



Insights into Grievance Mechanisms

Findings from a Survey of Grievance Focal Points in Project Implementation Units



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 and Saki Kumagai, comprised Harika Masud and H  l  ne Pfeil at the World Bank.

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Introduction

In April and May 2020, a first-of-a-kind survey was conducted by the World Bank with project implementation unit (PIU) focal points responsible for the operation of grievance mechanisms (GMs) in World Bank-financed projects across the world. The aim of the survey was to better understand challenges and opportunities linked to GM design and implementation from the perspective of people on the frontline, and to identify areas where they may need additional support to guarantee an effective right to remedy in their projects.

This note presents the rationale, methodology, and outcomes of this online survey, as well as related recommendations to improve the functioning of project-level GMs. First, details are provided regarding the background and implementation of the survey, followed by a presentation of survey results, main observations, and key messages regarding the current design and operating practices of GMs in World Bank-financed projects. The survey instrument itself is included in the appendix.

Box 1. Summary of Key Findings

1. A common challenge is a lack of dedicated financial and human resources to operate the project's GM.
2. Potential users—especially vulnerable or marginalized groups—are not systematically consulted regarding GM design.
3. The potential for new technologies to enhance grievance uptake and grievance handling remains underutilized.
4. Project-level GMs could be more deeply embedded into existing complaint-handling structures.
5. While most PIUs make a conscious effort to reach out to vulnerable and marginalized groups, more could still be done to ensure that everyone's needs are considered in terms of access to the GM.
6. PIUs should be encouraged to use a wide range of tools to communicate about the GM and to sustain communication efforts about the GM throughout the project lifecycle.
7. Grievance data should be shared with project-affected parties and public officials more transparently.
8. Several areas of the GM value chain could be further strengthened to enhance the predictability of the system, especially complaint acknowledgement and complainant satisfaction surveys.
9. The disaggregation and analysis of GM data is often insufficient to improve project performance.
10. PIU staff think that capacity building through training and technical assistance would help ensure more effective GMs.

GM = grievance mechanism; PIU = project implementation unit



Background and Methodology

In 2018, the Independent Evaluation Group found that grievance mechanisms (GMs) were among the most frequently used citizen engagement tools in investment-lending operations. Sixty-seven percent of projects in fiscal year 2014/15–15/16 were using a GM—it was the second-most widely used tool after consultations (World Bank 2018a). The use of GMs has increased slightly in recent years: as of September 2020, according to data from World Bank implementation status reports about investment project financing and program-for-results operations, 69 percent of the 1,876 active projects in the Bank’s portfolio had a GM in place.¹ The safeguard policies introduced in 1997 require Borrowers to establish GMs whenever the Bank’s Operational Policy and Bank Practice (OP/BP) 4.10 on Indigenous Peoples or OP/BP4.12 on Involuntary Resettlement has been triggered. Since the October 1, 2018 entry into force of the Bank’s new Environmental and Social Framework, which replaces the older safeguard policies, all investment project financing must propose and implement GMs under the Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure.

However, there are apparent challenges to the effective implementation of GMs. Of the previously mentioned 69 percent of active projects with GMs in place, only 70 percent have evidence that they are actually receiving and processing complaints. Reports from the Inspection Panel (the World Bank’s independent complaint mechanism), the Bank’s Grievance Redress Service (GRS), and Bank staff regularly point out that existing project-level GMs are flawed, which partly explains why project-affected people reach out to accountability mechanisms beyond the project itself. For example, as the GRS’s 2017 annual report highlights:

“project-affected people often reach out directly to the World Bank to raise their concerns because there is no GM available for the affected communities, or the existing GM does not function effectively, or it is not accessible or known to the affected population. In some cases, affected people do not trust that the project-level GM will hear and address their complaint in a timely way, impartially and with fairness” (World Bank, 2018c).

The perspective of implementing agencies on current practices linked to GMs in World Bank-financed projects across multiple countries is under-researched. To date, literature on GMs published by international development finance institutions is heavily focused on providing guidance and implementation support, including how-to notes and documents that advise on the set-up and implementation of GMs (ADB 2010; IFC 2010, 2016; EBRD 2012; Post and Agarwal 2011a, 2011b; UNDP 2017) and reports that highlight best practices with case studies of individual project-level GMs (Patel et al. 2014; Hirn 2015; ADB 2018). World Bank publications that explore the challenges linked to GMs have relied primarily on in-house expertise and knowledge rather than on testimonies or first-hand accounts provided by project implementation units. For instance, the analysis presented in the 2014 Global Review of Grievance Redress Mechanisms in World Bank Projects (World Bank 2014) relied solely on desk reviews and interviews with task team leaders and social development specialists.

Therefore, as part of the Universal Access to Remedies: Strengthening Country Systems for Effective Grievance Redress project supported by the Human Rights, Inclusion and Empowerment Trust Fund, a first-of-a-kind survey of project implementation units (PIUs) was conducted to collect data on their experiences with the design and implementation of GMs and to identify areas where as “duty-bearers,” they may need

1. See [http://operationsmonitoring.worldbank.org/view/index.html#details/global/allprojects/pfoliodetailsprojects/0401/\\$actact/](http://operationsmonitoring.worldbank.org/view/index.html#details/global/allprojects/pfoliodetailsprojects/0401/$actact/).



BACKGROUND AND METHODOLOGY

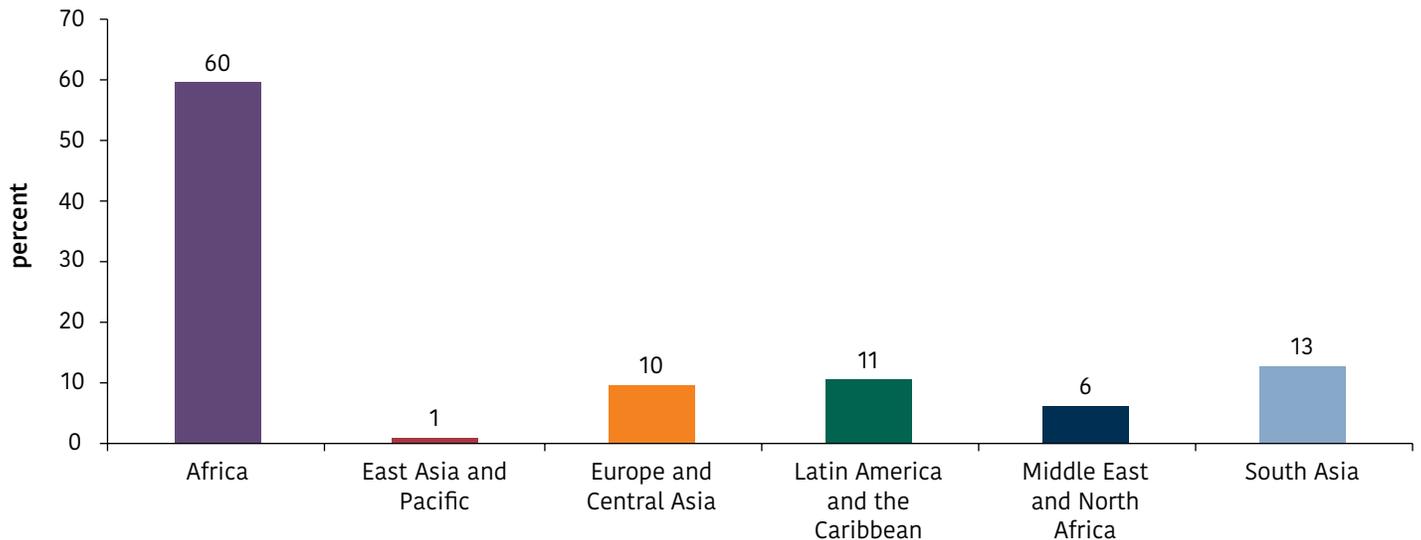
extra support to guarantee human rights and an effective right to remedy through grievance mechanisms. Designed in collaboration with the Human Rights, Inclusion and Empowerment Trust Fund team, the survey included over 20 questions focused primarily on setting up GMs, GM processes (e.g., from grievance uptake to complaint acknowledgment and resolution), grievance monitoring and evaluation, and the existence of mechanisms to guarantee GM access to vulnerable and marginalized groups (e.g., women, people with disabilities, people with low literacy levels, and refugees). By reaching out to World Bank social development specialists in multiple regions, the project team collected contact information for 135 PIU focal points overseeing project-level GM deployment. Administered online via a SurveyMonkey questionnaire, the survey was launched on April 14, 2020, closing three weeks later on May 5, 2020. Ninety-four responses were received—a 70 percent response rate, with 68 forms submitted in English and 26 in French. Respondents

included focal points from 24 countries,² with 60 percent from Africa (see figure 1).

One of the limitations of the survey is that it is based on self-reporting and therefore could, in some instances, be subject to exaggeration or reflect aspirations over reality. Practitioners may find that certain results give a slightly rosier view of GM planning and implementation than they would expect. It is also possible that only focal points with fairly well-functioning GMs took the time to complete the survey. Nevertheless, the survey provides new and valuable insights into the experience of implementing agencies with project-level GMs.

2. The 24 countries are: Afghanistan, Benin, Côte d'Ivoire, Egypt, Georgia, Grenada, Guinea, Guinea Bissau, Haiti, Iraq, Kenya, Lebanon, Mauritania, Mexico, Nicaragua, Romania, Saint Lucia, Saint Vincent and the Grenadines, Senegal, Sri Lanka, The Gambia, Togo, Uganda, and Zambia.

FIGURE 1.
Regional representation of respondents





Overview of Survey Results

This section frames survey results with 10 key observations about the functioning of project-level grievance mechanisms (GMs) linked to: **GM design (1–5)**; **GM operations (6–9)**; and **GM support going forward (10)**.

GM Design

1. A common challenge is a lack of dedicated financial and human resources to operate the GM.

Forty-one percent of survey respondents indicated that there is no dedicated budget to cover the functioning of the GM as part of project funds (see figure 2). Nonexistent or inadequate financial resources to cover the functioning of the GM, particularly costs linked to the operation of grievance redress committees, was the most frequently cited bottleneck impeding the GM's smooth functioning: 15 respondents indicated such in response to an open-ended question about the GM's most significant weakness. Conversely, six respondents mentioned adequate budgeting, especially funds under contractors' contracts, as a key strength of their project's GM. Thirty-eight percent of respondents also reported that there is no dedicated person/focal point assigned to coordinate GM activities. In over 80 percent of such cases, the project implementation unit's environmental and social specialist takes up this responsibility (see figures 3 and 4).

FIGURE 2. Is there a dedicated budget to cover the functioning of the GM as part of the project funds?

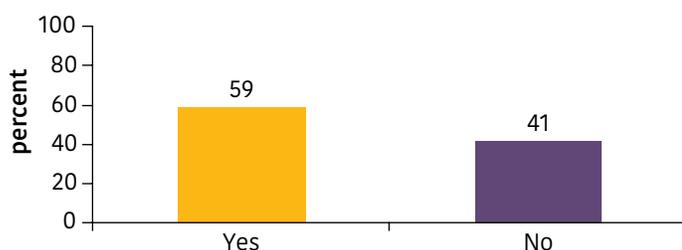
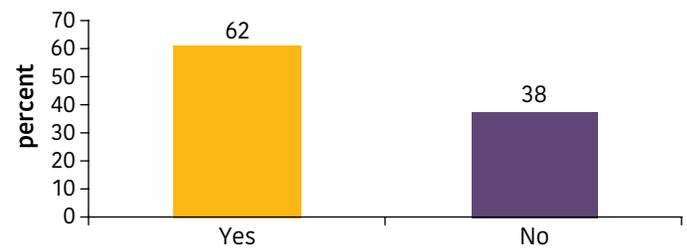


FIGURE 3. Is there a dedicated person/focal point who has been assigned to coordinate GM activities?



These results point to a systemic issue: the underestimation of resources and responsibilities needed to allow for the adequate operation of GMs. They suggest that as part of project preparation, **budgeting, and staffing, which are a prerequisite to a well-functioning GM, should be defined more clearly and in greater detail.** Under the Environmental and Social Framework, the stakeholder engagement plan in particular should include clear indications of both the financial and human resources that will be allocated to the GM.

2. Potential users—especially vulnerable or marginalized groups—are not systematically consulted during GM design.

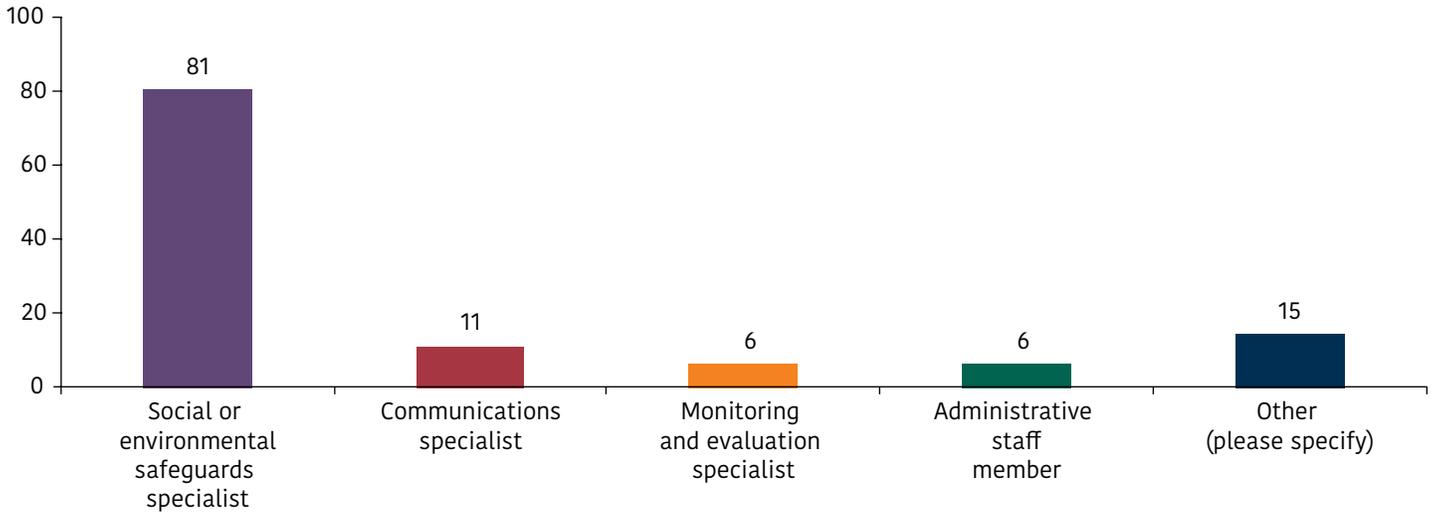
The survey reveals that in 35 percent of projects, project-affected people and other interested parties had not been asked about their preferred channel for submitting a grievance. In 21 percent of projects, vulnerable or marginalized groups or individuals were not included in consultations (see figures 5 and 6).

These numbers stand in stark contrast to the principle of “engagement and dialogue,” one of the effectiveness criteria for GMs set out in the 31st principle of the United Nations’ *Guiding Principles on Business and Human Rights* (UNGP-31).³ It states

3. The “effectiveness criteria” set out in UNGP 31 identify characteristics that help make a grievance mechanism effective: (1) legitimacy; (2) accessibility; (3) predictability; (4) equity; (5) transparency; (6) rights-compatibility; (7) source of continuous learning; and (8) based on engagement and dialogue. Ensuring the absence of retaliation could be added to this list.



FIGURE 4. If there is no dedicated GM person/focal point, then who coordinates the GM activities?



that operational-level mechanisms should be “consulting the stakeholder groups for whose use they are intended on their design and performance.” Engagement with affected stakeholder groups can help ensure that the GM “meets their needs, that they will use it in practice, and that there is a shared interest in ensuring its success” (OHCHR 2011: 34). Similarly, a recent report by the International Commission of Jurists found

“that community and stakeholder participation in the pre-design, design and operation of GMs is frequently below the levels required to create trust in the mechanism. Community and stakeholder participation need to be enhanced, including by privileging collaborative approaches of co-design and co-implementation and the use of community-driven [GMs when these exist]” (ICJ 2019: 11).

This point also relates to UNGP-31’s effectiveness criteria for “legitimacy,” as it is likely that enhanced participation would increase the GM’s legitimacy and make it “more effective at solving disputes. There are many examples where more stakeholder participation has made a positive impact” (ICJ 2019: 11). The Bank’s Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure—also recommends that

FIGURE 5. During project preparation, were project-affected people and other interested parties asked about which channels they would prefer to use to submit their grievances?

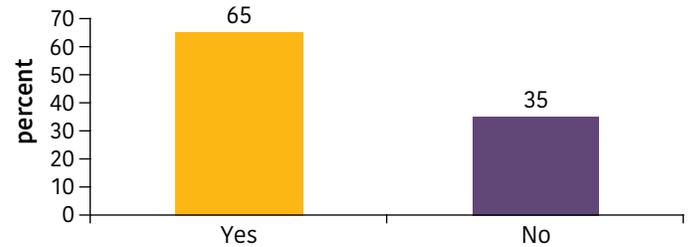


FIGURE 6. Were marginalized or vulnerable groups included in the consultations?

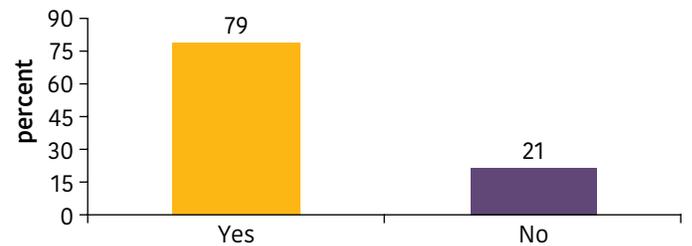
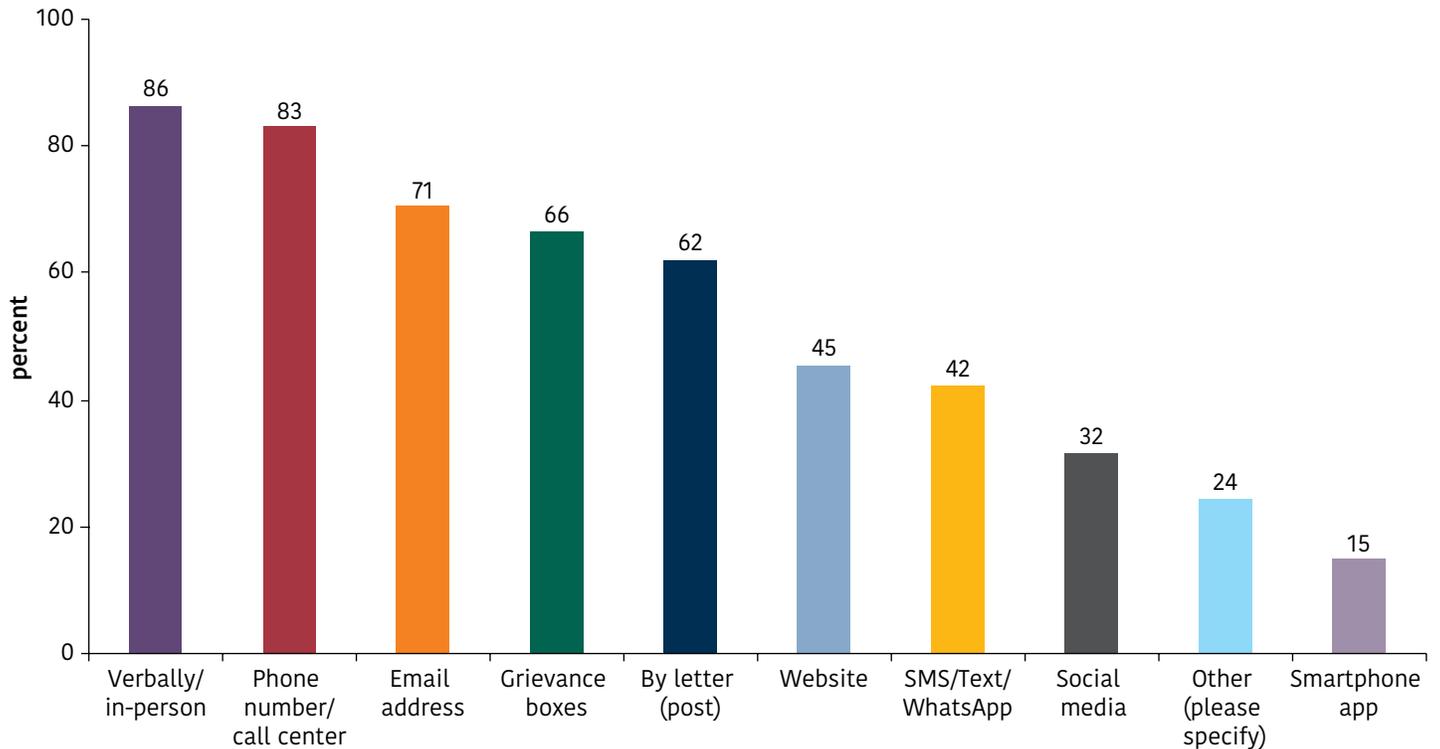




FIGURE 7.
Through which uptake channels can grievances be submitted?



stakeholder engagement should commence “as early as possible in the project development process” and that project-affected parties should be provided with “accessible and inclusive means to raise issues and grievances” (World Bank 2017: 98). **Project consultations should thus be used more systematically to ask project-affected persons about their preferences regarding GM design, and these consultations should include vulnerable groups and individuals.**

3. The potential for new technologies to enhance grievance uptake and grievance handling remains underutilized.

Although in-person submission and phone calls are the most widely used channels to receive grievances, email is a common grievance uptake channel option, offered in 71 percent of surveyed projects. Other tech-based grievance uptake channels include websites (45 percent), SMS/text/WhatsApp (42 percent), social media (32 percent), and smartphone application (15 percent) (see figure 7). With regard to the recording of grievances,

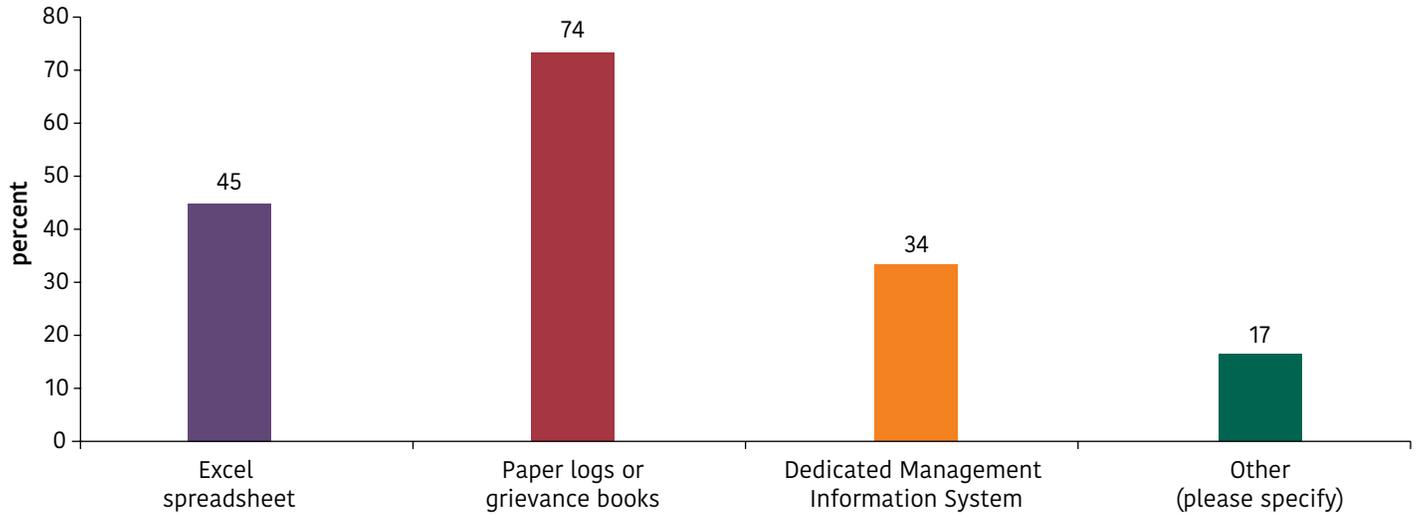
only 34 percent of respondents indicated that a management information system (MIS) was being used. Seventy-four percent indicated that grievances are logged on paper logs or grievance books; 45 percent reported that grievances are logged using Excel spreadsheets (figure 8).⁴ Six respondents noted the absence of a technology platform or MIS to facilitate grievance logging, tracking, and reporting when asked the open-ended question: “What do you see as the current main obstacles/bottlenecks to the good functioning of the GM?” Sixty-eight percent of respondents indicated that the adoption of a MIS to help process complaint data would increase the effectiveness of their project GM.

These results suggest that while increasingly more projects are utilizing technology, it is still not being sufficiently deployed to

4. These percentages amount to more than 100 percent because respondents were allowed to select several options: grievances can be captured differently at multiple levels of a project, for example, on paper logbooks at the local level and on Excel spreadsheets at the central/PIU level.



FIGURE 8.
How are grievances logged?



enhance GM operations. The potential of websites, SMS/text/WhatsApp, social media, and smartphone apps, in particular, as well as an integrated online system/MIS, could be much better capitalized upon. In addition, some vulnerable groups may lack access to new technologies; some may lack literacy or may only speak a local language. It is therefore vital to ensure that marginalized groups are not left even further behind when working through new technologies.

4. Project-level GMs could be more deeply embedded into existing complaint-handling structures.

GMs interact with other social accountability systems and, interestingly, about one-third (34 percent) are also being used for one or more projects financed by donors other than the World Bank (see figures 9 and 10). Sixty percent of respondents indicated that their project-level GM builds on an existing ministry/agency GM platform or a country-wide GM platform that receives and processes grievances from citizens (see figure 11). Answers also indicate that 78 percent of GMs build on local mechanisms that already exist in project-affected communities, e.g., community-based organizations and village councils (figure 12). In terms of sustainability, more than half of the projects (55 percent)

FIGURE 9.
The GM has been set-up and is used only for the purpose of one or more projects financed by the World Bank.

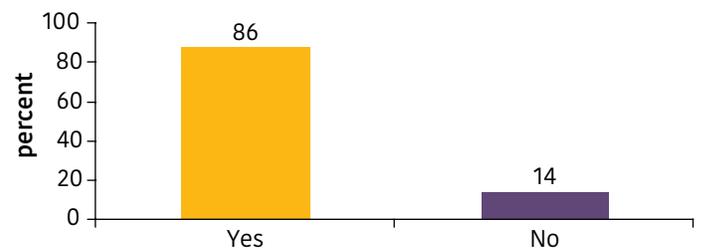


FIGURE 10.
The GM is also being used for one or more projects financed by donors other than the World Bank.

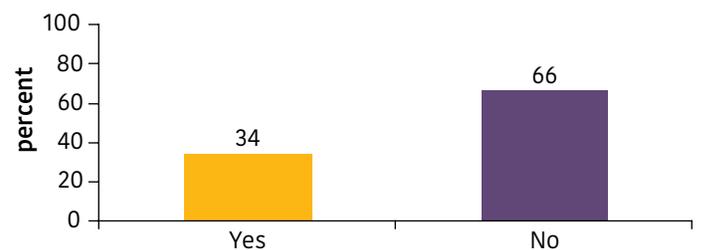
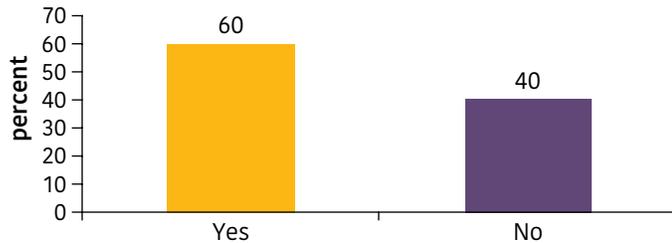




FIGURE 11. The project GM builds on existing ministry/agency GM platforms, or a country-wide GM platform that receives and processes grievances from citizens.



indicate that there are plans to scale up and hand the GM over to the ministry/agency/department when the project closes (figure 13).

While it is encouraging to see that the majority of GMs consider and integrate existing local- and national-level grievance mechanisms into their design, **the synergy between project-level GMs and other accountability systems could be fostered even more.** Where possible, information about domestic social accountability structures, captured as part of the project’s social assessment, should inform GM design. Opportunities to cooperate with other donor agencies on project-level grievance mechanisms, as well as options to build a GM whose lifetime will exceed the project’s closing date could be more systematically explored.

5. While most PIUs make a conscious effort to reach out to vulnerable and marginalized groups, more could still be done to ensure that everyone’s needs are considered in terms of access to the GM.

During project preparation, 65 percent of PIUs asked project-affected people and other interested parties their preferred channels for submitting grievances and then accommodated these preferences by holding public validation workshops, providing diversified uptake channels, translating GM manuals into local languages, conducting annual satisfaction surveys, and setting-up multiple reporting channels for gender-based violence. Several respondents mentioned the integration of

FIGURE 12. The GM builds on local mechanisms that already exist in the project affected communities (e.g., community-based organizations, village councils, etc.).

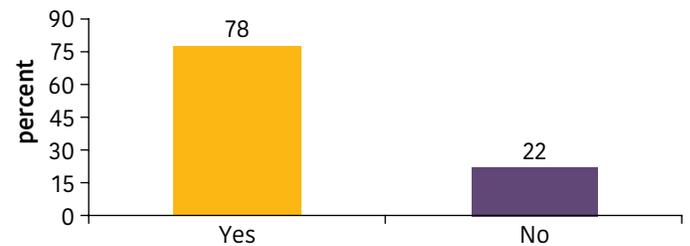
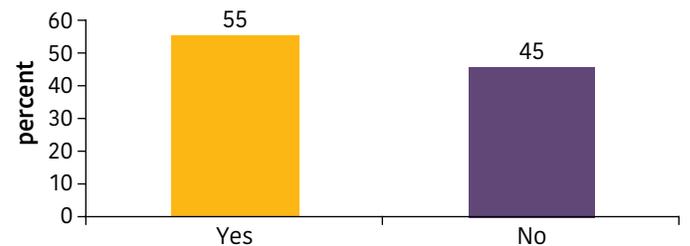


FIGURE 13. The project GM will be scaled up and handed over to the ministry/agency/department when the project closes.



local-level mechanisms into the GM (e.g., district and village councils, local-level grievance redress committees, and indigenous mechanisms) as well as the involvement of female representatives on the grievance redress committees.

In 79 percent of cases, vulnerable or marginalized groups or individuals were included in consultations. These were carried out, according to respondents, through formal and informal focus groups, one-on-one interviews, meetings with organizations or individuals representing such groups, public perception surveys, door-to-door visits, or barazas. Some projects referred to the use of interpreters into local languages as well as sensitization efforts and awareness-raising campaigns, for instance targeting men about the benefits of female participation in consultations.



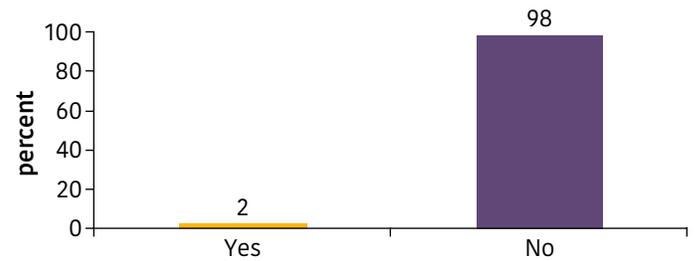
OVERVIEW OF SURVEY RESULTS

When asked about actions taken to consider the needs of marginalized or vulnerable groups in terms of the design and communications about the GM, respondents indicated a focus on:

- ✓ The use of adapted communication materials and communication channels, including translation into local languages, brochure design in simple language, flyers, local radio stations, community display boards, leaflets, toll-free telephone hotlines, posters, social media, and subtitled videos;
- ✓ Inclusive grievance-redress committee design, with representation of women, youth, religious groups, people with low literacy levels, indigenous people, people with disabilities, and others;
- ✓ The hiring of female grievance-handling officers, quotas on female participation or the creation of separate grievance-redress committees for women (for example, one project designed gender-balanced grievance redress committees after some women expressed their unwillingness to rely solely on grievance committees led by all-male community elders);
- ✓ The local character of the GM, such as the use of community liaison officers from local communities to facilitate communication with contractors and the recruitment of local leaders who are known and accessible to vulnerable persons into community-level grievance committees;
- ✓ The involvement of vulnerable groups and/or their representatives in the preparation of a GM manual or terms of reference for the grievance mechanism;
- ✓ Cooperation with local or international nongovernmental organizations to reach specific groups (e.g., refugees); and
- ✓ Acceptance of third-party complaints and anonymous complaints, as well as an emphasis on confidentiality.

One-fourth of respondents cited accessibility of uptake channels and the lack of cost to complainants as the greatest strengths

FIGURE 14.
Are you aware of any retaliations against people that have used the GM?



of their project-level GM. Nevertheless, “ongoing barriers to access” remain, particularly when translations into several local languages are required, or in contexts marked by patriarchal structures, high levels of illiteracy, and/or low technology penetration. These access barriers were cited by 13 respondents in response to an open-ended question about the current main obstacle to the GM’s good functioning, making it the second most frequently cited weakness after “lack of funds.”

An additional point to note is that while the survey results suggest that only a small fraction of projects (2 percent) have experienced a problem with retaliation (figure 14), judging from reports by civil society organizations, the fear of retaliation is a major concern for many people. Despite the low reported incidence of retaliation in the present survey, it remains vital to be cognizant that some may fear reprisal for submitting a complaint through a GM.

These observations are relevant to the UNGP-31 GM’s effectiveness criteria on accessibility and equity, according to which GMs should be “known to all stakeholder groups for whose use they are intended;” provide “adequate assistance for those who may face particular barriers to access;” and “ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms” (OHCHR 2011: 33). They also resonate with the Bank’s Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure, according to which “differentiated measures” should “allow the effective



participation of those identified as disadvantaged or vulnerable” (World Bank 2017: 99, 2018b: 6).

Therefore, it appears that while some projects include vulnerable and marginalized groups, **more work from the Bank’s side is needed to sensitize PIUs to the needs of vulnerable and marginalized groups and individuals, especially during project preparation.** Collecting and documenting some of the best practices mentioned by some respondents as outlined above, and highlighting the need to engage and empower these groups in regards to GM design and operation, could be one way to improve project-level GMs’ accessibility and equitable character. (See box 2.)

GM Operations

6. PIUs should be encouraged to use a wide range of tools to communicate about the GM and to sustain communication efforts about the GM throughout the project lifecycle.

Survey results show that the top two most widely used communication channels for the GM are public meetings (89 percent) and local leaders (71 percent); these are followed by displays, banners, posters, and billboards (57 percent). Just over half (53 percent) of the projects reported having flyers or brochures to highlight the GM; and less than half (44 percent) advertise the GM on the implementing agency’s website (figure 15). Nine respondents cited widespread communication or awareness-

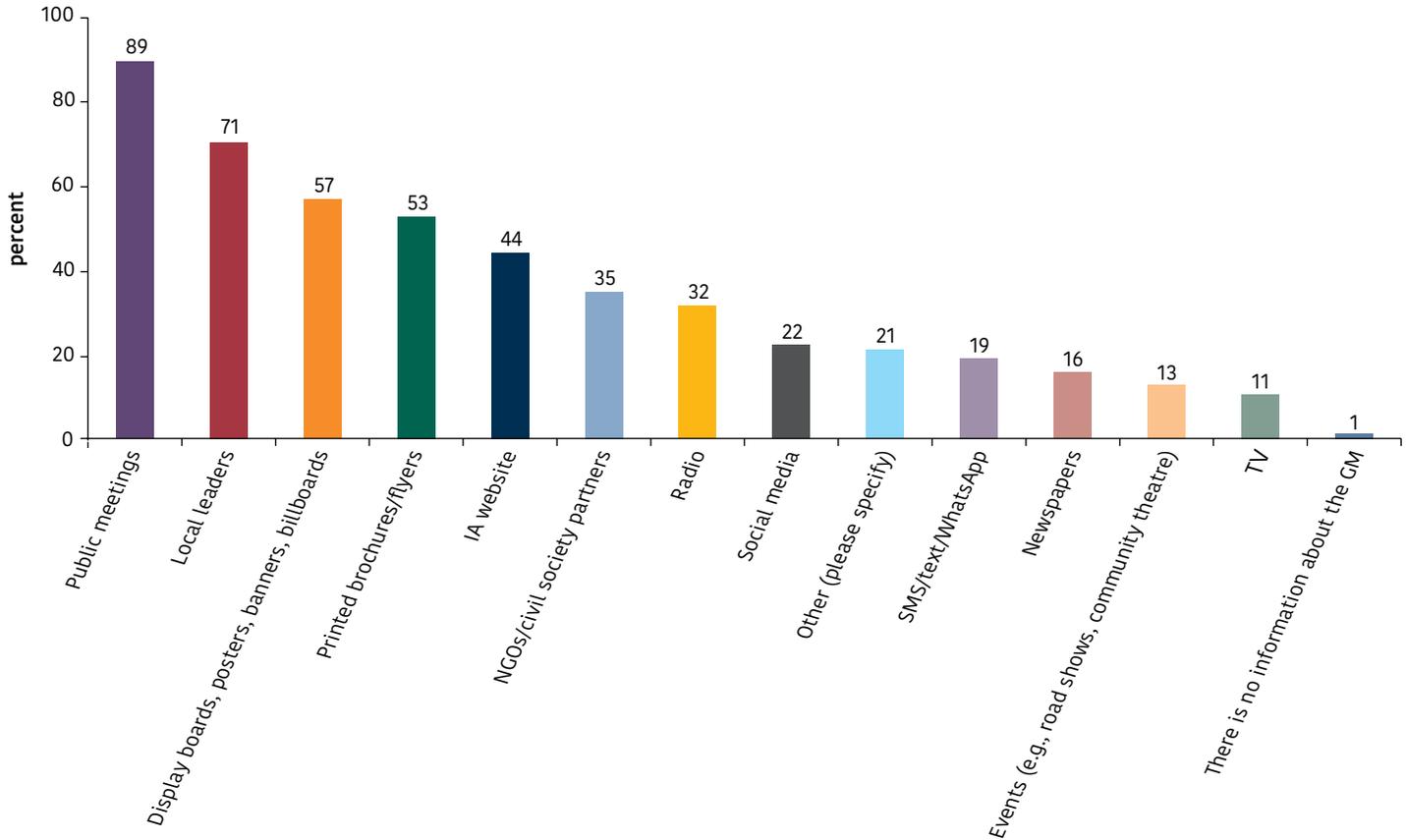
Box 2. Building Inclusive Grievance Mechanisms

In a World Bank-supported project focused on improving access to basic social services, expanding economic opportunities, and enhancing environmental management of communities hosting refugees in the Horn of Africa, the following efforts were made to increase the inclusiveness of the grievance mechanism (GM):

- ✓ The GM was structured along four levels, starting at the community level for easy accessibility, followed by subcounty, district, and ministry levels. Due attention was paid to guarantee gender balance in the composition of grievance redress committees.
- ✓ Consultations were carried out with vulnerable groups, mainly through: (1) focus group discussions with specific groups to capture their peculiar needs and concerns; (2) individual interviews of stratified sampled respondents; and (3) individual interviews of purposefully sampled respondents with deep knowledge of or who represent vulnerable categories.
- ✓ Project-affected people were provided with a variety of options to submit their grievances, including in-person, telephone, email, and postal. A grievance form was made available and anonymous complaints explicitly accepted. Grievances can be submitted in any language of convenience.
- ✓ To publicize the GM, the project made use of multiple communication channels, including community-based engagements and the use of local languages.
- ✓ Because the project targeted both host and refugee areas with specific needs, the project implementation unit worked closely with the United Nations High Commissioner for Refugees (UNHCR). This cooperation led to a revised mapping of grievance categories to cover additional types of complaints, building on UNHCR’s experience of working with these target groups.



FIGURE 15.
How do you communicate the existence of the GM?



raising campaigns in project-affected communities as a key strength of their project’s GM.

These observations suggest that the GM’s existence is primarily conveyed during in-person meetings or via the intermediary of local personalities. It appears that not all projects emphasize widespread, intentional communication campaigns about the GM itself, likely restricting awareness of the mechanism among project-affected people. **Open and regular communications about the GM, beyond the initial phases of the project, is essential to maintain it as a useful feedback tool throughout the project lifecycle, and it appears that there is room to do more in this regard.**

7. Grievance data should be shared with project-affected parties and public officials more transparently.

Forty-three percent of projects do not make statistics about complaint handling, such as the number of complaints received and resolved and their outcomes, publicly available (figure 16). In 90 percent of cases, it is possible to submit anonymous grievances to the GM (figure 17).

The fact that complaint handling statistics are often not made available to project-affected parties is not in line with GM best practices. Indeed,

“reporting of GM features and outcomes is a crucial part of garnering trust. Clear, regular and detailed communication on



FIGURE 16.
Are statistics about the number of complaints received, resolved, and their outcomes publicly available?

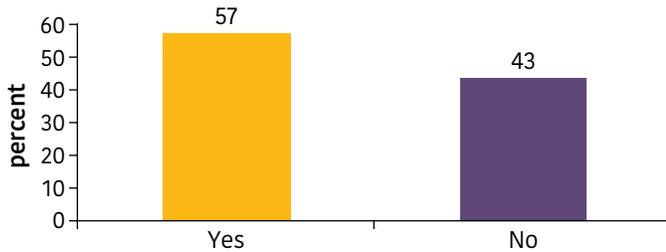
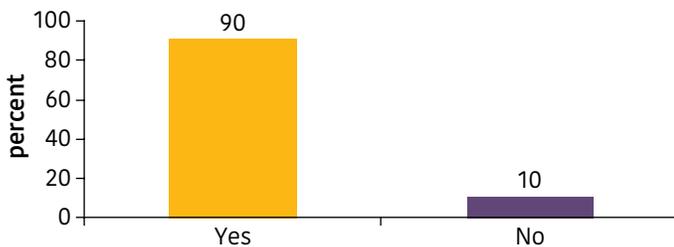


FIGURE 17.
Is it possible to submit anonymous grievances to the GM?



complaints received (including complaints turned down and the reasons), timelines and the outcomes delivered is an essential component of a transparent and effective GM” (ICJ 2019: 15).

Transparency is another effectiveness criterion of UNGP-13:

“Providing transparency about the mechanism’s performance to wider stakeholders, through statistics, case studies or more detailed information about the handling of certain cases, can be important to demonstrate its legitimacy and retain broad trust.”

Of course, the desire for transparency should not trump considerations of privacy and protection of complainants. Where necessary, full confidentiality should be guaranteed to complainants, or only aggregated, nonidentifiable data published. It is therefore good news that anonymous grievances can be submitted to the GM in the vast majority of surveyed projects.

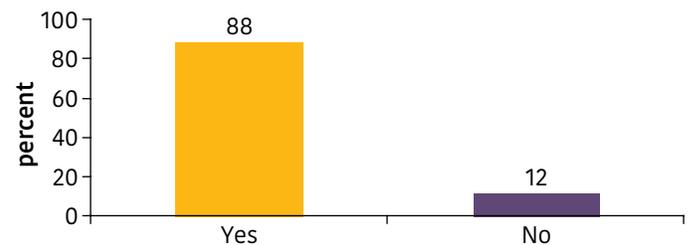
Furthermore, if statistics on grievances are not made available, it is unlikely that senior PIU managers are aware of them. This means that the GM is probably not being used as a feedback tool that could lead to improving project policies and processes.

Therefore, one can conclude that **the functioning of many GMs can be made more transparent and grievance data made more useful by making GM outcomes and complaint statistics easily available to the public and implementing agency staff.**

8. Several areas of the GM value chain could be further strengthened to enhance the predictability of the system, especially complaint-acknowledgement and complainant-satisfaction surveys.

Survey results regarding complaint-handling processes paint a mixed picture. Eighty-eight percent of respondents indicated that, upon their receipt, grievances are sorted into different categories, which is in line with GM best practices⁵ (figure 18). In addition, most GMs administer (18 percent) or plan to administer (63 percent) a satisfaction survey, an important step for evaluating whether or not complainants are satisfied with the proposed solution and to get an indication of the quality of complaint resolution. Nonetheless, this still leaves almost one-fifth of projects (19 percent) for which no complainant satisfaction surveys are being conducted, thereby weakening

FIGURE 18.
When grievances are received, are they sorted into different categories?



5. For practical reasons and because the survey was administered to PIUs from a wide variety of sectors, the survey did not ask respondents to specify which complaint categories were being used for each project. However, experience shows that while most GMs do indeed classify complaints as they are received, the pertinence of these categories can vary.



OVERVIEW OF SURVEY RESULTS

FIGURE 19.
Does the project GM administer a satisfaction survey with GM users?

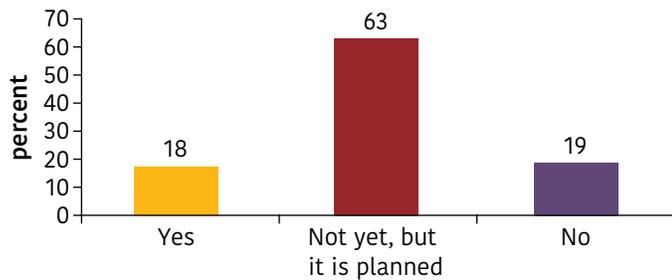
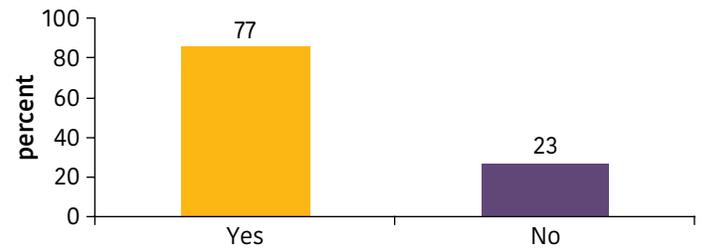


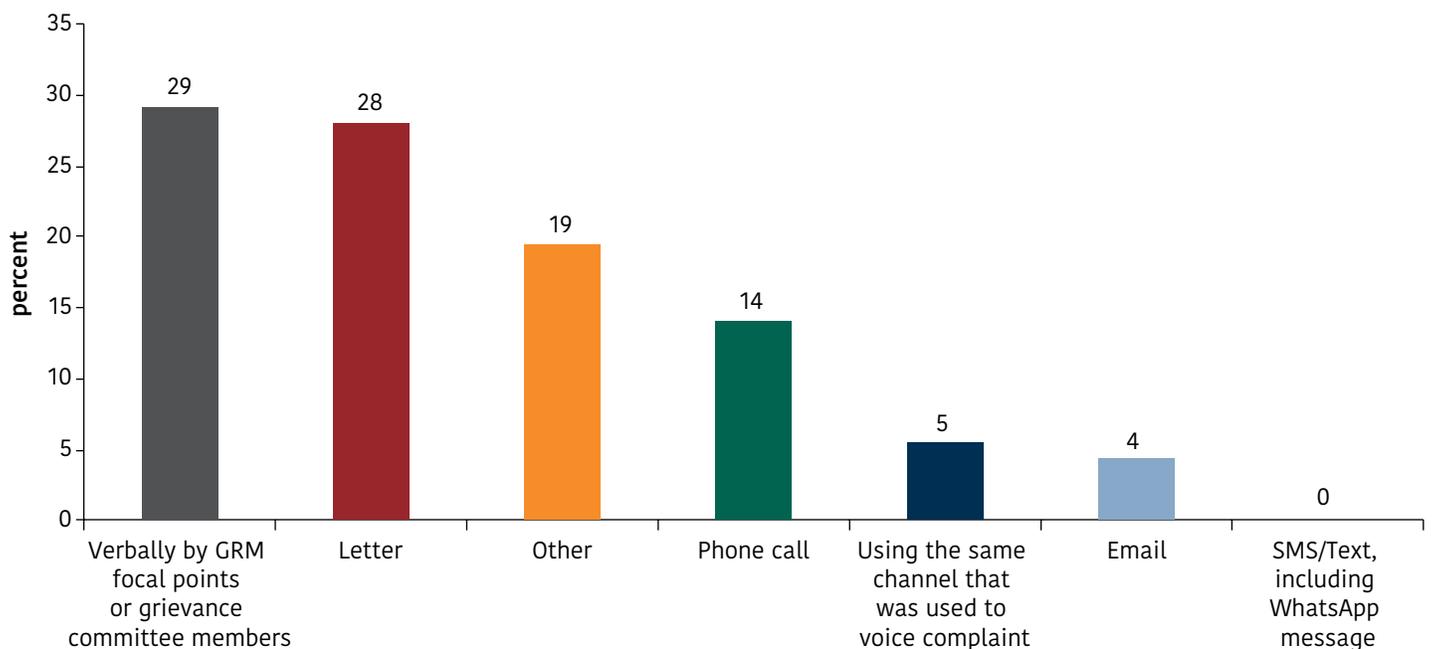
FIGURE 20.
Is the receipt of the grievance systematically acknowledged in writing?



their GMs (see figure 19). Furthermore, in 23 percent of cases, the receipt of the grievance is not systematically acknowledged in writing, despite recommendations suggesting that informing complainants of the good reception of their complaint as promptly as possible is a critical step to build trust and communicate complaint-handling timelines and processes to citizens, thereby also improving a mechanism’s transparency (figure 20). In 29 percent of cases, complainants are only informed of the

proposed resolution of their complaint verbally, i.e. informally, which deviates from good practice (see figure 21). It appears that engagement with the complainant during the grievance resolution process could be made more robust, especially in terms of providing complainants with status updates and explaining to them how they can get involved in the resolution process, for example, by facilitating the investigation of the issue with a site visit.

FIGURE 21.
How are GM users informed about the resolution?





These results speak to the predictability of the GM (another UNGP-31 effectiveness criterion), i.e., the extent to which a clear and known procedure is indicated for each grievance-handling stage, including indicative timeframes and clarity on the types of available outcomes and means of monitoring implementation. In this regard, it appears that **areas that can still be improved include a more systematic categorization of complaints, acknowledgement of receipt of complaints, formal communication of the suggested resolution, and conduct of complainant satisfaction surveys.**

9. The disaggregation and analysis of GM data is insufficient to improve project performance.

The survey results show that the monitoring and evaluation of various data points relevant to the operation of the GM is unsystematic. For instance, 32 percent of projects do not calculate the average time it takes to resolve a grievance (figure 22). When asked about the average time it does take to resolve a grievance, respondents' answers ranged from "15 minutes" to "2 months." Many respondents indicated that the length of grievance resolution greatly depends on the nature of the issue and the level at which it is being resolved. Average resolution times vary accordingly (e.g., 3 days for a sensitive complaint, 7-10 days if the complaint is of a more regular nature, 7 days at the subproject level, 1-2 weeks at the regional level, and 2-3 weeks at the headquarters level). Overall, respondents reported fairly high rates of grievance resolution: 60 percent claimed that 90-100 percent of grievances received since the start of project implementation had been resolved. In 4 percent of cases, less than 50 percent of grievances had been resolved. Twenty percent

of projects do not collect disaggregated data about complainants (see figure 23). Of the projects that do, the most widely collected data are the gender and geographic origin of the complainant (each collected by 87 percent of surveyed projects) (see figure 24). Additional pieces of information collected about complainants by some projects include their status as an indigenous group, religion, economic activity, marital situation, vulnerability, and land ownership.

These results suggest that the monitoring and evaluation of grievance data can be significantly improved and systematized to also serve as a source of continuous learning.

Being a "source of continuous learning" is another effectiveness criteria for GMs as set out in UNGP-31. It means that the information provided through the GM should help "to identify lessons for improving the mechanism and preventing future grievances" (OHCHR 2011: 34). The survey, conducted in the early days of the Covid-19 pandemic, for example, revealed that a small number of projects had already received complaints linked to the pandemic's impacts in terms of occupational health and safety, uncertainty linked to employment, and other issues—a good illustration of the versatility of a well-designed GM and its potential to preempt harm for project-affected parties (figure 25). Indeed,

"regular analysis of the frequency, patterns and causes of grievances can enable the institution administering the mechanism to identify and influence policies, procedures or practices that should be altered to prevent future harm" (OHCHR 2011: 35).

FIGURE 22.
Do you calculate the average time to resolve a grievance?

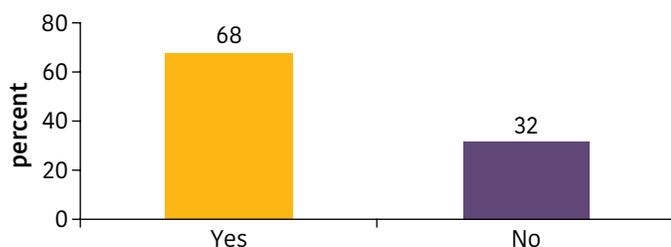


FIGURE 23.
Does the project collect data on GM users (e.g., gender, geographic location)?

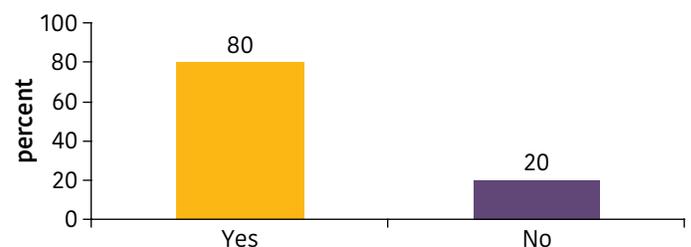
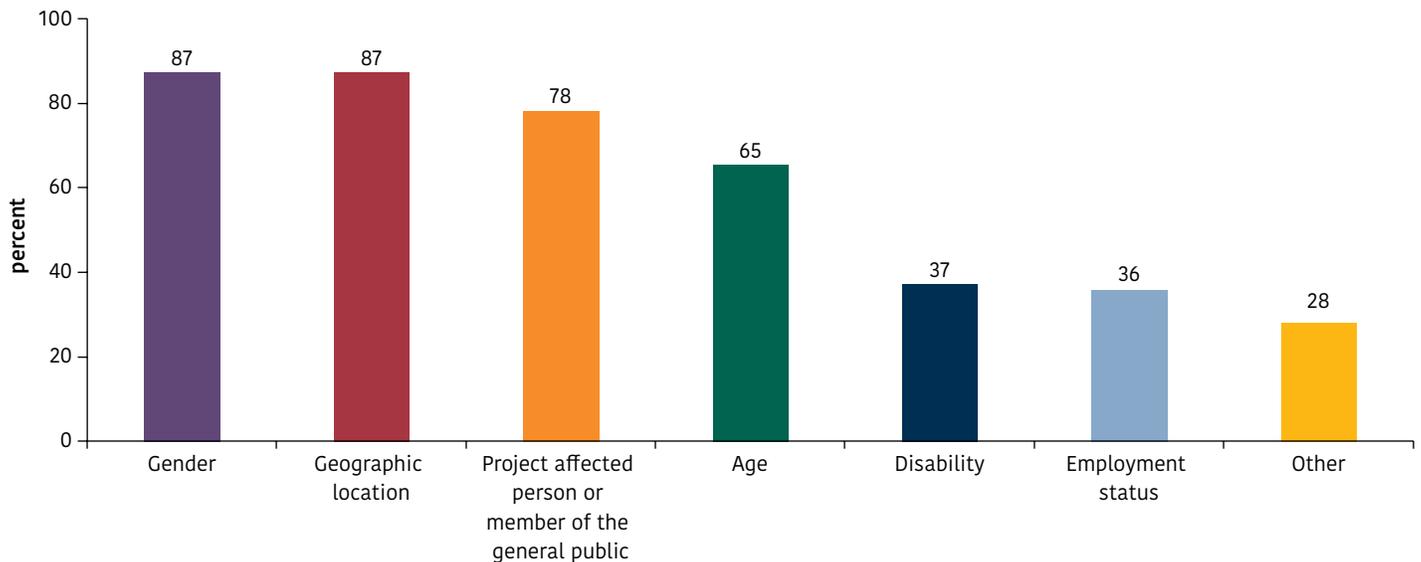




FIGURE 24.
Is it possible to sort the data collected about grievances along the following categories?



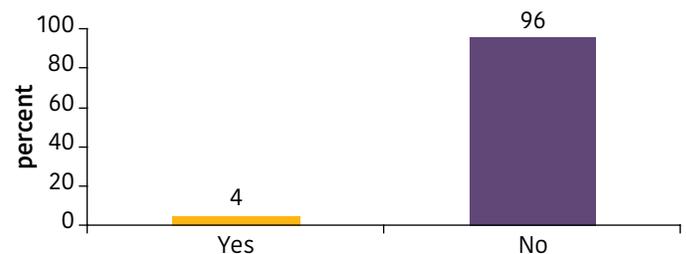
Disaggregating information about complaints can also provide important information about whether any particular group is especially concerned about the project and its implementation and can allow the project team to address such concerns to prevent the project from increasing feelings of discrimination, inequality, and injustice. This is particularly important in fragile and conflict-affected countries.

GM Support Going Forward

10. PIU staff think that capacity building through training and technical assistance would help ensure more effective GMs.

The two options to foster GM effectiveness most favored by respondents are training and technical assistance for PIU-level staff (73 percent) and for other staff (70 percent), such as at the subnational level (figure 26). Respondents further suggest that “special training for engineers and project supervisors” would be useful. Other PIU GM focal points suggest that “strengthening linkages/referrals with other already established GMs such as administrative offices, law enforcement, where necessary judiciary systems;” “the institutionalization of grievance redress;” and “improving policy, procedures and standards on the country

FIGURE 25.
Have you received any COVID-19 related feedback, suggestions, or complaints via the GM?

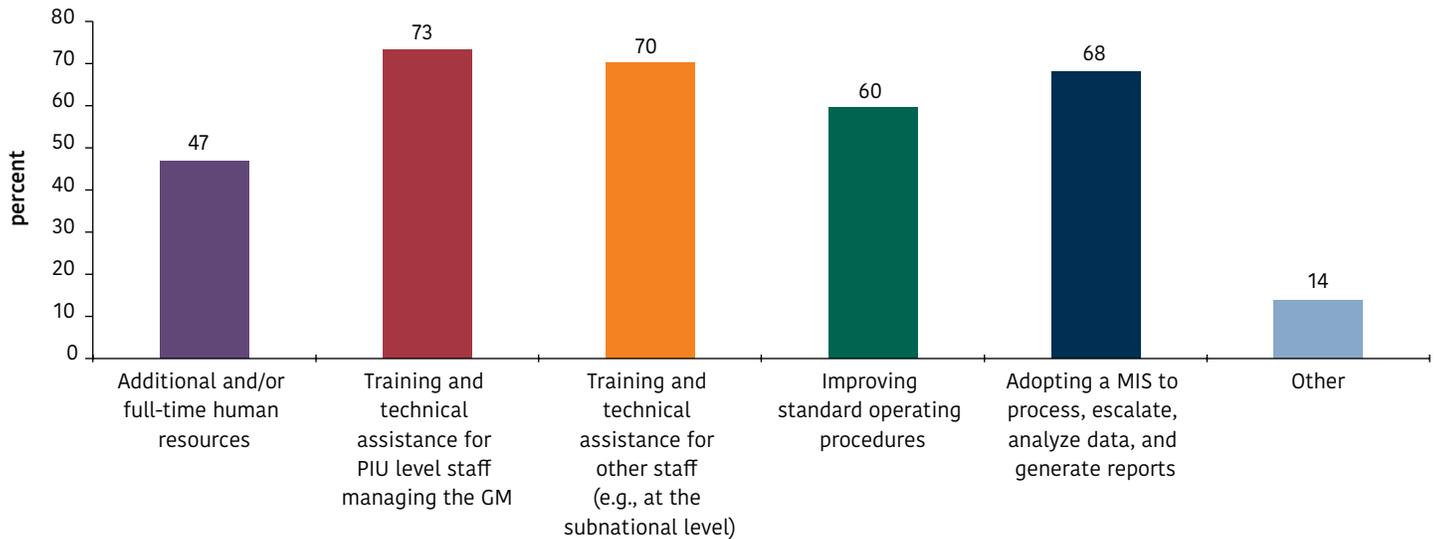


level” (for example, by enacting whistleblowing policies that forbid employers to fire complainants) would make a marked difference in the effectiveness of the GM.

These results underline the importance of building the capacity of PIU-level staff, as well as subnational staff, contractors, and supervision engineers, for example, through the preparation of adapted training materials for each stakeholder group (see box 3). **It also highlights the pertinence of efforts aimed at strengthening country systems that protect complainants and enforce the right to remedy.**



FIGURE 26.
What would be helpful to make the project GM more effective?



Box 3. Recommendations for Improving Grievance Mechanisms

The final survey question asked respondents to indicate if they thought one or several options from a list of five possibilities would be helpful to make their grievance mechanism (GM) more effective, or to propose any other idea to improve the GM. Of the proposed options, it is clear that most PIU GM focal points favored training and technical assistance for PIU-level staff managing the GM (73 percent) and for other staff (70 percent). The adoption of a management information system to process and escalate complaints, analyze data, and generate reports was also deemed useful by 68 percent of respondents. Improving standard operating procedures came in third at 61 percent (figure 26). Interestingly, equipping staff with knowledge and skills related to grievance handling was by and large preferred to more technical or procedural solutions. Benefitting from additional human resources was only deemed by 43 percent as a key factor that could potentially contribute to improving the GM.

Regarding the desire for additional capacity building, respondents stressed that this needs to happen at all levels. In addition to receiving training themselves, they highlighted the need for PIU GM focal points to “ensure grievance committee members are carrying out the GM as envisioned, identify improvement areas, and to build the capacity of the committees to perform better going forward,” especially given the fact that “many team members don’t take this very key role seriously or if they are, aren’t committed to giving the effort required to make GM function well.”

Other responses reflected a considerable appetite for in-depth training on grievance handling. As one respondent wrote: “GM members were trained for only two days.” In this context, exposure to international best practices appears to be perceived as inspirational. As one respondent put it: “GM coordinators need to get a feel of how multiple GMs have been implemented in other countries.”



Appendix. Survey Instrument

Survey on Project-Level Grievance Mechanisms

Purpose of the survey

As part of an effort supported by the Human Rights, Inclusion and Empowerment Trust Fund to strengthen the right to remedy by improving the effectiveness of project-level grievance mechanisms (GMs), the World Bank's Social Development and Governance Global Practices are currently collecting information from project implementing units (PIUs) across the world to capture the experience of Borrowers in setting up and maintaining GMs to address grievances from project-affected parties and other stakeholders promptly and effectively. The objectives of this survey are to gain a better understanding of: (1) existing challenges and opportunities for PIU teams to set up and maintain functional GMs and (2) the type of technical assistance that is required to improve GMs.

This survey should be completed by the PIU's GM focal person (who coordinates and supports the GM), in collaboration with the PIU head/coordinator and/or other PIU officials who are familiar with the GM (e.g. PIU social or safeguards specialist, communications specialist, monitoring and evaluation specialist, etc.).

Survey Timing and Design

It will take an estimated 15–20 minutes to complete this survey, which includes a total of 23 questions divided into 5 sections.

Thank you for your cooperation and time.

Background

Country: _____

Name of agency/ministry: _____

Name of PIU: _____

Name and job title of survey respondent: _____

Respondent's email address: _____

Name of World Bank project: _____

Region (please select):

- Africa/East Asia and Pacific
- Europe and Central Asia
- Latin America and the Caribbean
- Middle East and North Africa
- South Asia Region



I. Basic information on the Grievance Mechanism

1. Is there a dedicated budget to cover the functioning of the GM as part of the project funds?
 YES NO
2. Is there a dedicated person/focal point who has been assigned to coordinate GM activities?
 YES NO
- 2a. If there is no dedicated GM person/focal point, then who coordinates the GM activities? (you can select one or more options).
 - Social or environmental safeguards specialist
 - Communications specialist
 - Monitoring and evaluation specialist
 - Administrative staff member
 - Other (please specify)
3. Please indicate YES or NO for the following statements:

The GM has been set-up and is used only for the purpose of one or more projects financed by the World Bank.

 YES NO

The GM is also being used for one or more projects financed by donors other than the World Bank.

 YES NO

The project GM will be scaled up and handed over to the Ministry/Agency/Department when the project closes.

 YES NO

The project GM builds on existing Ministry/Agency GM platforms, or a country-wide GM platform that receives and processes grievances from citizens.

 YES NO

The GM builds on local mechanisms that already exist in the project affected communities (e.g. community-based organizations, village councils etc.)

 YES NO

II. Grievance uptake and processing

4. During project preparation, were project-affected people and other interested parties asked about which channels they would prefer to use to submit their grievances?
 YES NO

4a. If YES, please explain what action was taken to accommodate their preferences.

5. Were marginalized or vulnerable groups included in the consultations (women, people with low literacy, people with disabilities, linguistic minorities, youth, refugees, internally displaced people, indigenous peoples, etc.)?
 YES NO
- 5a. If YES, please specify how these consultations were carried out (for example: focus-group discussions with particular groups, individual interviews, consultations with organizations representing marginalized groups etc.).

6. Through which uptake channels can grievances be submitted? (Select all that apply).
 - Website
 - Social media (e.g. Facebook, Twitter)
 - Grievance boxes
 - Email address
 - Phone number/call center
 - By letter (post)
 - Verbally/in-person (e.g. to a GRM focal point or Grievance Committee)
 - Smartphone app
 - SMS/Text, including WhatsApp message
 - Others (please specify)
7. How do you communicate the existence of the GM? (Select all that apply)
 - Website of the implementing agency
 - Social media (Facebook, Instagram, Twitter, YouTube)
 - Display boards, posters, banners or billboards



- Newspapers
- Radio
- TV
- Printed brochures/flyers
- Public meetings (e.g. round table discussion, seminars etc.)
- Local leaders
- Nongovernmental organization/civil society partners
- Events (e.g. road shows, community theatre)
- SMS/text, including WhatsApp message
- There is no information about the GM
- Others (please specify)

8. Please explain how the needs of marginalized or vulnerable groups (e.g. women, people with low literacy, people with disabilities, linguistic minorities, youth, refugees, internally displaced people, indigenous peoples, etc.) have been considered in (a) the way the grievance mechanism is designed and (b) the way it is communicated.

9. Is it possible to submit anonymous grievances to the GM?

- YES NO

10. How are grievances logged?

- Excel spreadsheet
- Paper log or grievance books
- Dedicated management information system (MIS)
- Others (please specify)

11. When grievances are received, are they sorted into different categories?

- YES NO

III. Grievance acknowledgement and resolution

12. Is the receipt of the grievance systematically acknowledged in writing?

- YES NO

13. Do you calculate the average time to resolve a grievance?

- YES NO

13a. If YES, what was the average number of days it took to resolve a grievance in 2019?

14. Of the total number of grievances cases received since the implementation of the project started, what percentage of grievances have been resolved?

15. How are GM users informed about the resolution?

- Phone call
- Letter
- Email
- SMS/Text, including WhatsApp message
- Verbally by GRM focal points or grievance committee members
- Others (please specify)

IV. Monitoring and evaluation

16. Does the project collect data on GM users? (e.g. gender, geographic location)

- YES NO

16a. If the response is YES, then is it possible to sort the data collected about grievances along the following categories (select all that apply):

- Project affected person or member of the general public
- Age
- Gender
- Geographic location
- Disability
- Employment status
- Others (please specify)

17. Are statistics about the number of complaints received, resolved, and their outcomes publicly available?

- YES NO

18. Are you aware of any retaliations against people that have used the GM?

- YES NO



18a. If YES, could you please provide more details?

19. Does the project GM administer a satisfaction survey with GM users?

YES Not yet, but it is planned NO

20. Have you received any COVID-19 related feedback, suggestions, or complaints via the GM?

YES NO

20a. If yes, how many and what did they refer to?

V. GM strengths, weaknesses, and options for improvement

21. What do you see as the current main strengths of the project GM?

22. What do you see as the current main obstacles/bottle-necks to the good functioning of the GM?

23. What would be helpful to make the project GM more effective? (Select all that apply)

- Additional and/or full-time human resources
- Training and technical assistance for PIU level staff managing the GM
- Training and technical assistance for other staff (e.g. at the subnational level)
- Improving standard operating procedures
- Adopting a management information system to help process, escalate, analyze data and generate reports on feedback
- Other (please specify)

Thank you! The survey is now finished. Many thanks for your inputs!



References

- ADB (Asian Development Bank). 2010. *Designing and Implementing Grievance Redress Mechanisms: A Guide for Implementors of Transport Projects in Sri Lanka*. Manila: ADB.
- . 2018. *Building Bridges: Lessons from Problem-Solving in Viet Nam*. Manila: ADB.
- EBRD (European Bank for Reconstruction and Development). 2012. *Guidance Note on Grievance Management*. London: EBRD.
- Hirn, Maximilian. 2015. *MajiVoice: A New Accountability Tool to Improve Public Services*. Water and Sanitation Program. Nairobi, Kenya: World Bank Group.
- ICJ (International Commission of Jurists). 2019. *Effective Operational-Level Grievance Mechanisms*. Geneva: Switzerland.
- IFC (International Finance Corporation). 2010. *A Guide to Designing and Implementing Grievance Mechanisms for Development Projects*. Compliance and Advisory Ombudsman. Washington, DC: IFC.
- . 2016. *Grievance Mechanism Toolkit*. Compliance and Advisory Ombudsman. Washington, DC: IFC.
- OHCHR (Office of the United Nations High Commissioner for Human Rights). 2011. *Guiding Principles on Business and Human Rights*. Geneva: OHCHR. https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf.
- Patel, Darshana, Yuko Okamura, Elaine B Shanna. Rogan, and Sanjay Agarwal. 2014. *Grievance Redress System of the Conditional Cash Transfer Program in the Philippines*. Social Development Department and East Asia Social Protection Unit Case Study. Washington, DC: World Bank Group.
- Post, David, and Sanjay Agarwal. 2011a. *Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects, Part 1: The Theory of Grievance Redress*. Social Development How to Series. Washington, DC: World Bank.
- . 2011b. *Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-financed Projects, Part 2: The Practice of Grievance Redress*. Social Development Department How-To Notes. Washington, DC: World Bank.
- UNDP (United Nations Development Program). 2017. *Stakeholder Engagement, Supplemental Guidance: Grievance Redress Mechanisms*. NY: UNDP.
- World Bank. 2014. *Global Review of Grievance Redress Mechanisms in World Bank Projects*. Washington, DC: World Bank.
- . 2017. *The World Bank Environmental and Social Framework*. Washington, DC: World Bank.
- . 2018a. *Engaging Citizens for Better Development*. Independent Evaluation Group. Washington, DC: World Bank.
- . 2018b. *ESS10: Stakeholder Engagement and Information Disclosure: Guidance Note for Borrowers*. Washington, DC: World Bank.
- . 2018c. *Grievance Redress Service (GRS): 2017 Annual Report*. Washington, DC: World Bank.



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