Gaining Traction or Spinning Wheels?

Factors Influencing the Effectiveness of Grievance Mechanisms in World Bank-Financed Projects
Acknowledgments

This report was part of an effort to strengthen the right to remedy in World Bank operations and beyond by building the capacity of World Bank staff, clients, and project-affected people, especially the vulnerable and marginalized, to implement effective grievance mechanisms so that they can improve service delivery, risk management, and development outcomes. The core team, led by Sanjay Agarwal comprised Saki Kumagai, Harika Masud, and Hélène Pfeil at the World Bank.

The authors of the report are Hélène Pfeil and Sanjay Agarwal. The authors are grateful to Varalakshmi Vemuru, Louise J. Cord, and Maninder S. Gill, who provided valuable and timely guidance throughout the process. Valuable inputs, comments, and guidance were provided by Adila Abusharaf, Charles Di Leva, Jonathan Fox, Naomi Hossain, Tamir Ibragimoff, Erik Caldwell Johnson, Michael Kent, Saki Kumagai, Camilla Marie Lindstrom, Ekaterina Romanova, and Sunrita Sarkar.

The authors would like to thank all World Bank colleagues who shared their insights as part of the qualitative research interviews, as well as Laura Johnson for her excellent editorial support.

Finally, the authors are grateful to the Human Rights, Inclusion and Empowerment Trust Fund (HRIETF) for supporting the activities under this initiative. The findings, interpretations, and conclusions expressed in this report are entirely those of the authors and should not be attributed in any manner to the World Bank, to its affiliated organizations, or to members of its Board of Executive Directors or the countries they represent.
“Don’t focus on the surface. Only by planting seeds will you ever have fruits. At the moment, I walk on unpaved roads, but the future generation will have better roads. The country has faced a lot of suffering. It is our responsibility to make the two parallel lines meet. … To make grudges go away, we have to work together with our shoulders touching. Let us not say I am the one who is right. Let us help each other and move forward. Let us leave out our selfishness. … Let us think about the future.”

This poem by a villager of Myanmar was filed with the grievance mechanism (GM) of the National Community-Driven Development Project, a multimillion program financed by the World Bank since January 2013 and implemented by the Department for Rural Development of the Ministry for Agriculture. While it is somewhat unusual for GMs to receive such submissions, the feedback system in this specific project has seen a wide uptake among project beneficiaries. The many letters of thanks and even hand-drawn cartoons received reflect people’s experience with the local-level infrastructure projects supported in their communities over several years.

Usually though, GMs are systems primarily designed to “respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner” (World Bank 2017a: 100). Mandated by the World Bank’s Environmental and Social Framework in all Investment Project Financing (IPF) since October 1, 2018, the rationale for these systems builds on the business case established for GMs in the private sector where, it is recognized, they significantly reduce financial, construction, operational, reputational, and corporate risks (Herz, Vina, Sohn and 2007). Indeed, GMs can help “find rapid solutions to individual problems encountered by project-affected people” (World Bank 2016a: 13); act as an early alarm system that allows project implementors to course correct; build public awareness of the project and its objectives; prevent fraud and corruption; offer practical suggestions that make projects more accountable, transparent, and responsive to beneficiaries; assess the effectiveness of internal organizational processes; increase project stakeholders’ involvement; and improve targeting where individual beneficiaries exist (Agarwal and Post 2011a).

When not restricted to a reactive, problem-solving role, GMs can also help identify preventative measures and improve project design by analyzing and addressing recurring complaint patterns. When there is risk of a violation of fundamental human rights, well-working GMs offer effective remedies in line with Article 8 of the Universal Declaration on Human Rights. Conversely, “the absence of a GM or the presence of a dysfunctional one can breed frustration and mistrust among project-affected people” (World Bank 2016a: 13). This can result in harm, disrupt project implementation, prevent the materialization of project benefits, lead to cost overruns.

1. In August 2016, the World Bank adopted a new set of environment and social policies called the Environmental and Social Framework (ESF). The ESF enables the World Bank and Borrowers to better manage the environmental and social risks of projects and to improve development outcomes by offering broad and systematic coverage of environmental and social risks. As compared to the World Bank’s previous environmental and social policies, called safeguards policies, the ESF makes important advances in areas such as transparency, nondiscrimination, public participation, and accountability—including expanded roles for GMs. The ESF is composed of 10 Environmental and Social Standards (ESSs). ESS10—Stakeholder Engagement and Information Disclosure—recognizes the importance of open and transparent engagement between Borrowers and project stakeholders as an essential element of good international practice, and it requires that Borrowers design and implement GMs in all their projects.
due to implementation delays and necessary remedial action, and create reputational risks. Malfunctioning GMs can also leave unresolved a range of human rights violations that may occur, for example, due to the inadequate implementation of resettlement policies, unequal provision of access for project beneficiaries, or a failure to uphold labor standards.

While all countries have their own GMs, managed by the relevant judicial, administrative, or legislative authorities (e.g., Ombud’s office), project-level GMs send the message that project implementers care about project-affected people and want to offer them an alternative to lengthy and expensive proceedings, for example, in court (see box 1.1). The Asian Development Bank recognizes that:

**Box 1.1. Where do Grievance Mechanisms Fit in the Social Accountability Landscape?**

Social accountability is a form of citizen engagement defined as the “extent and capability of citizens to hold the state accountable and make it responsive to their needs” (World Bank 2012: 30–31). Among the range of social accountability-enhancing interventions, grievance mechanisms (GMs) stand out because they address fairness considerations for particular individuals. They aim to rectify “something that has gone wrong. This means that redress procedures, if effective, are intrinsically valuable, even without any effect on subsequent accountability relationships” (Gauri 2011: 3).

GMs target specific citizens and focus on individual actions. According to new public management theory, GMs are “top-down creations of very structured and controlled bottom-up mechanisms, to address information asymmetries in managing public administration and delivering public services” (Aslam, Grandvoinnet, and Raha 2015: 24). Because a GM focuses on the state’s capacity to respond—its “teeth”—it serves as a strategic social accountability intervention with the potential of being more effective than tactical social accountability interventions solely focused on “voice,” which have demonstrated a mixed record (Fox 2014).

Similar to the desired outcomes of other social accountability tools though, the expected results of GMs include

- “a reduction in corruption, better governance and policy design, enhanced voice, empowerment, and citizenship of marginalized groups, responsiveness of service providers and policy makers to citizens demands, and ultimately the achievement of rights, health, and developmental outcomes” (Lodenstein et al. 2013).

By building institutional channels for citizen-state interaction, GMs contribute to the “creation (or rejuvenation) of a transparent and credible public interface between states and citizens that is missing or is not being used in various contexts” (Aslam, Grandvoinnet, and Raha 2015: 60). If well operated, a GM can lead to an increase in trust between the state and citizens, improve the state’s performance legitimacy, and expand freedom of choice and action among citizens. In this way, a GM can also enhance project-affected people’s right to remedy as outlined in Article 3 of the International Covenant on Civil and Political Rights,a which is instrumental to fulfilling Sustainable Development Goal 16b to “provide access to justice for all and build effective, accountable and inclusive institutions at all levels.”

---

a. Article 3 of the International Covenant on Civil and Political Rights reads as follows: “3. Each State Party to the present Covenant undertakes: (a) To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy, notwithstanding that the violation has been committed by persons acting in an official capacity.”

b. In particular Sustainable Development Goal 16a “Develop effective, accountable and transparent institutions at all levels” and 16.7 “Ensure responsive, inclusive, participatory and representative decision-making at all levels.”
“A vibrant GM will avoid project delays, as aggrieved parties could resolve their grievances without approaching the judiciary. A GM will be in a much better position than a court to resolve project-related issues, because its members have good local knowledge, and its approach is to resolve issues through consultation and mediation” (Perera, Gamaathige, and Weerackody 2016: 236).

Despite their prevalence in projects financed by multinational development banks (see box 1.2), the record and effectiveness of GMs is at best mixed. A 2014 review of GMs in World Bank-financed projects found that “almost half of all GMs reported to be working either receive no complaints or have no data on complaints” (World Bank 2014a: 45). Data from World Bank implementation status reports about IPF and program-for-results operations show that, as of September 2020, 69 percent of the 1,876 projects in the Bank’s active portfolio had a GM in place, but evidence that they were actually receiving and processing complaints was available only for 70 percent of these GMs. Why “GMs exist on paper but not always in practice” (World Bank 2014a: 16) is under-researched. Understanding remains limited as to why existing resources, e.g., guidance notes, handbooks, and toolkits (World Bank 2014b), do not translate into consistent results on the ground and why there are so many instances when GMs do not fulfill their intended purpose but remain, as one interviewee described, “artificial spinning machines without outcomes.” The conclusion of a 2013 article on grievances and complaints in basic service delivery recognizes that “important work remains to be done … on what explains high levels of utilization in some settings but not others” and that this is an “area where further analytic and operational research would be useful” (Gauri 2011: 26).

This paper therefore explores which factors influence the success of a GM and under what circumstances GMs trigger—or fail to trigger—improvements in project design, changes in power dynamics, or community relations. By doing so, it aims to “produce clearer insights into the roadblocks as well as the dynamics of positive change achieved through [GMs]” (Aslam, Grandvoinnet, and Raha 2015: 70). Although the World Bank offers several avenues for grievance redress to project beneficiaries (see box 1.2), this paper focuses on project-level GMs in IPF, which are the responsibility of the World Bank’s clients, that is, public sector agencies and ministries. The key research question explored is: **What factors influence the effectiveness of project-level GMs?**

**Methodological approach.** This paper relies on a mixed-methods approach. Fifteen qualitative, semistructured interviews were conducted over a six-week period in February and March 2020 by the author with World Bank practitioners specializing in social safeguards policies and the supervision of social aspects, including GM implementation, in World Bank-financed projects. In April 2020, an online survey of 94 GM focal points in implementing agencies was conducted in 24 countries; its 23 questions probed the design, track record, strengths, and weaknesses of project-level GMs (World Bank 2021a). Follow-up discussions were then held with eight project implementation unit (PIU) members from two projects. Finally, the paper also relies on extensive case study analysis.

After this introduction, the paper’s structure is as follows:

**Section 2** argues that a GM’s effectiveness depends on the quality of its design and the resources allocated to it. Front-end considerations that play a vital role include the GM’s accessibility to project-affected people, the extent to which people are aware of the mechanism, and the extent to which the GM builds on existing complaint-handling mechanisms. Key back-end considerations include an adequate budget, sufficient staff, and robust case management procedures, as well as a thorough knowledge of good complaint-handling practices.

---

2. IPF provides loans, credit/grants, or guarantee financing to governments for activities that create the physical/social infrastructure necessary to reduce poverty and create sustainable development. See https://www.worldbank.org/en/projects-operations/products-and-services.
3. Practitioners included senior social development specialists, operations advisors, lead social development specialists, and regional safeguards advisors/coordinators with experience working and providing support to World Bank-financed projects in the Middle East and North Africa, South Asia, Africa, Europe and Central Asia, Latin America and the Caribbean, and East Asia and Pacific regions.
4. A PIU is a specially established team, usually at the ministerial level, responsible for the implementation of a World Bank-financed project.
1. INTRODUCTION

Section 3 focuses on the enabling environment to explain why some GMs fare well while others do not. It explores political dynamics, including the role of state-citizen trust and cultures of social accountability, the influence that individuals can have on a GM’s success; and how high-level commitment and participation shape a GM’s ability to adequately respond to people’s concerns.

Section 4 highlights the influence of legal frameworks on GM outcomes. Discrepancies between World Bank policies and the national legal framework, or between traditional mechanisms and the country’s domestic laws, can hamper the good functioning of a GM. Furthermore, GMs do better when the relevant actors have enforcement and/or sanctioning powers and are in a position to implement the proposed remedies.

Section 5 concludes by offering recommendations and anticipating future trends in GM implementation, including embedding GMs in broader citizen and stakeholder engagement activities; addressing the issue early on during project preparation; very clearly defining implementation responsibilities; and building consolidated grievance structures across projects, especially when the same ministry is implementing them (see table 1.1).

### Table 1.1. Factors That Influence the Effectiveness of a Grievance Mechanism

<table>
<thead>
<tr>
<th>Design considerations</th>
<th>A well-considered front end</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Accessible grievance channels</td>
</tr>
<tr>
<td></td>
<td>• Effective awareness-raising/communication campaigns</td>
</tr>
<tr>
<td></td>
<td>• Processes that build on preexisting complaint mechanisms</td>
</tr>
<tr>
<td>A well-resourced back end</td>
<td>• Adequate financial resources</td>
</tr>
<tr>
<td></td>
<td>• Adequate staffing</td>
</tr>
<tr>
<td></td>
<td>• Robust case management procedures and the capacity to implement them</td>
</tr>
</tbody>
</table>

| Political considerations | • Political context and culture of social accountability |
|                         | • Commitment of individual actors |
|                         | • High-level oversight and participation |

| Legal considerations | • Discrepancies between World Bank guidance on GMs and the national legal framework |
|                      | • Discrepancies between traditional, local-level mindsets and the domestic legal framework |
|                      | • Enforcement powers for remedy |

| Recommendations | • Change mindsets to view a GM as a useful tool for citizen engagement and feedback |
|                 | • Address the issue of GMs early on, including at the highest levels |
|                 | • Clearly define GM responsibilities |
|                 | • Consolidate GM structures where possible, and strengthen country systems for grievance redress |

GM = grievance mechanism.

---

5. “Social accountability is defined as an approach toward building accountability that relies on civic engagement, i.e., in which it is ordinary citizens and/or civil society organizations that participate directly or indirectly in exacting accountability. In a public sector context, social accountability refers to a broad range of actions and mechanisms that citizens, communities, independent media, and civil society organizations can use to hold public officials and public servants accountable... These citizen-driven accountability measures complement and reinforce conventional mechanisms of accountability such as political checks and balances, accounting and auditing systems, administrative rules and legal procedures” (Malena, Forster, and Singh 2004). The World Bank’s governance and anticorruption strategy update defines social accountability as the “extent and capability of citizens to hold the state accountable and make it responsive to their needs”—in other words—“accountability-enhancing actions that citizens can take beyond elections” (World Bank 2012).
1. INTRODUCTION

Box 1.2. Grievance Mechanisms at the World Bank

In 1993, the World Bank’s Board of Executive Directors created the **Inspection Panel**, an impartial fact-finding body independent from World Bank management and staff that reports directly to the Board, to ensure that people have access to an independent body where they can express their concerns and seek recourse. The Inspection Panel is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a World Bank-funded project.a

In 1997, the World Bank regrouped 10 Operational Policies as specific “safeguard policies” designed to help the Bank address environmental and social issues—six environmental, two social, and two legal policiesb—and put in place administrative procedures to support compliance with the safeguard policies during project preparation and implementation. When triggered, the two social safeguard policies, **Operational Policy and Bank Practice (OP/BP) 4.10 on Indigenous Peoples and OP/BP 4.12 on Involuntary Resettlement**, translate into a mandatory requirement for projects to establish appropriate and accessible GMs for indigenous peoples, displaced persons, and host communities, and to describe them in relevant safeguards documents, such as the project’s Indigenous Peoples Plan, Indigenous Peoples Policy Framework, Resettlement Action Plan, or Resettlement Policy Framework.

A 2010 Independent Evaluation Group (IEG) review of the World Bank’s safeguard policies recommended that the World Bank create a grievance redress and conflict resolution mechanism to complement the independent Inspection Panel, resulting in the creation of the **Grievance Redress Service** in March 2015, which provides an avenue for people and communities who believe a World Bank-funded project has or is likely to adversely affect them to submit complaints directly to the World Bank. It also provides support for World Bank task team leadersc to quickly and effectively address any issues raised. The Grievance Redress Service promptly reviews and responds to grievances and works with project-affected communities to identify possible solutions. It therefore represents a collaborative problem-solving effort and, unlike the Inspection Panel, is led by World Bank management through Operations Policy and Country Services.d

In 2011, two **How-To Notes focused on the theory and practice of grievance redress**, produced by the World Bank’s Social Development Department, helped task teams conceptualize and implement GMs in their projects (Post and Agarwal 2011a, b).

At the 2013 annual meetings, the World Bank Group pledged to **increase beneficiary feedback to 100 percent** of projects with clearly identified beneficiaries. To support this, in 2014, the World Bank Group established the **Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations**, which clearly identifies GMs as an effective citizen engagement approach. This led to a substantial increase in World Bank-financed operations that include a GM indicator in the project’s results framework.

Since January 2015, publicly disclosed **project appraisal documents** for all World Bank IPF must systematically include information about available avenues for submitting complaints on project-related issues. In addition to tailored information about the project-level GM provided by the team’s social specialists, one standardized paragraph explicitly refers to the Grievance Redress Service and the Inspection Panel.

Although later abandoned, the **World Bank’s 2016 Corporate Scorecard** included as an indicator the “percentage of grievances related to delivery of project benefits that were registered and that were actually resolved” (World Bank 2016b).
1. INTRODUCTION

Since October 1, 2018, the World Bank’s new Environmental and Social Framework applies to all new IPF from the World Bank. Its Environmental and Social Standard 10 (ESS10), Stakeholder Engagement and Information Disclosure, requires the Borrower to “respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.” To that end, the borrower must “propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances” which will be “proportionate to the potential risks and impacts of the project, … accessible and inclusive.” An accompanying checklist in the ESS10 guidance note serves as a tool for determining if a GM conforms to good international practice (World Bank 2018a). Since 2018, World Bank task teams are required to answer three questions in internal semiannual project implementation status reports: (1) Is there a GM in place? (2) Is the GM accessible? and (3) Is there evidence that the GM is receiving and resolving complaints? This process has catalyzed the collection and reporting of grievance data in World Bank-financed projects.

In 2020, the World Bank published the interim technical note Grievance Mechanisms for Sexual Exploitation and Abuse and Sexual Harassment in World Bank-financed Projects.

---

FIGURE B1.2. GRIEVANCE-RELATED DEVELOPMENTS AT THE WORLD BANK

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Safeguards policies on indigenous peoples and involuntary resettlement</td>
<td>IEG recommends establishing a grievance redress service</td>
<td>Corporate commitment to increase beneficiary feedback to 100%</td>
<td>World Bank corporate scorecard indicator on grievances</td>
<td>Note on GMs for sexual exploitation and abuse/sexual harassment in World Bank-financed projects</td>
<td>Grievance Redress Service established; project appraisal documents systematically refer to GMs</td>
<td>ESF ESS 10 requirement to establish a grievance mechanism</td>
<td>Inspection Panel established</td>
<td>How-to notes on grievance redress</td>
</tr>
</tbody>
</table>

---

c. A task team leader is a World Bank staff member who coordinates project team activities and who is responsible for hiring individual consultants for the project.
e. With the entry into force of the Environmental and Social Framework, the official World Bank terminology shifted from using the term grievance redress mechanism to using the term grievance mechanism. Therefore, World Bank documents published before October 1, 2018, likely use the term grievance redress mechanism, and documents published after that date likely use the term grievance mechanism. The change primarily reflects a semantic preference rather than a change to the fundamental characteristics of the mechanisms.
Design Considerations

The success of a grievance mechanism (GM) largely depends on its architecture and design. These considerations relate to the GM’s front end: its accessibility to project-affected communities, the effectiveness of awareness-raising efforts, and the extent to which it builds upon existing local accountability mechanisms; as well as to the GM’s back end: how well-resourced the mechanism is from a financial, staffing, and capacity perspective.

A GM’s uptake channels must be tailored to and easily accessed by project-affected people. To avoid any type of exclusion, the agency designing the GM should ensure that cultural, financial, linguistic, literacy, physical, psychological, or technical barriers to approaching the GM are minimized and that the mechanism matches the needs and preferences of various stakeholder groups, including some that may be disadvantaged or vulnerable, such as women, people with low or no literacy, people with no or little access to information and communication technology (ICT), indigenous peoples, residents of rural areas, the elderly, minorities, etc. This is essential to ensure that a GM is in line with the human rights principles of participation, inclusion, equality and nondiscrimination.\(^6\) It typically requires putting multiple uptake channels in place—one phone number, email address, or website is not sufficient. Translations into local languages and the use of simple, easily understood instructions further enhance a GM’s accessibility. In addition, the process should be kept “as close to the source (i.e., the complainant) as possible” (World Bank 2014a: 13). As highlighted by one interviewee, “The story all over infrastructure projects in the [region I work in] is that the ‘fancy’ GM is not being used. What is much more used is the guy that I see every other day. A good, working GM is a GM connected to people I see or know.” This sentiment is further illustrated by another interviewee describing how one hydropower project in Central Asia had an almost “flawless” GM setup, characterized by its provision of access to “a focal point/local community leader appointed for resettlement ... in each, smallest administration unit in the area people were being relocated from” but also in the area people were being relocated. These focal points:

“would address concerns from 9:00 a.m. to 5:00 p.m., Monday to Friday. There was a small office put up in all sites, every grievance was recorded, and there was a timeframe by which they needed to respond. ... The good point about this system is that it was right there, it was accessible: people could just walk-in and say what they wanted.”

In most contexts, a presence on the ground and direct access to staff are critical to a well-functioning GM. It is vital that GMs be close to project-impacted communities, but this is not always the case. For example, members of an involuntary resettlement grievance redress committee\(^7\) may fail to hold meetings due to conflicting schedules or may convene only in the country’s capital and not at district or provincial offices for the sake of their own convenience. Committee meetings held in project offices, board rooms, or ministry offices hinder accessibility in multiple ways. Project-affected people incur

---

\(^6\) For a comprehensive overview of the inclusion of disadvantaged and vulnerable individuals or groups in the design and operation of GMs, see, “Fostering the Inclusion of Disadvantaged and Vulnerable Individuals or Groups in Project-Level Grievance Mechanisms.” (World Bank. 2021b).

\(^7\) A grievance redress committee is a special body established to review and resolve grievances received under a given project. It typically includes representatives of project-affected groups as well as local public authorities; and can also include representatives of contractors and relevant land, audit, or legal specialists.
significant costs to access such meetings: few have the money or time for traveling to another city to voice a claim, not to mention the difficulty in entering a ministry building, including the need for identification and to go through a security check. A 2016 Inspection Panel report describing a power development project in Nepal is illustrative:

“The community was unable to engage with the GM because the grievance committee had moved out of the project area and into the city of Kathmandu, several hours away by car. This happened because the unit originally charged with facilitating the compensation, rehabilitation, and dealing with grievances reached the end of its contract, even though compensation payments were not finished, and its responsibilities were transferred to a Kathmandu-based office” (World Bank 2016: 13).

The governments of countries with well-functioning, central-level grievance platforms—e.g., an online portal that receives any type of complaint, forwards it to the appropriate department, and notifies the user of the outcome—may occasionally suggest using such a platform rather than a project-level GM. However, the evidence regarding the importance of proximity to project-affected people suggests that the existence of such a central-level grievance platform is not an excuse for failing to develop a GM specifically dedicated to the project area. Local-level grievance mechanisms are typically more effective than centralized ones. As Fox (2014: 27) puts it, “for the voiceless to exercise voice effectively requires support” and “the role of interlocutors becomes crucial.”

Moreover, the interviews confirm that a lack of awareness about the existence and features of the GM, as well as broader implementation processes, is a common challenge. In many cases, there is insufficient advertising and communications about the GM. Explanations given by project-related actors interacting with project-affected communities can lack detail or not fully explain the process, and therefore not be particularly helpful to project-affected people (for instance, simply directing them to a given website, phone number or announcement). When a GM’s set-up is restricted to official, government-prepared safeguards documents, or is only occasionally referred to in complex, technical terms, it is not surprising that project-affected people are unaware of it. In the earlier referenced power development project in Nepal,

“affected households were unaware of their right to access a GM. While the Resettlement Action Plan stated that one would be created so that anyone could file a complaint, the Panel, while in the field, was not able to ascertain where grievances could be filed” (World Bank 2016a: 13).

Beyond raising awareness of the GM’s existence, it is also important to inform communities about related procedures and timelines to set realistic expectations:

“to make productive use of an effective GM, project-affected parties and staff involved in grievance redress must be well informed of its existence, purpose and process to handle complaints” (World Bank 2016a: 13).

This means that clear guidelines on how to file complaints should be issued, and service standards (e.g., timelines for resolution) transparently communicated, in line with open government principles and proactive disclosure processes. When a community receives insufficient information about the project’s implementation plans or modalities, the GM’s effectiveness can be impacted. Experience shows that many received “grievances” are really requests to seek clarification due to a lack of understanding of the project’s objectives or, in resettlement cases, specific entitlement and compensation policies. Improving access to project-related information and addressing misunderstandings at the outset could therefore preempt many logged entries by a GM that are actually requests for information. This would enable GM entries to be better informed (e.g., “according to your policy, I should receive XYZ, but I have not”) and important issues to be prioritized and more rapidly addressed.

Another topic brought to light by the interviews was the need to better analyze preexisting grievance mechanism processes,
both formal and traditional, at the local level, to build on them, and to improve them where necessary. The 2014 World Bank Review on GMs provides a summary of the situation by default:

“Many staff acknowledged that existing systems were weak, but their responses to this tended to fall in one of two extremes: either (i) relying on existing systems completely but with limited or no effort to improve them; or (ii) setting up an independent, stand-alone system that reflected best practices but was ultimately not used because it was not linked to existing systems. We found few instances where staff worked with the client to either assess credibility of existing systems or try to link up existing systems to a Bank-designed GM” (World Bank 2014a: 14).

Furthermore, one interviewee felt that “the Bank ha(d) developed a legalistic, rigid, and Bank-focused stereotype of what GMs are” and that this did not encourage a thorough consideration of the mechanisms working on the ground, on which a project-level GM could build. Several practitioners acknowledged that the sections dealing with GMs in project documents (e.g., Resettlement Action Plan and Indigenous Peoples Plan) often use boilerplate language, partly to ensure Board approval of a project and partly due to rushed project preparation timelines that do not give project teams and implementing agencies enough time to analyze the default mechanisms used by project-affected people to resolve issues. A lack of attention to the default grievance resolution modalities of project-affected communities can result in GMs designed for World Bank-financed projects existing solely on paper, with grievances resolved—if at all—through channels outside of those foreseen by the project, thereby creating redundancies in project activities and reporting. Interviewees cited cases when project-affected people would not use the GM but would instead resort to reporting to a local authority who they believe is able to resolve the case, such as individual national agencies (e.g., land commissions, courts, or private valuers) or traditional mechanisms (e.g., traditional assembly of leaders or local chief). The 2014 review of GMs in World Bank-financed projects also notes that “in Vietnam and China, for example, we found GMs in place but most project beneficiaries with concerns sought redress through existing channels such as village leaders versus the ‘formal’ project GM” (World Bank 2014a: 16). In another example,

“in the Hubei Yiba Highway project in China, a simplified SMS system and matching web interface was designed by consultants and implemented by a task team, but it was not used by Chinese locals, who preferred to direct their complaints to local village authorities—the majority of complaints were channeled through such traditional mechanisms” (World Bank 2017b: 14).

Remediating such concerns and anchoring the project-level GM into existing systems for grievance redress requires an in-depth analysis of existing social accountability mechanisms at the local level, both formal and informal. (See box 2.1 for a discussion of the possible challenges linked to relying on existing grievance redress structures.) To design better, more contextually relevant GMs, interviewees recommended giving more time and attention to this issue, including evaluating community hierarchies and how issues/disputes have been addressed/resolved in the past, and documenting it more systematically and more rigorously as part of the social assessment conducted during project preparation. The idea of working “with and through customary institutions” by “incorporating them into social accountability activities” was also developed by Aslam, Grandvoinnet, and Raha (2015: 216) to prevent GMs from becoming “a competing and even superfluous mechanism.”

On the back end, adequate resourcing of finances, people, and knowledge is needed to build a credible and predictable grievance interface.

---

8. Social assessments can rely on engagement techniques such as focus group discussions and participatory appraisals of rural areas to document the traditional GMs being used by affected communities.
When project-level GMs are unfunded or underfunded, this significantly limits their ability to function well. A 2016 portfolio review of World Bank-financed projects in the Western Balkans found that only 22 percent of projects had an earmarked budget for a GM (World Bank 2016c). A 2020 survey of grievance focal points in project implementation units (PIUs) across the globe suggested that 41 percent of World Bank-financed projects did not have a dedicated budget to cover the functioning of a GM as part of project funds (World Bank 2021a). The lack of material resources, such as stationery and vehicles for conducting investigations, can lead to severe backlogs or incomplete grievance processes. Another challenge is that community-level grievance redress committee members do not usually receive remuneration, serving as volunteers in that function. In the case of projects involving involuntary resettlement, the typical budget for the GM covers

---

9. This appears to be changing with the shift to the ESF, which requires Borrowers to develop a detailed budget for their stakeholder engagement activities, including GMs. However, at the time of this writing, too few experiences and examples from IFI under the ESF were available to make an informed judgment as to whether or not this assumption will be verified in practice.

10. In some countries, committee members receive an honorarium or traveling and meal expenses for meetings or investigations.
the functioning of the mechanism itself but rarely provides a contingency fund so that people’s rightful grievances can be resolved through remedial compensation. One interviewee explained how in a few cases, “the project budget did not have any provisions for paying compensations to people who had legitimate grievances ... Setting up a GM in such a context is like inviting a thousand people to a party without preparing the food for dinner.” In the absence of sufficient financial resources, implementing teams are also not in a position to invest into information technology tools which could help GMs function more effectively. For instance, they cannot develop or adapt management information systems which could lead to improved monitoring and reporting of grievances and their resolution.

In addition, GM-related responsibilities in World Bank-financed projects tend to be added to the job description of PIU members already loaded with many other tasks. This limits the time and effort the person can dedicate to monitoring and encouraging the good functioning of the GM and reduces the overall sense of ownership and professionalism of the GM. According to one interviewee, “it is more something they do on the side. In the best case, they would have one person, but often they have no one.” The 2020 Grievance Focal Points survey of PIUs revealed that 38 percent of projects did not have a dedicated person assigned to coordinate GM activities. Resettlement action plans in particular are often unclear as to who is in charge of GM oversight. Typically, this task falls on to the PIU’s social safeguards specialist, who also serves as the GM focal point. Capacity can also become a challenge at the subnational and local levels as the volume of complaints increases and people with grievance-handling responsibilities are expected to invest more of their time in the midst of other activities in their portfolio. Conversely, projects that invest in highly motivated grievance redress staff often see positive results. In the Philippines, the Pantawid Pamilyang Pilipino Program, with its well-designed GM structures and 200+ dedicated staff, has seen frontline grievance officers “work hand-in-hand with beneficiaries and service providers” to address grievances linked to this large-scale conditional cash-transfer program, leading to the resolution of more than half a million complaints (Patel et al. 2014: 9; see box 5.1).

A lack of robust case management procedures and capacity to implement them can also lead to bottlenecks at various steps of the GM value chain (Agarwal and Post 2011a, b). In particular, interviewees noted the importance of acknowledging the receipt of a grievance to a complainant and of communicating a clear framework for its resolution, including a timeline and regular progress updates/feedback. One practitioner commented:

“Not getting back to people allows small problems to grow into bigger controversies and big dissatisfaction and actually affects the relationship between communities and people as well as the covenant and trust people have in our projects. To me, this is the most critical thing.”

Other problems include the absence of pertinent grievance categories to allow for the classification of incoming grievances and to possibly accelerate complaint management procedures; a lack of clarity regarding verification, investigation, and action; piecemeal tracking of grievances or nonexistent tracking systems to determine if complaints have been addressed; superficial monitoring and evaluation of grievances, which does not guide decision making or allow to course correct (see box 2.2); and ineffective appeal processes in GM systems where the possibility to escalate a complaint is hampered by the existence of too many tiers or by a lack of trust in a lower tier, which leads some people to bypass it. Having clear policies on how complaints will be examined and addressed is essential to providing actual redress. Capacity-building and awareness-raising trainings were suggested as useful ways to enhance the quality of GMs because local-level grievance focal points are often “given general instructions” but not well trained “in terms of how to resolve issues, what different things need to be taken into consideration, etc.” A good practice example in

---

11. With the shift to the ESF, several interviewees mentioned that they were expecting this to possibly change as “projects under the ESF pay more attention to staffing in PIUs” by further emphasizing and requiring more detail on the resourcing of GMs (for example, by assigning specific staff to monitor the GM). One interviewee explains that the vision is to “have dedicated people up the chain whose job it is to monitor (GMs) permanently: if the GM stops functioning, somebody in the project implementation unit … has nothing to monitor and it becomes obvious.”
2. DESIGN CONSIDERATIONS

Box 2.2. Adaptive Management and Grievance Mechanisms

When complaints-related data are systematically analyzed in a sufficient amount of detail, recurrent complaint patterns can be identified, and necessary adjustments can be made by project management to avoid similar complaints in the future. Whenever this happens, grievance mechanisms (GMs) become effective tools for improving project implementation and live up to their potential of addressing systemic issues through the provision of relevant insights.

For example, the grievance mechanism of Egypt’s Takaful and Karama programa receives, addresses, and records grievances from the program applicants, beneficiaries, and the public on various process and aspects of the program. Since the launch of GM in 2015, the program received over 1.17 million grievances and approximately 1.14 million grievances have been addressed to date. As part of the roll-out of the “Karama” (dignity) unconditional cash transfer program in Egypt, a significant number of grievances were recorded from applicants complaining that their disabilities had not been accurately assessed and that they were therefore unable to register and benefit from the program. As part of the GM’s processes, these applicants were later reassessed and made eligible for the cash transfers when they did indeed meet the program beneficiary criteria. Between February 2018 and June 2020, among the 273,493 grievance cases received by the GM on assessment outcomes, 99,951 cases (or 37 percent) were later assessed as being “disabled” and became eligible to receive support from Karama. The team in charge of the GM at the Ministry of Social Solidarity analyzed the data of applicants to identify the underlying reasons for their initial exclusion from the program and conducted field visits to better understand what was taking place on the ground. As a result, the team was able to map the bottleneck at the initial medical assessment and to propose new training for physicians on assessing disabilities, drastically reducing the number of future complaints and program exclusions.

GMs also must adapt to ever-increasing (and sometimes unforeseen) social issues. In some cases, a GM may have to be tailored to unanticipated risks of sexual exploitation and abuse and sexual harassment risks, possibly requiring significant redesign of the system’s complaint-handling approach and an increase in the allocation of human and financial resources. GMs may also need to adapt to feedback received from project-affected parties about the mechanism’s setup or resolution processes.b

---

a. Implemented by the Ministry of Social Solidarity in Egypt, the Takaful and Karama program comprises two components. Takaful means “solidarity” in Arabic and provides conditional cash transfer to poor households with children under 18. The beneficiary households receive a basic monthly transfer of 325 Egyptian pounds, with additional support for up to two children per household. Karama is a component of cash transfer program. Karama targets the elderly poor, persons with severe disabilities and diseases, orphans, and poor widows. Elderly and disabled beneficiaries receive a monthly transfer of 450 Egyptian pounds, and orphans receive a monthly transfer of 350 Egyptian pounds.

b. See, in particular, World Bank 2021b, box 3: “The Iterative Nature of GMs: Refining GMs After They Have Started Operating.”

---

this regard is the grievance handling mechanism for Myanmar’s National Community-Driven Development Project. In addition to solid complaint-handling procedures, the system has benefited from an extensive training program for all grievance staff and committee members, run by the Department for Rural Development. Dedicated one-to-three-day trainings on grievance management were organized for all grievance focal points at the township, state, and regional levels to ensure a thorough understanding of the types of grievances likely to be received and corresponding procedures.
The political context and culture of social accountability influence the ease with which World Bank practitioners can convince government representatives to put in place strong grievance mechanisms (GMs). The 2014 World Bank report on GMs noted that “not surprisingly, we found that in countries with strong domestic support for grievance redress, reflected in legislation or existing institutions, Bank projects had better GM design and implementation” (World Bank 2014a: 14). The track record of government institutions and their overall respect for human rights is a key factor shaping project-affected people’s expectations regarding the responsiveness of state agencies to their grievances and feedback. Project-affected people can be discouraged from using the project GM due to many factors, including their lack of trust in the implementing agency over its perceived lack of neutrality, objectivity, and representation; corruption; prior negative experiences; the absence of “an institutional culture where you need to listen;” and a fear of speaking up, notably linked to potential retaliation. This situation is especially acute in fragile and conflict-affected situations and in authoritarian environments, and can lend an artificial character to the GM. In the words of one interviewee, GMs can have a “very heavy Bank fingerprint” that starkly contrasts with a nation’s social, political, and cultural context.

The enabling environment for civil society also determines the likelihood that people will submit complaints to a GM. Civil society organizations and community-based organizations play an important role in channeling people’s voices, and when the government restricts their room for maneuver, for instance by limiting the right to assembly or to free speech, the country context will likely be less conducive to people using a GM. Perceptions and attitudes of project implementation unit (PIU) staff and other government officials also matter, particularly if the lack of feedback, including complaints, is believed to attest to the progress and effectiveness of project activities. Furthermore, the local culture can influence the quality of grievance reporting and monitoring. In some contexts, project-affected people and officials markedly prefer informal resolution processes, which can lead to ad hoc processes and incomplete complaint databases. But while “the predisposition of the state to citizen engagement in governance is a central determining factor for the success of social accountability” (UNDP 2013: 9), several World Bank-financed projects within the same country can show different results and varying degrees of effectiveness in addressing and monitoring complaints, highlighting that the sociopolitical context does not provide a complete explanation.

Indeed, several practitioners underlined that one or a few dedicated individuals can make a significant difference. In the previously mentioned case of a successful GM for resettlement in a Central Asian hydropower plant project, the interviewee noted:

“This was one of the best GMs I have seen because we had a fantastic person at the head of the project implementation unit. When the project head changed, the quality of grievance redress dropped dramatically. ... The next person leading it did not have the same passion and commitment anymore. It was almost the singularity of one to two people that transformed it.”

12. Meticulous logging of grievances and their status is part of complaint-handling best practices, as it allows to avoid discretion in complaints handling, to achieve greater transparency and to measure the GM’s performance.
This example highlights that “where officials and civil servants with reformist tendencies are appointed, their responsiveness can help in bringing about more dynamic social accountability relationships” (UNDP 2013: 9). A World Bank staff member remarked: “This is development. You have to change the mindset of bureaucrats, public servants. If there is no change of mind, then it doesn't work.”

**Beyond the receptiveness of individual counterparts, high-level oversight and participation in the GM is among the most effective ways to guarantee its successful roll out.** Overall, a strong commitment from elected politicians and/or the PIU’s management to address concerns usually trickles down as a culture to the rest of the staff involved in the GM. Having a clear system whereby the GM’s results are monitored and publicized by high-level officials (e.g., the prime minister’s office) can encourage more effective grievance resolution and more diligent reporting. Actors along the entire GM value chain will likely be more inclined to follow-up on complaints if “there are important eyes looking at it” and if the absence of action on their part leads to automatic escalation of a complaint to higher levels. During involuntary resettlement operations, high-level political representation within the GM can help fast-track decision making and guarantee the active participation of various actors who would not otherwise necessarily cooperate with each other effectively. For instance, the fact that the governor (wali, the region’s highest political figure) led the process for setting up the GM for the Artisan and Fez Medina Project in Morocco meant that representatives of all the actors involved, such as the local water utility, the power utility, the urban commune of Fez, and official and unofficial associations of artisans, among others, could convene at one grievance redress committee table and agree on appropriate forms of compensation and assistance for the traditional artisans being relocated (Roquet et al. 2017). Achieving this kind of high-level participation is easier for prestigious, strategic, or priority projects for the government, when citizens and possibly additional international agencies are paying a great deal of attention to the process, or in sectors with individual beneficiaries, such as cash transfer, agricultural, or educational programs with clear distributive aims, where effective targeting largely affects the project’s overall development outcomes.

**Conversely, a lack of client buy-in can lead to the GM’s implementation lingering for long time periods.** Two interviewees shared the example of a project in a conflict-affected country in the Middle East and North Africa region, where the implementing agency did not take any action toward establishing the agreed-on grievance redress structure. The World Bank task team documented this in its official communications with the PIU, escalated the issue to the ministry level, and ended up downgrading the performance rating of the project in its biannual implementation status and results report. Yet still no action was taken. This situation was flagged to World Bank senior management, which communicated the importance of the GM again and again, until, with a two-year delay, the GM was publicly launched. This example, in which the World Bank had to rely on a corporate approach of applying pressure through multiple levels and using its leverage (including, ultimately, the threat to cease disbursements) to enforce GM implementation, illustrates how a lack of political support for and ownership of the GM can significantly hinder the establishment of an effective GM.
Discrepancies between the grievance mechanism (GM) on paper and the one on the ground are likely if existing national procedures differ significantly from the World Bank’s guidance on GMs. In resettlement cases, for example, governments usually try to implement action plans according to their own national procedures, which do not typically include remedial options for citizens dissatisfied with any aspect of the process other than going to court. In GMs for involuntary resettlement, the crux of the matter could therefore be that the precedence of international legal agreements over national legal frameworks needs to be affirmed. Indeed, local implementation authorities are often very familiar with the national legal framework but unfamiliar with the resettlement standards of international development banks and uncomfortable with the additional measures they require, including setting-up a GM, but also, for instance, compensating people without legal titles to land or providing full replacement cost compensation as well as allowances for vulnerabilities. Given that local implementation authorities may not be well versed in the technicalities of the loan agreement between their Ministry of Finance and the World Bank, they might question the legal validity of the resettlement plan or ignore its content. Moreover, they may fear an audit or judicial proceeding if they fail to abide by national law, or they may fear being suspected of corruption if they provide higher levels of compensation to displaced people than national law allows.

Furthermore, given the time commitment linked to setting-up a GM, public servants may genuinely believe they are doing what is best for the project in accelerating its implementation by compensating people as quickly as possible. Such considerations combine to disincentivize local government authorities from implementing GMs as described in the World Bank-approved Resettlement Action Plans. This inherent artificiality of GMs also has repercussions for grievance recording and reporting. The logging of grievances in significant detail and their systematic consolidation is a formal exercise which does not correspond to typical government practices and can be perceived as a burdensome clerical task. In many countries, complaints are verbally expressed, and the handling of complaints is an informal process, in which people try to remain amicable and to avoid being overly formal with documentation and reporting. One interviewee explains: “It seems to them more like ‘feeding the beast’: ... they do it just for the Bank.”

Tensions can also arise when a GM’s policies are at odds with local-level traditions and mindsets. Some projects report noticing that some GM actors, including members of grievance redress committees, do not always act in line with the GM’s provisions because they lack knowledge of the country’s national framework or newly introduced regulations. To illustrate, this has happened in a project where women would not feel comfortable approaching the grievance committee, composed of male village elders, regarding resettlement and land-related issues because women from the indigenous community did not own land in the past – to do so was “a man’s business” – despite guarantees of gender equality under the national constitution. Often, when the GM prescribed in project documents fails to account for on-the-ground realities, such as local informal and formal GM practices, many people prefer not to use the formal GM.
The degree to which a GM has the power to follow through with a proposed resolution and enforce its decisions affects the investigation and addressing of complaints and the realization of public trust. A GM’s effectiveness greatly depends on whether or not it can provide actual redress. When citizens have negative experiences with GMs—for example, if they submit complaints but receive no response or unsatisfactory redress—they typically share that experience with others, which leads to a decrease in people using the system, eventually resulting in the GM existing on paper but not receiving any complaints. The authority that a GM can yield, and its ability to make and carry out decisions, is thus determinant. Decisions of GMs not being honored by the parties concerned make the entire system very weak.

In the previously referenced Artisan and Fez Medina Project in Morocco, the presence of the Fez Region governor at the grievance redress committee’s regular meetings allowed the various actors around the table to actually make decisions about what to do regarding specific issues and to enact rather than just talk about them. Another example of a project-level GM that worked well is an urban development project in South Asia, where a dedicated regulation at the national level gave land acquisition and resettlement committees the power and authority to increase complainants’ compensation amounts based on different criteria. One interviewee highlighted that, “equipped with this legal mandate, the GM was allowed to be involved not only in resolving grievances, but also in enacting the solutions, and (appears to have) worked much better than in other contexts without legislative backing.” The cabinet-approved regulation, whose provisions give the committees the institutional backing required to pay compensation and provide support to project-affected people, was the result of a joint effort of the government and the World Bank, undertaken when it became clear that national legislation did not include provisions to compensate for economic losses unrelated to direct land acquisition and therefore did not meet World Bank requirements.
Embedding grievance mechanisms (GMs) more into stakeholder engagement activities may help government counterparts see their value. Public sector representatives across the world are naturally reluctant to think of a “complaint” as something positive that could improve project performance. Complaints are usually viewed as something negative, and many in the public sector fear that setting-up a GM would result in people inventing or looking for problems, thereby tarnishing the project’s image and potentially their own reputations and political futures. Changing this perception may take time but is achievable (see box 5.1). Several interviewees stressed that the entry-into-force of the World Bank’s Environmental and Social Framework in October 2018 may encourage increased synergies between the social accountability tools embedded in older safeguards policies and broader stakeholder engagement activities, especially under the Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure. Enhanced cooperation between citizen engagement and social safeguards specialists could contribute to the transformation of the GM into a broader community engagement mechanism more palatable to public officials. This is possible if GM-related matters are more fully integrated into consultations with project-affected people, and communication and awareness-raising activities. Such outreach efforts and direct exchanges with project-affected people would help build trust and increase understanding of people’s project-related concerns and preferences regarding communication channels and how they would like their GM to work. “If we design the GM in isolation, people will do whatever they like to anyway. Communities should tell us how they want the GM to function. They know best how to convey their grievances,” in the words of one interviewee.

With such an approach, GMs could serve as more than just a tool for redress and provide a channel for regular stakeholder feedback and ongoing community engagement. “We need to think about this as a whole rather than separate pieces,” remarks another interviewee. There is also the potential for a more systematic engagement of civil society organizations in providing feedback on GMs, encouraging their use, and channeling grievances. Some interviewees also note that the language of “feedback system” or “community engagement mechanism” may be more effective in triggering a client’s sense of accountability and responsibility than words such as “complaint” or “grievance.” Presenting the GM as a way to offer the community an ongoing voice in the project could therefore be more appealing than viewing the mechanism as a narrow safeguards or compliance issue.

Secondly, a GM designed early in the project preparation phase has a better chance of being implemented properly. Building the GM into the project’s DNA from the outset increases the chances that its processes will be thoroughly considered.13 Its set-up, as well as options available to the borrowing government (in particular in terms of technology) should ideally be discussed well in advance. Such an approach

13 Several interviewees mentioned that, with the shift towards the ESF, frontloading the issue of GMs will be facilitated through the disclosure of a draft stakeholder engagement plan, including a dedicated section on GMs before project appraisal as required by ESS10: Stakeholder Engagement and Information Disclosure.
can help guarantee that key human rights principles—such as equal treatment, nondiscrimination, participation, inclusion, accountability, and the rule of law—are firmly embedded into the GM’s procedures and operations from the outset, for example, by agreeing to monitor the use of the GM by vulnerable or marginalized people and by tracking related data in the consolidated grievance log at the PIU level. However, the time needed to engage implementing agencies and raise their awareness and understanding of the importance of GMs often conflicts with increasingly tighter project preparation timelines. Furthermore, the time gap between project approval and project effectiveness can also impact a GM’s success: implementing agency staff working on the project during the preparation and Board-approval stages may differ from the staff that will work on the project once it becomes effective. This disconnect may account for a lack of initial buy-in or awareness of the GM. Thirdly, World Bank practitioners who were interviewed highlighted the importance of reaching early agreement on the definition of GM-related responsibilities: “There is a need to define clearly whose neck is on the line to avoid a diffused blame game.” Planning GM implementation in more detail means that there should be equal attention paid to the GM’s front end (e.g., uptake channels) and back end (e.g., communications with the complainant and decision-making modalities). Paying adequate attention to implementation arrangements can improve the consistency of decisions reached by GM actors, and thereby minimize the risk of resentment among local communities if for example, in a decentralized operation, complainants from one area receive more favorable decisions than complainants from other areas.

Clarity of responsibilities and appropriate responses to a variety of issues is also essential to local communities understanding how the GM works, who they can expect to hear from, and the type of response they will receive. “If responsibility is unclear, diffused, or if there are too many steps, that is unhelpful. Ideally, it should be one step to accountability, not more.” To reach clear agreement on implementation arrangements—which some interviewees claim is often the weakest section of a Resettlement Action Plan—World Bank project teams must have thorough, high-level discussions about GM implementation arrangements during project preparation, including how issues will be resolved, how local authorities will be brought on board, and how the investments of time and effort by various actors will be incentivized and compensated. This process is crucial because many of the consultants who are typically hired to draft Resettlement Action Plans and other safeguards documents

Box 5.1. Shifting Away from the “No Feedback is Good Feedback” Approach

The Pantawid Pamilyang Pilipino Program, the government of Philippines’ flagship social assistance program, successfully put a positive spin on grievance collection and resolution and contributed to a mindset change among public servants. High-level buy-in and the effective structuring of the grievance mechanism (GM) for this conditional cash transfer program led to a change in thinking among the officials in charge of grievance resolution (Patel et al. 2014). While initially, everyone worried about complaints, civil servants, especially the project implementation unit (PIU) team, soon came to realize that too few complaints coming from a specific province was actually a signal that something was wrong there. Such a mindset change is needed at every level, from ministry officials to individual contractors. As one PIU social safeguards specialist in Uganda explains:

“Grievances are often perceived as a sign that people are not performing or under-performing. We tell contractors: ‘No, it is the contrary: accepting grievances shows you are addressing issues which can potentially become a timebomb if they are not resolved. Reporting about those is actually a proof that you are listening to voices that are usually not being heard.’”
lack access to the government and are unable to negotiate with relevant political actors. In one roads project in the Caucasus, for example, the grievance redress committees proposed in the Resettlement Action Plan had never been set up. Instead, a sole contact person at the municipal level managed grievances. Having a comprehensive project operational manual, project implementation manual, or dedicated grievance manual in addition to relevant training is key to ensuring that the various actors do not skip steps in the GM value chain or dodge their responsibilities. Furthermore, regular follow-up on the GM and its utilization prompted by the task teams during later project implementation stages (for example, by systematically asking about and reviewing the GM’s functioning during missions, in implementation status and results reports) can help keep up momentum, highlight the importance of GMs, and keep responsible actors on track.

Fourthly, there is room to expand synergies and consolidated grievance structures across projects (World Bank, forthcoming). Some practitioners observed that coordination among World Bank-financed operations on grievance redress is sometimes scarce, although some projects engage similar types of people in village-level grievance redress committees with similar roles and responsibilities within one and the same country for instance. Rather than establishing multiple grievance redress committees for different projects at the village level, synergies could be sought to streamline the process. Similarly, when one ministry is implementing multiple projects through separate project implementation units (PIUs), greater coordination (also from the Bank’s side, where different Global Practices may lead these operations and assign different specialists) could prove instrumental in designing and implementing a GM that strengthens the country/ministry system and benefits all operations at once. Pursuing such synergies could foster scale and sustainability, as well as build country systems for grievance redress. In Uganda, for example, the National Road Agency established 125 grievance management committees to manage complaints linked to roads built under the World-Bank financed Transport Sector Development Project (Berger 2018). Based on this experience, the agency decided to expand the effort and set up more than 250 committees for various other road segments. Grievance management committee training materials, such as a manual for facilitators and a handbook for members, were prepared to facilitate the wider replication of the process. Another potential avenue for improving efficiency is the more generalized use of centralized GM structures, established at the ministry level (World Bank 2015), that integrate multiple GMs, such as a unified registry for social assistance programs.

In terms of future trends for GMs, advances in technology will undoubtedly play a major role. The greater penetration of ICT can be used to enhance GMs or link them with civic tech. For example, in Quito, Ecuador, where internet and cellphone penetration rates are high, a World Bank project to install a metro line used Facebook, Twitter, web-based forms, a call center, SMS and email to solicit feedback. A smartphone app was developed that included an input and recording customer service system that allows service providers to track the resolution of complaints (World Bank 2017b).

ICT use was also leveraged to improve citizen engagement in a cash transfer program implemented in the Palestinian Territories by the Ministry of Social Development, which “established a two-way SMS communications line that serves the dual purpose of (i) sharing information relating to the cash transfer program with its beneficiaries and (ii) being usable by citizens to send feedback” (about the cash transfer program to the ministry). This method was particularly effective because over 97 percent of Palestinians own a mobile phone and it could be used remotely (World Bank n.d.).

On the back end, management information systems can be a great help to public officials implementing projects and can make grievance handling less burdensome by streamlining grievance recording and tracking. Sixty-eight percent of

---

14. For financial management and procurement, for example, the World Bank has moved toward a streamlined tool approach, which may serve as a model. In countries with weak systems for managing Bank-financed operations, the same PIU team from the Ministry of Finance can, under certain circumstances, deal with all questions regarding World Bank-financed operations on financial management and procurement, regardless of the project’s sector.
respondents in the online PIU survey indicated that the adoption of a management information system to process and escalate complaints, analyze data, and generate reports would be useful. The emergence of artificial intelligence could also lead to faster and more innovative grievance management processes, for example, through automatized content analysis, categorization, and sending of responses to complainants.

At the same time, nontechnical approaches will remain relevant, especially for ensuring an ongoing focus on the accessibility of grievance redress for vulnerable groups, which ties into the Environmental and Social Framework’s approach and human rights principles. More research may be needed to explore, for example, how GMs might be linked with social inclusion guidance and best practices to allow for the identification of nontechnical approaches for hard-to-reach groups. Given the current COVID-19 pandemic, knowledge on how to adapt GM procedures to such challenges is also relevant, particularly at the subnational level and for mechanisms that rely on face-to-face interactions that are close to the source. With the mushrooming of recently established dedicated COVID-19 response hotlines, technical support to ensure the effectiveness of back-end systems and the replication of successful health GMs in other sectors are opportunities to watch. But while increasing more countries are adopting centralized online grievance platforms, the evidence base suggesting that ICT-enabled citizen voice leads to greater government responsiveness remains thin (Peixoto and Sifry 2017). Finally, technology may enhance GM oversight in the future through the operationalization of a system that gives task teams in multilateral development banks access to real-time data on complaints registered and processed through project-level GMs.
In conclusion, GM outcomes and their effectiveness are shaped by:

**Front-end and back-end design considerations, including:**

- The careful choice of uptake channels, which need to be accessible and tailored to the preferences of project-affected parties;
- Well-designed communication strategies, which effectively raise awareness of the project’s GM throughout the project’s lifecycle;
- The integration of existing accountability mechanisms into the broader grievance framework, ideally based on findings documented in the project’s social assessment or a stand-alone diagnostic;
- Adequate financial resources to cover the costs of the GM;
- Adequate staffing to manage all GM-related activities; and
- Strong case management procedures and knowledge of complaint-handling best practices by actors involved in the GM.

**Political realities, including:**

- Existing expectations of social accountability, trust in the implementing agency, and quality of civic space;
- The individual commitment of core people involved with the GM; and
- The buy-in, oversight, and participation of high-level elected officials or bureaucrats.

**Legal considerations, including:**

- Possible gaps between national legal procedures and World Bank requirements regarding grievance redress;
- Possible gaps between traditions and cultures, often at the local level, and domestic legal frameworks; and
- The legal empowerment of the GM to provide redress, implement solutions, and effectively follow through with grievance resolution.

**Key take-aways are also that GMs are more likely to operate well if:**

- They are presented as and made an integral part of stakeholder engagement activities, providing useful feedback to implementing agencies;
- They are designed early in the project preparation phase;
- They clearly define implementation arrangements and related responsibilities; and
- Synergies are created across GMs from various operations, and GMs are embedded into broader country systems.
References


