



**Lebanon Renewable Energy  
and System Reinforcement Project**

**Labor Grievance Mechanism (GM)**

**May 2026**

**Litani River Authority (LRA)**

**Beirut**

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## **LIST OF ABBREVIATION**

COC	Code of conduct
LRA	Litani River Authority
E&S	Environment Specialist
ESS2	Environmental and social standards
ESMF	Environmental and social management framework
GBV	Gender based violence
GM	Grievance mechanism
LMP	Labor Management Procedures
NGO	Non-governmental organization
PMT	Project management team
PPE	Personal Protective Equipment
PV	Photovoltaic
SA	Sexual abuse
SE	Sexual exploitation
SH	Sexual harassment
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder engagement plan
SH	Sexual Harassment (SH)
OE	Owner Engineer
OHS	Occupational Health and Safety

## **GRIEVANCE MECHANISM (GM)**

### **1. Introduction:**

A grievance mechanism (GM) is in place to allow workers to voice their concerns during the project phases: pre-construction, construction, and operation. The GM is designed to allow a timely resolution of concerns, assuring workers that grievances have been heard and that the institutionalized mechanism will yield a fair and impartial outcome. Furthermore, the grievance mechanism is applicable for both Lebanese and Syrian workers with the option to remain anonymous when filing a grievance to encourage workers to speak out without potential fear of repercussions.

The Lebanon Renewable Energy and System Reinforcement Project (Rehabilitation of LRA's HPPs), managed by LRA, includes two grievance mechanisms to ensure transparent and effective communication throughout the project's implementation. In line with the World Bank's Environmental and Social Standards, the project establishes a Grievance Mechanism (GM) for stakeholders in accordance with ESS10, and another GM for workers in accordance with ESS2.

Each mechanism includes clear procedures for grievance handling, methods for grievance intake, and the Code of Conduct (CoC) that guides responsible behavior and accountability and each one will address sensitive complaints related to harassment and abuse and exploitation.

The following section presents both mechanisms, describing their purpose and the process for submitting and addressing grievances, to ensure that all concerns from stakeholders and workers are handled in a fair, timely, and transparent manner.

### **2. GM for Workers:**

A dedicated Grievance Mechanism (GM) is established for all project workers, including PMT staff, the Owner's Engineer team, Contractors, and Subcontractors. This Worker GM provides a safe, confidential, and accessible channel for reporting workplace concerns, grievances, or any misconduct, including sensitive issues such as sexual harassment.

The Worker GM is governed separately from the community GM, following the framework and procedures outlined in the project's Labor Management Procedures (LMP). It includes clear steps for grievance submission, acknowledgment, review, resolution, and feedback. Complaints may be submitted verbally, in writing, by email, or through a secure digital platform. Anonymous submissions will also be accepted.

The E&S Focal point (Mr. Nassim Abou Hamad : E&S Specialist) will record the grievance details provided by the worker and submit the complaint through one of the designated channels. Workers will be encouraged, though not required, to use the grievance template, which will be made available in both hard and soft copies and on the website. If a worker prefers to raise a grievance in person, by phone, or through another method, the E&S Focal Point will complete the template

on their behalf, maintaining anonymity if requested. Workers who wish to remain anonymous may still provide contact details to receive updates, though this is not required for the grievance to be processed. Each grievance will be assigned a unique reference number, along with the date and time of submission. For non-anonymous cases, an acknowledgment of receipt will be issued within three working days, along with information on next steps, the expected timeframe for resolution, and contact details of the responsible person.

Sensitive grievances, particularly those related to Sexual Harassment (SH) or Sexual Exploitation and Abuse (SEA), will be handled under a survivor-centered and confidential process. All cases will be referred to qualified service providers for psychological, legal, and medical support in line with World Bank SEA/SH Guidelines.

However, if the alleged perpetrator is a project worker, the project shall conduct an internal review to determine whether the individual violated the Code of Conduct and apply appropriate disciplinary measures. Complaints related to sexual harassment in the workplace must also be investigated internally when the perpetrator is a project employee, ensuring that corrective and disciplinary actions are implemented in accordance with project rules and regulations, while maintaining the survivor-centered approach and confidentiality.

Regular monitoring and reporting of worker grievances will be conducted to ensure transparency, accountability, and continuous improvement of the mechanism.

In the event that a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, or faces an incident onsite, they may not wish to submit the grievance to her or his employer. The worker may raise the case directly to an OE, to the LRA - PMT (or to the legal system).

## **2.1 GM Objectives**

The Grievance Mechanism (GM) for workers aims to ensure that all individuals employed under the project whether directly by LRA, through contractors, subcontractors, or service providers have a transparent, accessible, and safe channel to raise workplace-related concerns.

The overall objectives of the Workers' GM are to:

- Provide a structured and confidential process for the timely identification, review, and resolution of workplace grievances.
- Strengthen accountability and trust between project workers, contractors, and management.
- Promote a safe and respectful working environment, free from discrimination, exploitation, and harassment.
- Enable early identification and correction of potential labor, health, and safety issues before they escalate.
- Ensure that workers' rights and protections under national labor law and ESS2 are upheld at all times.

### Scope and Access

All categories of project workers including direct employees, contracted workers, and temporary laborers are eligible to access the GM.

Workers can submit complaints or feedback at any time through any of the following channels:

- In person to a designated Grievance Manager or Workers' Representative.
- In writing (sealed envelope or form) submitted to a locked grievance box at the worksite.
- By phone or email to the Contractor's focal point which is the Owner's Engineer or LRA E&S Focal Point.
- Through a dedicated hotline or digital form ([QR code](#))<sup>1</sup> available at the construction sites.



As mentioned before, the E&S Focal Point will record the grievance details provided by the worker and submit the complaint through one of the designated channels. Information on how to use the GM, including contact details, will be displayed at all project sites in accessible language and format.

### Workers' Grievance Log

Each designated Grievance Manager (from the Contractor, Owner's Engineer, or E&S Focal Point at the LRA PMT (Mr. Nassim Abou Hamad)) will maintain a detailed Workers' Grievance Log to ensure transparent tracking and follow-up of each case. The log will include, at a minimum, the following information:

- **Reference Number:** A unique identification code for each grievance.
- **Complainant Information:** Worker's name and contact details (unless submitted anonymously or related to SEA/SH).
- **Complaint Details:** Clear description of the issue, location, and context.
- **SEA/SH Cases:** For cases of Sexual Exploitation, Abuse, or Harassment, only the survivor's own words will be recorded without interpretation. The log will note whether the alleged perpetrator is linked to the project and confirm referral to appropriate survivor support services.
- **Date of Submission:** When the grievance was received.
- **Assigned Personnel:** Name of the person responsible for managing the complaint.
- **Proposed Resolution:** Description of the corrective or preventive action taken. For SEA/SH cases, only whether the case was referred and resolved (or not) will be noted.

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<sup>1</sup> This QR code is available at the following link : <https://www.litani.gov.lb/en-us/aboutlra/worldbankagreement>

- **Communication Records:** Dates and methods of communication with the complainant, and confirmation of acknowledgment when possible.
- **Satisfaction and Closure:** Whether the worker accepted the resolution and the case was closed.
- **Completion Date:** When the issue was fully resolved or formally closed.

#### Responsibility and Oversight

- **LRA PMT** will hold overall responsibility for ensuring that the Workers’ GM is implemented effectively and in compliance with the Labor Management Procedures (LMP).
- **Contractors and the Owner’s Engineer** will serve as part of the GM structure to receive, record, and resolve grievances in coordination with LRA-PMT.
- **Monthly GM summaries** will be submitted to LRA for monitoring and continuous improvement.

#### SEA/SH Grievances

- All SEA/SH-related complaints will be treated with **strict confidentiality** and handled separately from other grievances.
- No personal information will be disclosed without consent.
- Survivors will be **immediately referred** to qualified GBV service providers for psychological, medical, or legal assistance.
- **No investigation** While project staff do not conduct formal investigations of SEA/SH cases themselves, a dedicated committee at the level of the employer must review and address cases of sexual harassment, as these constitute violations of the Code of Conduct. Referral to support services alone is not sufficient; if the perpetrator continues to work without any disciplinary measures, the survivor remains at risk and the purpose of the grievance mechanism is undermined. The employer-level committee is responsible for ensuring that appropriate disciplinary actions, including warnings, training, suspension, or termination of employment as outlined in the Code of Conduct, are applied. Project staff will continue to document referrals, follow up on service provision, and maintain survivor-centered support throughout the process.

## 2.2 Project Workers

The following table summarizes the different categories of workers engaged under the project, provides a brief description of their roles, and outlines their eligibility to access the Grievance Mechanism (GM) in accordance with the Labor Management Procedures (LMP).

**Table 1- Categories of Workers and Eligibility for the Grievance Mechanism**

<b>Type of Workers</b>	<b>Description</b>	<b>Eligibility</b>
<b>Direct Workers</b>	These are individuals directly employed by LRA or the Project Management Team (PMT) to support project implementation,	Direct workers are entitled to raise grievances related to: <ul style="list-style-type: none"> <li>• Working hours, salary, and employment contract conditions</li> </ul>

	<p>supervision, and management activities. This includes:</p> <ul style="list-style-type: none"> <li>• Skilled and non-skilled labors</li> <li>• Labors’ supervisors</li> <li>• Technical and engineering staff</li> <li>• Environmental and social specialists</li> <li>• Health and Safety officers</li> <li>• Administrative and financial staff</li> <li>• Consultants under fixed-term contracts</li> </ul>	<ul style="list-style-type: none"> <li>• Workplace behavior or misconduct by supervisors</li> <li>• Occupational Health and Safety (OHS) issues</li> <li>• Discrimination or harassment at the workplace</li> <li>• Violation of labor standards under Lebanese Labor Law or ESS2</li> <li>• Violation of Code of Conduct</li> </ul>
<b>Contracted Workers (Contractors and Subcontractors)</b>	<p>These are workers hired by construction contractors, supervision consultants, or service providers to carry out project-related works and services. Examples include:</p> <ul style="list-style-type: none"> <li>• Construction and electrical installation crews</li> <li>• Environmental monitoring staff</li> <li>• Security and maintenance personnel</li> <li>• Transport and logistics providers</li> </ul>	<p>Contracted workers have the right to file grievances regarding:</p> <ul style="list-style-type: none"> <li>• Non-payment or delay of wages</li> <li>• Unsafe or unhealthy working conditions</li> <li>• Unfair treatment or misconduct by supervisors</li> <li>• Discrepancies between contract terms and actual work conditions</li> <li>• SEA/SH or discrimination incidents</li> </ul> <p>They must have clear access to the GM, confidential reporting options, and protection from retaliation.</p>
<b>Temporary Laborers</b>	<p>These are individuals engaged on a short-term or casual basis to support site-level Examples include:</p> <ul style="list-style-type: none"> <li>• Site cleaning and maintenance staff</li> </ul>	<p>Temporary workers are eligible to submit grievances related to:</p> <ul style="list-style-type: none"> <li>• Underpayment or exploitation by local supervisors</li> <li>• Lack of safety training or protective equipment</li> <li>• Discriminatory hiring or exclusion from work opportunities</li> <li>• SEA/SH-related concerns in field conditions</li> </ul> <p>They are covered under the project’s Labor Management Procedures (LMP) and the same GM process as other workers.</p> <ul style="list-style-type: none"> <li>• All SEA/SH-related grievances will be handled through confidential channels, ensuring protection and referral to appropriate survivor support services</li> </ul>

SEA/SH grievances are logged and tracked separately from other worker complaints to ensure confidentiality and appropriate follow-up.

### **3. Training Procedure:**

Before the commencement of works, all project workers will receive an induction training conducted by the Environmental and Social (E&S) Focal Point (Mr. Nassim Abou Hamad) . Prior to the training session, the Code of Conduct will be shared with all workers to review in advance. During the induction meeting, workers will be briefed on the project’s Grievance Mechanism (GM), including how to access and use it, as well as their rights, obligations, and protections under the project. Attendance will be recorded through a signed attendance sheet to confirm participation. Following the training, each worker will be required to sign the Code of Conduct to acknowledge their understanding and commitment to comply with its provisions.

The training will cover:

- The purpose and procedures of the Worker GM, including reporting channels and confidentiality measures.
- Workers’ rights under Lebanese labor law and project policies.
- Occupational Health and Safety (OHS) requirements, including the proper use of Personal Protective Equipment (PPE) and emergency procedures.
- Expected behavior as outlined in the Project’s Code of Conduct, with emphasis on preventing Sexual Exploitation, Abuse, and Harassment (SEA/SH) and ensuring respectful workplace interactions.

At the end of the training, each worker will sign the Code of Conduct, confirming their understanding and commitment to responsible conduct, workplace safety, and compliance with project standards.

These topics will be regularly reinforced during monthly toolbox meetings and periodic refresher sessions to ensure ongoing awareness and adherence to the GM and OHS requirements. New or temporary workers will also receive the same induction prior to commencing work on site.

The following table outlines the categories of workers, their roles, and their eligibility to access the project’s Grievance Mechanism (GM) as defined in the Labor Management Procedures (LMP).

All workers engaged under the project are required to adhere to the Code of Conduct. Violations, including SEA/SH-related misconduct or OHS breaches, will result in disciplinary action, which may include formal warnings, suspension, or termination of employment.

### **4. SEA/SH grievances:**

#### **4.1 Definition of SEA/SH**

**Sexual Exploitation (SE):**

Abuse of a position of power, trust, or vulnerability for sexual purposes, including personal or financial gain.

Examples: Offering jobs, promotions, or favorable work conditions in exchange for sexual acts, or threatening dismissal if sexual favors are refused.

**Sexual Abuse (SA):**

Any actual or attempted sexual act carried out by force or under coercive or unequal circumstances. Examples: Unwanted touching, coercive sexual acts, or any sexual contact with a person unable to consent.

**Sexual Harassment (SH):**

Unwelcome sexual advances, comments, gestures, or behaviors that cause offense, humiliation, or create a hostile work environment.

Examples: Inappropriate jokes, explicit messages, unwanted invitations, or displaying offensive materials in the workplace.

**4.2 SEA/SH Awareness and Training for Workers**

SEA/SH awareness and training ensure that all workers, supervisors, and contractors understand what SEA/SH is, how to prevent it, and how to report incidents safely and confidentially.

**Target Groups:**

- All project workers, including direct employees, contractors, and sub-contractors.
- Supervisors, engineers, and site management staff.
- Consultants and project implementation staff.

**Objectives:**

SEA/SH training for workers aims to:

- Promote respectful behavior in the workplace and surrounding communities.
- Clarify what constitutes SEA/SH and the consequences of such behavior.
- Ensure all workers understand how and where to report SEA/SH incidents.
- Build a safe and inclusive work environment where all individuals are treated with dignity.

**Content of Training Sessions:**

Training activities will include:

- Definitions and examples of SEA/SH.
- Code of Conduct expectations and disciplinary actions for violations.
- Clear reporting channels and focal points for workers to submit complaints.
- Confidentiality and survivor-centered handling of cases.
- Information on available support services (medical, psychosocial, and legal).

**Format and Frequency:**

- Delivered during worker induction and refresher sessions throughout the project.
- Conducted in accessible, understandable language (with translations when needed).
- Include visual materials, videos, and interactive discussions to enhance understanding.
- Periodic refreshers to ensure awareness and compliance remain high during project implementation.

### **4.3 SEA/SH Grievance Mechanism for Workers**

A confidential, survivor-centered Grievance Mechanism (GM) is available to all project workers to safely report any incidents, concerns, or allegations related to Sexual Exploitation, Abuse, or Sexual Harassment (SEA/SH). The GM prioritizes survivor protection, confidentiality, and timely action.

#### **Reporting Channels:**

Workers may report SEA/SH incidents through any of the following secure channels:

- Dedicated SEA/SH email managed only by the SEA/SH focal point (Mme. Grace Ammoury , phone +961 1 662118).
- Confidential hotline operating during working hours.
- Locked complaint boxes placed at discrete locations within the work sites.
- Direct reporting to the SEA/SH Focal Point, PMT representative, or any supervisor trained on SEA/SH response.
- Anonymous submissions accepted through all channels.

#### **Immediate Actions Upon Receiving a Complaint:**

- The SEA/SH Focal Point , at LRA: Mrs. Grace Ammoury, phone No +961 1 662118) or designated GM staff member must immediately document the complaint using a secure and confidential incident form, without collecting unnecessary personal details.
- Only essential information for safety and referral is recorded. No attempt is made to investigate or question the survivor beyond what is needed for support.

#### **Ensuring Confidentiality:**

Strict measures are applied to protect survivors and their identity:

- No personal information of the survivor is stored in the GM database.
- Paper records (if any) are kept in locked cabinets with restricted access.
- Digital records are encrypted and accessible only to the SEA/SH Focal Point and PMT GM officer.
- Information is shared strictly on a need-to-know basis and never disclosed to co-workers or unauthorized personnel.
- Any retaliation, intimidation, or disclosure of survivor identity is strictly prohibited and will result in sanctions.

#### **Survivor Support and Referral Pathways:**

Immediately after receiving a SEA/SH complaint:

- The survivor is offered immediate referral to specialized service providers (psychosocial support, medical care, legal assistance, and safe shelter if needed).
- The survivor may choose whether or not to accept any services.
- The GM will not require proof or evidence for a survivor to access services.
- The survivor may choose a trusted worker to accompany them during referral.

#### **Management of the Complaint:**

- The GM focuses on support and safety, not investigation.

- Any internal administrative action (if applicable) will follow established HR procedures and the Code of Conduct.
- If the allegation involves a project worker or contractor staff, the employer will take immediate protective measures (e.g., temporary removal from duty, reassignment) to ensure the survivor's safety.

#### **Mandatory Reporting to PMT and the World Bank:**

- All SEA/SH complaints must be reported immediately to the PMT by the SEA/SH Focal Point (without survivor-identifying information).
- The PMT is responsible for notifying the World Bank within 48 hours of becoming aware of an alleged SEA/SH incident, following the Bank's mandatory reporting requirements.
- Reports to the World Bank include only non-identifiable information.

#### **Monitoring and Follow-Up:**

- The SEA/SH Focal Point follows up to ensure the survivor received the services they chose.
- Non-identifiable data on SEA/SH cases (number of complaints, type, status) is compiled monthly for PMT review to improve prevention efforts.
- Lessons learned are used to strengthen training, supervision, worker conduct, and site-level safeguards.

#### **Worker Awareness and Training:**

- All workers, supervisors, and contractors receive mandatory SEA/SH training on expected behavior, Code of Conduct obligations, reporting channels, and confidentiality principles.
- SEA/SH focal points and GM staff receive specialized training on survivor-centered response, protection protocols, and safe communication.

#### **Key Features:**

- **Multiple reporting options:** Email, hotline, locked complaint boxes, or direct contact with SEA/SH focal points.
- **Confidentiality:** All complaints are treated with discretion; workers may report anonymously.
- **Survivor support:** Immediate referral to professional service providers for psychosocial, medical, and legal support.
- **No retaliation:** Workers who report SEA/SH are protected from any form of retaliation or discrimination.
- **Monitoring and follow-up:** Grievance data (excluding personal information) will be reviewed to improve prevention and response actions.

**Continuous Risk Management :** SEA/SH risk prevention and monitoring are integral to the project's labor management and supervision practices

- **Assessment:** Identify SEA/SH risks within work sites and worker–community interactions.
- **Training:** Provide ongoing awareness and behavioral training for all workers and managers.
- **Supervision:** Ensure supervisors and focal points monitor compliance with the Code of Conduct.

- **Monitoring and Reporting: Review the effectiveness of prevention and grievance systems** regularly, ensuring workers' trust and accessibility.

## 5. Project GM Structure and Procedures

The project's Grievance Mechanism (GM) follows a three-level resolution process to ensure that all complaints and concerns are addressed promptly and fairly.

Beyond SEA/SH-related grievances, the project's overall Grievance Mechanism (GM) operates through several structured levels to handle all types of complaints and feedback. Thus, the GM levels for the contracted workers of the project are as follows:

**Level 1:** If any Project worker has any complaint, concern or suggestion regarding the project implementation, he or she can lodge an oral or write a grievance complaint through an assigned e-mail (ES Focal point, email: [grm@litani.gov.lb](mailto:grm@litani.gov.lb) – LRA, email: [litani@litani.gov.lb](mailto:litani@litani.gov.lb), OR phone call or text message to ES Focal point Mr. Nassim Abou Hamad +961 3 641280, and LRA +961 1 660476, or LRA's website link : <https://www.litani.gov.lb/en-us/aboutlra/worldbankagreement>, or using the QR Code published on the project signboard at the site location and at the concerned municipality signboard. The PMT will be informed about the complaints at this stage, without intervention. In case an oral complaint is made, it should be converted to a written form by the receiving unit. The above issue will be resolved within a maximum duration of 7 calendar days.

**Level 2:** If the issue is not resolved with the action of the site contractor team, he or she should bring the complaint to the attention of the Owner Engineer of the project, and also the PMT will be informed of the complaint through an assigned e-mail (email: [grm@litani.gov.lb](mailto:grm@litani.gov.lb) – or LRA's email: [litani@litani.gov.lb](mailto:litani@litani.gov.lb), OR phone call or text message to the Assistant Project Manager Mr. Ghassan Gebran +961 3 438992 at this stage without intervention. The issue shall be resolved within a maximum of 10 calendar days.

**Level 3:** If the issue is not yet resolved with the action of the Owner Engineer of the project, he or she can bring the complaint to the attention of the LRA PMT through project email address ([grm@litani.gov.lb](mailto:grm@litani.gov.lb)), OR phone call or text message to Project Manager Mr. Elie El Rayes who has been assigned by the LRA +961 3 132585). Once the Manager receives the complaint, it needs to be resolved within a maximum of 10 calendar days If an LRA employee has a complaint, they must follow the internal LRA reporting hierarchy. In this project, LRA workers shall submit their complaints directly to the PMT.( Project Manager- Elie El Rayes, E&S Focal point -Nassim Abou Hamad, and a female administrative assistant who will receive hotline calls using the dedicated landline, Mrs. Grace Ammouy (+961 1 662118) about grievance complaints concerning SEA/SH Cases).

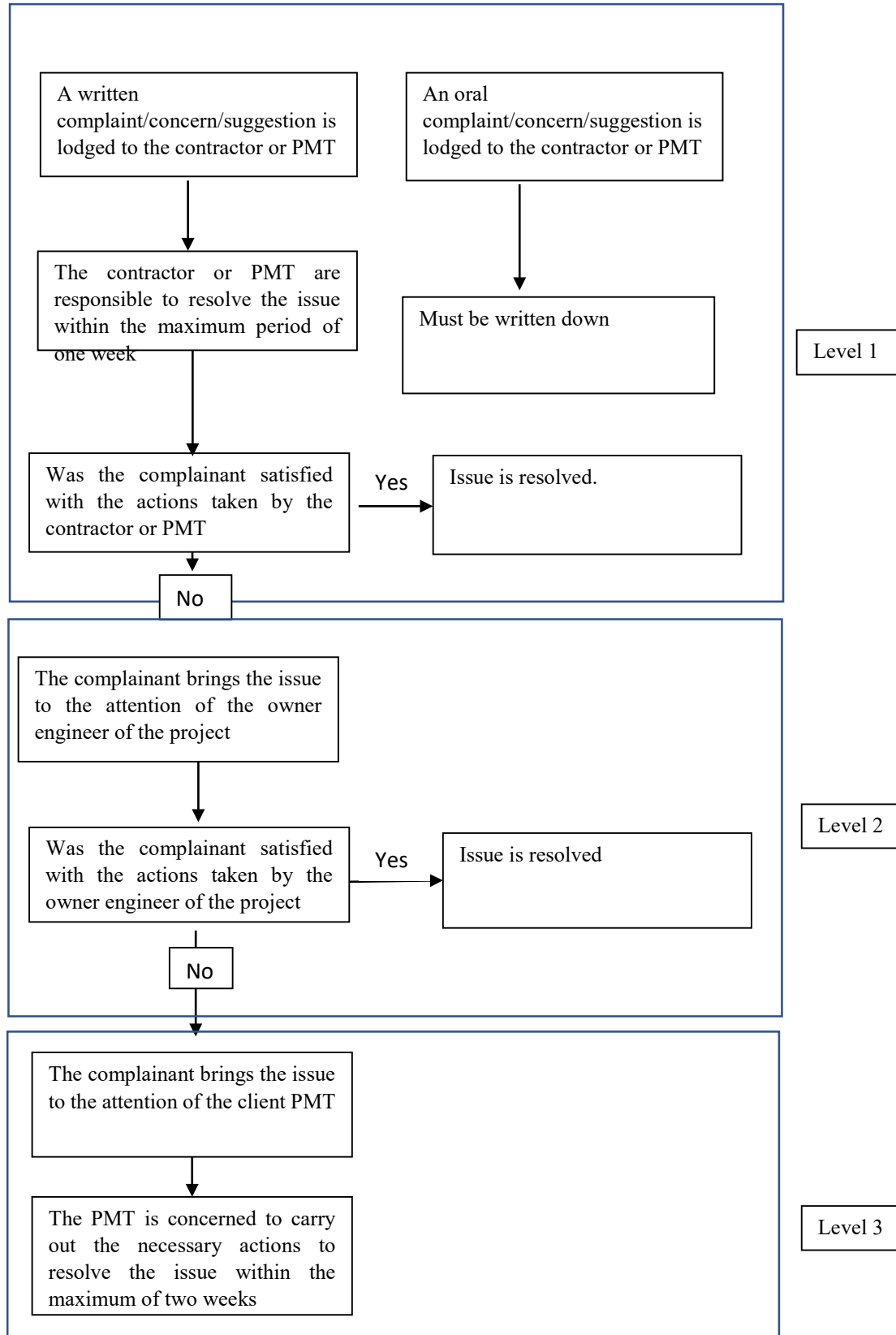
Noting that, all grievances should ideally be resolved within a **maximum of 30 calendar days** from the date of submission, unless the issue requires additional coordination with government

entities or specialized agencies. In such cases, the complainant will be informed of the reason for the delay and the expected timeline for resolution.

Meanwhile, it is recommended that the aggrieved party is consulted and be informed of the course of action being taken, and when a result may be expected.

Moreover, reporting of the complaints to the Project Management Team (PMT) should be done regularly. The designated person at each level should report to the PMT on the number and subject of new complaints received, and the status of the already existing complaints, if any. All electronic submissions received via [email](#), [QR code](#), or [website](#) will be automatically logged in the project's digital grievance database and assigned a unique reference number. This ensures accurate tracking, response monitoring, and secure record-keeping. The system will generate automated acknowledgment messages confirming receipt to complainants (unless submitted anonymously).

The flowchart below describes the process for complaints submitted by contracted workers. However, if an LRA employee has a complaint, they must follow the internal LRA reporting hierarchy. In this project, LRA workers shall submit their complaints directly to the PMT .( Project Manager-Elie El Rayes, ES-Nassim Abou Hamad, and a female administrative assistant who receives hotline calls about grievance complaints including sexual harassment).



**Figure 5-1 Grievance Resolution Process**

**Table 2-Workers' Grievance Mechanism**

Category of grievances	Number of grievances received in the reporting period (eg. Jan – June)	Number of grievances closed in the stipulated timeframe in the reporting period	Total number of grievances received since the beginning of the project	Number of grievances closed in the stipulated timeframe since the beginning of the project	Total number of open grievances	Number of grievances Open more than 30 days
Total						

The main purpose of the table above is to track how many complaints (grievances) are received, how many are resolved on time, and how many remain open, both during a specific reporting period and over the entire life of the project.

## 6. Appeals Procedure

If a complainant is not satisfied with the proposed resolution of their grievance, they have the right to request an appeal. The appeal process provides an additional opportunity to review the case, explore alternative solutions, and ensure that the concerns of the complainant are fully addressed in a fair, transparent, and confidential manner.

Stages to appeal:

The Opportunity to Appeal

- If the proposed resolution is not accepted, the complainant has the right to appeal within five working days. The worker will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal.
- When this second tier is initiated, the assigned person will work with E&S managers or other higher-level manager to carry out additional investigation and/or identify and propose alternative options in an effort to meet the concerns of the complainant.

- The assigned person and E&S Specialist may escalate the complaint to the Project Manager if needed or even invite the services of an independent party (such as a non-governmental organization, civil society group or independent consultant) and ask them to provide one, or more, representatives to help mediate the case—in such cases, the third party must be accepted by the worker. At any time during the grievance resolution process, a worker can seek independent legal advice or involve a court of law.
- Wherever possible, an alternative resolution should be proposed within seven working days from the date of the appeal—if a longer time is needed, this will be discussed with the grievant.
- Any second-tier response should also include a clear explanation of the proposed response, including all alternative options, and the choices that may be available.
- As before, each step in the appeal process, including the resolution or further appeal, will be recorded in the register.

## LRA Grievance Form

<b>Litani River Authority Grievance Form</b>				
Grievance reference number:				
Contact details (may be submitted anonymously)	Name(s):			
	Address:			
	Telephone:			
	Email:			
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>	No contact <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Arabic	<input type="checkbox"/> French	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, what happened, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.				
What is your suggested resolution for the grievance, if you have one? Is there something you would like LRA or another party/person to do to solve the problem?				
How have you submitted this form to the project?	Website <input type="checkbox"/>	email <input type="checkbox"/>	By hand <input type="checkbox"/>	
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>	
Who filled out this form (If not the person named above)?	Name and contact details:			
Signature				
Name of person assigned/responsibility				
Resolved?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Date:	
<b>Completion</b>				
Final resolution (briefly describe)				
	Short description	Accepted? (Y/N)	Acknowledgement signature	
1 <sup>st</sup> proposed solution				
2 <sup>nd</sup> proposed solution				
3 <sup>rd</sup> proposed solution				

# Annex A

## Code of Conduct for Workers:

### **Contractor Code of Conduct (According to the Labor Management Procedures - LMP):**

#### **1. Respect and Fair Treatment**

- Treat all people with dignity and respect, regardless of gender, age, race, color, language, religion, nationality, ethnicity, social origin, disability, or any other status.
- Behave in a professional and culturally appropriate manner at all times.
- Promote equality, inclusion, and non-discrimination in the workplace and in interactions with community members.

#### **2. Protection of Children and Prohibition of Child Labor**

- Children under the age of 18 are not permitted to work on the project under any circumstances.
- All workers must ensure that no child is engaged in any project activity, whether directly or indirectly.
- Show respect and care toward all children in the community.
- Never behave in a way that harms, exploits, or takes advantage of children in any form physically, emotionally, or sexually.

#### **3. Prevention of Sexual Exploitation, Abuse, and Harassment (SEA/SH)**

- Sexual exploitation, abuse, or harassment of any kind is strictly prohibited.
- Do not use words, gestures, or behavior that are inappropriate, harassing, sexually suggestive, or demeaning toward others.
- Do not request or accept sexual favors or engage in any sexual activity in exchange for money, employment, goods, or services.
- Maintain professional boundaries with all members of the community and avoid any actions that could be perceived as exploitative or abusive.

#### **4. Workplace Conduct**

- Follow all project rules and occupational health and safety measures.
- Treat colleagues and community members with courtesy and respect.
- Refrain from violence, intimidation, or any behavior that causes harm or discomfort to others.
- Avoid the use of alcohol or drugs during working hours or while on duty.

#### **5. Reporting Misconduct**

- Report any concerns or suspicions of SEA/SH, child labor, or other misconduct immediately to:
  - The Grievance Mechanism (GM), or

- Your OE or E&S specialist.
- Reports can be made confidentially, and all workers are protected from retaliation when reporting in good faith.
- Respect the confidentiality and safety of all persons involved in a reported incident.

I commit to:

- Adhere to the provisions of this Code of Conduct both on and off the project site.
- Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect SEA and SH, at the project site or surrounding community, I understand that I am encouraged to report it to the Grievance Mechanism (GM) or to PMT. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning or formal warning.
- Additional training.
- Loss of salary.
- Suspension of employment (with or without payment of salary).
- Termination of employment.
- Report to the police or other authorities as warranted.

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Individual Name:

Signed by:

Title:

Date: