrastructure rehabilitation, system strengthening, and project management. Operational responsibility for the GM at the national level rests with the **Social and GBV Specialist within the Project Delivery Team, who serves as both the GM Lead and the PIU GM Focal Point**. This position is responsible for maintaining the central grievance registry, coordinating case management, and ensuring compliance with ESF standards for all grievance categories — including non-SEA/SH cases.

4.2 Multi-Tier Governance Structure

Given the national scope of the EXCEL Project across Liberia's fifteen counties, the GM adopts a decentralized, multi-tier structure that allows grievances to be addressed at the lowest appropriate administrative level while preserving clear escalation pathways.

The structure consists of:

- **Tier 1 – School Level Resolution:** At the school level, a designated **School GM Focal Person**, typically the School Principal or a nominated teacher, preferably a female teacher, will receive and record complaints. The School GM Focal Person is distinct from the PIU GM Focal Point (the Social and GBV Specialist). Their role is first-contact intake, initial documentation, and escalation; they do not resolve or investigate cases independently."
- **Tier 2 – County Level Review:** Where grievances cannot be resolved at the school level, or where they involve broader administrative or financial concerns, they will be escalated to the County Education Office. County-level authorities will review the matter, coordinate fact-finding, and engage relevant technical personnel as needed. This tier ensures decentralized oversight consistent with Liberia's administrative structure.
- **Tier 3 – National Level Review:** Grievances categorized as high-risk, sensitive, systemic, or involving reputational or safeguard implications will be reviewed at the national level by the Project Delivery Team. This includes allegations related to GBV/SEA/SH, fraud, significant environmental harm, serious misconduct, or repeated unresolved complaints. National-level review ensures alignment with ESF requirements and consistency in decision-making.

This tiered system balances efficiency, accountability, and proportionality.

4.3 Roles and Responsibilities

Effective implementation of the EXCEL Grievance Redress Mechanism (GM) requires clearly defined institutional roles and lines of accountability. Given the project's national scale and Substantial Social Risk classification, role clarity is essential to prevent procedural gaps, duplication of authority,

or delays in resolution. The following table outlines the principal actors within the GM structure and their respective responsibilities.

Table 2: Institutional Roles and Responsibilities within the EXCEL GM

Actor / Position	Function within the GM	Key Responsibilities
Project Coordinator	Strategic oversight and accountability	- Provides overall supervision of the GM. - Ensures adequate staffing, resources, and operational functionality. - Reviews periodic grievance reports and trend analyses. - Approves high-level or sensitive resolutions where required. - Ensures severe incidents are reported to the World Bank in accordance with ESCP commitments and within prescribed timelines.
Social and GBV specialist (GM Lead)	Technical leadership and operational management	- Maintains the central grievance registry and database. - Oversees intake, screening, categorization, and risk classification of grievances. - Coordinates investigations and ensures documentation integrity. - Ensures compliance with ESF standards, particularly ESS10 and ESS2. - Prepares internal monitoring reports and World Bank submissions. - Manages severe incident notification procedures (including 24-hour reporting requirements).
Social and GBV Specialist	Management of sensitive and survivor-centered cases	- Handles complaints involving sexual exploitation and abuse (SEA), sexual harassment (SH), and child protection concerns. - Applies survivor-centered principles and ensures confidentiality. - Coordinates referral pathways to health, psychosocial, legal, and protection services. - Advises on risk mitigation measures related to GBV and safeguarding.
County Education Officers (CEOs)	Decentralized review and oversight	- Provide second-tier review for grievances escalated from schools. - Support investigations at county level. - Ensure documentation is complete and transmitted to national level where required. - Facilitate coordination between schools and the Project Delivery Team.
School-Level GM Focal Persons	First point of contact and intake	- Receive and acknowledge complaints at school level. - Document grievances using prescribed formats. - Responsible for receiving, registering, and forwarding grievances to the County GRC. The Focal Person does not make resolution decisions. - Escalate grievances where necessary in accordance with referral thresholds. - Maintain confidentiality and ensure non-retaliation protections.

Contractors and Service Providers	Compliance and corrective action	• Designate a representative responsible for GM engagement. • Cooperate fully with investigations concerning civil works, labor conditions, and occupational health and safety. • Implement corrective actions as directed by the Ministry. • Ensure their workers are informed of and have access to the workers' grievance pathway.
School Management Committee (SMC)"	Community Level Oversight	• Ensure community-level oversight and supporting the School GM Focal Person in intake and awareness;
Grievance Redress Committee (GRC) – School/County/National	Reviews	• Conduct formal reviews, deliberating on contested cases, and communicating decisions to complainants at each tie

Contractors engaged under EXCEL are required under ESS2 to maintain their own Workers' Grievance Mechanism for direct and contracted workers. The MoE/PIU is responsible for verifying that contractor WGMs are operational as a condition of contract compliance. Contractor WGMs interface with the EXCEL GM for escalation of unresolved labor complaints or severe incidents. Section 8 provides the full Workers' GM protocol

4.4 The Grievance Redress Committees (GRC)

To ensure procedural integrity, transparency, and collective accountability, the EXCEL Grievance Redress Mechanism incorporates structured Grievance Redress Committees (GRCs) at different administrative tiers. These Committees are convened for grievances that are complex, sensitive, high-risk, systemic in nature, or unresolved at lower levels. The GRC structure reflects the decentralized governance framework of the Ministry of Education and aligns with the project's national implementation across fifteen counties. While minor operational grievances may be resolved at school level through informal administrative processes, matters requiring formal review, evidence assessment, or policy interpretation are referred to the appropriate GRC tier.

The GRC does not replace statutory authorities or judicial institutions. It functions as an administrative review body within the Ministry's mandate. Where grievances involve alleged criminal conduct, including sexual exploitation and abuse (SEA), sexual harassment (SH), child abuse, fraud, or corruption, the Committee facilitates referral to competent authorities in accordance with Liberian law and survivor-centered safeguards.

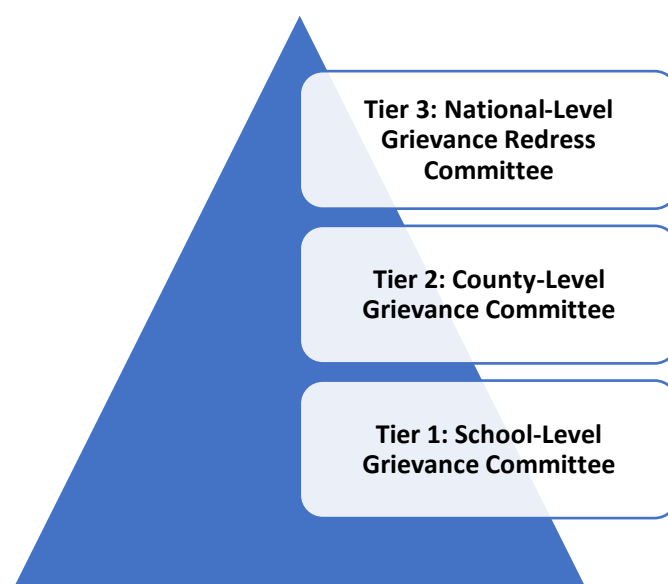


Figure 1: Three-Tier Grievance Redress Committee (GRC) Structure under the EXCEL Project

This pyramid illustrates the hierarchical governance structure of the EXCEL Grievance Redress Mechanism, reflecting the principle of subsidiarity in grievance handling. Grievances are first addressed at the School Level (Tier 1), where unresolved, escalated to the County Level (Tier 2) and where unresolved or more complex; further elevated to the National Level (Tier 3) for high-risk, systemic, or sensitive cases. The structure ensures proportional review, decentralized accountability, and structured escalation consistent with Ministry of Education administrative authority and World Bank safeguard requirements.

The table below shows the various terminologies used. All variant titles are standardized to two official terms throughout the Manual.

Term(s) used in this document	Standardized official title	Who they are and what they do
<i>school focal person / School GM focal person / GM focal person / School-Level GM Focal Persons / safeguarding focal person / trained teacher</i>	School GM Focal Person	A designated person, preferably a woman at school level (teacher or administrator) who is the first point of contact for all complaints. Receives disclosures, applies survivor-centered protocol, and escalates to the PIU GM Focal Point. Does not independently investigate or resolve cases.
<i>GM lead / GM Focal Point at PIU / GM focal person (PIU) / social and GBV focal person</i>	PIU GM Focal Point	The Social and GBV Specialist within the PDT. One position, one person. Maintains the central grievance registry, leads case coordination across ALL grievance types (not only SEA/SH), manages 24-hour WB reporting, and provides GM technical oversight.
<i>Social and GBV Specialist</i>	PIU GM Focal Point	Same person as the PIU GM Focal Point above. The title "Social and GBV Specialist" is retained only in contexts specific to survivor-centered SEA/SH case management. In all GM operational contexts, the title "PIU GM Focal Point" applies.
<i>Environmental and Social Specialist / Environmental Specialist</i>	Environmental Specialist (PDT)	Separate PDT position. Distinct from the PIU GM Focal Point. Supports the GM only where grievances involve environmental impacts under ESS4/ESMF.

ESS5 (Land Acquisition and Involuntary Resettlement) complaints arising from EXCEL-related works are handled within the EXCEL GM framework by the Environmental and Social Specialist at PIU level, consistent with the project's Resettlement Policy Framework (RPF). A separate stand-alone mechanism is not established. Given that EXCEL primarily finances rehabilitation within existing footprints (low resettlement risk per ESRS), ESS5 complaints are expected to be infrequent but are categorized as High Risk under the Risk Classification Framework (Table 3) and trigger immediate national-tier handling.

Tier 1: School-Level Grievance Committee

At the school level, a School Grievance Committee may be constituted to address operational and community-level concerns that cannot be resolved informally by the **School GM Focal Person**.

NOTE: GRC Placement & Cluster Approach: Each participating school shall constitute its own School-Level GRC. In remote or low-enrollment communities where constituting a full committee is not feasible, a cluster approach may be adopted, whereby a single School-Level GRC serves a defined group of nearby

schools within the same district. In such cases, the District Education Officer shall facilitate cluster GRC meetings and ensure that all schools within the cluster have an accessible, named School GM Focal Person in place.

Composition, with gender balance:

1. School Principal (Chair)
2. School GM Focal Person (*Secretary of the School-Level GRC; shall be preferably a woman, see terminology table above*)
3. Representative of the School Management Committee (SMC)
4. Teacher Representative
5. PTA Representative
6. Youth Representatives (Male and Female)
7. Community Elder or Parent Representative (where appropriate)

Primary Roles:

- Review complaints relating to school administration, classroom practices, minor infrastructure issues, or grant management;
- Facilitate mediation between parties where appropriate;
- Document proceedings and resolutions;
- Escalate unresolved or sensitive grievances to the County Education Office.

The School-Level GRC promotes participatory governance and local ownership while ensuring documentation and transparency.

Handling of SEA/SH Complaints at School Level

School-level grievance committees shall **not** investigate complaints involving Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), School-Related Gender-Based Violence (SRGBV), or Violence Against Children (VAC). Upon receipt of any such complaint, the **School GM Focal Person** shall immediately:

- (i) Apply the survivor-centered protocol outlined in Section 7 and ensure strict confidentiality;
- (ii) Notify the County Education Officer within the same working day; and
- (iii) Escalate directly to the **PIU GM Focal Point (Social and GBV Specialist)** without delay, bypassing standard committee review.

Where the School Principal is the alleged perpetrator, the **School GM Focal Person** shall bypass the Principal entirely and notify the PIU GM Focal Point directly. The PIU GM Focal Point then assumes full lead responsibility for all subsequent case management.

NOTE: Role distinction: The School GM Focal Person (school level) and the PIU GM Focal Point, who is the Social and GBV Specialist within the PDT (national level), are two distinct roles performed by two different people. They do not act simultaneously, the School GM Focal Person acts first; the PIU GM Focal Point takes over upon notification.

To support safe disclosure at school level, a smaller **School Safeguarding Sub-Committee** may be constituted where needed, comprising: the School Principal; the **School GM Focal Person** (who shall be a woman); and one female SMC member nominated by the County Education Officer. This sub-committee does **not** investigate SEA/SH cases. Its role is strictly limited to: (i) facilitating safe, confidential intake; (ii) providing immediate emotional support to the survivor; and (iii) ensuring rapid referral in accordance with the GM escalation pathway and relevant referral services.

Tier 2: County-Level Grievance Committee

Where grievances are escalated beyond the school level or involve broader administrative concerns, a County-Level Grievance Committee provides secondary review.

Composition:

8. County Education Officer (Chair)
9. District Education Officer
10. County Gender Focal Person (where applicable)
11. **Representative of the Ministry of Gender, Children and Social Protection (MoGCSP)** at the county level
12. Representative of the Project Delivery Team (as needed)
13. Legal or administrative officer (if required)

Primary Roles:

- Review grievances escalated from schools;
- Conduct or supervise investigations;
- Assess compliance with Ministry regulations and project safeguards;
- Recommend corrective actions;
- Escalate high-risk or systemic matters to the National-Level GRC.

The County-Level GRC ensures decentralized oversight consistent with Liberia's administrative structure and strengthens accountability closer to affected communities.

Escalation of SEA/SH Cases from School to National Level

Upon receiving notification of a SEA/SH complaint from the School GM Focal Person, the County GRC immediately engages the designated SEA/SH Referral Focal Person and triggers the confidential referral pathway without further county-level processing. The matter is escalated directly to the PIU GM Focal Point for national-tier handling per Section 7

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The PIU GM Focal Point shall assume lead responsibility for case management, coordinate with the National-Level GRC as required, and ensure compliance with the 24-hour severe incident reporting protocol to the World Bank. At no point shall the alleged perpetrator be involved in the handling, referral, or documentation of the case at school or county level.

Tier 3: National-Level Grievance Redress Committee

The National-Level GRC addresses complex, high-risk, or sensitive grievances that have significant safeguard, reputational, or systemic implications. This includes cases involving SEA/SH, serious misconduct, procurement irregularities, environmental non-compliance, or repeated unresolved complaints.

Composition:

1. Technical Lead (Minister's Office Representation)
2. Project Coordinator (Chair)
3. Social and GBV Specialist (GM Lead)
4. Legal Representative of the Ministry of Education (where required)
5. Relevant Technical Lead (where required e.g., Infrastructure, Procurement, Grants, ECE, Finance)
6. County Representative (if grievance originated at county level)

Primary Roles:

- Review investigation findings and supporting evidence;
- Assess compliance with the World Bank Environmental and Social Framework (ESS10, ESS2, ESS4, ESS5) and national regulations;
- Determine appropriate corrective, disciplinary, or remedial actions;
- Approve severe incident reporting to the World Bank in accordance with ESCP requirements;
- Document decisions to ensure transparency, traceability, and audit readiness.

The National-Level GRC enhances multidisciplinary review and strengthens institutional credibility by ensuring that high-risk grievances receive structured, evidence-based assessment.

Referral to External Authorities

- Where a grievance involves alleged criminal conduct or statutory violations, the GRC will:
- Refer the matter to appropriate national institutions (e.g., law enforcement, labor authorities, procurement regulatory bodies);
- Ensure that referrals involving SEA/SH or child protection follow survivor-centered and confidentiality protocols;
- Coordinate with the Environmental Protection Agency where environmental compliance issues arise;
- Inform complainants of their right to pursue judicial remedies or access the World Bank's Grievance Redress Service.

Institutional Value of the GRC Structure

The tiered GRC system strengthens procedural fairness, distributes decision-making authority appropriately, and reinforces institutional accountability across school, county, and national levels. By embedding collective review within the Ministry's administrative structure, the EXCEL GM promotes consistency in decision-making while preserving proportionality and escalation pathways. Integration with Monitoring and Reporting. The GM is fully integrated into the project's monitoring and evaluation framework. All grievances will be recorded in a centralized registry and categorized by type, risk level, status, and resolution timeframe. Aggregated data will inform internal management reviews and semi-annual reporting to the World Bank as required under the ESCP.

5. SCOPE AND CATEGORIZATION OF GRIEVANCES

Given the national scope of implementation and the Substantial Social Risk classification assigned to the project, clear categorization of grievances is essential to ensure proportional handling, appropriate escalation, and compliance with both national law and the World Bank ESF. Grievances may arise from actions, omissions, or decisions by the Ministry of Education, the Project Delivery Team, contractors, consultants, service providers, school management structures, or other actors engaged under the project. For operational clarity, grievances under the EXCEL GM are categorized as follows.

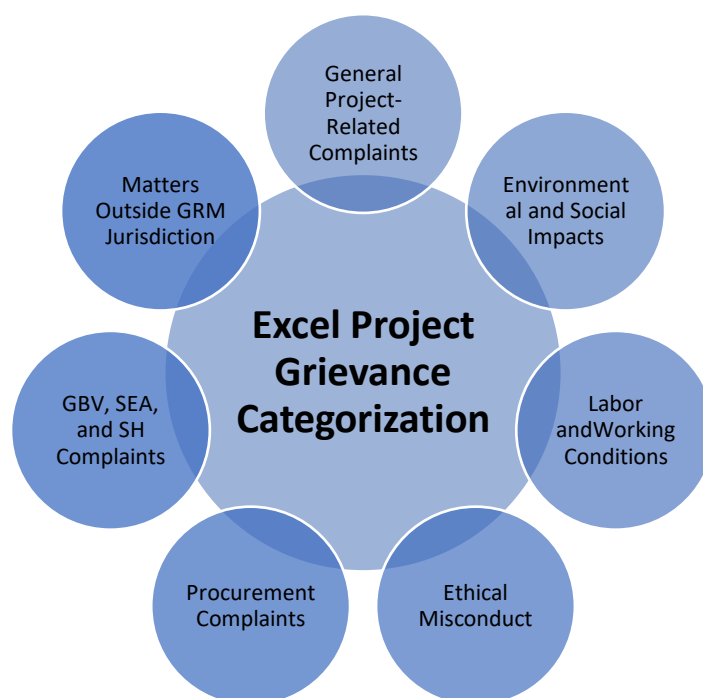


Figure 2: Scope and Categorization of Grievances under the EXCEL Grievance Redress Mechanism (GRM)

5.1 General Project-Related Complaints

General project-related grievances concern matters directly linked to EXCEL implementation but do not necessarily involve environmental, social, labor, or misconduct dimensions.

- **Service Delivery:** Complaints regarding delays or deficiencies in the delivery of teaching and learning materials, teacher professional development activities, school-level training sessions, or implementation of structured pedagogy interventions.
- **Resource Distribution:** Grievances concerning allocation or management of school grants, distribution of educational materials, classroom supplies, or infrastructure inputs. This includes disputes regarding transparency, adequacy, or perceived inequities in allocation.
- **Inclusion or Exclusion:** Complaints alleging that students, teachers, schools, or communities were unfairly excluded from project benefits, training opportunities, or grant allocations. Given the project's objective of improving access and equity (World Bank, 2025a), such grievances are central to safeguarding inclusion commitments.

General project-related grievances are typically resolved at the school or county level unless systemic or repeated patterns emerge requiring national-level review.

5.2 Environmental and Social Impacts

Consistent with the Environmental and Social Review Summary (ESRS), the EXCEL Project finances limited rehabilitation works primarily within existing school premises. Although environmental risks are rated Moderate, localized impacts may arise. Grievances in this category may relate to:

- **Construction Impacts:** Concerns regarding dust, noise, waste disposal, sanitation disruptions, minor structural defects, or site safety issues arising from rehabilitation works under Component 2.
- **Community Health and Safety:** Complaints regarding unsafe construction practices, inadequate fencing of work sites, hazards to students during school hours, or unsafe storage of materials.
- **Land-Related Issues (If Applicable):** While the project is not expected to involve significant land acquisition (World Bank, 2024), any grievances relating to land use restrictions, encroachment, or boundary disputes linked to rehabilitation activities must be handled in accordance with ESS5 and applicable national laws.

Environmental grievances may require coordination with the Environmental Protection Agency (EPA) where regulatory compliance issues arise.

5.3 Labor and Working Conditions

The Project engages both direct and contracted workers under its project management and rehabilitation components (World Bank, 2025a). In accordance with ESS2 and Liberia's Decent Work Act (2015), the GM incorporates a workers' grievance pathway. Grievances in this category may include:

- **Wages and Compensation:** Disputes regarding payment delays, underpayment, or discrepancies in agreed compensation.
- **Discrimination and Harassment:** Complaints alleging discriminatory treatment, workplace harassment, or unequal opportunities.
- **Occupational Health and Safety (OHS):** Concerns regarding unsafe working conditions, lack of protective equipment, exposure to hazards, or failure to comply with safety standards.
- **Unfair Termination or Disciplinary Action:** Allegations of wrongful dismissal or unjust disciplinary measures.
- denial of access to the Workers' Grievance Mechanism;
- retaliation or intimidation for filing a complaint;
- identification or suspicion of child labor in project activities;
- SEA/SH incidents involving workers (to be handled per the dedicated protocol in Section 7); and
- complaints of harassment or privacy violations arising from work in close proximity to students or school communities

Labor-related grievances are handled in coordination with project management and may be referred to statutory labor authorities where administrative resolution is insufficient.

5.4 Ethical Misconduct

This category covers allegations of conduct that violates ethical, fiduciary, or administrative standards. Grievances may involve:

- **Fraud:** Allegations of falsification of records, misrepresentation, or manipulation of project data.
- **Corruption:** Claims of bribery, kickbacks, or misuse of project funds.
- **Abuse of Authority:** Misuse of official position for personal benefit or coercive behavior toward beneficiaries.

Where allegations involve potential criminal conduct under the Penal Law of Liberia, referral to competent authorities shall be undertaken while maintaining confidentiality and due process safeguards.

5.5 Procurement Complaints

Procurement-related grievances concern disputes arising from bidding, contract award decisions, evaluation processes, or contractor selection. While the GM may receive such complaints initially, matters falling within the jurisdiction of the Public Procurement and Concessions Act (PPCA) must be addressed in accordance with statutory procurement complaint procedures. The GM will facilitate referral to the appropriate forum while maintaining documentation for project oversight purposes.

5.6 GBV, SEA and SH Complaints

Given the Substantial Social Risk classification of the EXCEL Project, grievances involving sexual exploitation and abuse (SEA), sexual harassment (SH), gender-based violence (GBV), or child protection concerns require special handling. These complaints:

- Are managed using survivor-centered principles;
- Are handled with strict confidentiality;
- May require referral to health, psychosocial, legal, and protection services;
- May trigger disciplinary action under the Teacher Code of Conduct or contractor Codes of Conduct;
- May require referral to law enforcement authorities where criminal conduct is alleged.

Such grievances are not treated as routine administrative matters and are escalated immediately to the Social and GBV Specialist.

5.7 Matters Outside GM Jurisdiction

The EXCEL GM addresses grievances directly related to project implementation. Complaints that fall outside this scope may include:

- Private disputes unrelated to EXCEL activities;
- Political grievances unrelated to education reform;
- Matters already adjudicated by competent courts;
- Issues under exclusive statutory jurisdiction of other regulatory bodies without a direct project nexus.

Where grievances are deemed outside the scope of the EXCEL Project, complainants will be informed and guided toward the appropriate authority or institution.

5.8 Operational Implications of Categorization

Categorizing grievances ensures proportionality, appropriate expertise involvement, and compliance with applicable laws and ESF standards. It supports timely escalation, structured documentation, and informed reporting to the World Bank under ESCP commitments. This structured categorization framework enhances transparency, strengthens accountability, and ensures that the GM functions as both a safeguard instrument and a governance strengthening tool within Liberia's education system.

6. GM PROCESS FLOW (THE VALUE CHAIN)

The GM operates through a structured value chain designed to ensure that complaints are received, recorded, assessed, investigated, resolved, and closed in a transparent, timely, and proportionate manner. This process reflects the principles outlined in Section 2, aligns with the Ministry of Education's administrative authority, and complies with the requirements of the World Bank Environmental and Social Framework, particularly ESS10 and ESS2. The process is sequenced to ensure procedural fairness, risk-based handling, and clear escalation pathways, especially in cases involving sensitive or severe incidents.

6.1 Grievance Uptake

The first stage of the value chain is grievance intake. Complaints may be submitted through multiple channels, including in-person submissions at schools or County Education Offices, written letters, email communication, toll-free hotline reporting (where established), suggestion boxes placed at school level, and formal submission during community engagement meetings. Anonymous complaints are also accepted and recorded. To ensure inclusiveness, the mechanism accommodates individuals with low literacy through verbal submissions, which are documented by designated officers. Provisions for disability access are incorporated where feasible. For grievances involving sexual exploitation and abuse (SEA), sexual harassment (SH), or other sensitive matters, gender-sensitive and confidential reporting pathways are made available through direct access to the Social and GBV Specialist. No fees or administrative barriers are imposed for filing complaints.

6.3 Registration and Risk Classification

Upon receipt, every grievance is formally registered using a standardized intake form. The complaint is assigned a Unique Tracking Number (UTN) to ensure traceability throughout its lifecycle. The intake record captures essential information including the nature of the complaint, date received, location, complainant details (where provided), and initial risk indicators. At this stage, the grievance is categorized according to the classification framework outlined in Section 5 and assigned a risk level. Risk classification determines the level of review, the urgency of response, and the escalation pathway.

Table 3: Risk Classification Framework

Risk Level	Description	Administrative Handling
Level 1 (Low)	Minor operational issue with limited impact	School or County level
Level 2 (Moderate)	Requires structured review or technical assessment	County or National level
Level 3 (High)	Sensitive, systemic, or safeguard-related issue	National GRC
Severe Incident	Death, serious injury, SEA/SH, major fraud, or significant environmental harm	Immediate escalation to appropriate authorities (the EPA for significant environmental harm, Liberia National Police and Ministry of Gender for SEA/SH cases and major fraud, Ministry of Health (nearby health facility for death or serious injuries); and 24-hour notification to World Bank)"

Severe incidents trigger mandatory notification to the World Bank within 24 hours in accordance with the Environmental and Social Commitment Plan (ESCP). This requirement is non-negotiable and supersedes ordinary investigation timelines.

6.4 Acknowledgment of Receipt

Within two to five working days of registration, the complainant receives formal acknowledgment of receipt. The acknowledgment confirms the tracking number, outlines the next procedural steps, and provides an indicative timeline for review. Where the complaint is submitted anonymously, acknowledgment is documented internally even if direct communication with the complainant is not possible.

6.5 Screening and Assignment

Following registration, the GM Lead or designated officer conducts a preliminary screening to determine whether the grievance falls within the scope of the EXCEL Project and to confirm the appropriate level of administrative handling. This stage clarifies three critical questions:

1. Is the matter within the jurisdiction of the EXCEL GM?
2. What is the appropriate risk classification?
3. Which tier of the grievance structure (School, County, National) is responsible for review?

If the grievance falls outside the project's jurisdiction, the complainant is formally informed and guided toward the appropriate authority.

6.6 Investigation

The investigation phase is proportionate to the assigned risk level. Investigations may involve document review, interviews with relevant parties, site visits, consultation with technical experts, and review of applicable regulations or contractual provisions. Where a conflict of interest exists, a neutral investigator may be appointed. The following investigation timelines serve as operational benchmarks:

Table 4: Investigation Timelines

Risk Level	Standard Investigation Period
Level 1	5 – 7 working days
Level 2	10 – 14 working days
Level 3	Up to 20 working days
Severe Incident	Immediate action; 24-hour notification; investigation per ESCP

Extensions may be granted in complex cases, but must be justified and documented.

6.7 Resolution and Corrective Action

Following investigation, the responsible authority determines appropriate corrective measures. Resolutions may include administrative adjustments, mediation between parties, procedural reforms, financial rectification, compensation where legally justified, disciplinary action under the Teacher Code of Conduct, or contractual remedies in the case of contractors. For labor-related grievances, resolution must align with the Decent Work Act and ESS2 requirements. For environmental matters, coordination with regulatory authorities may be necessary. For misconduct involving potential criminal liability, referral to competent authorities is undertaken. Each resolution is supported by a documented action plan identifying responsible parties and implementation timelines.

6.8 Communication of Decision

The outcome of the grievance process is formally communicated to the complainant. Communication may be written or verbal, depending on literacy considerations. The decision notice explains the findings, the corrective actions to be implemented, and the complainant's right to

appeal. For sensitive cases, particularly those involving SEA/SH, communication follows strict confidentiality protocols and survivor-centered principles.

6.9 Appeal Mechanism

If dissatisfied with the outcome, the complainant may file an appeal within 15 calendar days of receiving the resolution decision. The appellate GRC at the next tier shall acknowledge the appeal within 3 working days and issue a determination within 21 calendar days . Appeals are reviewed at the next higher tier of the GRC structure, culminating in review at the national level where required.

Upon exhaustion of administrative remedies, complainants retain the right to pursue judicial recourse through Liberia's courts or, where applicable, submit complaints to the World Bank's Grievance Redress Service or Inspection Panel.

6.10 Case Closure and Archiving

A case is formally closed when the resolution has been implemented and either confirmed by the complainant or deemed complete after reasonable administrative effort. Closure requires documentation of actions taken, confirmation of compliance, and secure archiving within the central grievance registry. All closed cases remain available for monitoring, audit, and reporting purposes.

6.11 Process Summary

The GM value chain follows a structured sequence:

Uptake → Registration → Risk Classification → Acknowledgment → Screening → Investigation → Resolution → Communication → Appeal (if required) → Closure

This structured process ensures consistency, transparency, proportionality, and compliance with national regulations and World Bank safeguard requirements. It transforms grievance management from a reactive function into a governance instrument that strengthens institutional accountability and public trust.

7. GBV / SEA / SH PROTOCOL

The Project adopts a zero-tolerance approach to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). Given the Substantial Social Risk classification of the project, a dedicated response protocol is embedded within the Grievance Redress Mechanism (GM) to ensure that such complaints are handled with urgency, confidentiality, and strict adherence to survivor-centered principles. GBV/SEA/SH cases are not treated as routine grievances. They trigger immediate, specialized procedures aligned with Liberia's Penal Law, the Children's Law (2011), national referral systems, and the World Bank Environmental and Social Framework.

7.1 Survivor-Centered Approach

All GBV/SEA/SH complaints shall be managed in accordance with survivor-centered principles. This approach prioritizes safety, dignity, confidentiality, non-discrimination, and informed choice. The GM's role is not to determine criminal liability but to ensure safe reporting, referral, and institutional accountability. Survivors retain full control over decisions regarding medical care, psychosocial support, legal action, and administrative processes, except where mandatory reporting applies under national law, particularly in cases involving minors.

Information collection is limited to essential details necessary for referral and risk mitigation. Repeated questioning or unnecessary disclosure is strictly avoided.

7.2 Confidential Reporting Channels

GBV/SEA/SH complaints must be reported through safe and confidential channels within the GM. Reports may be submitted directly to the Social and GBV Specialist, through designated safeguarding focal persons, via secure communication platforms, or anonymously.

Upon receipt, the complaint shall be acknowledged within 24 hours and immediately classified as high-risk or severe. Access to the case is restricted to authorized personnel only.

Confidentiality is paramount. Identifying information shall not be disclosed without explicit survivor consent, and no details shall be shared beyond what is strictly necessary for referral or mandatory reporting.

In the case of children, if immediate protection needs become apparent, it may not be possible to ensure confidentiality and also serve the best interests of the child. Further guidance and advice on this issue will be sought from child rights, ethics or protection experts when establishing SOPs for confidentiality and case handling within schools.

7.3 Informed Consent

No referral or administrative action shall proceed without the survivor's informed consent, except where the instant case by law mandates reporting (e.g., child protection cases).

Informed consent requires that the survivor:

- Understands available support and reporting options;
- Is aware of possible consequences of legal action;
- Has the opportunity to accept or decline services;
- Retains autonomy in decision-making.

Note that the consent shall be documented securely and confidentially.

Obtaining the consent of children is different than obtaining the consent of adults as they do not have the ability and/or experience to anticipate the implications of an action, and/or may not understand or be empowered to exercise refusal/ acceptance. If any interactions are to take place with children, they will be carried out by a person trained in child consultations who understands local culture and customs, as well as global best practice in child rights. Before commencing consultation, the focal point in schools should be prepared with information related to those providing services to survivors in the school or community, so anyone who discloses violence can be immediately and ethically referred. Where possible, an adult caregiver/guardian should be present and provide consent for decisions in responding to allegations of SEA/SH.

Secondly, when a child experiences SEA/SH, good practice requires that GBV service providers act in the “best interests of the child”. This means considering the following at the minimum, by those who assess the child’s best interest:

- presence or absence of parents
- the quality of the relationships between the child and their family or caregivers
- the physical and psychosocial situation of the child and their protection situation, etc.

7.4 Referral Pathways

The GM functions primarily as a referral and coordination mechanism for GBV/SEA/SH cases. Immediate referral is required due to the time-sensitive nature of medical and psychosocial care. Referral pathways include:

- **Health Services:** Coordination with the Ministry of Health or qualified providers for emergency care, clinical management of rape, and related medical services, recognizing the 72-hour window for critical interventions such as Post-Exposure Prophylaxis (PEP).
- **Psychosocial Support:** Referral to trained counselors or specialized service providers, including those coordinated through the Ministry of Gender or accredited NGOs, for trauma-informed support.
- **Legal Services:** Referral to appropriate legal aid providers or the Liberia National Police (Women and Children Protection Section) where the survivor elects to pursue legal action or where mandatory reporting applies.
- **Protection Services:** Where there is risk of retaliation or continued harm, referral to protection services or safe shelter arrangements shall be facilitated.

Survivors shall be informed of all available options and retain full control over which services they access. Contractors and subcontractors are required to facilitate immediate access to services for survivors within their workforce and ensure that no retaliation or discrimination occurs.

To successfully implement the referral mechanism, the MoE will undertake the following actions within the timelines specified below:

(i) Map and update GBV/SEA/SH service and referral pathway information — Develop or update the directory of GBV, SEA, SH, VAW, and child protection services available at county and community levels, in coordination with the Ministry of Gender, Children and Social Protection (MoGCSP).

Target: Completed by Project Year 1, after GM operationalization.

(ii) Develop shared response protocols and tools — Develop standardized response protocols at all levels for MoE GM operators and focal persons, including counseling scripts, referral process flows, reporting templates, and case handling aids consistent with survivor-centered principles. Target: Completed by Project Year 1, and updated annually thereafter.

(iii) Establish regular GRM coordination mechanisms — Convene recurring coordination meetings between the PIU GBV/Social Specialist, relevant education agencies, MoGCSP, and key GBV/SEA/SH

service providers to review referral system performance and address operational gaps. Target: Project Year 1; thereafter held quarterly throughout project implementation.

(iv) Sign Memoranda of Understanding (MoUs) with service provider agencies — Formalize collaboration arrangements with education, health, psychosocial, legal aid, and GBV/SEA/SH service provider organizations, defining respective roles and responsibilities, information-sharing and reporting protocols, and timelines for response and feedback. Target: Initial MoUs signed by Project year 1, prior to any school-level rehabilitation works commencing; reviewed and renewed annually.

7.5 Employer Disciplinary Procedures

Where the alleged perpetrator is a project worker, teacher, contractor, or consultant, administrative disciplinary procedures may be initiated in parallel with survivor support measures. Disciplinary actions shall be undertaken in accordance with the Teacher Code of Conduct; Applicable labor laws; Contractual obligations and Codes of Conduct; and the Ministry's administrative procedures. Sanctions may include suspension, termination, contractual remedies, or other corrective measures. Administrative action does not replace criminal proceedings and must respect due process standards.

7.6 Criminal Referral Threshold

Allegations that constitute criminal offenses under Liberia's Penal Law, including rape, sexual assault, exploitation, coercion, or child abuse, may require referral to law enforcement authorities.

Referral shall occur:

- With the survivor's informed consent, except where mandatory reporting applies;
- With appropriate confidentiality safeguards;
- In coordination with support services to ensure survivor safety.

The GM does not conduct criminal investigations; its responsibility is to facilitate safe referral and institutional compliance. Severe SEA/SH incidents meeting World Bank reporting thresholds must be reported within 24 hours in accordance with the Environmental and Social Commitment Plan (ESCP), without disclosing identifying information.

7.7 Confidential Data Management

All GBV/SEA/SH case information shall be managed under strict confidentiality protocols. Access to case records is limited to authorized personnel. Documentation shall be securely stored in both physical and digital formats, using anonymized identifiers for tracking and reporting purposes. Only aggregated and non-identifying data may be included in periodic project reports. Under no circumstances shall survivor identity be disclosed in routine reporting or public documentation.

7.8 School-Based SEA/SH/GBV/VAC Response Protocol

In addition to the GM reporting pathway, the EXCEL Project adopts a dedicated school-based response framework for SEA/SH/GBV/VAC cases consistent with the project's SEA/SH/GBV/VAC Action Plan. This framework governs the following:

(a) Safe Identification and Disclosure: **School focal persons** shall be trained to recognize signs of abuse and create conditions in which children and community members can disclose safely, without fear of retaliation or stigma.

(b) Immediate Response and Referral: Upon disclosure or identification of a case, focal persons shall follow the referral pathway to county-level services and the PIU Specialist, using the standardized referral form. Response shall occur within 24 hours of identification.

(c) Case Documentation and Confidentiality: All cases shall be documented using the anonymized case tracking form Table 2 below maintained under restricted access at school and county level, and transmitted securely to the PIU.

(d) Coordination with Support Services: The PIU **Social and GBV Specialist** shall mainly maintain referral info in all GM cases, including non-SEA/SH cases and ensure that referral links are operationalized.

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Table 2: SEA/SH/GBV/VAC Referral and Case Tracking Matrix

EXCEL Project — Ministry of Education, Republic of Liberia

Confidential — For Authorized PIU and GRC Personnel Only

Instructions: All SEA/SH/GBV/VAC cases must be recorded using anonymized identifiers only. No survivor names, school names, or identifying details may appear in this register. This document is stored under restricted access by the PIU Social and GBV Specialist. Case entries must be completed within 48 hours of incident report. All cases must be reported to the World Bank irrespective of severity threshold.

Case ID (Anon.)	Date Reported	Incident Type	Survivor Profile	Location (County/School)	Referral Destination	Referral Date	Follow-Up Status	Case Outcome / Notes
SEA/2026/001	DD/MM/YY	SEA	Female, 14 yrs, Student	Montserrado / [School Code]	MoGCSP + Health Facility	DD/MM/YY	Support Services Accessed	Referred to county health facility and MoGCSP psychosocial unit. Alleged perpetrator is a teacher; disciplinary process initiated by PIU.
SH/2026/002	DD/MM/YY	SH	Female, Adult, Teacher	Margibi / [School Code]	PIU GBV Specialist + Legal Aid	DD/MM/YY	Case Under Investigation	Complaint filed against school principal. PIU leading investigation. Interim protective measures in place.
VAC/2026/003	DD/MM/YY	VAC	Male, 10 yrs, Student	Nimba / [School Code]	UNICEF Psychosocial + Police	DD/MM/YY	Referral Made – Awaiting Confirmation	Physical abuse by community member on school premises. Referred to police and UNICEF partner for psychosocial support.
GBV/2026/004	DD/MM/YY	GBV	Female, 16 yrs, Student	Bong / [School Code]	Health Facility + MoGCSP	DD/MM/YY	Closed – Resolution Achieved	Domestic violence-related case. Survivor accessed medical and legal support. Case closed with survivor consent.
SRGBV/2026/005	DD/MM/YY	SRGBV	Female, 13 yrs, Student	Lofa / [School Code]	PIU GBV Specialist + MoGCSP	DD/MM/YY	Escalated to National Level	Pattern of bullying with GBV elements. Escalated to National GRC. School-level systemic review initiated.
[Case ID]	[Date]	[Type]	[Profile]	[Location]	[Destination]	[Date]	[Status]	[Notes]

Reference Guide: Incident Types, Referral Destinations & Status Codes

Field	Reference Values / Guidance
Incident Type Codes	SEA – Sexual Exploitation and Abuse SH – Sexual Harassment GBV – Gender-Based Violence (other) VAC – Violence Against Children SRGBV – School-Related GBV
Referral Destinations	County Health Facility / Hospital Ministry of Gender, Children & Social Protection (MoGCSP) National Police / Liberia National Police UNICEF / NGO Psychosocial Support Legal Aid / Ministry of Justice PIU Social & GBV Specialist World Bank (via PIU – 24hr protocol)
Follow-Up Status Options	Pending Referral Referral Made – Awaiting Confirmation Support Services Accessed Case Under Investigation Closed – Resolution Achieved Closed – Survivor Withdrew Escalated to National Level

Confidentiality Notice: This register must be stored in a locked physical file and/or password-protected digital folder. Access is restricted to the PIU Social & GBV Specialist, Project Coordinator, and authorized GRC members only. Aggregated, non-identifying data may be included in periodic monitoring reports.

8. WORKERS' GRIEVANCE MECHANISM (ESS2)

8.1 Legal and Policy Basis

The Project establishes a dedicated Workers' Grievance Mechanism (WGM) in compliance with Environmental and Social Standard 2 (ESS2) of the World Bank Environmental and Social Framework and the Decent Work Act of Liberia (2015). ESS2 requires that all project workers have access to a grievance mechanism to raise workplace concerns in a timely, confidential, and non-retaliatory manner. Similarly, the Decent Work Act provides statutory protections relating to fair treatment, non-discrimination, occupational health and safety, wages, and dispute resolution.

8.2 Categories of Workers Covered

The Workers' Grievance Mechanism applies to all categories of workers engaged under the EXCEL Project, consistent with ESS2 definitions.

- **Direct Workers:** These include individuals employed directly by the Ministry of Education or the Project Implementation Unit (PIU) for project-related activities, including technical staff, consultants, and administrative personnel.
- **Contracted Workers:** These include workers employed by third-party contractors, subcontractors, and service providers engaged in project-financed activities, including school rehabilitation works, technical service delivery, or support functions.
- **Community Workers (where applicable):** In instances where community members are engaged in project-related activities on a voluntary or compensated basis, they are also covered under the Workers' Grievance Mechanism, proportionate to the nature of their engagement.

All workers, regardless of category, must be informed of the grievance mechanism at the time of engagement, including procedures, contact points, and protections against retaliation.

8.3 Grievance Process Flow for Workers

The Workers' Grievance Mechanism follows a tiered resolution process designed to encourage resolution at the lowest appropriate level while preserving clear escalation pathways.

1. **Supervisor-Level Resolution:** Workers are encouraged, where appropriate and safe, to raise concerns first with their immediate supervisor or designated workplace focal person. Many routine matters, such as scheduling issues, minor wage discrepancies, or operational misunderstandings, may be resolved at this level through dialogue and clarification. Where a worker is uncomfortable raising concerns with a supervisor, alternative reporting channels must be made available.
2. **Contractor-Level Review:** For contracted workers, unresolved grievances may be escalated to the contractor's designated grievance officer or human resources representative. Contractors are required, under their contractual obligations, to maintain a functional grievance system aligned with ESS2 and the Decent Work Act. The contractor must document complaints, provide acknowledgment, investigate proportionately, and implement corrective action where warranted. The Ministry reserves the right to review contractor grievance records for compliance monitoring.
3. **PIU-Level Review:** If a grievance is not resolved at the contractor or supervisor level, or if the matter involves serious concerns such as workplace harassment, occupational safety violations, discrimination, or unfair termination, the complaint may be escalated to the Project Implementation Unit (PIU). At this stage, the Environmental and Social Safeguards

Specialist reviews the matter, ensures documentation, and determines whether corrective action, mediation, disciplinary review, or contractual enforcement is required.

4. External Escalation: If administrative remedies within the project structure are exhausted or deemed insufficient, workers retain the right to seek recourse through:

- The Ministry of Labor or competent labor authorities under the Decent Work Act;
- The Liberian judicial system;
- The World Bank's Grievance Redress Service, available to any individual or community impacted by EXCEL Project activities. Project-affected parties may submit complaints directly to the GRS at any time, including if they believe the EXCEL GM has not adequately addressed their concerns. Contact information for the GRS shall be included in all public disclosure materials." This corrects the inadvertent narrowing of GRS access

The Workers' Grievance Mechanism does not restrict statutory or constitutional rights to formal dispute resolution.

8.4 Protection from Retaliation

The EXCEL Project strictly prohibits retaliation against any worker who submits a grievance in good faith. Retaliation includes dismissal, demotion, harassment, intimidation, reduction in wages, or any adverse employment action resulting from the filing of a complaint. Confidentiality shall be maintained throughout the grievance process. Workers may submit complaints anonymously, and reporting channels must be accessible without fear of reprisal. Contractors are contractually obligated to enforce non-retaliation provisions and may face sanctions for violations, including termination of contract.

8.5 Worker-Related GBV / SEA / SH Complaints

GBV/SEA/SH complaints involving project workers are handled in accordance with the dedicated protocol outlined in Section 7. Workers who are survivors of GBV, SEA, or SH are entitled to the same survivor-centered protections, confidentiality safeguards, and referral pathways as community members. Where a worker is the alleged perpetrator, administrative disciplinary measures may proceed in accordance with employment contracts, Codes of Conduct, and national labor laws. Criminal referral thresholds apply as described in Section 7.

Contractors and subcontractors must ensure that:

- All workers sign and adhere to Codes of Conduct prohibiting SEA/SH;
- Awareness training is conducted regularly;
- Immediate reporting channels are available;
- Disciplinary action is taken where violations occur.

All worker-related GBV, SEA, SH, and VAC (Violence Against Children) cases shall be reported to the World Bank, irrespective of severity threshold, within 24 hours of identification, in accordance with ESCP requirements and World Bank operational policy on sensitive cases.

8.6 Monitoring and Reporting

All worker grievances shall be documented in a dedicated register separate from community grievances. Aggregated data on worker complaints including type, resolution timeframe, and corrective measures, shall be included in periodic monitoring reports to the Ministry and the World Bank. The Workers' Grievance Mechanism contributes to strengthening labor standards compliance, promoting safe and fair working conditions, and mitigating project-related social risks.

9. INCIDENT MANAGEMENT & SEVERE INCIDENT REPORTING

9.1 Definition of Severe Incident

All SEA/SH cases regardless of severity, are subject to mandatory 24-hour reporting to the World Bank upon PIU notification. This requirement applies without exception and ensures immediate action and accountability. “Severe Incidents” also include, but are not limited to, fatalities, serious injury, child abuse forced labor. Major environmental harm, or other high-risk events. For clarity, SEA/SH cases are always treated as requiring immediate reporting, and this obligation is consistent with the protocol outlined in Section 10.9

Severe incidents include, but are not limited to:

- **Fatality** connected to project activities, including worker or community member deaths occurring during project implementation;
- **Sexual abuse or exploitation**, including child sexual exploitation and abuse (SEA), sexual harassment (SH), or any form of violence involving minors within the project context;
- **Forced labor or trafficking**, including coercive employment practices, involuntary labor, or violations of the Decent Work Act;
- **Major environmental harm**, including significant pollution, hazardous material release, structural collapse, or incidents causing serious environmental damage or public safety risk.

An incident may also be classified as severe if it poses significant reputational risk, systemic safeguard failure, or serious non-compliance with national law or World Bank standards. The determination of severity shall be made by the Environmental and Social Safeguards Specialist in consultation with the Project Coordinator and, where applicable, the Social and GBV Specialist.

9.2 24-Hour Reporting Protocol

All severe incidents must be reported to the World Bank within 24 hours of becoming known to the Project Implementation Unit (PIU). This reporting obligation is mandatory and cannot be delayed pending full investigation. The 24-hour notification shall include:

- A brief description of the incident;
- Date, time, and location;
- Nature and extent of harm;
- Immediate actions taken to address safety concerns;
- Preliminary classification of the incident.

This initial notification does not require detailed findings and must not disclose confidential or identifying information, particularly in cases involving GBV/SEA/SH. Simultaneously, the Ministry shall ensure that:

- Immediate measures are taken to secure the site (if applicable);
- Survivors or affected individuals receive necessary support and referral;
- Relevant national authorities are notified where legally required.

Failure to comply with the 24-hour reporting obligation constitutes non-compliance with ESCP commitments.

For complaints coming from students or parents to schools, the PDT will develop reporting protocols and support within schools specific to project component 2.4 concerning school-related GBV prevention, case detection and response.

Preparing school systems to provide incident response would include:

- Developing a school-based GBV/SEA/SH complaint and response system which is:

- Accessible to all students, parents and teachers
- Child friendly
- Able to be used anonymously, so that students, teachers, parents/ caregivers who use them do not fear identification or retribution because of reporting
- Linking reporting mechanisms to child protection and related support systems directly, with the option to not disclose to/ have cases recorded in school GM system.
- Designing appropriate interventions and literature for school children to promote safety and peer support, through trained focal points.
- Offering appropriate interventions, such as:
 - psycho-social counseling,
 - peer group support/ therapy, and
- educational and extra-curricular support, to help child survivors recover from the impact of GBV.

9.3 Root Cause Analysis

Following initial notification, a structured Root Cause Analysis (RCA) shall be conducted to determine the underlying factors contributing to the incident. The purpose of the RCA is not to assign blame prematurely, but to identify systemic weaknesses, procedural failures, supervision gaps, or risk mitigation deficiencies that allowed the incident to occur.

The Root Cause Analysis shall examine:

- Compliance with ESF requirements;
- Adherence to national regulatory standards;
- Contractor performance and supervision;
- Effectiveness of existing risk mitigation measures;
- Institutional oversight mechanisms.

Where appropriate, independent technical expertise may be engaged to ensure objectivity. Findings shall be documented formally and retained for audit and monitoring purposes.

9.4 Corrective Action Plan

Upon completion of the Root Cause Analysis, a Corrective Action Plan (CAP) shall be developed and implemented. The CAP must:

- Identify specific remedial actions;
- Assign responsible parties;
- Establish clear implementation timelines;
- Include monitoring indicators;
- Address both immediate and systemic risks.

Corrective actions may include enhanced supervision, policy revisions, contractor sanctions, retraining of personnel, strengthening of safety measures, or revision of operational procedures. In cases involving GBV/SEA/SH or child protection, corrective actions must prioritize survivor safety and confidentiality. Implementation of the Corrective Action Plan shall be monitored by the PIU and reported to the World Bank until completion.

9.5 Reporting to the World Bank

Severe incident reporting to the World Bank follows a structured sequence:

- 1. Initial Notification (within 24 hours)** – Brief factual summary without confidential details.
- 2. Follow-Up Report** – Submission of preliminary findings within an agreed timeframe.

- 3. Root Cause Analysis Report** – Detailed explanation of contributing factors.
- 4. Corrective Action Plan Submission** – Outline of remedial and preventive measures.
- 5. Implementation Updates** – Periodic reporting on progress until closure.

All reports must respect confidentiality requirements, particularly for GBV/SEA/SH cases, and must not disclose survivor identities. The incident is considered closed only when:

- Corrective actions have been fully implemented;
- Monitoring confirms risk mitigation;
- The World Bank has acknowledged satisfactory resolution.

9.6 Integration with the GM Framework

Severe incidents bypass standard grievance timelines and are escalated immediately to the National-Level GRC and Project Coordinator. While the GM serves as the entry point for reporting, incident management is handled under this dedicated protocol.

10. MONITORING, REPORTING & PERFORMANCE MANAGEMENT

The effectiveness of the EXCEL Grievance Redress Mechanism (GM) depends not only on procedural integrity but also on systematic monitoring, performance measurement, and transparent reporting. Monitoring and reporting ensure accountability, enable adaptive management, and demonstrate compliance with national regulations and World Bank Environmental and Social Framework (ESF) requirements. The GM shall operate as a structured performance system with defined reporting cycles, measurable indicators, and documented review processes.

10.1 GM Register (Digital and Hard Copy Systems)

All grievances received under the EXCEL Project shall be recorded in a centralized GM Register. The register shall be maintained in both digital and secure hard-copy formats to ensure redundancy, accessibility, and audit readiness. The GM Register shall capture, at minimum:

Unique Tracking Number (UTN);

- Date of receipt;
- Location (school/county);
- Category of grievance;
- Risk classification level;
- Assigned responsible tier;
- Investigation timeline;
- Resolution status;
- Date of closure;
- Escalation status (if applicable).

For GBV/SEA/SH cases, the register shall contain only anonymized identifiers, with detailed documentation maintained separately under restricted access protocols. The Environmental and Social Safeguards Specialist shall be responsible for maintaining the central digital database and ensuring that county-level records are transmitted regularly for consolidation.

10.2 Monthly Internal Reporting

The GM Lead shall prepare monthly internal summary reports for the Project Coordinator. These reports shall provide a structured overview of:

- Number of grievances received during the reporting period;
- Categories of complaints;
- Risk classification breakdown;
- Status of open and closed cases;
- Severe incidents reported;
- Emerging trends or systemic concerns.

Monthly reporting supports early identification of recurring issues, implementation gaps, or institutional weaknesses. It enables corrective action before risks escalate.

10.3 Quarterly Reporting to the World Bank

In accordance with ESCP commitments, aggregated GM data shall be included in the Quarterly Environmental and Social reports submitted to the World Bank. The GM Section within the reports shall include:

- Total number of grievances received;
- Disaggregation by category (general, environmental, labor, procurement, GBV, etc.);
- Percentage resolved within established timelines;

- Number of grievances pending beyond prescribed timelines;
- Summary of severe incidents and status of corrective actions;
- Lessons learned and system improvements.

No personally identifiable information shall be disclosed in reports to the World Bank, particularly for GBV/SEA/SH cases.

10.4 Key Performance Indicators (KPIs)

To measure effectiveness and responsiveness, the GM shall track defined Key Performance Indicators (KPIs). These indicators support performance management and continuous improvement.

Table 5: GM Performance Indicators

Indicator	Definition	Target Objective
% Resolved Within Timeline	Percentage of grievances closed within prescribed timeframe	≥ 80%
Average Resolution Time	Mean number of working days from registration to closure	Continuous reduction
% Resolved at First Tier	Percentage resolved at school or county level without escalation	≥ 60%
Satisfaction Rate	Percentage of complainants expressing satisfaction with outcome	Progressive improvement
Severe Incident Compliance	% of severe incidents reported within 24 hours	100%

These indicators shall be reviewed periodically and may be refined based on implementation experience.

10.5 Semi-Annual GM Performance Review

A Semi-Annual GM Performance Review shall be conducted to assess overall effectiveness, compliance, and system integrity. The review shall evaluate:

1. Volume and trend analysis of grievances;
2. Recurring patterns indicating systemic weaknesses;
3. Performance against KPIs;
4. Timeliness of severe incident reporting;
5. Adequacy of referral mechanisms;
6. Functionality of decentralized grievance structures;
7. Effectiveness of worker grievance pathways.

Findings from the annual review shall inform updates to procedures, training programs, communication strategies, and risk mitigation measures. The review shall be documented and maintained as part of the project's governance records.

10.7 Data Protection and Confidentiality

The integrity of the GM depends on strict adherence to data protection standards. All grievance records shall be stored securely, with controlled access limited to authorized personnel. Digital systems shall be password-protected, and physical files shall be stored in locked facilities. Sensitive case files, particularly those involving GBV/SEA/SH or labor disputes, shall be segregated and subject to enhanced confidentiality safeguards. Data used for reporting shall be aggregated and anonymized. Under no circumstances shall personal identifiers be included in public disclosures or routine reporting. Confidentiality breaches shall be treated as serious non-compliance incidents and addressed through corrective measures.

10.8 Continuous Improvement

Monitoring and reporting are not merely compliance functions but tools for institutional learning. Patterns emerging from grievance data shall inform:

- Policy adjustments;
- Contractor supervision improvements;
- Strengthening of school-level governance;
- Targeted training and capacity building;
- Enhancement of stakeholder engagement strategies.

By integrating monitoring, reporting, and performance management into the GM framework, the EXCEL Project ensures transparency, accountability, and adaptive governance throughout implementation.

10.9 School-Based Monitoring and Reporting for SH/SEA/SRGBV Cases

Given the heightened sensitivity of SEA/SH and School-Related Gender-Based Violence (SRGBV) cases, a dedicated monitoring and reporting protocol is established for school-level incidents, consistent with the EXCEL SEA/SH/GBV/VAC Action Plan. This protocol reinforces the survivor-centered principle and the mandatory 24-hour reporting requirement for all SEA/SH cases and is activated by the **School GM Focal Person** — the designated woman at school level — upon any identification or disclosure of an SEA/SH/SRGBV/VAC complaint.

Step 1 — Identification and Safe Disclosure

The **School GM Focal Person** identifies or receives a disclosure or complaint. Any trained school staff member who first receives a disclosure must immediately pass it to the School GM Focal Person without delay. **No formal questioning of the child or survivor shall take place at this stage.** The School GM Focal Person creates conditions for safe, voluntary disclosure and ensures the survivor feels supported and not judged.

Step 1b — Direct Notification to PIU GM Focal Point

Before notifying the School Principal, the **School GM Focal Person** shall immediately contact the **PIU GM Focal Point (Social and GBV Specialist)** directly. This direct-first notification is mandatory in all SEA/SH/SRGBV cases.

Bypass rule: *Where the School Principal is the alleged perpetrator, the School GM Focal Person shall bypass the principal entirely at this and all subsequent steps, reporting only to the PIU GM Focal Point and the County Education Officer. This mirrors the bypass rule established in Section 4.4.*

Step 2 — Immediate Notification to School Principal and County Education Officer

After notifying the PIU GM Focal Point (Step 1b), the **School GM Focal Person** notifies the School Principal and the County Education Officer **within the same working day**. The PIU GM Focal Point confirms receipt and assumes lead responsibility for all subsequent case management. **Note:** If the County Education Officer is the alleged perpetrator, notification goes to the PIU GM Focal Point only, who will coordinate alternative county-level oversight.

Step 3 — Form Completion

The school-level **Confidential Incident Intake Form** is completed by the School GM Focal Person using only anonymized identifiers (see also Annex 4: GBV/SEA/SH Referral & Case Tracking Form). The form captures: date; school code (not name); type of incident (category only); survivor profile (age range, sex — **no names**); alleged perpetrator relationship; immediate action taken; and referral status. The form is **not** filed in the child's school record (see record-keeping provisions at the end of this section).

Step 4 — Referral Activation

The **School GM Focal Person** activates the referral pathway at two levels simultaneously:

(i) Local level: *The School GM Focal Person contacts the nearest available community-level service (community health worker, local health post, or MoGCSP-nominated local focal point) immediately for any urgent medical or protective needs.* **(ii) County level:** *The School GM Focal Person activates the formal county referral pathway (medical, psychosocial, legal) using the County Referral Directory maintained by the PIU GM Focal Point. The MoGCSP local focal point, as nominated by MoGCSP, is included in this directory and activated where relevant.*

Step 5 — PIU Reporting

The completed Confidential Incident Intake Form is transmitted by the **School GM Focal Person** to the **PIU GM Focal Point** via secure channel **within 48 hours** of the incident report. The PIU GM Focal Point logs the case in the restricted-access central case register (see also Annex 4: GBV/SEA/SH Referral & Case Tracking Form) and confirms receipt to the School GM Focal Person.

Step 6 — World Bank Notification

As noted in Section 9.1, all SEA/SH cases must be reported to the World Bank within 24 hours of PIU notification. This requirement applies irrespective of severity or categorization, in accordance with ESCP requirements. No identifying information shall be disclosed in this notification.

Record-Keeping and Data Protection

All case records are subject to the confidentiality provisions in Sections 7.7 and 10.7. Storage responsibilities are as follows:

At school level: Physical intake forms shall be stored in a **locked cabinet** accessible only to the School GM Focal Person. Digital records, where applicable, shall be saved in a **password-protected folder** on a dedicated device not connected to the general school administration system. No SEA/SH/SRGBV/VAC case record shall be stored alongside routine school files.

At PIU level: All case records are stored in the restricted-access central case register maintained by the PIU GM Focal Point, subject to Sections 7.7 and 10.7. Access is limited to the PIU GM Focal Point, Project Coordinator, and authorized GRC members only.

School Records Protection

SEA/SH/SRGBV/VAC incident records shall not be entered into, referenced in, or attached to a child's official school file, academic record, or any school administration system accessible to teachers, administrators, or parents beyond the School GM Focal Person.

In accordance with the Children's Law of Liberia (2011) and survivor-centered principles, such records are maintained solely within the confidential GM case register under PIU control. Any breach of this requirement constitutes a serious safeguarding violation and shall be reported immediately to the PIU GM Focal Point and Project Coordinator.

11. AWARENESS, COMMUNICATION & CAPACITY BUILDING

11.1 Strategic Framework

The effectiveness of the EXCEL Grievance Redress Mechanism (GM) depends fundamentally on awareness, clarity of roles, and institutional capacity. A grievance system that is not understood by beneficiaries, workers, contractors, and administrative actors cannot function as intended. Accordingly, the EXCEL Project integrates a structured awareness, communication, and capacity-building strategy to ensure that the GM is operationalized consistently across all fifteen counties. This strategy is aligned with the principles of transparency and accessibility under ESS10 (Stakeholder Engagement), the labor protections under ESS2, and the decentralized governance framework of Liberia's education sector. The objective is not merely to disseminate information, but to embed grievance handling competence within the Ministry of Education's institutional architecture.

11.2 School-Level Sensitization

At the commencement of EXCEL-supported activities in each participating school, structured **sensitization and capacity-building sessions** shall be conducted targeting school administrators, teachers, School Management Committees (SMCs), parents, and where appropriate, students in age-sensitive formats. Sensitization refers to building awareness of the GM's purpose, reporting channels, and protections; capacity-building refers to developing practical skills among designated focal persons and committee members for receiving, documenting, and responding to complaints.

Capacity Building at this level shall cover:

- The purpose and scope of the GM;
- Types of complaints that may be submitted;
- Available intake channels, including confidential reporting;
- Escalation pathways from school to county and national levels;
- Protections against retaliation;
- Specific procedures for handling sensitive matters, including GBV/SEA/SH.

Communication materials shall be visibly displayed at school premises, including simplified process diagrams and contact information for reporting channels. Where literacy levels present barriers, verbal engagement during community meetings and SMC forums shall supplement written communication.

Special emphasis shall be placed on ensuring that vulnerable groups, including girls, children with disabilities, and marginalized community members understand safe and confidential reporting options.

11.3 School- level Trainings

School-based SRGBV prevention and response actions would include trainings for school focal points, select teachers, school leaders, and members of school members committees, on the following topics:

- Detecting signs of GBV, SEA/SH, VAC
- Gender-friendly learning environment
- Creating safe spaces and support to child survivors of GBV/SEA/SH for recording and counseling
- Case management in schools and via GM and referrals, including but not limited to:

- Consent-taking
- Code of conduct for school management/teachers
- GBV case management: approach, ethics, standards, and protocols
- Incident reporting
- survivor trust- and confidence- building,
- survivor risk assessment and safety planning
- third-party disclosure
- parental involvement strategies
- referral information
- follow-up support
- case recording and documentation

11.4 County-Level Rollout

County Education Offices (CEOs) serve as the supervisory and escalation tier within Liberia's decentralized education system. The county-level rollout shall focus on:

Risk classification and escalation thresholds;

Documentation and reporting standards;

Severe incident identification and 24-hour reporting requirements;

Coordination between school-level focal persons and the PIU;

Oversight responsibilities in resolving escalated grievances.

The objective is to ensure uniform application of procedures across counties and to prevent fragmentation or inconsistent case handling. To support standardization, participants shall receive structured guidance materials, including intake templates, investigation protocols, escalation matrices, and reporting formats.

11.5 Contractor Induction

All contractors, subcontractors, consultants, and service providers engaged under the EXCEL Project shall undergo mandatory induction prior to mobilization. This induction shall formally communicate:

- Introduction to the World Bank ESF
- The Workers' Grievance Mechanism procedures;
- Obligations under ESS2 and the Decent Work Act;
- Code of Conduct requirements;
- GBV/SEA/SH prevention and reporting obligations;
- Severe incident reporting thresholds and 24-hour notification requirements;

Coordination obligations between contractor-level grievance systems and the Ministry's GM.

Contractual documents shall explicitly require compliance with the GM framework. Contractors shall designate a grievance focal person and maintain documented grievance registers for worker-related complaints. Compliance with GM provisions shall form part of routine supervision and performance monitoring. No contractor shall commence work without confirmation of induction and signed Codes of Conduct for all personnel.

11.5 Teacher and Staff Orientation

Teachers and education personnel occupy dual roles as both potential beneficiaries and duty bearers within the GM framework. Orientation sessions shall therefore ensure that teachers clearly understand professional responsibilities, reporting obligations, and protections available under the mechanism and under national laws. Orientation sessions shall address:

- the legal and administrative mandate of the GM;
- professional standards under the Teacher Code of Conduct;
- Procedures for lodging employment-related grievances;
- Safeguarding and child protection responsibilities; and
- Disciplinary and escalation procedures.

Orientation sessions shall be documented and integrated into monitoring records.

11.6 Initial Annual and Refresher Training

Prior to the commencement of project activities, an initial training shall be conducted for all designated GM focal persons, county officers, and PIU safeguards staff. This initial training provides the foundational knowledge and practical skills required to operationalize the GM from the outset. Subsequently, annual refresher training shall be conducted to sustain institutional capacity, address emerging risks, and incorporate lessons learned from the preceding year...

To ensure institutional sustainability and responsiveness to emerging risks, annual refresher training shall be conducted for school-level focal persons, county officers, PIU staff, and contractor representatives.

Annual training shall incorporate:

- Review of grievance trends and performance indicators;
- Lessons learned from severe incident cases (anonymized);
- Updates to procedures or reporting requirements;
- Reinforcement of confidentiality standards;
- Reorientation on survivor-centered handling of GBV/SEA/SH cases, child case handling protocols, parent engagement strategies, (updated) referral information on service providers;
- Clarification of any policy or legal updates affecting grievance handling.

The refresher cycle ensures that turnover, evolving risks, and operational pressures do not weaken the effectiveness of the mechanism.

11.7 Communication Tools and Public Disclosure

To reinforce awareness and transparency, standardized communication materials shall be developed and disseminated across participating schools and administrative offices.

These materials may include:

- GM posters and visual process flow diagrams;
- Brochures summarizing reporting options;
- Contact information for confidential reporting channels;
- Simplified guidance for students and parents.
- Public disclosure of GM procedures shall also occur during stakeholder engagement sessions, school meetings, and county-level consultations.

All communication shall be culturally appropriate and accessible, ensuring clarity across varying literacy levels and local contexts.

13. GM BUDGET, RESOURCING & SUSTAINABILITY FRAMEWORK

13.1 Strategic Context

The effectiveness, credibility, and compliance of the EXCEL Grievance Redress Mechanism (GM) depend on predictable and adequate financial resourcing. The GM operates across fifteen counties, covering approximately 2337 participating schools, direct and contracted workers, and multiple stakeholder groups. It must comply with:

- ESS10 (Stakeholder Engagement)
- ESS2 (Labor and Working Conditions)
- ESS4 (Community Health and Safety)
- ESCP severe incident reporting obligations (24-hour notification requirement)

This section presents a comprehensive annual budget framework designed to ensure:

- Operational functionality across decentralized structures;
- Digital grievance tracking and reporting;
- Hotline accessibility;
- Structured training and refresher cycles;
- Referral pathway strengthening;
- Long-term institutional sustainability.

Personnel costs for national-level safeguards staffing are already covered under the Project and are therefore reflected but not duplicated.

13.2 National-Level Staffing (Covered by Project)

The GM is managed at national level by:

Table 6: National-level GM Staffing Costs

Position	Annual Cost (USD)	Notes
Environmental & Social Safeguards Specialist (GM Lead)	60,000	Full-time PIU oversight
Social and GBV Specialist	30,000	Survivor-centered case management; Facilitating authorities responsible for and process of SH/SEA inquiries; Capacity-building and monitoring of SEA/SH-related safeguards and mitigation measures; overseeing implementation of the SEA/SH/GBV/VAC action plan
Administrative Support	20,000	Documentation & coordination
Total Personnel Cost	110,000	Covered under project staffing

County and school focal persons are integrated within existing Ministry administrative structures.

13.3 Comprehensive Annual GM Operating Budget (Indicative)

The following table consolidates awareness rollout, training, infrastructure, monitoring systems, and operational support into one structured annual envelope.

Table 7: Consolidated Annual GM Budget (Indicative – USD)

Category	Description	Annual Cost (USD)
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A. Nationwide Awareness & Rollout Activities	County-level sensitization (15 counties), travel, DSA, vehicle rental, fuel, venue rental	225,000
B. Training & Capacity Building	Initial training for all focal persons, county officers, and PIU staff (Year 1); annual refresher training (Years 2–5); contractor induction; GBV/SEA/SH specialized training modules; materials printing and translation .	100,000
C. Hotline & Reporting Infrastructure	Toll-free line, Phones and communication for all GRCs, subscription, call management system, IT support, data security	45,000
D. Digital Monitoring & Registry System	Database hosting, maintenance, analytics tools, backup systems	30,000
E. Communication & IEC Materials	Posters, brochures, translation, community outreach events	60,000
F. Referral Pathway Mapping & GBV Service Strengthening	National & county-level mapping (in coordination with MoGCSP and MoJ, to fill gaps only), cooperation meetings, directory printing, coordination support	40,000
Subtotal Operational Budget		500,000

Personnel costs (USD 110,000) are separately financed under Project staffing and not included in the operational subtotal above.

13.4 Annual Budget Summary

Table 8: GM Annual Budget Summary (Indicative)

Component	Amount (USD)
Operational GM Budget	500,000
Personnel (Project-Funded)	110,000
Total GM System Value (Annual)	610,000

13.5 Risk Mitigation Value of Investment

The annual allocation of approximately USD 500,000 represents a risk mitigation investment rather than administrative overhead. Under-resourcing could result in:

- Failure to meet 24-hour severe incident reporting obligations;
- Escalation of community disputes;
- Non-compliance with ESCP commitments;
- Reputational damage to the Ministry and the Project;
- Financial and legal liabilities.

The cost of one poorly managed severe incident could exceed the annual operational GM budget.

13.6 Long-Term Institutional Integration

To ensure sustainability beyond project financing:

- GM responsibilities shall be gradually embedded within Ministry job descriptions.
- Budget lines for hotline, training, and communication shall be integrated into the Ministry's recurrent expenditure framework.
- Annual refresher training shall be institutionalized within teacher and county officer training cycles.
- The digital grievance registry shall be transitioned into Ministry IT systems.

- Referral pathway coordination shall be aligned with national child protection and GBV frameworks.

13.7 Sustainability Outlook

The EXCEL GM is not a temporary safeguard instrument. It is a governance system that strengthens accountability, improves service delivery, and enhances trust between communities and the Ministry of Education. With an annual operational envelope of approximately USD 500,000 and structured institutional integration, the GM is financially realistic, operationally viable, and sustainable within Liberia’s education governance context.

14. REFERENCES

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15. ANNEXES

15.1 Annex 1: Community Grievance Intake & Resolution Form (GM Focal Person to fill in)

SECTION A: Administrative Information	
Item	Details
Unique Tracking Number (UTN)	
Date Received	___ / ___ / ____
Level of Intake	☐ School ☐ County ☐ National
Received By (Name & Title)	_____
Method of Submission	☐ In Person ☐ Suggestion Box ☐ Phone ☐ Email ☐ Letter ☐ Community Meeting ☐ Anonymous
SECTION B: Complainant Information (Complete only if not anonymous)	
Name	_____
Gender	☐ Male ☐ Female ☐ Prefer not to say
Contact Information	
Community / School	
If Anonymous (<i>check this box</i>)	☐
SECTION C: Description of the Grievance	
Location of Incident	
Date of Incident (if known)	___ / ___ / ____
Category (tick one)	☐ Service Delivery ☐ Resource Allocation ☐ Environmental Issue ☐ Labor Issue ☐ Procurement ☐ Misconduct ☐ GBV/SEA/SH ☐ Other
Brief Description of Complaint	(Attach additional sheet if needed)
SECTION D: Risk Classification (To be completed by GM Focal Person)	
☐ Level 1	Low
☐ Level 2	Moderate
☐ Level 3	High
☐ Severe Incident	
If Severe Incident, date reported to PIU:	___ / ___ / ____
SECTION E: Immediate Action (if required)	
<i>Question</i>	<i>Response</i>
Was urgent action required?	☐ Yes ☐ No
Action taken (if any)	_____
Was case escalated?	☐ Yes ☐ No
If yes, to which level?	☐ County ☐ National ☐ External Authority
SECTION F: Acknowledgment	
Date Acknowledged	___ / ___ / ____
Method	☐ Verbal ☐ Written ☐ Phone ☐ Email
Tracking Number Communicated	☐ Yes ☐ No
SECTION G: Investigation & Resolution	
Investigator Assigned	_____
Investigation Start Date	___ / ___ / ____
Investigation End Date	___ / ___ / ____
Summary of Findings	_____
Resolution Decision	_____
Date Decision Communicated	___ / ___ / ____
Complainant Satisfied?	☐ Yes ☐ No ☐ No Response
SECTION H: Closure	
Date Closed	___ / ___ / ____
Final Status	☐ Resolved ☐ Referred to External Authority ☐ Closed – No Further Action
Approved By	_____

15.2 Annex 2: Worker Grievance Form*(To be completed by Supervisor, Contractor GM Representative, or PIU Social and GBV Specialist)*

SECTION A: Administrative Information	
Item	Details
Unique Tracking Number (UTN)	_____
Date Received	____ / ____ / ____
Received By (Name & Title)	_____
Employer	☐ PIU ☐ Contractor ☐ Subcontractor
Method of Submission	☐ In Person ☐ Phone ☐ Email ☐ Written ☐ Anonymous
SECTION B: Worker Information <i>(Complete only if not anonymous)</i>	
Name	_____
Position / Role	_____
Work Location	_____
Contact Information	_____
☐ Anonymous complaint	
SECTION C: Nature of Grievance	
	☐ Wages / Payment
	☐ Working Conditions
	☐ Occupational Health & Safety
	☐ Discrimination / Harassment
	☐ Unfair Termination
	☐ Contractual Dispute
	☐ GBV/SEA/SH
	☐ Other
Description of Complaint:	

Date of Incident (if known): ____ / ____ / ____	
SECTION D: Initial Review	
Risk Level	☐ Routine ☐ Serious ☐ Severe Incident
Was immediate action required?	☐ Yes ☐ No
Action Taken	_____
Escalated To	☐ Contractor Level ☐ PIU Level ☐ External Authority
SECTION E: Resolution	
Investigation Start Date	____ / ____ / ____
Investigation End Date	____ / ____ / ____
Resolution Summary	_____
Date Communicated to Worker	____ / ____ / ____
Worker Satisfied?	☐ Yes ☐ No ☐ No Response
SECTION F: Closure	
Date Closed	____ / ____ / ____
Final Status	☐ Resolved ☐ Referred to Labor Authority ☐ Closed
Approved By	_____
Confidentiality Note All worker grievances shall be handled confidentially. Retaliation against workers who file complaints in good faith is strictly prohibited. GBV/SEA/SH complaints shall follow the dedicated protocol outlined in Section 7.	

15.3 Annex 3: Severe Incident Notification Form (24-Hour Reporting Template)**EXCEL Project – Incident Management & ESCP Compliance**

(To be completed by Safeguards Specialist / Project Coordinator within 24 hours of becoming aware of the incident)

SECTION A: Basic Incident Information	
Item	Details
Unique Incident Reference No.	_____
Date Incident Occurred	___ / ___ / ___
Date Incident Reported to PIU	___ / ___ / ___
Location (School / County)	_____
Reported By	_____
SECTION B: Type of Severe Incident	
	☐ Fatality
	☐ Child Abuse / Exploitation (also use Annex 4: GBV / SEA / SH Referral & Case Tracking Form)
	☐ Serious Injury
	☐ GBV / SEA / SH (also use Annex 4: GBV / SEA / SH Referral & Case Tracking Form)
	☐ Forced Labor / Trafficking
	☐ Major Environmental Harm
	☐ Other (specify): _____
SECTION C: Brief Description of Incident	
(Provide factual summary only. Do not include confidential or identifying details.)	

SECTION D: Immediate Actions Taken	
	☐ Site secured
	☐ Medical assistance provided
	☐ Survivor referred to services
	☐ Contractor notified
	☐ Authorities informed (if required)
	☐ Work suspended (if applicable)
Brief description of actions taken:	

SECTION E: Reporting Status	
Date Notified to World Bank	___ / ___ / ___
Method of Notification	☐ Email ☐ Official Letter
Follow-Up Investigation Initiated?	☐ Yes ☐ No
Responsible Officer	_____
Confidentiality Notice This form is for initial notification only. No personal identifiers shall be included, particularly in cases involving GBV/SEA/SH or minors. Detailed findings shall be documented separately following Root Cause Analysis procedures	

15.4 Annex 4: GBV / SEA / SH/ VAC Referral & Case Tracking Form*(Confidential – Restricted Access Only)***Important:** This form must not contain identifying survivor information unless strictly necessary and with informed consent.

SECTION A: Administrative Information	
Item	Details
Case Reference Number	_____
Date Report Received	____ / ____ / ____
Received By (PIU GM Focal Point / Social and GBV Specialist)	_____
Reporting Channel	☐ Hotline ☐ In Person ☐ Referral ☐ Anonymous
SECTION B: Nature of Allegation (tick multiple, as relevant)	
	☐ Sexual Exploitation
	☐ Sexual Abuse
	☐ Sexual Harassment
	☐ Violence against child
	☐ Other GBV
Location (County/School):	_____
SECTION C: Survivor Consent	
Consent to receive medical referral	☐ Yes ☐ No
Consent for psychosocial support	☐ Yes ☐ No
Consent for legal referral	☐ Yes ☐ No
Consent to report to police	☐ Yes ☐ No
SECTION D: Referral Actions Taken	
Medical	
Psychosocial	
Legal	
Protection Services	
SECTION E: Follow-Up	
Survivor requires continued support?	☐ Yes ☐ No
Case closed?	☐ Yes ☐ No
Date of Closure	____ / ____ / ____

Confidential files must be stored separately under restricted access.

15.5 Annex 5: Monthly GM Summary Reporting Template*(For Internal Monitoring & PIU Reporting)*

Reporting Period: _____	
Indicator	Value
Total Grievances Received	_____
Level 1 Cases	_____
Level 2 Cases	_____
Level 3 Cases	_____
Severe Incidents	_____
% Resolved Within Timeline	_____ %
Average Resolution Time (Days)	_____
% Resolved at First Tier	_____ %
No. of Worker Grievances	_____
No. of GBV/SEA/SH Cases (No Identifiers)	_____
Narrative Summary Key Trends Observed:	
Systemic Issues Identified:	
Corrective Actions Initiated:	
Prepared by:	Date: ____ / ____ / ____

15.6 Annex 6: Root Cause Analysis (RCA) Template*(For Severe or High-Risk Cases)*

SECTION A: Incident Overview	
Item	Details
Incident Reference Number	_____
Date of Incident	____ / ____ / ____
Location	_____
Incident Type	_____
SECTION B: Immediate Cause	
Describe what directly led to the incident:	
SECTION C: Underlying Causes	
Identify contributing factors:	
	☐ Procedural Failure
	☐ Supervision Gap
	☐ Contractor Non-Compliance
	☐ Training Deficiency
	☐ Policy Gap
	☐ Resource Constraint
	☐ Other
Explanation:	
SECTION D: Corrective Actions	
Action	Responsible Party and Timeline
SECTION E: Preventive Measures	
Describe systemic changes required:	

15.7 Annex: General GM Logbook

EXCEL Project – Grievance Register (For School / County / National Level Use)

(To be maintained in hard copy and digitized monthly)

GM LOGBOOK – MASTER REGISTER

No.	UTN	Date Received	Location (School/County)	Category	Complainant (Name/Anonymous)	Brief Description	Status	Remarks

CONFIDENTIAL GM REGISTER (Restricted Access)

Case Ref No.	Date Received	Category	Referral Made	Follow-Up Required	Status	Responsible Officer