

UPDATED ENVIRONMENTAL MANAGEMENT PLAN

DIVUNDU BULK WATER SUPPLY SCHEME



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ABBREVIATIONS

CoC	Code of Conduct
DBWSS	Divundu Bulk Water Supply Scheme
DEA	Department of Environmental Affairs
EMP	Environmental Management Plan
ESMP	Environmental and Social Management Plan
MET	Ministry of Environment and Tourism
NEM	NamWater Environmental Manager
PPE's	Personal Protective Equipment

1 INTRODUCTION

1.1 Background & Rationale for the Project:

The existing Divundu Bulk Water Supply Scheme is located in the Kavango East Region in the far extreme North-East of Namibia. The Scheme links the towns of Divundu and the settlement of Bagani with one another via a water pipeline distribution channel.

Through this Scheme NamWater provides high quality class A potable water to Divundu and Bagani and Divundu- East supply areas.

NamWater appointed Enviro Dynamics CC. in 2012 to compile the original EMP on their behalf. This document contains the updated EMP for the operation, maintenance and decommissioning of the Divundu Water Supply Scheme and associated infrastructure.

1.1.1 Scope of the EIA:

The particular objectives of the EIA in terms of the Terms of Reference are to:

- Comply with Namibia's Environmental Assessment Policy, Environmental Management Act (2007) and its Regulations (2012).
- Compile an Environmental Management Plan for the operation, maintenance and decommissioning phases of the Divundu Water Supply Scheme and associated infrastructure.

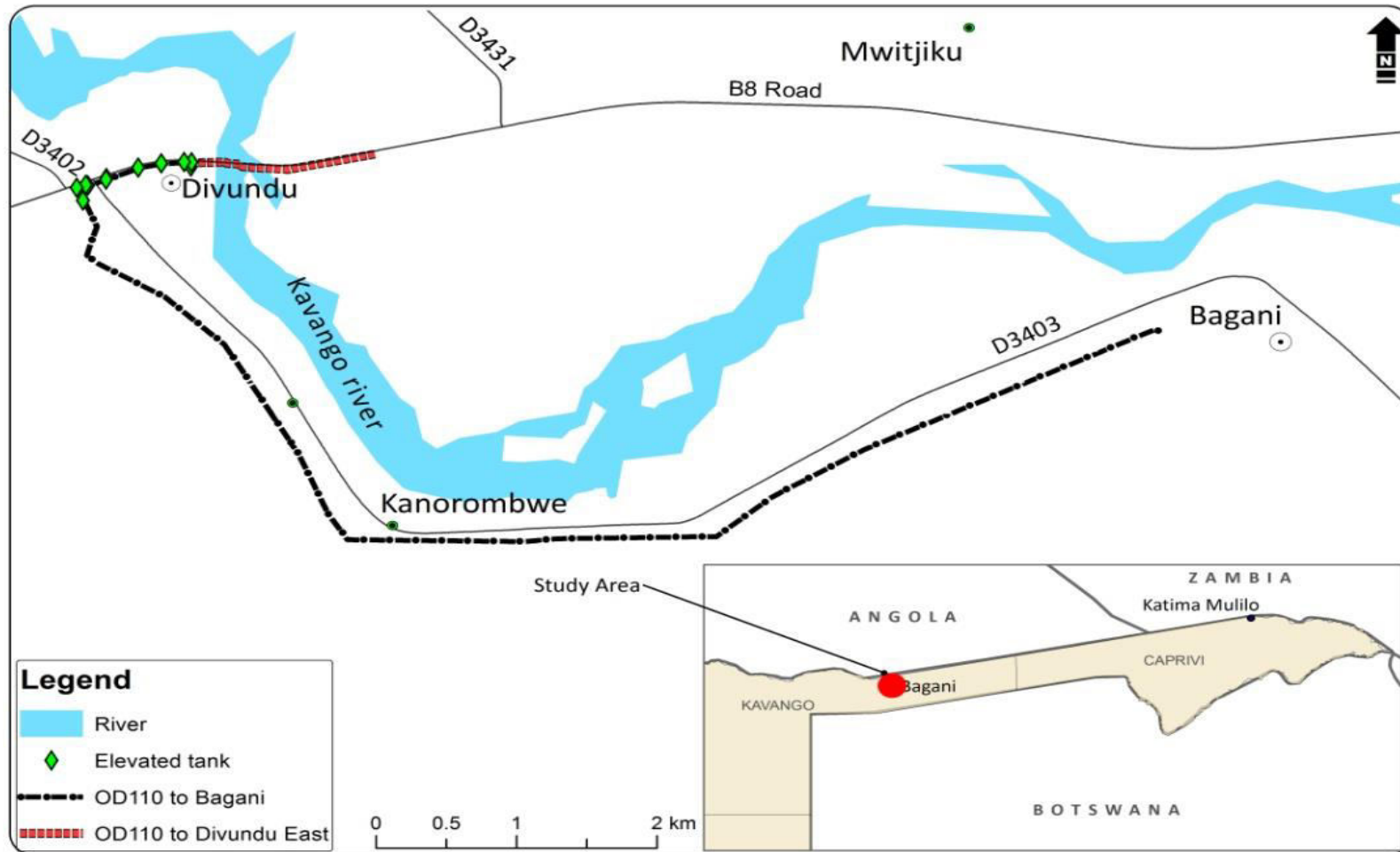


Figure 1: Locality Map of Divundu Bulk Water Supply Scheme

2 ENVIRONMENTAL MANAGEMENT PLAN

2.1 What is an Environmental Management Plan?

Environmental Management Plans (EMPs) are important tools that focus on the management actions that are required to ensure environmental compliance of a project. The Draft Regulations of the Environmental Management Act (2007) state that “the environmental management plan shall set out steps that are intended to be taken to manage any significant environmental impact that may result from the operation of the undertaking”.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. An EMP must respond to unforeseen events and changes in project implementation that were not considered before. Through monitoring and auditing, feedback for continual improvement in environmental performance must be provided and corrective action taken to ensure that the EMP remains effective.

2.2 What are the legal implications and obligations under this plan?

The Environmental Management Plan will be sent to the Directorate of Environmental Affairs of the Ministry of Environment and Tourism (MET) for approval. Once the DEA is satisfied with the contents of the EMP, they will issue a pro-forma Environmental Clearance Certificate to NamWater. The Environmental Clearance Certificate is linked with the recommendations of the Environmental Management Plan.

The EMP, once accepted, therefore becomes a legally binding document and each role-player including contractors and sub-contractors who are made responsible to implement the relevant sections of this EMP are required to abide to the conditions stipulated in this EMP document.

3 EXISTING DIVUNDU INFRASTRUCTURE

The Divundu Water Supply Scheme consist of the following infrastructure:

ABSTRACTION, TREATMENT AND STORAGE COMPONENTS

The water abstraction structure consist of a steel jetty, resting on 6 vertical steel columns. The jetty cantilever for 4.8 m over the Okavango River. A set of two submersible pumps are installed on a fixed guide rail, connecting the jetty to the river bed. The pumps are installed in a protective cage to protect the pumps against debris carried by the river.

Approximately 3.6 m of the abstraction structure is in the water, while more than 10 m of the structure is on the river bank. The outlet structure of the waste water is approximately 8 m from the maximum height of the flood line. Thus, the waste water flows for about 8 m over sand before it reaches the river water and any active coagulant binds to organic matter before it reaches the water.

The river abstraction pump system is a set of submersible pumps with variable speeds. The height of the pump is adjustable by means of a mechanical hoist, installed permanently on the jetty. One pump runs at a time. When the tank is nearing empty, the pump speed increases. The pump supply (output) will be harmonized with the flocculent pump, which will also have a variable speed drive.

THE WATER TREATMENT PLANT AND TREATMENT PROCESS

The water treatment plant is accommodated in an industrial shed with a footprint of 10.77 m by 8.44 m. A control room, a laboratory and an electrical room are also constructed next to the shed. The shed is an open structure that accommodate the filters, located directly under the roof.

The water of the Okavango River has very low total hardness (below 40 mg/l as CaCO₃) and is therefore very corrosive to steel pipes. White lime will be added at the inlet to the plant or after clarification, for stabilization of the product water. Full stabilization of the water with lime results in an increase of the pH higher than is allowed for a Group A water and requires subsequent lowering of the pH, either with carbon dioxide or an acid. Lime is only added until the pH reaches 9. This leaves the final water only mildly corrosive.

WATER STORAGE AND PUMPING

After treatment, the water is pumped to a 1460 m³ closed ground level reservoir for intermediate storage from where it is pumped to the supply areas. The maximum water storage volume of the reservoir is 1460m³ and represents 48 hours of the average water demand.

The pump-station is an open steel structure with an enclosed electrical switchboard room, which hosts 2 variable speed centrifugal pumps. The pumps each supply a designated pipeline and runs for 20 hours per day.

THE PROPOSED PIPELINE

The pipeline network will consist of high-pressure un-plasticized Polyvinyl Chloride (uPVC) pipes with a 110mm diameter.

In addition to the two pipelines, a separate pipeline will be constructed to feed the existing 169 m³ tank at Divundu. See **Figure 2** below. The three pipeline sections are described in detail below



Figure 2: Divundu Pipeline

4 GENERAL REQUIREMENTS FOR THE EMP

4.1 EMP administration

Copies of this EMP shall be kept at the Scheme and will be distributed to all senior personnel. All senior personnel shall be required to familiarize themselves with the contents of this document.

4.2 Roles and Responsibilities

NamWater's Environmental Manager is primarily responsible for the implementation of the EMP during the operational, maintenance and decommissioning phases.

NamWater

NamWater, as the implementing agency, is responsible for:

- * Ensuring that the objects of the EMP are being obtained;
- * Ensuring that all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating and rehabilitation. This will be achieved by successful implementation of the EMP;
- * Ensuring that appropriate monitoring and compliance auditing are executed;
- * Ensuring that the environment is rehabilitated to its natural state as far as possible.

NamWater shall ensure that all employees attend an Environmental, Awareness Training Course. This course shall be structured to ensure that attendees:

- * Become familiar with the environmental controls contained in the EMP;
- * Are made aware of the need to conserve water and minimise waste;
- * Are made aware of NamWater's Code of Conduct;
- * Are aware that a copy of the EMP is readily available at the plant and that all staff are aware of the location and have access to the document;
- * Are informed that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.
- * Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP (via the ER/RE).

- * Auditing the implementation of the EMP and compliance with authorization on a monthly basis.
- * Undertaking a continual review of the EMP and recommending additions and/or changes to the document.

5 MANAGEMENT ACTIONS

5.1 Operation and Maintenance Phase

Responsibility: NamWater's Environmental Manager.

ASPECT	OBJECTIVE	MANAGEMENT AND MONITORING MEASURES	RESPONSIBILITY/PARTNERSHIPS
HEALTH, SAFETY AND SECURITY	<p>To aim for zero incidents and accidents at the Scheme</p> <p>To ensure there are emergency response procedures in place in case of incidents and accidents.</p> <p>To ensure security measures are in place to protect property and life for the duration of the Scheme.</p>	<ul style="list-style-type: none"> NamWater Head: North shall make sure that all staff are equipped and know how to use safety and personal protective equipment (PPE). The use of PPE must be enforced. Signage indicating the use of PPE will be erected at appropriate locations. Hazard identification signage should be erected at appropriate locations. Keep a comprehensive first aid kit at Scheme. All items for treatment as specified in the material safety data sheets for hazardous materials should be available in the first aid kit. Ensure that all staff knows where the first aid kits are located and who is trained in first aid. Emergency procedures for accidents should be communicated to all employees. Enough fire extinguishers and firefighting equipment should be kept on each site in a case of a fire and be put out as soon as possible. No alcohol/drugs are allowed on any site and anyone found to be under the influence of alcohol/drugs will be disciplined. All drivers must adhere to traffic regulations at all times. No speeding shall be allowed. Make sure all drivers/operators have licenses for the vehicles/equipment they are driving. Copies of these records must be kept on file and must be accessible for inspection. Dangerous areas must be clearly marked and access to these areas controlled or restricted. Make sure all vehicles are roadworthy. Repair faulty brakes, exhausts etc. immediately. 	<p>NEM</p> <p>NamWater Head: North</p>

<p>CONSERVATION OF THE NATURAL AND HISTORICAL ENVIRONMENT</p>	<p>To minimise damage to soil, vegetation, habitat and heritage resources during the operation and maintenance phases.</p>	<ul style="list-style-type: none"> Smoking is prohibited in areas where it is a fire hazard, e.g. fuel storage areas, workshops, etc. No off-road driving shall be allowed, except on the agreed upon temporary service road(s). All vehicles must stay strictly in the one track made – drive carefully in this track and do not deviate from it. No trees may be felled or live wood in the project area removed by any member of the Scheme staff, including sub-contractors. Note that the collection of animals, plants and minerals is prohibited by law. No animal may be killed, chased, baited or harassed, and no eggs may be removed from a bird's nest, nor may the nest be tampered with or damaged. Any staff members caught in such an activity must be handed over to the authorities. Avoid small mammal / reptile and bird nesting where possible. Do not hurt, kill, or unnecessarily disturb birds or animals. No wood may be collected. Do not disrupt any of the important archaeological sites. Contractors need to be aware of the specific sites as defined in Table 1. 	<p>NEM NamWater Head: North</p>
<p>ROAD MAKING AND DRIVING</p>	<p>To ensure the making of roads are kept to a minimum, so as to avoid unnecessary damage to the fragile floodplains. To minimise amount of dust generated</p>	<ul style="list-style-type: none"> Do not make new roads when the quality of existing roads deteriorates. Where possible, repair or upgrade existing roads. Road construction methods should ensure good road surfaces to preclude vehicles driving off road to find smoother surfaces with less corrugations or potholes. Do regular road maintenance to ensure good road surfaces. Prevent cutting of corners. Demarcate areas that are prone to corner cutting so that this is avoided. Activities causing dust should be limited along access roads by keeping to the driving speed (30km/hr) on all tracks. As far as possible existing tracks within the present servitude should be utilized for maintenance. These should be clearly indicated, together with designated turning points. Vehicles driving along the service route should engage four-wheel drive to prevent excessive track making. Use 3-point turns and not U-turns. Prevent shortcuts between roads. 	<p>NEM NamWater Head: North</p>

HAZARDOUS CHEMICAL MANAGEMENT	To avoid potential chemical / hazardous substance pollution	<ul style="list-style-type: none"> • Tyre pressures should be as low as possible to reduce impacts. • Designated areas for the storage of potentially hazardous material will be lined with concrete and secured. The bunded area will be of adequate capacity to contain 1,5 times the volume of the hazardous material to be stored in the bunded area. • Cement should be stored on pallets. The mixing of cement should always be in a container. Cement water should not come into contact with the surrounding soil. 	NEM NamWater Head: North
WASTE MANAGEMENT AND WATER RESOURCE MANAGEMENT	<p>To avoid potential surface and groundwater pollution.</p> <p>To ensure that sound waste management practices are adhered to during operation, maintenance and decommissioning phases.</p>	<ul style="list-style-type: none"> • All waste at the Scheme produced daily should be contained daily. • All recyclable waste need to be taken to a recycling depot in Rundu, since there are no other sites closer. • Adequate separate containers for hazardous and domestic waste must be provided at the Scheme. They must be clearly marked. • Make sure that the bins are regularly emptied and the waste taken to an appropriate waste dumpsite (i.e. Rundu for general waste and Windhoek / Walvis Bay for hazardous waste). No hazardous waste may be burned • The workshop area must be lined with concrete and must have an oil-water separator. • Accidental spills must be cleaned immediately. The contaminated soil must be treated as hazardous waste. • In the event of a hazardous spill: <ul style="list-style-type: none"> ○ Immediately implement actions to stop or reduce the spill activity. ○ Contain the spill. ○ Arrange implementation of the necessary clean-up procedures. ○ Collect contaminated soil, water and other materials and store it in an appropriate container for later disposal at the Windhoek / Walvis Bay hazardous waste disposal site. ○ All spills should be reported and a "spills register" kept. • A hazardous material spill kit must be available at the Scheme and there must be at least one person with appropriate authority who is trained in hazmat response. • Refuelling vehicles should be equipped with specific vehicle spill kits. Drivers should be trained in relevant spill response procedures. • Explosives should be stored according to the prescribed regulations. 	NEM NamWater Head: North

- Corrosive, explosive, toxic, and flammable material will be stored in separated areas.
- All hazardous materials must be stored in separate containers and stored for transport and disposal at an approved waste disposal site (Windhoek) or for collection by an oil recycling company.
- Water will be used sparingly and all faulty and leaking taps, toilets and pipes shall be immediately repaired.

5.2 Site Closure and Rehabilitation

Rehabilitation is the process of returning the land in a given area that has been disturbed by construction, operation and maintenance to an acceptable state or an otherwise predetermined state. Many projects, if not all, will result in the land becoming degraded to some extent. However, with proper rehabilitation, most impacts associated with the operation and maintenance of the Divundu Bulk Water Supply Scheme could be mitigated and restored to an acceptable level. Poorly rehabilitated areas provide a difficult legacy issue for governments, communities, and companies, and ultimately tarnish the reputation of companies as a whole.

Rehabilitation proposals and concept plans should be developed and those plans should be revised from time to time.

Rehabilitation should be an integrated part of all stages of the project life cycle.

5.2.1 Objectives of proper site closure and rehabilitation

The aim is to restore the area to an acceptable standard as close to its baseline environmental state as possible.

The objectives of the rehabilitation plan should be based upon the specific characteristics of the construction area and should reflect:

- * Legislative requirements in the area;
- * Health and safety considerations;
- * Environmental and social characteristics of surrounding area;
- * Biodiversity in the area;
- * Ecosystem services provided within the site's ecological boundaries;
- * Post-closure land use plan.

5.2.2 Rehabilitation measures to implement:

- a. A site inspection will be held by the scheme supervisor after every maintenance work during operation of the scheme. Rehabilitation will be done to the satisfaction of the ENV section and MET.
- b. Frequent inspections of the scheme and effective follow-up procedures, to prevent minor defects from becoming major repair jobs.

- c. Make sure all soil polluted during maintenance work is properly stored in drums and removed to an appropriate waste dump.
- d. Make sure all windblown litter is removed once maintenance has ceased.
- e. Make sure that all potential hazards are properly closed and left in a safe and neat position.
- a. Should there be spills of hazardous substances on the soil, polluted soil will be collected and disposed of at a hazardous landfill site that accepts such waste and replaced with unpolluted soil.
- b. Dismantle and flatten temporary drifts and water course crossings, reinstating all drainage lines to approximate their original profile.
- c. Rip and / or scarify all disturbed areas at the maintenance site, including temporary access routes and roads, compacted during the execution of the works.
- d. Rip and / or scarify along the contour to prevent the creation of down-slope channels.
- e. Ensure that the area is safe for the intended end land use.
- f. Rehabilitation will be done to the satisfaction of the NamWater ENV section and MET.

6 NAMWATER ENVIRONMENTAL CODE OF CONDUCT

What is an Environmental Code of Conduct?

It is a set of rules that everybody has to follow in order to minimise damage to the environment.

What is the ENVIRONMENT?

The ENVIRONMENT means the surroundings within which people live. The ENVIRONMENT is made up of the **soil, water, plants, and animals** and those characteristics of the soil, water, air, and plant and animal life that influence **human health and well-being**. **People** and **all human activities** are also part of the environment and have to be considered during the operation of the Scheme.

Do these ENVIRONMENTAL RULES apply to me?

YES, The Environmental Rules apply to EVERYBODY. This includes all permanent, contract, or temporary workers as well as any other person who visits the Scheme. Every person will be required to adhere to the Environmental Code of Conduct.

ALL PERSONNEL must study and keep to the Environmental Code of Conduct

The SCHEME SUPERVISOR will issue warnings and will discipline ANY PERSON who breaks any of the Environmental Rules. Repeated and continued breaking of the Rules will result in a disciplinary enquiry and which may result in that person being asked to leave the Scheme permanently.

What if I do not understand the ENVIRONMENTAL RULES?

ASK FOR ADVICE, if any member of the WORKFORCE does not understand, or does not know how to keep any of the Environmental Rules, that person must seek advice from the SCHEME SUPERVISOR. The PERSON that does not understand must keep asking until he/she is able to keep to all the Environmental Rules.

Safety and Security

1. Only enter and exit roadways and maintenance areas at demarcated entrances.
2. Wear protective clothing and equipment as per signboards at the Scheme and according to instructions from your SCHEME SUPERVISOR.
3. Report to your SCHEME SUPERVISOR if you see a stranger or unauthorised person in the maintenance area.
4. Never enter any area that is out of bounds or that is demarcated as dangerous without permission of your SCHEME SUPERVISOR.
5. Never climb over any fence or enter private property without permission of the landowner or your SCHEME SUPERVISOR.
6. Do not remove any vehicle, machinery, equipment, or any other object from the maintenance site without the permission of your SCHEME SUPERVISOR.
7. Keep clear of blasting sites. Follow the instructions of your SCHEME SUPERVISOR.
8. Never enter or work in the Scheme while under the influence of alcohol or other intoxicating substances.
9. All staff should know the emergency procedures in case of accidents.

Waste Disposal

10. Learn the difference between different types of waste, namely:
 - general waste, and
 - hazardous waste.

Containers will be provided for different types of wastes.

General Waste includes waste paper, plastic, cardboard, harmless organic (e.g. Vegetables) and domestic waste

Hazardous Waste includes objects, liquids or gases that are potentially dangerous or harmful to any person or the environment. Sewage, fuel, tyres, diesel, oils, hydraulic and brake fluid, paints, solvents, acids, soaps and detergents, resins, old batteries, etc. are all potentially hazardous.

11. Learn how to identify the containers for the different types of wastes. Only throw general waste into containers, bins or drums provided for general waste.
12. Recycle drums, pallets and other containers.
13. Never bury or burn any waste on site, all waste is to be disposed in allocated refuse disposal containers, bins or bags.
14. Never overfill any waste container. Inform your SCHEME SUPERVISOR if you notice a container that is nearly full.
15. Do not litter.

16. Do not bury litter or rubbish in the backfill trench.

Plants and Animals

21. **Do not ever pick any plants, or catch any animal.** People caught with plants or animals in their possession will be handed to the authorities for prosecution.
22. Never feed, tease, play with, or set devices to trap any animal or livestock. Wild animals are not to be domesticated.
23. Keep off the rock outcrops unless given specific permission by the SCHEME SUPERVISOR to be there.
24. Never cut down any tree or branches for firewood.
25. Never leave rubbish or food scraps or bones where it will attract animals, birds, or insects.
26. Rubbish must be thrown into allocated waste disposal bins/bags.
27. Always close the gates behind you.

Preventing Pollution

28. Only work with hazardous materials in bunded areas.
29. Never discard any hazardous substances such as fuel, oil, paint, solvent, etc. into stream channels or onto the ground. Never allow any hazardous substances to soak into the soil.
30. Clean up spills immediately.
31. Immediately report to your SCHEME SUPERVISOR when you spill, or notice any hazardous substance overflow, leak or drip or spill on site, into the streambeds or along the road.
32. Immediately report to your SCHEME SUPERVISOR when you notice any container, which holds hazardous substances overflow, leak or drip. Spillage must be prevented.
33. Only wash vehicles, equipment and machinery, containers and other surfaces at work site areas designated by your SCHEME SUPERVISOR.
34. Do not change oil on uncovered surfaces.
35. If you are not sure how to transport, store, use, or get rid of any hazardous substances ask your SCHEME SUPERVISOR for advice.

Health

36. Drink lots of clean water every day.
37. Use toilets that have been provided.
38. Take the necessary precautions to avoid contracting HIV / AIDS. Condoms are available at most Clinics.

39. Inform your SCHEME SUPERVISOR when you are sick.
40. Do not work with any machinery when you are sick.
41. If you are working in malaria areas, you must take the necessary precautions.

Dust Control

42. Do not make any new roads or clear any vegetation unless instructed to do so by your SCHEME SUPERVISOR.
43. Keep to established tracks and pathways.
44. Keep within demarcated work areas.

Saving Water

47. Always use as little water as possible. Reduce, re-use and recycle water.
48. Never leave taps or hose pipes running. Close all taps after use.
49. Report any dripping or leaking taps and pipes to your SCHEME SUPERVISOR.

Working Hours

50. You may only work on weekends and after hours with the consent of the SCHEME SUPERVISOR.

Archaeological and Cultural Objects

52. If you find any archaeological, cultural, historical or pre-historical object on the maintenance site you must immediately notify your SCHEME SUPERVISOR.
53. Never remove, destroy, or disturb any cultural, historical, or pre- historical object on site.

Cultural and Historical Objects include old buildings, graves or burial sites, milestones, old coins, beads, pottery and military objects.

Pre-Historical objects include fossils and old bones, old human skeletal remains, pieces of pottery and old tools and implements.

Sensible Driving

54. Tracks and roads should be kept to a minimum. Where possible follow existing roads.
55. No off-road driving is allowed.
56. Never drive any vehicle without a valid licence for that vehicle class and do not drive any vehicle that is not road-worthy.
57. Never drive any vehicle when under the influence of alcohol.

58. **Always** keep your headlights on when driving on dusty roads.
59. Keep to the roads as specified by your SCHEME SUPERVISOR. Vehicles may only be driven on demarcated roads. Drivers should always use three point turns, “u-turns” are not allowed. Do not cut corners.
60. Do not drive on rocky outcrops.

Noise

61. Keep noise levels as low as possible.
62. Do not operate noisy equipment outside normal working hours.

Fire Control

63. Do not make open fires, use a drum or tin and do not collect any vegetation to burn.
64. Do not smoke or make fires near refuelling depots or any other area where fuel, oil, solvents, or paints are used or stored. Fireplaces should be at a safe distance from fuel and explosive storage sites as well as vehicle parking sites.
65. Cigarette butts should always be thrown in allocated refuse bins. Make sure that the cigarette butt is out before throwing it into the bin.
66. Immediately notify your SCHEME SUPERVISOR if you see an unsupervised fire at the campsite or maintenance site.

Dealing with Environmental Complaints

67. If you have any complaint about dangerous working conditions or potential pollution to the environment, talk to your SCHEME SUPERVISOR.
68. If any person complains to you about noise, lights, littering, pollution, or any harmful or dangerous condition, immediately report this to your SCHEME SUPERVISOR.
69. For any enquiries or grievances, please call

Jolanda Kamburona
Tell: 061-71 2105
Cell: 081 144 1528

or

Fillemon Aupokolo
Tell: 061-71 2095
Cell: 081 325 3301

7 GRIEVANCE PROCEDURES AND REGISTRATION

All grievances should be submitted through the completion of the grievance registration form as presented below and submitted to the Scheme Superintendent during the operation and maintenance phase.

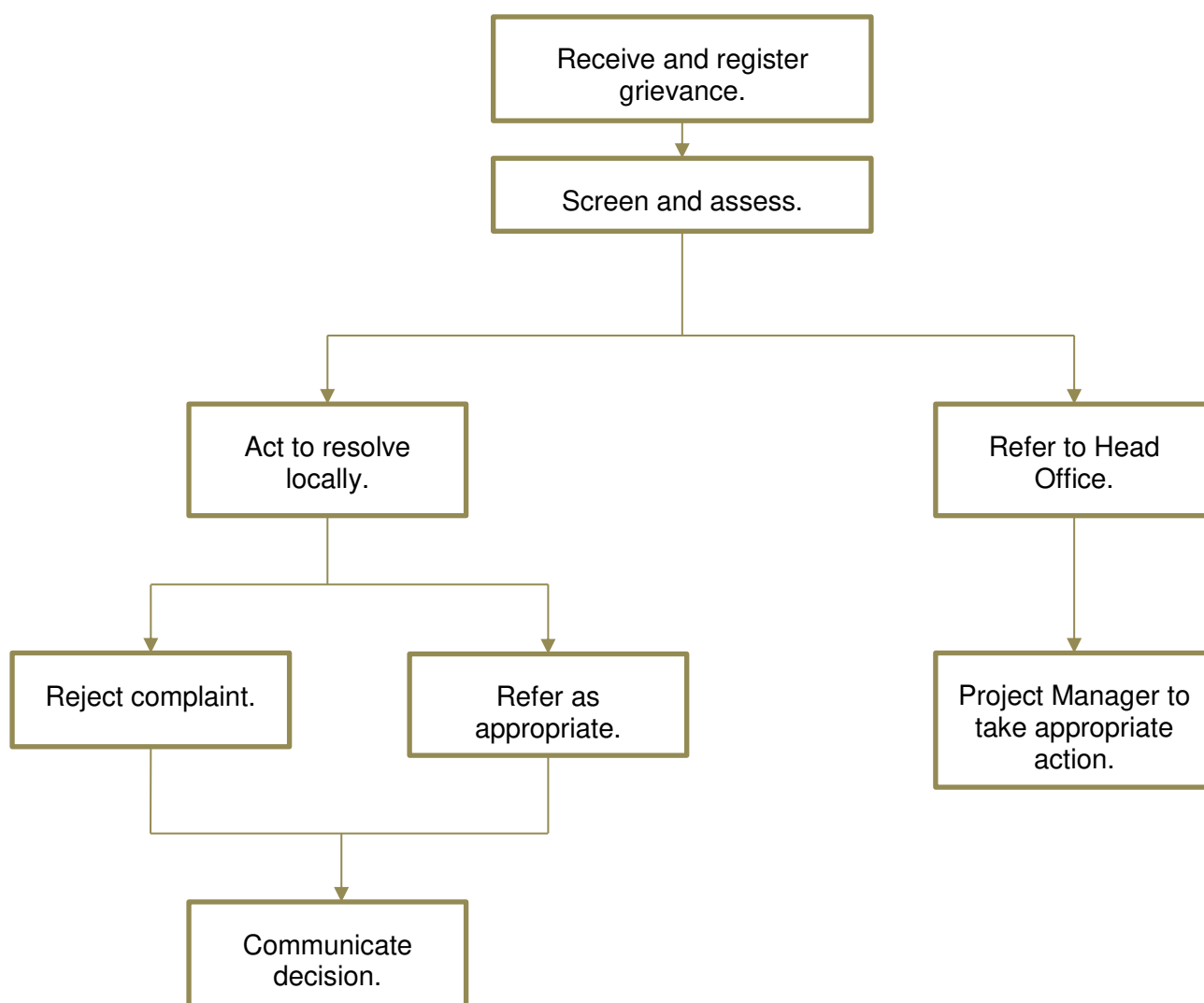


Figure 1: Grievance response procedure

Upon receipt of the registered grievance forms, Scheme Superintendent shall screen and assess to either act to solve the grievance locally or refer it to head office. If the grievance is referred to the head office, the line manager should decide. If the grievance is to be solved locally, it should either be rejected or handled appropriately of which the decision should be communicated to the aggrieved person.

Grievance Registration

Grievance Registration	
Case No:	Date:
Name of complainant:	Cell no:
	Email address:
Details of grievance: (Date, location, persons involved, frequency of occurrence, effects of ensuing situation, etc)	
Name of person recording grievance:	Cell number:
Proposed date of response:	
Signature of recording person:	Signature of complainant:
Date of redress:	

Decision and action: