

GRM Template

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2 List of abbreviations

Abbreviation	Meaning
CAP	Code of Administrative Procedure .
DEC	Decision on Environmental Conditions
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS1	Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
ESS10	Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure
ESS3	Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management
ESS4	Environmental and Social Standard 4: Community Health and Safety
ESS5	Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
GDOŚ	General Directorate for Environmental Protection
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data (General Data Protection Regulation)
GRM	Grievance Redress Mechanism
Investor	
IPIP	Investment Project Implementation Permit
LARAP	Land Acquisition and Resettlement Action Plan
LMR	Land and Mortgage Register
PAC	Provincial Administrative Court
PAP	Project Affected Persons
PIU	Project Implementation Unit separated within the structure of SWH PW Regional Water Management Authority in
POM	Project Operations Manual
RDOŚ	Regional Director for Environmental Protection
REMA	Act of August 21, 1997 on real estate management
RIPID	Road Investment Permit Implementation Decision
RLB	Register of Land and Buildings
RZGW	Regional Water Management Authority
SAC	Supreme Administrative Court
SEP	Stakeholder Engagement Plan
Special Flood Act	Act of July 8, 2010 on special rules for preparation for the implementation of investments in flood protection structures
SWH PW	State Water Holding Polish Waters
Task	
UOOŚ	Act of October 3, 2008 on the provision of information on the environment and its protection
WB	World Bank

3 Dictionary

Term	Definition
Closing the case	Finalization of the grievance examination process after: (1) substantive consideration, (2) implementation of the solution (if applicable), (3) informing the submitting party of the outcome, (4) expiry of the deadline for submitting a notice of dissatisfaction.
Fast track	Streamlined process used to review and assess minor issues for cases that do not require detailed analysis, site visits or legal consultations. It focuses on quick verification of facts, basic documentation review, and prompt resolution.
Grievance	Any notification or expression of dissatisfaction – verbal or written, named or anonymous – in the form of a complaint, question, suggestion, request, opinion or grievance concerning the preparation or implementation of the Task, which requires a response, explanation or corrective actions by the project team.
GRM Committee	A team consisting of the head of the PIU, the PIU land acquisition department manager and a key social expert from the PIU technical support consultant team. For cases requiring specialized assessment, the Committee may invite key environmental, social, or technical experts as needed. The Committee is responsible for reviewing grievances forwarded by the GRM Coordinator as requiring consideration at a higher level and of notices of dissatisfaction with the handling of a case.
GRM Coordinator	Person responsible for: registering all submissions, tracking status and response deadlines, coordinating activities between expert teams, communicating with submitting parties, and reporting. The GRM Coordinator has authority to resolve straightforward cases independently. Complex cases, escalations, and notices of dissatisfaction are referred to the GRM Committee for decision.
GRM register	A centralized database used to record, track, and manage all grievances. For each submission, the register contains: unique grievance ID number; date received; complainant/grievant details (or anonymized reference); description of the grievance; category/type (e.g., land acquisition, environmental, communication); current status (received / under review / resolved / closed); actions taken; responsible person or unit; planned and actual resolution deadlines; escalation history; and complainant satisfaction with the outcome.
Monitoring (LEG cases)	Tracking the progress of cases examined by external bodies (courts, administrative bodies, law enforcement and supervisory agencies including the Police, Public Prosecutor's Office, State Labour Inspectorate, Environmental Inspectorate, and other public oversight bodies) for information purposes, without interfering in their substantive examination. All LEG cases are registered in the GRM Register and assigned a unique LEG reference number.
Notice of dissatisfaction with the handling of case	Formal submission of dissatisfaction with the handling of the case under the GRM system, submitted within 14 days of receiving the response, which results in the case being referred to the second-tier review to the GRM Committee for reconsideration.
Remedial measures	Actions taken to correct, mitigate, or eliminate a harm, problem, or non-compliance identified through a submitted grievance, including physical, financial, procedural, or communicative interventions.
Stakeholder	Individuals or groups who: (a) are affected or may be affected by the consequences of the Task (parties affected by the Task); and (b) may be interested in the Task (other interested parties)
Submitting Party	A person or group of persons submitting a grievance under the GRM system

4 Introduction

4.1 Purpose of the document

This document defines the Grievance Redress Mechanism (GRM) specifically established for the task titled". The document is an integral part of the Task's environmental and social management system for receiving, registering, and resolving grievances, feedback, and inquiries from all stakeholders.. As a rule, it is intended to provide all stakeholders with an effective, transparent and free-of-charge system for submitting requests, opinions, comments, complaints and reservations related to the preparation and implementation of the Task.

It should be emphasized that filing a grievance under the GRM is free of charge, and submitting parties are protected from any form of retaliation, harm, discrimination, or unfounded allegations arising from their use of this mechanism. All grievances may also be made anonymously.

This document outlines a procedure for filing grievances by the Task stakeholders (including, among other things, the form of grievances submitted) and the deadlines for their consideration.

The a GRM system has a dual function - recording and tracking all grievances **feedback, and inquiries — whether or not directly related to the Task**, and complaints related to the Task, regardless of whether they are resolved through the GRM mechanism or by external authorities (courts, administrative bodies and law enforcement and supervisory authorities (including the Police, Public Prosecutor's Office, State Labour Inspectorate, and Environmental Inspectorate). For each submission, the GRM determines the appropriate course of action: substantive consideration under the GRM, referral to an external body, or a finding of inadmissibility. The aim of this approach is:

- providing a complete overview of all grievances and their status – ensuring that the project team remains fully informed about all matters related to the Task,
- ensuring full traceability of all submissions and preventing gaps in the task's monitoring coverage, early identification of emerging issues and timely management of escalation risk – early identification of potential problems or emerging conflicts.

This GRM mechanism applies to all grievances, feedback, and inquiries related to the Project's environmental, social, technical, and fiduciary aspects, covering all relevant Environmental and Social Standards. The GRM incorporates specific procedures for the safe, confidential, and survivor-centered handling of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) complaints, in line with World Bank ESF requirements [see section 6-8]. For grievances concerning employee matters covered by ESS2 (Labor and Working Conditions), a separate mechanism for considering grievances will be developed, The GRM system records all cases and then:

- assesses each submission upon receipt to determine admissibility and the appropriate course of action; all submissions are registered regardless of the outcome of this assessment,
- examines these grievances that can be considered under the GRM mechanism,
- monitors the progress of those that are decided by external bodies – without interfering in their substantive consideration.

For grievances concerning land expropriation and compensation, the GRM operates in conjunction with the statutory remedies available under Polish law. The Task-level GRM records and monitors all such cases until their final resolution by the competent authorities, without interfering in their substantive consideration. The use of statutory remedies does not preclude a complainant from simultaneously engaging with the project-level GRM, and does not prejudice any rights available under national law.

4.2 Legal basis and standards

The Grievance Redress Mechanism was developed in accordance with:

- World Bank's Environmental and Social Frameworks (ESF), in particular ESS10 – Stakeholder Engagement and Information Disclosure,
- Act of June 14, 1960, Code of Administrative Procedure, hereinafter as CAP,
- Act of October 3, 2008 on the provision of information on the environment and its protection
- Act of August 21, 1997 on real estate management
- Act of July 8, 2010 on special rules for preparation for the implementation of investments in flood protection structures
- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter as GDPR.

Stage	GRM functional requirements
Early design	GRM must be set up and operational immediately at this stage, before consultation processes begin
	Receive and register feedback and concerns on all steps in preparation
	Ensure public communication of GRM channels, consistent with the phasing set out in the SEP
Design	Address all grievances from the ESIA process
	Address environment-related grievances arising from the EIA process
	Provide a mechanism for stakeholders to raise concerns and file appeals in connection with the decision on environmental conditions, in coordination with the competent authority (RDOŚ/GDOŚ)
	Receive and register feedback on LARAP and ESMP documentation disclosed for consultation, consistent with the phasing set out in the SEP and the note on the ESMP
Pre-construction	Handle grievances related to land acquisition, valuation, and compensation
	Ensure coordination with the municipality, Ministry, and valuation bodies responsible for compensation determinations
	Register all LEG cases without interfering in formal proceedings
	Ensure SEA/SH procedures are in place and GRM operators are trained before contractor mobilization
Construction	Receive and resolve grievances related to works execution
	Ensure coordination with the Contractor and integration with the Contractor's own grievance handling procedure
	Ensure linkage with the workers' GRM
	Apply dedicated SEA/SH procedures for safe, confidential, and survivor-centered handling of SEA/SH complaints, including immediate referral to GBV service providers
	Ensure no personally identifiable information of survivors is recorded in the GRM system
Operation	Monitor residual grievances
	Handle grievances related to reservoir operation and safety

This GRM document constitutes the primary and complete framework for handling grievances under the Task, fully defining the process, handling procedures, roles, contact persons, and contact details. Prior to the commencement of construction works, this GRM will be updated to reflect the specific operational arrangements for that stage, including coordination with the Contractor and linkage with the workers' GRM. The ESMF and POM integrate this GRM as designed for this and other schemes under the Project.

5 GRM objectives and principles

5.1 Objectives of GRM mechanism

- Enabling all stakeholders to submit grievances understood as complaints, requests, questions, suggestions or grievances concerning the Task,
- Ensuring a fast, effective, free of charge, accessible, transparent and fair process for handling grievances,
- Reducing the risk of escalating disputes and delays in Task execution
- Compliance with the requirements of the World Bank's ESF and Polish law,
- Building trust and constructive relationships with the local community.

5.2 Guiding principles

1. Confidentiality

The personal data of complainants is protected in accordance with the GDPR. Information about the identity of the person submitting the grievance shall not be disclosed without their consent, unless required by law. At the complainant's request, confidentiality may also be extended to the substance of the complaint, and the fact that a complaint has been submitted. Such information shall not be disclosed to any third party, including any party involved in the matter, without the complainant's consent, unless required by law.

2. Impartiality

Grievances are judged objectively and without bias.

3. Transparency

Submitting parties are informed about the course of the grievance examination procedure, the person responsible for examining it, the expected deadlines, and the possibilities for notifying their dissatisfaction with the handling of the case. All activities are documented.

4. Availability

The mechanism is free of charge, available through multiple channels (in writing, verbally, online, by telephone), and understandable to all social groups, including older people and people with disabilities.

5. Responsiveness

Grievances are processed without undue delay, within specified time limits. Submitting parties receive regular updates on the status of their case.

6. No repression

No person shall suffer any negative consequences as a result of submitting a grievance. This principle applies to both the community and Task employees.

7. Access to other remedies

Access to the GRM shall not impede or preclude access to judicial or administrative remedies available under national law. Complainants retain the right to pursue legal avenues at any stage, independently of the grievance mechanism.

5.3 Scope of GRM mechanism

GRM does not have the authority to substantively consider or resolve the following categories of cases, as their examination falls exclusively within the competence of independent state authorities:

- appeals against administrative decisions (including environmental decision, investment project implementation permit decision, compensation decisions, etc.) – considered by higher-level authorities in accordance with the CAP
- complaints to provincial administrative courts (PAC) and the Supreme Administrative Court (SAC)
- requests for reconsideration of a case and requests for concluding the invalidity of the decisions submitted to public administration bodies in accordance with the CAP,
- grievances against decisions issued in the course of administrative proceedings,
- cases being investigated by other state authorities, in particular the police, the public prosecutor's office, the National Labor Inspectorate, the Environmental Protection Inspectorate and other controlling authorities, as well as authorities responsible for public safety and order.

All of the above cases are nevertheless accepted and registered by the GRM upon receipt. Where relevant, the GRM facilitates the transmission of such cases to the competent authority and informs the complainant of the appropriate legal avenue available to them. The GRM then monitors the progress of these cases for information purposes, without interfering in their substantive examination.

The GRM has full authority to receive, assess, and resolve grievances concerning matters falling within the direct competence of the Investor (PGW WP RZGW Wrocław), including in particular: information and communication obligations, land acquisition and compensation procedures conducted directly by the Investor, environmental and social management during design and construction, and contractor conduct during works.

The matters listed above are being considered within the framework of legal procedures independent of the Investor and over which the Investor has no influence. Under Polish law, the examination of such cases falls exclusively within the competence of the relevant administrative authorities, courts and public security and order authorities. The GRM mechanism does not have the authority to replace or interfere with these procedures.

While the GRM does not interfere in proceedings conducted by external authorities, the Investor undertakes all legally available efforts to support their timely resolution, including in particular

the prompt preparation and delivery of required documentation, responses to requests from competent authorities, and timely provision of any information necessary for the proceedings.

The GRM operates as a single entry point for all submissions related to the Task. Upon receipt, each submission is registered and classified according to its nature, and the GRM determines the appropriate course of action:

- substantive consideration and resolution under the GRM — for matters within the Investor's competence;
- transmission to the competent authority and monitoring — for matters under external jurisdiction;
- a finding of inadmissibility — where the submission does not fall within the GRM's scope.
- This approach ensures: providing a complete overview of all grievances and their status – ensuring that the project team remains fully informed about all matters related to the Task,
- counteracting the risk of information loss – no case "slips through" the monitoring system,
- enabling preventive measures – early identification of potential problems or emerging conflicts.

In practice, a situation may arise in which:

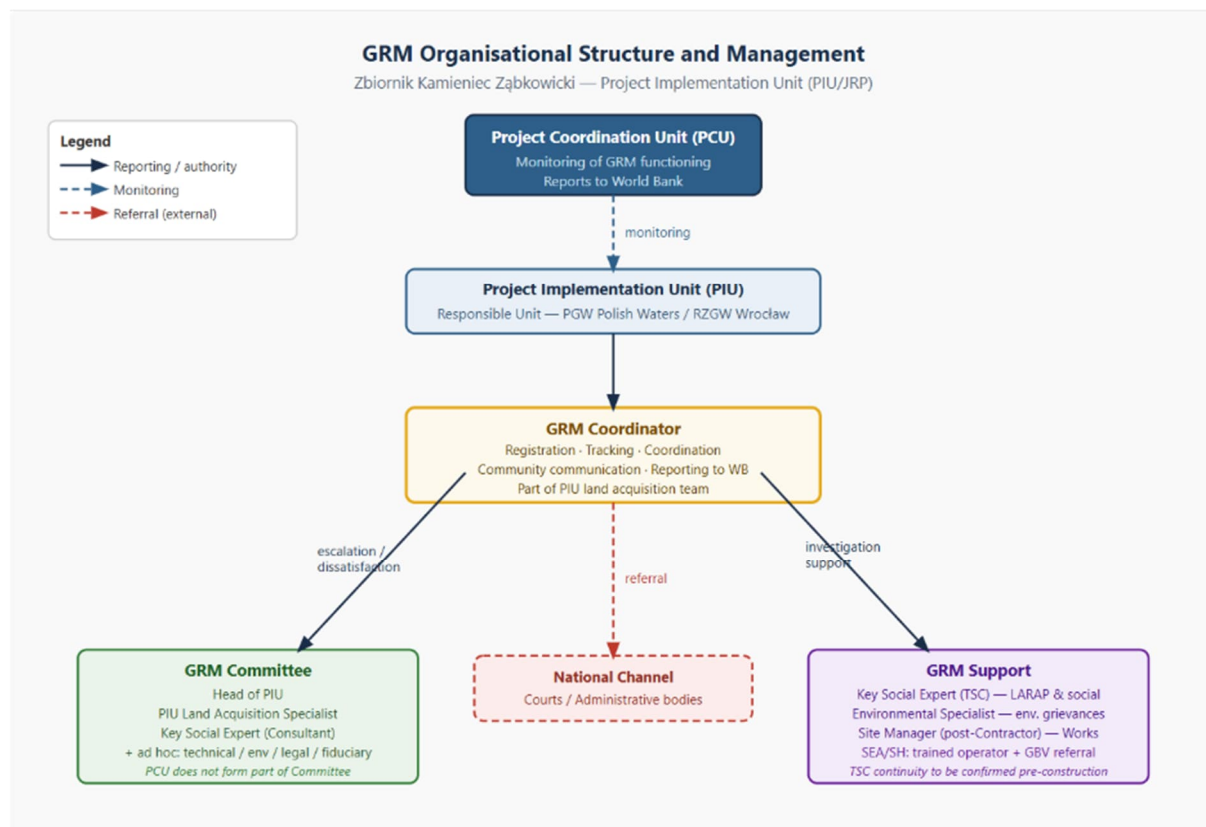
- the matter is first reported to the GRM,
- then the party decides to take formal action (e.g. lodges an appeal against an administrative decision),
- if the case had not been recorded in the GRM, the project team would have lost track of its progress and would not have been able to manage the risks appropriately.

Hence, the GRM system records all cases and then:

- decides on those that are submitted under the GRM mechanism,
- monitors the progress of those that are decided by external bodies – without interfering in their substantive consideration,
- the GRM continues to track the case and maintains a record of its progress, enabling appropriate risk management by the project team.

6 Organizational structure and management of GRM

Figure 1 - GRM organizational structure



6.1 Responsible unit

Project Implementation Unit

State Water Holding Polish Waters

Regional Water Management Authority in

[address]

6.2 GRM Coordinator

The GRM Coordinator is the main point of contact responsible for:

- Recording all incoming grievances within the GRM
- Tracking the status and deadlines for processing the grievance,
- Coordinating the activities between expert teams,
- Communication with complainants,
- Reporting to the World Bank.

The GRM Coordinator is part of the PIU's land acquisition team.

6.3 GRM Committee

The GRM Committee considers grievances forwarded by the GRM Coordinator as requiring consideration at a higher level of grievance management and those for which the Submitting Party has expressed dissatisfaction with the handling of the case. The Committee is responsible for reviewing the merits of each case referred to it, determining the appropriate resolution, and communicating the outcome to the Submitting Party within the prescribed deadline.

The GRM Committee consists of: the head of PIU, the PIU social department manager and a key social expert on the Consultant's side. The Committee is multidisciplinary in composition — depending on the nature of the grievance under consideration, the standing members may invite relevant technical, environmental, legal, or fiduciary experts to support the review. The composition of the Committee for each case is documented in the GRM Register.

6.4 Project Coordination Unit

The Project Coordination Unit monitors the correct functioning of the GRM system and reports directly to the World Bank. The PCU's role is monitoring in nature — it verifies whether the GRM operates in accordance with the established procedures and rules, without interfering in individual case handling or outcomes. Where systemic deficiencies are identified, the PCU may flag these to the PIU for corrective action.

In cases escalated to the national level, the PCU may perform an additional coordination function, ensuring that the relevant parties are informed and that the case is appropriately tracked. The PCU does not form part of the GRM Committee.

6.5 GRM team structure

Role	Scope of responsibility
GRM Committee	It considers grievances assigned by the GRM Coordinator as requiring consideration at a higher level and those for which the complainant has notified of dissatisfaction with the handling of the case
GRM Coordinator	Registration of grievances, tracking, coordination, reporting, contact with the community
Key Social Expert (Technical Support Consultant)	Support in investigating the grievances concerning matters related to LARAP and other social issues. The Technical Support Consultant is engaged for the duration of the design and pre-construction stages; continuity arrangements for subsequent stages will be confirmed prior to construction commencement
Environmental Specialist	Support in resolving environmental grievances
Site Manager (after Contractor selection)	Support in resolving matters related to the performance of the Works

7 Channels and methods for submitting complaints

In order to ensure full accessibility, the system offers the following channels for submitting complaints:

1. By using the standard grievance forms (optional) available at:

- a. Project Office:
- b. Consultant's Office:
- c. at the information point for PAP:

Grievance forms and a brief information leaflet on the GRM — describing available channels, deadlines, and submitting parties' rights — will be available in paper form at all locations listed above, as well as on the websites and Facebook page listed above.

2. Dedicated telephone/SMS tel.

3. E-mail:

4. Traditional post/e-delivery

5. Meetings and consultations - the possibility to submit a verbal/in writing grievance during:

- a. Public consultations
- b. Duty shifts at the Information Point for PAP,
- c. Field meetings with the Consultant's personnel and PIU representatives.

Note: Verbal grievances require the person receiving them to draw up a written record.

As per the World Bank's requirements, the system also accepts anonymous complaints. They are considered on an equal footing with complaints submitted under a name, but the lack of contact details makes it impossible to provide feedback to the complainant.

8 Classification of grievances

8.1 Level 1: Suggestions, questions, and requests for information (IRP)

Grievances relevant to stakeholder engagement:

Code	Character	Examples	Objective
IRP-01	Information request	Request for a copy of the LARAP, work schedule, explanation of standards	Dissemination of information
IRP-02	Request/Proposal/Application	Suggestion to change working hours, proposal for a temporary access road	Conflict prevention Impact reduction/minimalization
IRP-03	Opinion	Opinion on stakeholder engagement	Satisfaction monitoring

8.2 Level 2: Complaints and grievances (GR)

Reporting the damage, nuisance, problem or non-compliance with project plans requiring investigation:

Code	Category	Scope/Examples	Level of resolution
GR-RAP	Properties and compensation	Disputing the amount of compensation, delays in payment, damage to property	GRM Coordinator / GRM Committee
GR-LRP	Means of subsistence and support	Lack of support, loss of income, resettlement issues	GRM Coordinator / GRM Committee
GR-ENV	Environmental impact	Noise, dust, water/soil pollution, waste, environmental impacts, etc.	GRM Coordinator and expert team
GR-SIA	Social impact/Health and safety	Access issues, traffic safety, nuisances, complaints about staff	GRM Coordinator and expert team
GR-COM	Procedural/communication-related	No response to grievances, improper consultations, breach of confidentiality	GRM Coordinator / GRM Committee
GR-SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment	Any complaint related to SEA/SH involving project-associated personnel or occurring in connection with the Task, submitted by community members	GRM Coordinator — immediate referral to competent public support services (GBV service providers)

8.3 Level 3: Formal complaints – legal route (LEG)

The listed categories of cases are the legal means of challenging decisions or proceedings conducted by competent state authorities, as provided for in Polish law. Their consideration falls exclusively within the competence of higher-level administrative bodies, administrative courts or law enforcement and control authorities. The GRM mechanism is an extrajudicial and extra-administrative tool – it has no powers to interfere with or replace these procedures.

The matters below are recorded in the GRM system solely for information and monitoring purposes. The GRM project team monitors their progress in order to remain fully informed about matters related to the project, but their substantive consideration is carried out by the relevant authorities, independent of the project.

Code	Character	Consideration path
LEG-EIA	Environmental decision	Appeal to GDOŚ/complaint to PAC
LEG-IPIP	IPIP/Expropriation	Complaint to the Minister of Infrastructure (as the higher-level authority over the Voivode who issues the IPIP decision)/complaint to PAC
LEG-ODSZ	Amount of compensation	Appeal to the Minister of Infrastructure against the Voivode's compensation decision, or complaint to PAC
LEG-INV	Proceedings of state authorities in exceptional circumstances (e.g. accident, exposure to danger, etc.)	Proceedings conducted by judicial, supervisory and state security authorities, such as the police, public prosecutor's office, Labor Inspectorate, Environmental Protection Inspectorate, etc.

8.4 Level 4: Malicious/abusive grievances (MAL)

Code	Character	Procedure
MAL-01	Misleading, repeating closed cases without new circumstances, false allegations, manipulation	Legal verification; possibility of refusal to consider after proving abuse
MAL-02	Threats against staff, allegations of corruption	Immediate escalation to the GRM Committee

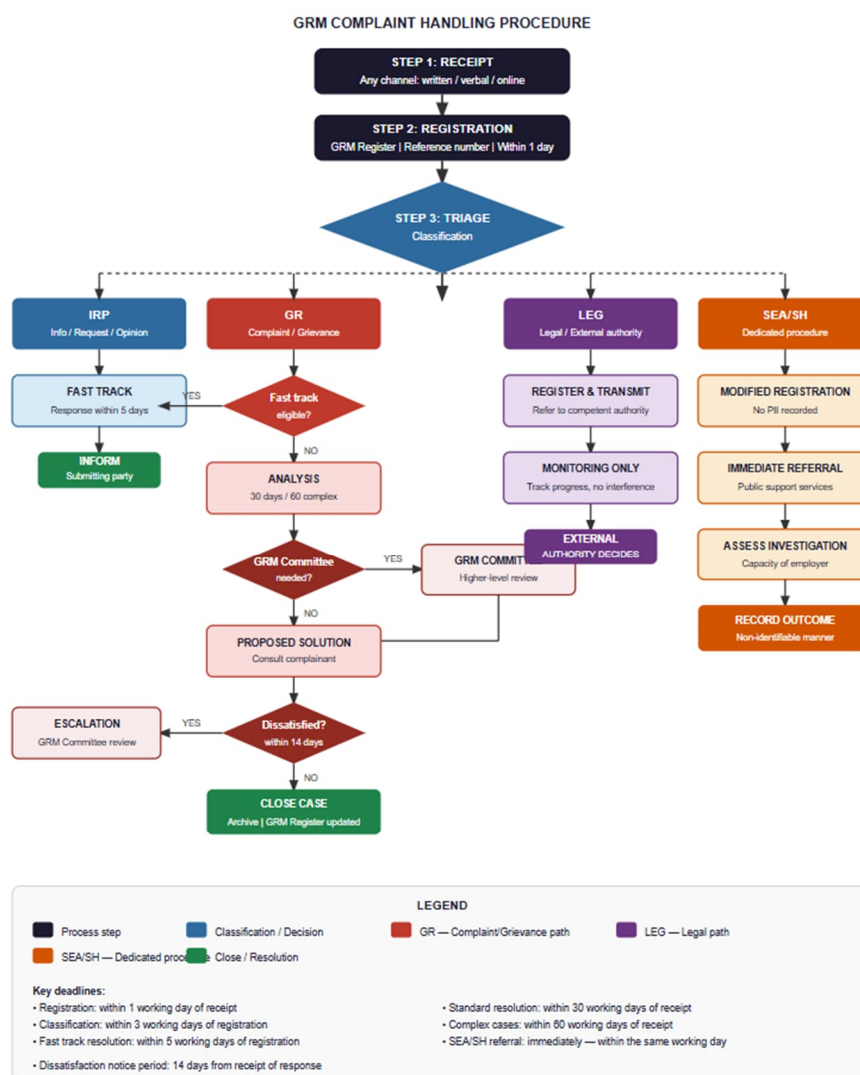
9 Grievance handling procedure

The procedure comprises eight steps leading to the provision of high-quality services. A defined temporal framework applies to each stage, as set out below:

1. Identification and registration of grievance
2. Confirmation of receipt
3. Assessment and classification (triage)
4. Early resolution or analysis
5. Consideration of remedial measures
6. Communication of results and consultation with the complainant on resolution options
7. Finalization or escalation
8. Feedback on system issues
9. Archiving

Note - formal complaints subject to the legal route and described in chapters 4.3 and 7.3 are only subject to registration and classification. SEA/SH complaints are handled exclusively under the dedicated procedure set out in section 8.4.

Figure 2 - GRM complaint handling procedure



9.1 Registration

Step	Action	Responsible entity	Deadline
Receipt	Receiving the grievance via any channel (in writing, verbally, online)	GRM Coordinator/Task Personnel	Immediately upon receipt
Registration	Entering into the GRM Register, assigning a reference number, preliminary classification	GRM Coordinator	Within 1 working day of receipt

9.2 Assessment and classification

Step	Action	Responsible entity	Deadline
Classification	Determining the character: IRP/GR/LEG/SEA/SH/MAL and urgency based on the magnitude and nature of the reported impact	GRM Coordinator with the participation of Expert Consultant	Within 3 working days of registration
Allocation	Referral to the appropriate expert/team or to monitoring (LEG complaints)	GRM Coordinator	Within 1 working day of classification
Verification	Checking the completeness of information, possible contact with the complainant	Assigned expert	Within 2 working days of allocation
SEA/SH	SEA/SH complaints are not subject to standard classification or allocation. Upon identification, the GRM Coordinator immediately refers the survivor to competent public support services. The GRM's role is limited to facilitating safe referral and recording the outcome in a non-identifiable manner	GRM Coordinator	Immediately — no standard triage applied

9.3 Resolving the matters

9.3.1 Fast track

A fast-track procedure is available for straightforward cases. A simple case eligible for fast-track consideration is a grievance that meets all of the following conditions:

- does not require detailed analysis or evidence gathering,
- the recipient has sufficient information and competence to respond or take action,
- the solution can be implemented immediately or within a maximum of 5 working days,
- the case does not require referral to the GRM Committee/legal consultation.

The category of simple matters includes, in particular:

- information requests concerning the work schedule, design procedures or scope of the investment,
- requests for providing documents or information materials (excluding matters relating to public information and environmental information),
- complaints about lack of notification or insufficient communication – requiring an apology and additional information,
- matters beyond the scope of the Task's competences – requiring only referral to the competent authority,
- recurring, routine requests for which a standard solution has been developed.

Cases are NOT eligible for the fast track if they:

- concern compensation, property valuation or resettlement,
- require site visits, gathering documentation, internal project consultations or discussions with multiple parties,

- are associated with potential legal liability for the project,
- are collective in nature or concern many people,
- contain elements of aggression, threats or accusations of corruption,
- concern workplace safety incidents,
- are identified as or suspected to be SEA/SH-related — SEA/SH complaints are never subject to fast-track procedure and are handled exclusively under the dedicated SEA/SH procedure.

Step	Deadline
Assessment and decision on fast-track eligibility	Within 3 working days of registration
Resolution and communication to submitting party	Within 5 working days of registration
Closing the case (if no notice of dissatisfaction received)	Within 19 working days of resolution (14-day dissatisfaction period + 5 days)

9.3.2 Analysis and solution

Cases within the GRM system are processed within 30 days of receipt of the grievance.

Particularly complex cases requiring expert analysis are considered within 60 days of receipt of the grievance. If it is not possible to consider the case within this time limit, the GRM Coordinator shall agree with the Submitting Party on a date for considering the grievance.

Step	Action	Responsible entity	Deadline
Analysis	Collecting the facts, site visit, discussions with stakeholders and experts	Assigned expert / GRM Coordinator	Within 10 days of allocation
Proposed solution	Developing a plan of corrective actions/preparing an expert opinion; the complainant is consulted on proposed resolution options before a final determination is made	Assigned expert / GRM Coordinator	Within 20 days of receipt
Response	Written response with findings, actions, deadlines and instructions	GRM Coordinator	Within 30 days of receipt (60 for complex cases)
Implementation	Implementation of corrective actions and verification	Responsible expert / PIU unit	As per agreed action plan
Closing	Marking the case as "Closed" after confirming the resolution.	GRM Coordinator	After expiry of 14-day dissatisfaction period

9.4 SEA/SH grievances

SEA/SH grievances are handled under a procedure separate from the standard GRM process, consistent with World Bank ESF requirements and the Good Practice Note on Addressing SEA/SH in Investment Project Financing involving Major Civil Works (Third Edition, October 2022). This procedure applies to two distinct but related categories:

- Sexual Exploitation and Abuse (SEA): any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including sexual abuse by project-associated personnel against community members;

- Sexual Harassment (SH): any unwanted verbal, non-verbal or physical conduct of a sexual nature occurring in the workplace or in connection with the Task-related activities.

This procedure is operational from the early design stage and will be updated prior to construction commencement to reflect risks associated with labor influx and contractor presence.

The following principles apply to all SEA/SH cases:

1. Survivor-centered approach: the survivor's safety, confidentiality, dignity and wishes are the primary consideration at every stage. For adult survivors, this means following the survivor's wishes and recognizing them as the principal decision-maker in their own care.
2. Do no harm: no action is taken that could increase the risk of retaliation or harm to the survivor.
3. Confidentiality: no personally identifiable information of the survivor is recorded in the GRM Register or disclosed to any unauthorized person. Access to the restricted-access section of the GRM Register is limited to the GRM Coordinator. Members of the GRM Committee and the PCU contact are granted access only to the extent strictly necessary for the performance of their specific function and only for the duration of that function.
4. Non-discrimination: SEA/SH grievances are handled without judgment, regardless of the identity of the survivor or the alleged perpetrator.
5. Mandatory reporting obligations: prior to receiving a SEA/SH grievance, the survivor is informed of any mandatory reporting obligations under Polish national legislation. Reporting to law enforcement authorities is undertaken only with the informed consent of the survivor, unless otherwise required by law.
6. Best interests of the child: where the survivor is a minor (under 18 years of age), the best interests of the child are the primary consideration in all actions. The standard survivor-centered approach is applied with additional safeguards — no information is collected from a child without the presence of an appropriate adult, and the case is immediately referred to child protection services in addition to standard referral.
7. Anonymous reporting: SEA/SH grievances may be submitted anonymously. Anonymous grievances are handled under this procedure without any attempt to identify the survivor. Where a grievance is submitted anonymously and no direct contact with the survivor is possible, the GRM Coordinator does not attempt to initiate contact. In such cases, referral to support services takes the form of ensuring that up-to-date information on available local support services is maintained and publicly accessible on the Project information boards and on the Project website.

All SEA/SH grievances, regardless of whether submitted under a name or anonymously, are handled exclusively under this procedure. The identity of the survivor is protected at every stage — no personally identifiable information is shared beyond the GRM Coordinator and authorized personnel.

The survivor retains full control over the process and is not required to provide any information beyond what they voluntarily choose to disclose. No adverse consequences shall result from the submission of a SEA/SH grievance, and no pressure shall be placed on the survivor to pursue any particular course of action.

Step	Action	Responsible entity	Deadline
Receipt and identification	Upon receipt, if the submission is identified as or suspected to be SEA/SH-related, the standard procedure is immediately modified. The survivor is informed of their rights and of mandatory reporting obligations under Polish law. If the survivor is a minor, child protection services are contacted immediately in addition to standard steps.	GRM Coordinator	Immediately upon identification
Modified registration	The case is registered in a restricted-access section of the GRM Register, accessible only to authorized personnel. For the purposes of this procedure, authorized personnel are limited to: the GRM Coordinator; members of the GRM Committee, but only where the case involves a project-associated perpetrator or requires escalation; and the designated PCU contact, but only where notification under Step 5 is required. Access to the restricted-access section of the GRM Register is limited to the GRM Coordinator. Members of the GRM Committee and the PCU contact are granted access only to the extent strictly necessary for the performance of their specific function and only for the duration of that function. Information recorded is limited to: (i) the nature of the grievance in the survivor's own words, without probing or leading questions; (ii) whether the alleged perpetrator is associated with the Project; (iii) if voluntarily provided, the age and sex of the survivor; (iv) whether the survivor has been referred to support services. No further information is requested or recorded.	GRM Coordinator	Immediately
Referral	The GRM Coordinator immediately refers the survivor to competent public support services, including crisis intervention centres, psychological support services, and legal aid available under Polish national and local social support systems. A list of available local services is maintained and updated by the GRM Coordinator. Where the grievance is submitted anonymously and no direct contact with the survivor is possible, referral takes the form of ensuring that up-to-date information on available support services is publicly accessible on the Project information boards and on the Project website. No attempt is made to identify or contact the anonymous survivor.	GRM Coordinator	Immediately — within the same working day
Assessment of investigation capacity	The GRM Coordinator assesses: (i) whether it is safe for a misconduct investigation to be undertaken; (ii) whether the alleged perpetrator is associated with the Project; (iii) whether the employer of the alleged perpetrator has an appropriate administrative process in place — with in-house expertise and survivor-centered procedures — to conduct a misconduct investigation. The assessment is based on the following minimum criteria: (a) the existence of a documented internal misconduct procedure that ensures confidentiality and a survivor-centered approach; (b) the availability of personnel with relevant competence who are independent of the alleged perpetrator; and (c) the absence of a conflict of interest at the level of the employer's management. Where such capacity is lacking, the GRM may recommend that the employer establish a service contract to procure expertise through a suitably qualified person or organization. Where the employer fails to initiate or unreasonably delays the misconduct investigation, the GRM Coordinator notifies the PCU, which may direct the relevant employer to take corrective action.	GRM Coordinator / GRM Committee	Within 3 working days of receipt

Step	Action	Responsible entity	Deadline
	Where the alleged perpetrator is a project worker, the GRM Coordinator notifies the GRM Committee and — where applicable — the PCU.		
Notification to PCU	Where the case involves a project-associated perpetrator or is of a serious nature, the GRM Coordinator notifies the PCU for oversight purposes. The PCU does not intervene in individual case handling. The PCU may, however, direct corrective action where the employer's investigation process is found to be inadequate or where the employer fails to act within a reasonable timeframe.	GRM Coordinator	Within 3 working days of receipt
Outcome recording	The outcome of the grievance is recorded in a non-identifiable manner in the restricted-access section of the GRM Register.	GRM Coordinator	Upon conclusion of referral and assessment

The role of the GRM in SEA/SH cases is strictly limited to:

- facilitating safe and ethical referral to competent public support services;
- assessing the adequacy of the employer's misconduct investigation process;
- notifying the PCU where required; and
- recording the outcome in a non-identifiable manner. The GRM does not investigate SEA/SH allegations.

All SEA/SH-related information is treated with strict confidentiality, with access restricted to authorized personnel only.

Prior to construction commencement, the Contractor will be required to adopt a Code of Conduct addressing SEA/SH, consistent with World Bank standard procurement documents. Compliance with the Code of Conduct will be monitored by the supervising engineer.

The following indicators are tracked and reported to the World Bank on a semi-annual basis. All data reported externally is aggregated and non-identifiable. Disaggregated data is reported only where the number of cases in a given category is sufficient to prevent re-identification of the survivor (minimum threshold: 3 cases per category). Where the number of cases in a given category falls below this threshold, the indicator is reported as "<3" and no further disaggregation is provided. No personal data is transferred to the World Bank.

- Number of SEA/SH grievances received (disaggregated by type: SEA / SH / anonymous — subject to re-identification threshold)
- Number of survivors referred to public support services
- Number of cases where investigation capacity assessment was conducted
- Number of Contractor's personnel trained in SEA/SH awareness
- Number of training sessions delivered by the Contractor and percentage of personnel trained.

SEA/SH indicators are reported separately from general GRM monitoring data and are not included in publicly disclosed GRM reports.

Prior to the commencement of works, the Contractor is required to ensure that all personnel receive training in SEA/SH awareness, applying a survivor-centered approach. Training covers at minimum: definitions of SEA and SH; expected standards of conduct under the Code of Conduct; reporting obligations; and referral pathways to public support services. Training is delivered by a qualified specialist appointed by the Contractor. Training records are maintained by the Contractor and submitted to the supervising engineer upon request.

9.5 Complaints and motions submitted under the Code of Administrative Procedure

Section VIII of the Code of Administrative Procedure (CAP) regulates the procedure for submitting complaints and motions to state authorities. According to the regulations:

- the subject of the complaint may be, in particular, negligence or improper performance of tasks by the competent authorities or their employees, violation of the rule of law or the interests of the complainants, as well as protracted or bureaucratic handling of cases (Article 227 of the CAP).
- the subject of the motion may include, in particular, matters related to improving organization, strengthening the rule of law, streamlining the work and preventing the abuse, protecting property, and better satisfaction the population's needs (Article 241 of the CAP).

Article 229 of the CAP provides that unless specific provisions designate other authorities competent to examine complaints, the National Water Management Authority is the authority competent to examine complaints concerning the tasks or activities of SWH PW - Regional Water Management Authority in Wrocław.

The authority competent to examine the complaint may refer it to a lower-level authority for resolution, provided that the complaint does not contain allegations concerning the activities of that authority. A complaint against an employee may also be forwarded for resolution to their supervisor, with the obligation to notify the authority competent to examine the complaint of how it has been resolved. The complainant shall also be notified that the complaint was forwarded.

A complaint in an individual case, which has not been and is not the subject of administrative proceedings, shall give rise to initiating the proceedings, if it has been lodged by a party. If such a complaint comes from another person, it may result in the initiation of administrative proceedings ex officio, unless the regulations require a request from a party to initiate proceedings.

In the case in which administrative proceedings are pending:

- 1) the complaint lodged by the party shall be examined in the course of the proceedings, in accordance with the provisions of the Code;
- 2) the complaint from other persons constitute the material which the authority conducting the proceedings should examine ex officio.

Article 242 of the CAP stipulates that motions shall be submitted to the authorities competent for the subject matter of the motion. If the authority that has received the motion is not competent to consider the same, it shall forward it to the competent authority within seven days. The applicant shall also be notified that the motion was forwarded.

Under Article 237 of the CAP, complaints and motions shall be dealt with without undue delay, but no later than within one month. Particularly complex cases are dealt with within a maximum period of 2 months, which may be extended.

Members of Parliament, senators and councilors who have lodged a complaint on their own behalf or forwarded another person's complaint for resolution should be notified of the manner in which the complaint has been resolved, and if evidence, information or explanations need to be collected to resolve it, also of the status of processing the complaint, no later than fourteen days from the date of its submission or referral.

The complainant shall be notified of the manner in which the complaint or motion has been dealt with. In accordance with Article 238, a notice of the manner in which the complaint has been resolved shall include: identification of the authority from which it originates, an indication of how the complaint has been considered, and a signature stating the name and official position of the person authorized to deal with the complaint. A notice of refusal to process a complaint should also include factual and legal grounds and information about the content of Article 239. This provision stipulates that if, as a result of its examination, the complaint has been found to be unfounded and its unfounded nature has been demonstrated in the response to the complaint, and the complainant has repeated the complaint without indicating any new circumstances, the authority competent to examine it may uphold its previous position with an appropriate note in the case file, without notifying the complainant.

The above provisions apply to complaints and motions submitted in accordance with the CAP, with the reservation that in the case of an unfounded complaint, the complainant must be notified that the complaint will not be considered.

9.6 Notice of dissatisfaction with the handling of case

If the complainant is dissatisfied with the solution, they may submit a notice of dissatisfaction with the handling of the case to the GRM Committee within 14 days of receiving the response. In cases where the complaint is being considered by the GRM Committee, if the complainant is dissatisfied with the manner in which the matter has been handled, they may submit such a notice together with a request for reconsidering the matter.

Step	Timeframe	Action	Who
Submission of the notice of dissatisfaction with the handling of case	Within 14 (fourteen) days from the date of receipt of the decision on the submitted grievance.	Notice of dissatisfaction	Submitting party
Re-analysis	Within 5 working days of receipt of the notice of dissatisfaction	Review of all documentation	GRM Committee
Final position	Within 30 working days of receipt of the notice of dissatisfaction	Written, final response	GRM Committee

9.7 Closing the case

Closing a case in the GRM system means finalizing the process of reviewing the grievance and confirming that the case has been:

- considered on its merits,
- the solution has been implemented (if applicable),
- the submitting person has been informed of the outcome,
- the submitting party's satisfaction with the outcome has been sought; where dissatisfaction has been expressed, the 14-calendar-day deadline for submitting a notice of dissatisfaction has expired without such notice being received,
- no further action is required under the GRM system.

A case may be closed even where the submitting party continues to maintain claims that have been assessed as unsubstantiated or excessive, provided that the grievance has been substantively considered, a reasoned response has been issued, applicable remedial measures have been extended, and the deadline for submitting a notice of dissatisfaction has expired. In such cases, the grounds for closure are documented in the GRM Register.

LEG cases are not closed in the traditional manner – they are monitored until the proceedings are completed by the relevant external authorities.

The status of a LEG case may be changed to "closed" after:

issuing a final administrative decision

- issuing a final ruling by an administrative court
- closing the investigation by state authorities (police, public prosecutor's office, inspectorates)
- discontinuing the proceedings
- withdrawing the complaint/appeal by the submitting party

A closed case may be reopened, particularly in the following circumstances:

- the submitting party presented new factual circumstances that were not known at the time the case was examined,
- an error was found in the examination of the case (e.g. relevant evidence was omitted, the procedure was incorrectly applied),
- corrective actions have not been implemented or have proved ineffective.

The GRM Coordinator decides on the reopening of a closed case, after obtaining the opinion of the GRM Committee.

10 Corrective actions

Grievances should be resolved through remedial measures that are proportionate to the nature and severity of the concern raised, fair, transparent, and implemented in a timely manner. Corrective actions may seek to address both the process through which the issue arose and the substantive impact experienced by the complainant.

Depending on the circumstances of the case, remedial measures may include one or more of the following:

1. Procedural Remedies

- These measures aim to restore trust, improve communication, and correct deficiencies in the handling of the matter:
- Acknowledgement and recognition – formal recognition of the complainant’s concern and confirmation that the issue has been understood and duly considered.
- Apology – where errors, omissions, inconvenience, or inappropriate conduct have occurred without damage and evident harm.
- Clarification or additional explanation – provision of supplementary information, reasons for decisions, or clarification of applicable procedures and project requirements.
- Acceleration of pending action – expediting a delayed process, review, payment, or response where unjustified delays have occurred.
- Improved communication arrangements – designation of focal points, enhanced notification, or more regular updates to affected stakeholders.

2. Substantive Remedies

- These measures address the actual impact or harm caused by project activities or decisions:
- Correction of decision or process – revision of a previous decision, adjustment of a project activity, or modification of an administrative process where justified.
- Restoration or repair – remediation of physical damage, reinstatement of access, restoration of land, assets, services, or livelihoods, as applicable.
- Compensation or other entitlements – provision of financial compensation or assistance in accordance with the applicable LARAP, project commitments, or relevant legal requirements.
- Change in work practices – modification of construction methods, schedules, traffic arrangements, environmental controls, worker conduct, or other operational practices to prevent recurrence.
- Preventive measures – implementation of additional mitigation measures, monitoring, training, supervision, or safeguards to avoid similar grievances in the future
- Temporary suspension of works – where continued works may pose significant environmental, social, health, or safety risks to workers or the community, the Grievance

Mechanism Coordinator may recommend temporary suspension of relevant activities to the PIU. Any decision on suspension shall be taken by the PIU in coordination with the supervising engineer and in accordance with contractual arrangements.

- All agreed remedial measures shall be recorded in the grievance register, communicated clearly to the complainant, tracked to completion, and closed only once implementation has been verified or otherwise appropriately concluded.

11 Complaint database and register

11.1 Contents of the register

The register of GRM grievances must contain the following information:

Complainant information:

- Unique complaint identification number.

Complaint information:

- Date and channel of receipt,
- Description of the complaint
- Category and classification code,
- Result (justified/unjustified/unresolved),
- Remedial measures applied,
- Closing date.

11.2 Protection of personal data

11.2.1 Personal data protection policy applied for the Task

The following rules, applied during the implementation of this Task, are aimed at ensuring transparency, protection and security of collected personal data of parties submitting the grievances under this GRM.

11.2.2 Who is the personal data controller

Pursuant to Article 13(1) and (2) of the General regulation on the protection of personal data of April 27, 2016, the controller of personal data is the State Water Holding Polish Waters with its registered office in Warsaw 00-848, 59a. Żelazna St. It is responsible for the use of the data in a safe and lawful manner - in particular in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

11.2.3 Contact details for the data protection officer

All questions of the parties submitting grievances concerning the manner and scope of personal data processing within the scope of SWH Polish Waters' operations, as well as the powers vested in them, are answered by the Personal Data Protection Officer at SWH Polish Waters using the address iod@wody.gov.pl

11.2.4 Legal basis for processing

The legal basis for the processing of personal data is Article 6(1)(e) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC in connection with Article 3 of the Special Flood Act.

11.2.5 What personal data may be collected and for what purpose

Personal data is any information of a personal nature that identifies a particular person. **SWH PW RZGW in Wrocław** collects only those data which are necessary to carry out investment tasks implemented by **SWH PW RZGW in Wrocław**. Such data are processed only to the extent stated by the Submitting Party, on the basis of their voluntary consent through the relevant form, and may include:

- a) identity data: full name and date of birth,
- b) contact details: telephone number, registered and/or residence address, e-mail address,
- c) data related to the payment of compensation for permanent occupation of property, restrictions on use: PESEL number, series and number of identity card, parents' names, bank account number.

Consent to the storage and processing of personal data is voluntary, however, its absence may make it impossible to inform the Submitting Party about how the grievance has been considered.

SWH PW RZGW in Wrocław stores only current personal data of the Submitting Party, and the Submitting Party should inform RZGW in Wrocław about any change of data.

11.2.6 What personal data have been obtained other than from the person concerned and from what source(s)

In order to identify the owners/perpetual usufructuaries/operators of the properties that will be subject to permanent occupation or restrictions on use, **SWH PW RZGW in Wrocław** has obtained personal data from the Register of Land and Buildings and the electronic Land and Mortgage Register system. The data obtained include:

- a) identity data: full name and first names of parents (where indicated in EGIB), PESEL number (where indicated in LMR)
- b) contact details: address for registration (in those cases where indicated in EGIB).

11.2.7 To whom personal data may be disclosed

The Submitting Party's personal data can only be disclosed to:

- a) eligible public entities for the purposes of their proceedings, when **SWH PW RZGW in Wrocław** is obliged to do so on the basis of relevant regulations and documents (e.g. summons from the court, court order or other administrative or legal procedure),
- b) units involved in the Task implementation
- c) only to the extent necessary to carry out a specific activity,
- d) postal operators, to inform the Submitting Party,
- e) the Consultant's representatives and lawyers to support the implementation of the Task and for compensation payments.

Personal data will not be transferred to third countries or international organizations.

11.2.8 What rights does the data subject have

Every Submitting Party is entitled:

- a) to access, update and correct their personal data,
- b) to delete their personal data ("right to be forgotten") or transfer them to another controller,
- c) to restrict the processing of their personal data - some data may be designated as restricted to processing only in certain circumstances,
- d) to lodge a complaint concerning the processing of their data by **SWH PW RZGW in Wrocław** to the competent authority supervising the processing of personal data, if PAP considers that the processing of personal data concerning them violates the provisions of the General Regulation on Personal Data Protection of April 27, 2016 (indicated above),
- e) to withdraw at any time consent to the processing of their personal data by **SWH PW RZGW in Wrocław**

Submitting Parties' data will not be subject to automated decision-making processes (profiling).

11.2.9 Contact to the supervisory authority to which a complaint can be lodged on matters related to privacy policy

President of the Office for the Protection of Personal Data

2. Stawki St.

00-193 Warsaw

tel. +48 22 531 03 00

fax. +48 22 531 03 01

Office hours: 8.00 a.m. – 4.00 p.m.

Helpline: 606-950-000 open on working days from: 10.00 a.m. – 1.00 p.m.

11.2.10 Contact at SWH PW RZGW on matters related to privacy policy

At SWH PW, **Data Protection Inspector** tel: +48 22 37 20 213 e-mail: iod@wody.gov.pl

At RZGW in

11.2.11 Period for which personal data will be stored

Personal data will be stored until the completion date of the Task and settlement of its implementation.

12 Monitoring and reporting

12.1 Indicators for monitoring

The GRM system is regularly monitored using the following indicators:

- Number of registered complaints/grievances (total and by category)
- Types of grievances and recurring issues — identification of patterns and systemic problems
- Percentage of resolved complaints
- Level of satisfaction with the outcome — tracked through follow-up contact with the submitting party; cases where dissatisfaction was expressed or escalated to the GRM Committee are flagged for trend analysis
- Percentage of complaints resolved within the specified time frame
- Average resolution time (broken down by complaint type)
- Number of cases considered by the GRM Committee
- Number of notices of dissatisfaction received and percentage upheld by the GRM Committee
- Number of LEG cases under monitoring and their current status
- Number of SEA/SH grievances received — reported separately

12.2 Reporting

The GRM coordinator prepares the following reports:

Monthly report (internal):

- List of complaints received and their status.

13 Training

13.1 Training for Project staff

Project staff - comprising PIU personnel, the Technical Support Consultant and, once selected, the Contractor and supervising Engineer — must be trained in:

- Objectives and operating principles of GRM,
- Roles and responsibilities of each team member in the grievance handling process,
- Procedures to be followed when a grievance is received,
- Zero tolerance policy for retaliation.

13.2 SEA/SH training

All Contractor personnel — including management, supervisory staff, workers, and subcontractors — are required to complete SEA/SH training before commencing works and at regular intervals throughout the construction period. Training is mandatory and attendance is tracked.

Training for all Contractor personnel covers:

- Definitions of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) and how they may occur in the context of civil works projects, including risks associated with labor influx and power differentials between workers and community members;
- Prohibited conduct under the Code of Conduct, including examples of SEA/SH behaviors in the workplace and in the community;
- Understanding of consent and why certain relationships — especially between project personnel and community members or persons in vulnerable situations — are inherently unequal;
- Specific prohibitions regarding sexual activity with minors, regardless of the age of consent under national law;
- Obligations to report SEA/SH incidents and concerns through available channels, including anonymous grievances options;
- Protection from retaliation for notification in good faith;
- Available grievance channels — including the project GRM and the workers' GRM;
- Referral pathways to public support services available to survivors.

Training for managers and supervisory staff additionally covers:

- Responsibilities of management in preventing and responding to SEA/SH;
- How to receive a disclosure from a survivor in a survivor-centered manner — including active listening, non-judgmental response, and immediate referral;

- Obligations under the Code of Conduct regarding investigation and disciplinary procedures;
- How to assess whether the employer's internal process is adequate to conduct a misconduct investigation in a survivor-centered manner;
- Coordination with the GRM Coordinator in the event of a SEA/SH grievance.

Training delivery requirements:

- Training is delivered by a qualified specialist with demonstrated experience in GBV/SEA/SH awareness — not by the Contractor's internal HR without specialist support;
- Initial training is completed before commencement of works;
- Refresher training is conducted at least every 12 months and whenever significant changes to the workforce occur (e.g. large-scale recruitment);
- Training is delivered in a language understood by all participants;
- Where literacy levels are low, training is adapted accordingly — using visual materials, role plays, and group discussion rather than written materials only;
- Training records — including dates, trainer credentials, topics covered, and signed attendance lists — are maintained by the Contractor and submitted to the supervising engineer;
- The supervising engineer verifies completion of training before authorizing commencement of works and conducts spot checks during implementation.

14 GRM's public disclosure

Information about the GRM — including available channels, deadlines, and submitting parties' rights — is publicly disclosed in accordance with the SEP. Disclosure activities include:

- Publication on the SWH PW website and Facebook page,
- Distribution of information leaflets at PAP information points and local authority offices,
- Announcements at public consultations,
- Updates whenever the GRM is materially revised.

15 Appendix 1: Complaint Form

COMPLAINT FORM for the construction project of the Kamieniec Ząbkowicki Reservoir	
Important information:	
☐ Procedure is free of charge. ☐ Complaint can be filed anonymously ☐ You will not suffer any negative consequences ☐ If you provide your contact details, we will respond to your complaint.	
TO BE FILLED OUT BY THE PROJECT OFFICE	
Date of receipt:	
Case no.:	
Submitting party's details:	
☐ I am notifying ANONYMOUSLY – do not fill in below, proceed to "CONTENT OF THE COMPLAINT"	
☐ I am providing the details Name and surname: Address: Telephone: E-mail:	
☐ I give consent to process my personal data to consider the complaint by the State Water Holding Polish Waters, Regional Water Management Authority in Wrocław, 34. C. K. Norwida St., 50-950 Wrocław	
How should we contact you?	
☐ Telephone ☐ E-mail ☐ Post ☐ In person ☐ I do not expect a reply	
Describe what happened and what the problem is:	
Appendix: GDPR clause	