



Fostering the Inclusion of Disadvantaged and Vulnerable Individuals or Groups in Project-Level Grievance Mechanisms



ASSESSMENT TOOL

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 H el ene Pfeil at the World Bank.

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Introduction

 As part of a community-driven development project, an electricity generator was placed next to a house in a village. The bedridden woman living in the house and her husband, realizing that the noise of the generator was negatively affecting her health, filed a complaint with the project-level grievance mechanism (GM). To their relief, due to mediation with township representatives, the community promptly agreed to move the generator.

 During another project, a GM helped surface complaints about a local leader who had hired several of his relatives as technical assistants even though their qualifications were lacking. Following an investigation of the complaint, the relatives' contracts were terminated, and their poor-quality construction work was reviewed to ensure safety.

 And in yet another case, a project beneficiary who raised an exclusion error through the GM of a cash transfer program was rapidly reassessed and included in the program, thereby able to receive vital support for food, medication, and utilities.

These three examples illustrate how GMs can empower citizens to make public institutions more transparent, accountable, and effective. GMs are systems put in place to respond to the concerns, grievances, questions, and suggestions of stakeholders in an orderly and timely manner. They are particularly important to development because they can help governments achieve improved public service delivery, public financial management, good governance, and social inclusion. Principles that are especially relevant to the operation of GMs include:

✓ **Equality and nondiscrimination.** GMs should be easily accessible to all without distinction, although this is not always the case, e.g., if lodging a grievance requires technology that is not universally available or if grievance boxes are not fairly distributed throughout the project area.

- ✓ **Participation and inclusion.** GMs require a high degree of participation by stakeholders.
- ✓ **Accountability and the rule of law.** Because the purpose of a GM is to ensure that relevant authorities are answerable for their actions and decisions as well as to provide aggrieved persons the opportunity to instigate proceedings for appropriate redress, accountability and the rule of law are crucial (see box 1.1).¹

In addition, since the entry into force of the World Bank's Environmental and Social Framework on October 1, 2018, the design and implementation of a GM is a policy requirement for all Investment Project Financing.²

1. The principles of equality and nondiscrimination, participation and inclusion, and accountability, as well as the rule of law, are core human rights principles.

2. See the Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure.



Box 1.1. Human Rights and Grievance Mechanisms

The United Nations' Guiding Principles (UNGP) on Business and Human Rights, which was endorsed by the United Nations' Human Rights Council in 2011, defines grievance mechanisms (GMs) as "any routinized ... process through which grievances concerning ... human rights abuse can be raised and remedy can be sought" (OHCHR 2011). GMs are a means of fulfilling an individual's right to effective remedy as outlined in Article 3 of the International Covenant on Civil and Political Rights.^a The human rights principles of nondiscrimination, accountability, participation, and transparency overlap with the best practice guiding principles of GMs. Principle 27 affirms:

"States should provide effective and appropriate nonjudicial grievance mechanisms, alongside judicial mechanisms, as part of a comprehensive State-based system for the remedy of business-related human rights abuse."

Guiding Principle 31 provides eight effectiveness criteria for nonjudicial GMs, asserting that they should "conform

to principles of legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, be a source of continuous learning and based on engagement and dialogue," and it defines each principle. Commentary to Guiding Principle 31 highlights that these effectiveness criteria:

"provide a benchmark for designing, revising or assessing a nonjudicial grievance mechanism to help ensure that it is effective in practice. Poorly designed or implemented grievance mechanisms can risk compounding a sense of grievance amongst affected stakeholders by heightening their sense of disempowerment and disrespect by the process."

These core principles provide a useful framework when assessing a GM's effectiveness in enhancing the application of human rights. In 2019, the International Council on Mining and Metals developed a checklist (ICMM 2019) that outlines how to align a project-level GM with the principle's effectiveness criteria (see figure B.1.1).

(continued)

Raising grievances is a delicate process, one that often excludes vulnerable and marginalized groups. The World Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups defines disadvantaged or vulnerable as:

"those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits."

One reason disadvantaged or vulnerable individuals and groups may find it particularly difficult to raise concerns is that their needs are easily overlooked in the design and implementation of a GM. Certain decisions, such as the language chosen to operate the GM or the selection of grievance focal points, may end up excluding some people and represent a form of indirect discrimination. Vulnerable and marginalized groups may encounter more barriers to accessing the GM or related communication and information materials than do other stakeholders. They may also have serious grounds to fear retaliation. Implementing agencies must therefore make a concerted effort to ensure that the GM is respectful of the principles of equality, discrimination, participation, and inclusion.

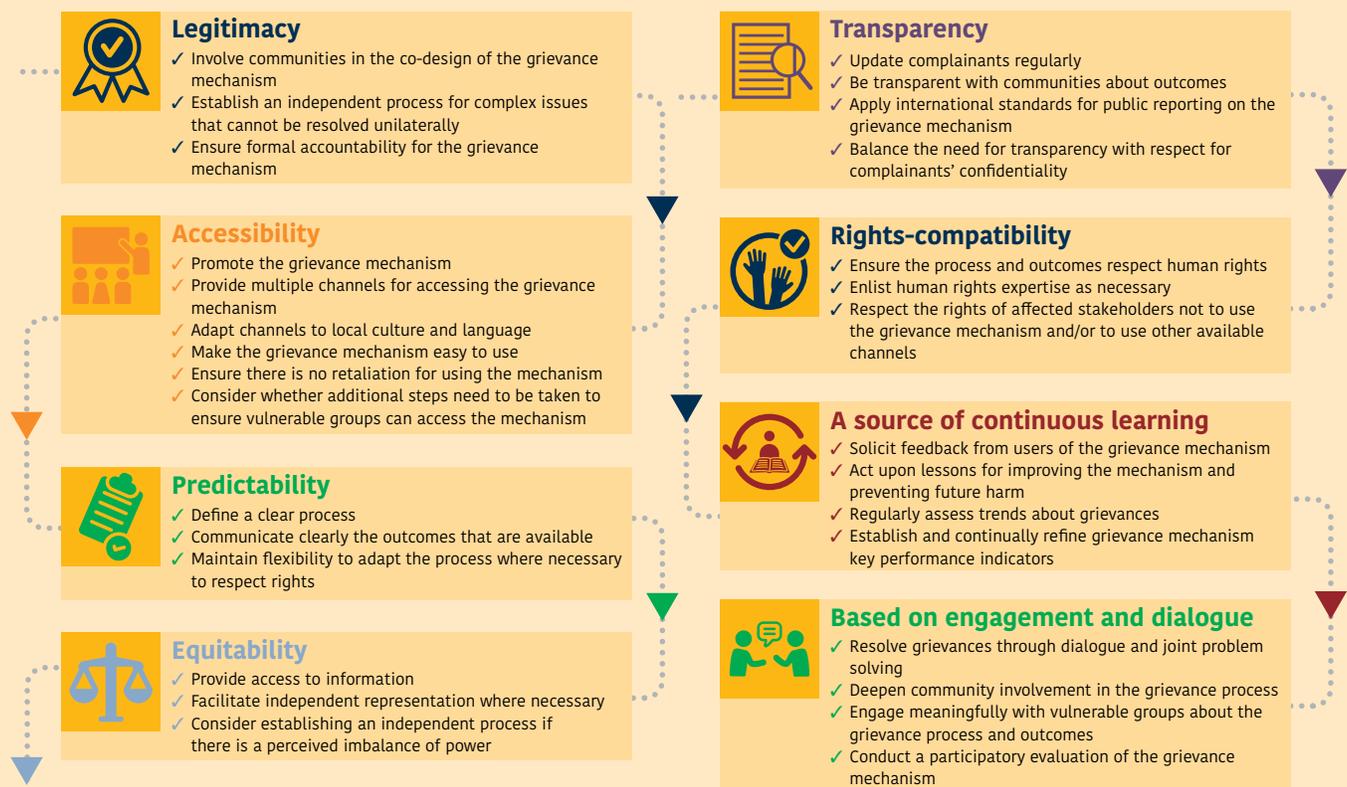


Box 1.1. Continued

The current note is inspired by the principles and effectiveness criteria cited above and builds on them, although with a narrower focus on how GMs can be designed and rolled out in a manner that will foster

social inclusion and sustainability by considering the requirements of vulnerable and marginalized groups and individuals.

FIGURE B1.1. CHECKLIST FOR ALIGNING A GRIEVANCE MECHANISM WITH THE EFFECTIVENESS CRITERIA OF THE UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (AS SUGGESTED BY THE INTERNATIONAL COUNCIL ON MINING AND METALS)



Source: International Council on Mining and Metals, Handling and Resolving Local-Level Concerns and Grievances—Human Rights in the Mining and Metals Sector, 2019.

- a. Article 3 of the International Covenant on Civil and Political Rights reads: “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) To ensure that any person claiming such a remedy shall have his right thereto determined by competent judicial, administrative or legislative authorities, or by any other competent authority provided for by the legal system of the State, and to develop the possibilities of judicial remedy;
 - (c) To ensure that the competent authorities shall enforce such remedies when granted.”



1. INTRODUCTION

This note aims to support Bank task teams and project implementation units in the design and roll-out of inclusive GMs at the project-level. It proposes a six-step process to ensure that a GM will truly cater to the needs of disadvantaged and vulnerable groups and individuals (see figure 2.1). The remainder of this note is structured into two sections. Section 2 provides concrete advice on how the six steps can be put into practice.³ Section 3 suggests a rapid scoring tool comprising 20 questions for assessing how thoroughly a GM considers the requirements of vulnerable and marginalized groups and individuals in its setup and implementation.

An important caveat: This note focuses on making GMs accessible to vulnerable and marginalized groups and

individuals. It does not delve into the effectiveness of back-end processes, which greatly influence user experience for all complainants. For advice on how to develop robust grievance-handling procedures and operate a responsive and well-working GM, readers should refer to the readily available dedicated literature (see IFC 2008, 2009, 2016; Post and Agarwal 2011a, b; World Bank 2020b, forthcoming; Peixoto and Sifry, 2017). Task teams should be aware that even with an inclusive GM in place, they are still responsible for assessing the overall inclusiveness of a project and whether there are any project-related cases of severe exclusion or discrimination. Because GMs are only as good as the context and the people implementing them allow, certain systemic exclusion issues may never be detected by a GM.

3. Should there be a demand for further capacity building on key issues related to the six steps outlined in this note, the research team stands ready to provide additional support and advice.



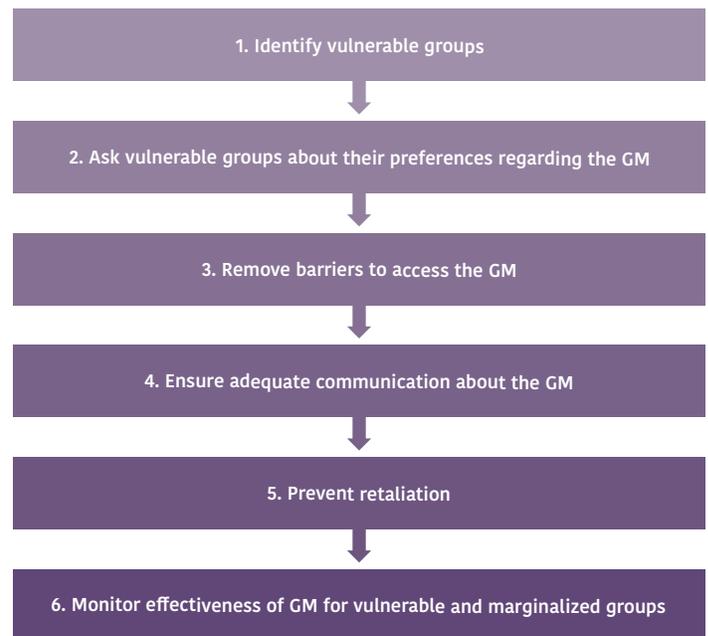
Steps to Ensure that a GM Serves Vulnerable and Marginalized Groups and Individuals

Step 1. Identify vulnerable groups

The first step to building an inclusive GM is to have a clear picture of the types of vulnerable groups that may come to know of and use it. Vulnerable or disadvantaged groups and individuals relevant to the project, as well as their specific needs, are usually determined during the project's environmental and social impact assessment.

In addition to being aware of these vulnerable groups and their characteristics, it is vital to examine the issue of intersectionality—the ways that different types of vulnerabilities overlap and compound discrimination and disadvantage, for example in the case of women engaged in the informal sector; LGBTIQ⁴ seniors; children with disabilities, or refugees with low levels of literacy.⁵ Being aware of such complexities can inform the design of holistic measures to address inequalities and develop adequate responses (see table 2.1).

FIGURE 2.1. SIX STEPS TO ENSURE THAT A GM SERVES VULNERABLE AND MARGINALIZED GROUPS AND INDIVIDUALS



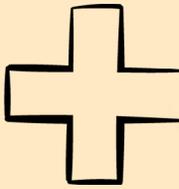
4. LGBTIQ = Lesbian, gay, bisexual, transgender, intersex, and questioning.

5. For example, the Office of United Nations High Commissioner for Human Rights' report "Women's Rights are Human Rights" states that "some groups of women face additional forms of discrimination based on a variety of grounds, such as ethnicity, education and socioeconomic status, among other grounds. These intersecting forms of discrimination must be considered when developing measures and responses to combat discrimination against women." (OHCHR 2014).



2. STEPS TO ENSURE THAT A GM SERVES VULNERABLE AND MARGINALIZED GROUPS AND INDIVIDUALS

TABLE 2.1. INDICATIVE LIST OF VULNERABLE OR MARGINALIZED GROUPS AND INDIVIDUALS, BY TYPE OF VULNERABILITY

Physical factors 	People living in remote areas	Social factors 	Age, e.g., the elderly and minors, including in circumstances where they may be separated from their families, the community, or other individuals who they depend on
	People living in hard-to-reach areas, e.g., due to fragility, conflict, and violence		People with low levels of education
	People with limited transportation options		People with low literacy levels
	People with precarious/uncertain housing situations, e.g., slum dwellers and the homeless		People with low technical literacy, especially for complex technical projects
	People living in areas prone to natural disasters		Sexual orientation and gender identity minorities
	Rural communities		Survivors of gender-based violence
	Nomads		Women
Political factors 	People living in existing humanitarian emergencies		Indigenous peoples
	Internally displaced people		Ethnic minorities
	People with a specific civil status (refugees, migrants, asylum seekers)		Linguistic minorities
Economic factors 	People disadvantaged based on economic or occupational status, e.g., the unemployed, people with few marketable skills, people who depend on unique natural resources or the informal economy, women and men returning after taking parental leave, pensioners, single-headed households, people engaged in seasonal agriculture, workers at risk of being laid-off, caregivers providing support to a person with disability, and prisoners		Religious minorities
	People living under the poverty line—the bottom 40 percent		People with limited access to media, e.g., newspapers, television, and radio
	Informal settlers—project-affected people with no legal right to land		People with limited digital connectivity due lack of availability, affordability, awareness, ability, or agency
			Health factors 
	People with intellectual disabilities		
	People with physical disabilities, e.g., visual or hearing impairments or limited mobility		

Note: This list is not exhaustive, and people often fit into multiple categories due to intersectionality.



Step 2. Ask vulnerable groups about their preferences regarding the GM

Direct consultations with vulnerable and marginalized people are crucial to understanding their preferences regarding GM design and to ensuring that their specific needs are met. This process, which should be carried out as early as possible during project preparation, can be integrated into the project's environmental and social impact assessment⁶ or be part of a separate social diagnostic, if resources permit. Environmental and Social Standard 10 (ESS10) of the World Bank's Environmental and Social Framework directs Borrowers to identify individuals or groups who "may require different, or separate forms of engagement" (World Bank 2018: 98) and to document consultations with them in the stakeholder engagement plan, which should also outline the features of the project's GM. Project implementation units (PIUs) thus have a crucial role to play in the integration of vulnerable groups, both in the planning process and in the resolution of grievances.⁷ Vulnerable and marginalized people should be asked about the channels and/or interlocutors they would trust and prefer to use for submitting complaints; existing feedback channels that they already use; people they tend to approach at the local or community level, such as municipal representatives, tribal leaders, and civil society organization representatives; potential barriers to accessing the GM and how to remove them; and expectations related to language, the location of the GM, interactions during a grievance investigation, and how they would like to receive responses as part of the resolution process.

A variety of tools can be employed to engage vulnerable groups in meaningful conversations about project design and GM setup. Focus group discussions are one useful way to engage vulnerable groups in a sensitive and safe manner. Participatory tools, such as participatory rural assessments, can also help to map the existing resources of subgroups, ascertain each

group's level of access to services, and determine what is missing. Deploying the appropriate resources and skill sets to engage vulnerable groups is crucial, for example, having female facilitators conduct focus group discussions with women. The COVID-19 pandemic has demonstrated that, in contexts where face-to-face consultations are not feasible, virtual consultations using various forms of technology still allow teams to reach vulnerable and marginalized groups (IFRC, OCHA, and WHO 2020).

In some cases, direct consultations with vulnerable and marginalized people may not be possible or present specific challenges, such as ethical considerations with survivors of gender-based violence, and security considerations with sexual orientation and gender minorities. In such situations, qualified third parties can help identify the needs of vulnerable groups regarding the GM. Examples include civil society organizations representing specific groups, such as people with disabilities or a trade union; advocacy groups; international organizations specifically focused on one particular stakeholder category, such as UNHCR and UNICEF; and umbrella organizations, such as parents' associations.

To guarantee the physical accessibility of consultations about the GM, due attention should be paid to the choice of venue. Venues are not all accessible to people with disabilities or with limited mobility options, and safe and easy transportation services are not universally available. The times and dates of consultations can also impact the ability of various stakeholders to participate. In some regions, people migrate as seasonal laborers; groups such as nomads and farmers may not be available at certain times of year; and parents, single-parent households, and workers may not be able to attend at certain times of the day due to their household or professional obligations.

From a psychological point of view, several measures can be taken to make consultations more accessible: (1) ensure the allocation of adequate time so that everyone feels comfortable raising issues that are relevant to them; (2) ensure that people with disabilities understand what is being said by others and

6. Questions to guide the environmental and social impact assessment's mapping of the preferences of vulnerable groups regarding GMs could include:

- Who do you usually turn to when a problem arises in your community?
- How have grievances been handled in the past?
- If a project-related issue arises, what would your preferred complaint channel be?

7. This can be particularly challenging to tackle when relevant authorities are reluctant to engage with vulnerable groups, either in practice or for considerations resulting from the national legal framework.



2. STEPS TO ENSURE THAT A GM SERVES VULNERABLE AND MARGINALIZED GROUPS AND INDIVIDUALS

are able to communicate their own ideas; (3) communicate with stakeholders prior to the meeting to allow them to share their questions in advance; (4) engage facilitators and intermediaries, such as experts familiar with gender-sensitive and child-friendly approaches and communication assistants; and (5) guarantee confidentiality of the participants' inputs. In many cases, vulnerable groups may be reluctant to raise specific issues in a large venue or meeting. Engagement strategies must therefore be adapted. For example, small-scale meetings may be more constructive than open public meetings for understanding certain groups' concerns. Similarly, where there is distrust of groups and authority, discreet forms of notification may be required for public meetings or events to prevent the targeting of certain groups with violence or intimidation.

Finally, from a linguistic point of view, accessibility can be guaranteed by using interpreters into local languages; arranging for sign-language interpretation; and planning for real-time captioning during online meetings.

Step 3. Remove barriers of access to the GM

To make the GM accessible to all, a variety of channels should be provided for grievance uptake. Teams should verify that everyone can easily submit grievances, including people with various—and sometimes multiple—vulnerabilities, such as lack of access to specific information technologies (e.g., mobile phone or smartphone), low literacy levels, or living in a remote area. Options for grievance submission include the use of a dedicated email address; a dedicated phone number or call center; grievance boxes; an online form; a smartphone application; SMS/texts, including WhatsApp messages; social media (e.g., Facebook, Twitter); verbal/in-person (e.g., to a trusted community member or community leader, GM focal point or grievance committee, during community meetings); and letter (mail).

Beyond offering multiple access channels, the GM's design may need to be adapted to address the preferences of vulnerable and marginalized groups, remove the barriers they face, and allow them to engage in the GM process. Indeed, while some projects can rely on existing and well-used mechanisms that

the population trusts, others may require changes to existing accountability structures to better suit the needs of different vulnerable groups (see box 2.1).

One method for removing cultural and psychological barriers to GM access is designating community liaison officers or trusted individuals at the local level to increase vulnerable groups' level of comfort with filing grievances and approaching grievance focal points. Grievance channels may also need to be adapted to the local culture, such as by offering dedicated grievance channels for women or choosing a palatable name for the GM in contexts where there is no "culture of complaint." Intermediaries and third-party groups, such as organizations providing counseling, information, translation, or representation services for vulnerable groups, may need to be engaged. The inclusion of representatives of vulnerable groups (e.g., women, youth, religious representatives, people with low literacy levels, indigenous people, and people with disabilities) in grievance redress committees is also effective at fostering inclusion and enhancing GM access among vulnerable groups.

To remove the physical barriers to GM access, physical grievance access points should be within safe reach and easily accessible to vulnerable groups; and, ideally, some grievance uptake channels should not require complainants to undertake extensive travel, for example, phone lines, email addresses, and instant messaging systems.

Projects should aim to remove technical and literacy barriers by allowing people with no or low literacy to access the GM, for example, through oral testimony or by phone, and by adapting GM communication materials for people with low literacy or low education levels, including the use of simple language and visuals.

To mitigate language barriers to accessing the GM, people should be able to submit grievances and receive information and updates on the status of their complaint in their preferred language. Appropriate measures include providing the option of submitting grievances and receiving updates face-to-face with a person who speaks the local language; translating materials



into local languages, including minority languages; and hiring of translators and interpreters for documents and meetings, respectively, to explain the results of investigations. Another dimension to consider is if people with speaking or hearing impairments can submit grievances using sign language or auxiliary aids and services, and if there are provisions allowing for the dissemination of project and GM-related documents in Braille.

Finally, to keep financial barriers from preventing people from submitting complaints, the GM should be free of charge, and the transaction costs for complainants to submit a complaint kept minimal. Concretely, this might mean setting up free telephone hotlines or considering issues such as the potential cost of travel to a complaint uptake location.

Box 2.1. Examples of Grievance Mechanism Designs Adapted to Meet the Needs of Vulnerable and Marginalized Groups

To ensure that a GM is trusted and considered legitimate by project-affected parties, its design may need to be adapted to the preferences of vulnerable and marginalized groups, as was done in the following examples.

Decentralized Service Delivery Program II, Sierra Leone

Under this project, female representation is required on the World Bank's grievance redress committees at the ward (community) level. At the local council level, the representation of religious leaders (from both Muslim and Christian communities), the media, and the youth population is mandated. Expanding grievance redress committee composition beyond local council members is widely viewed as progress toward greater transparency, accountability, and participation.

Energy Supply Reliability and Financial Recovery Project, Georgia

To emphasize the local character of the GM, this project recruited five community liaison officers from five municipalities, who were tasked with receiving, reviewing, and recording grievances, as well as communicating and disseminating project-related information.

Girls' Education and Women's Empowerment and Livelihoods Project, Zambia

Under this project, the implementation team decided to provide project-affected people with more channels than just the traditional complaint box to submit grievances. The project put in place a system of community grievance

focal points as well as a telephone hotline for complaints related to gender-based violence to ensure that all women and girls would feel comfortable raising concerns. The community grievance focal points were selected by the communities based on a set of criteria outlined in the GM manual (e.g., "woman who is a trusted member of the community," "respected for leadership and honesty," "has lived in the community for 6 months or longer," "possesses basic literacy skills," "speaks clearly," "treats everyone equally"). Furthermore, the existence of the GM and its processes were advertised through community-level sensitization activities, radio messaging, and communications with existing women's organizations.

Reaching Out-of-School Children Project II, Bangladesh

This project anticipates that female complainants can be assisted by a female member of the Union Parishad (the smallest rural administrative and local government unit); and complainants who come from tribal community can be assisted by a tribal representative.

Santa Cruz Road Corridor Connector Project, Bolivia

Under this project, measures taken to adapt the GM to vulnerable groups, particularly as they relate to gender-based violence, include using indigenous languages (Bësiro and Zamuco) in the reception of complaints and information broadcasting, as well as also supporting integrated municipal services through the training and coaching of female community promoters and establishing WhatsApp/Facebook-based communication networks.



Step 4. Ensure adequate awareness raising and outreach activities

To publicize the GM's existence and its processes, projects should use various communication channels, including in-person community-based engagements; dedicated events; local, regional, or national radio stations; newspapers; and printed materials such as flyers, display boards, leaflets, posters, and brochures—disseminated at a variety of physical locations, on the project's web page, on social media, on television, and in video clips posted online, as examples.

In addition, awareness-raising and outreach strategies to inform people about the GM should be adapted to the requirements of vulnerable groups. This may mean providing documents in electronic format, Braille, large print, easy-to-read-and-understand formats at an appropriate level of technical detail (e.g., brochure design in simple language); using subtitled videos, oral presentations for vision-impaired stakeholders, and age-sensitive communication tools (e.g., cards, images) for younger stakeholders; holding information-sharing and sensitization meetings for specific subsets of the population (e.g., women-only meetings with a female speaker/facilitator); translating materials into local languages; and relying on community leaders or community liaison officers.

Furthermore, communication about the GM should be ongoing, and not simply limited to the start of the project or launch of the GM. Publishing information about the GM continuously throughout project implementation and finding ways to highlight the desirability of feedback from project-affected parties throughout the project lifecycle is vital to encouraging vulnerable groups to come forward and provide their insights through the GM.

Step 5. Prevent retaliation

Vulnerable people may fear reprisal from public authorities, local communities, co-workers, or employers, among others, if they submit grievances. Such concerns may be due to the social and political context, which could be marked by

corruption, conflict, or distrust of various groups and authorities. Guaranteeing confidentiality in the complaint-handling process and permitting the anonymous filing of complaints are therefore essential to giving the most vulnerable the confidence they need to speak up and raise concerns. Experience shows that neither confidentiality nor anonymity are easy to implement, and these principles may sometimes even be met with resistance. For example, there could be significant pressure from PIUs or contractors to reveal the identity of complainants, claiming that doing so would facilitate the resolution of the case. Nevertheless, both are extremely important to give project-affected people the safety and confidence they need to file sensitive complaints.

Confidentiality can be guaranteed by setting up adequate safeguards in the complaint-handling process, including putting in place mechanisms to protect the identity of the complainant (e.g., anonymizing files), restricting staff access to the grievance log/registry of “sensitive” complaints (digital safeguards if registered electronically, physical safeguards if registered on paper), the sharing of complaint-related information on a need-to-know basis (i.e., only among a limited number of authorized people for the purpose of investigating the complaint), and setting-up guidelines on how to handle complaints where the substance of the complaint may lead to the identification of a specific individual or group (e.g., handling such complaints in a more generic rather than specific way). Such safeguards should be integrated into the code of conduct that is applicable to all actors involved in grievance uptake and resolution. Another option to consider is allowing a project-affected person who fears retaliation to file their grievance with someone they trust, such as a nongovernmental organization representative.

In addition to ensuring confidentiality, allowing stakeholders to submit anonymous complaints can help uncover wrongdoings that would otherwise not surface. GMs should therefore provide vulnerable citizens with avenues to submit complaints anonymously and have a policy in place on how to handle such claims.



Step 6. Monitor the effectiveness of the GM for vulnerable groups and make any necessary adjustment

Finally, once the GM has been launched and is operating, it is useful to monitor if, in fact, vulnerable and marginalized individuals and groups understand and are comfortable using it. Four main strategies can be pursued toward that objective. First, using ongoing stakeholder engagement activities with vulnerable groups throughout the project's lifecycle can reveal

whether they are aware of the GM; confident in its legitimacy, trustworthiness, and outcomes; and if they would make use of it if the need arose. Second, PIU management can carry out spot checks (e.g., verify grievance logs at random times without prior warning), or use mystery shopping techniques (e.g., submit a complaint to test how it is handled) to gauge the GM's performance. Third, conducting satisfaction surveys with all complainants, but analyzing in particular feedback provided by vulnerable groups, can help identify the strengths and weaknesses of the GM's setup and complaint resolution

Box 2.2. The Iterative Nature of GMs: Refining GMs After They Have Begun Operating

Unexpected issues related to a GM can surface during project implementation, resulting in the mechanism needing to be altered. Adaptive management is required from project implementation teams to consider emerging factors as projects unfold.

In **Pakistan's Dasu Hydropower Project**, for example, a four-tier grievance redress committee (GRC) system had initially been proposed, starting at the village level, followed by the union-council level, the district level, and finally the project-level. Grievance redress committees were trained at multiple levels, but the project team soon recognized some constraints in operationalizing the GM: locals preferred using the customary grievance mechanism (*jirga*, the traditional assembly of tribal leaders), lacked confidence in the community representatives selected as part of the grievance redress committees, and did not think that the village and union-council-level grievance redress committees added value to the GM. For major policy issues, the community expressed a preference for using the grand *jirga*, able to access high levels of government. As a result, project implementors decided to incorporate the long-established, customary grievance mechanism (the *jirga*) into the GM's processes, with the first line of action

being the community negotiating with the contractor to resolve issues. The community's preferences were also acknowledged by allowing *jirgas* to be conducted at the offices of the Deputy Commissioner and Water and Power Development Authority.

Another example is the **Kenya Water Security and Climate Resilience Project**, which planned to make use of village-level committees as the first, local-level platform for handling grievances, especially those related to land acquisition and resettlement. However, women's forums organized by the project implementation unit's gender specialist soon revealed that women from one particular indigenous group did not feel comfortable approaching these male-dominated village-level committees, where elders have a major say, especially given the context in which women's rights to land were not customary. This led the project team to highlight that project-affected people had several avenues to lodge a complaint beyond the village grievance redress committee, including with committees at the sublocation level (just above the village level). Committee members were also sensitized to land and gender issues through additional trainings.

Sources: World Bank online seminar: "Strengthening the Right to Remedy: Integrating Local Accountability Structures into Project-Level Grievance Mechanisms," April 24, 2020; World Bank 2020b.



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processes. Fourth, where possible, collecting data about complainants' drivers of vulnerability can provide a sense of the proportion of vulnerable people in the entire pool of complainants.

It is hardly surprising that GMs rarely capture data on vulnerability: asking about this kind of information is sensitive, and a complainant may be uncomfortable sharing this type of information. Furthermore, in authoritarian contexts, complainants may fear providing potentially identifying information about themselves. At the same time, monitoring grievance data related to vulnerabilities can help inform insights regarding the type of people that are accessing the GM (e.g., in terms of age, income, belonging to indigenous peoples' groups). Therefore, data on vulnerabilities should be collected when

feasible, for example, by adding an additional set of questions to the GM management information system or to grievance forms, or by making data requests about vulnerability drivers optional.

It is vital to remember that building an effective GM is an iterative process and that it may be necessary to continuously adapt it to an individual project's circumstances (see box 2.2). The results of complainant satisfaction surveys, ongoing consultations with stakeholders, and the disaggregated information collected by the GM about complainants should be regularly analyzed and reviewed to identify if any changes are needed to grievance-related policies and practices and, more broadly, to project design or implementation processes.



Checklist for Assessing the Inclusiveness of a Project-Level Grievance Mechanism

The tool proposed here, which assesses the inclusiveness of project-level grievance mechanisms (GMs) consists of a 20-question checklist. While not exhaustive, it provides an overview of key issues that help determine the degree to which a GM considers the needs of vulnerable and disadvantaged groups and individuals in its design and implementation. The questions allow for “yes” or “no” answers. A “yes” answer is awarded one point, and a “no” answer receives zero points, with all questions having equal weight. To introduce more granularity, some questions allow a middle-of-the-road option which awards half a point. The highest score that can be attained is 20 points. Questions 3-6 focus on engaging vulnerable groups in GM design through targeted consultations and are therefore particularly relevant during the project preparation phase. They

are therefore marked with an asterisk (*) and may warrant a retrospective assessment. All other questions are relevant throughout the project’s lifecycle and can be answered at any point once the project is effective. Projects with scores below 10 points pay insufficient attention to vulnerable and marginalized groups and individuals. Projects with scores of 10-15 points cover important aspects of giving voice to vulnerable groups but still have considerable room to improve the inclusiveness of their GM. Projects scoring 16-20 points reflect a commendable effort on the side of project implementors to reach out and involve various stakeholder segments. Analyzing the content of the questions that resulted in lost points can help direct efforts to improve a GM’s effectiveness at empowering vulnerable people by giving them a voice.⁸

8. Due to the COVID-19 pandemic, opportunities to pilot the tool have been severely restricted. Therefore, at the time of this writing, this proposed checklist has not yet been field tested.



CHECKLIST

I. Identify vulnerable groups

1. Has the project identified vulnerable and marginalized group in sufficient detail in relevant project documents, such as the social assessment, stakeholder engagement plan, or grievance manual?

The project has identified vulnerable and marginalized groups and individuals, but the categories are broad and vague.	The project has identified a wide range of vulnerable and marginalized groups and individuals along a variety of vulnerability drivers, such as physical political, economic, social, health factors (see table 2.1).	The project has comprehensively identified vulnerable and marginalized groups and individuals, and it has conducted an in-depth analysis of each group's characteristics, what drives their vulnerability, and how this could shape their engagement with the project.
Score		
0	0.5	1

2. Does the project consider people and groups who are marginalized or vulnerable in multiple ways?

The project does not consider the issue of intersectionality.	The project considers various layers of vulnerability and how, combined, they may put certain groups or individuals at even greater disadvantage.	The project considers the issue of intersectionality and includes specific measures to mitigate risk, such as training GM actors on the importance of nondiscrimination and inclusion of vulnerable groups.
Score		
0	0.5	1

II. Ask vulnerable groups about their preferences regarding the grievance mechanism

3. Is the project planning or using an effective outreach strategy to involve vulnerable groups in the GM's design?*

The project does not have a detailed plan about how to reach vulnerable groups to ask them about their views on the GM.	The project proposes a limited range of avenues through which it hopes to engage vulnerable groups with the GM.	The project proposes a comprehensive approach for reaching out to vulnerable groups about the GM, using at least two distinct channels to collect perspectives, such as dedicated meetings, focus group discussions, door-to-door visits, existing forums (e.g., religious gatherings and <i>barazas</i>), meetings with organizations or individuals representing or possessing deep knowledge of these groups, one-on-one interviews, and surveys.
Score		
0	0.5	1



4. Are consultations with vulnerable groups easily accessible from a physical perspective?*

The choice of location and timing of consultations do not seem to reflect any particular attention paid to the special needs of vulnerable groups.

The project carefully selects the venue and timing for the consultations to ensure easy access for vulnerable groups. These measures and considerations are well documented.

Score

0

1

5. Are consultations with vulnerable groups easily accessible from a psychological perspective?*

No particular measures ensure that vulnerable or marginalized groups feel safe and comfortable participating in consultations.

Dedicated measures to enhance the free flow of discussions demonstrate the attention paid to facilitating the participation of vulnerable groups.

Score

0

1

6. Are consultations with vulnerable groups easily accessible from a linguistic perspective?*

Considerations of linguistic accessibility are not apparent in the planning and implementation of the consultations.

Specific measures ensure consultations are conducted in a language that everyone can easily understand.

Score

0

1

III. Remove barriers to accessing the grievance mechanism

7. Are there a variety of grievance uptake channels available to vulnerable and marginalized groups and individuals?

No more than three channels for submitting grievances are available to vulnerable stakeholders.

A variety of channels for submitting grievances are available to vulnerable stakeholders.

Score

0

1

8. Are efforts made to remove the cultural and psychological barriers to accessing the grievance mechanism?

The project proposes standard language regarding the accessibility of the GM but does not delve into possible cultural or psychological barriers that vulnerable groups might encounter, or how to mitigate them.

The project uses a range of measures to help vulnerable groups access the GM, such as community liaison officers, the inclusion of vulnerable groups on grievance committees, grievance channels adapted to local cultures, and the use of intermediaries and third-party organizations to facilitate GM access.

Score

0

1

9. Are efforts made to remove the physical barriers to accessing the grievance mechanism?

The grievance uptake channels selected under the project may make it difficult for certain groups to file a grievance due to physical constraints, such as required travel or lack of digital devices.

Several grievance uptake channels allow people who may face mobility or digital constraints to easily file grievances.

Score

0

1



3. CHECKLIST FOR ASSESSING THE INCLUSIVENESS OF A PROJECT-LEVEL GRIEVANCE MECHANISM

10. Are efforts made to remove the technical and literacy barriers to accessing the grievance mechanism?

No particular steps have been taken to make the GM more accessible and easily understood in terms of technology, language, and communication constraints.	The project has adapted its communication materials to cater to diverse audiences, including those with lower literacy rates or education levels.
Score	
0	1

11. Are efforts made to remove the linguistic barriers to accessing the grievance mechanism?

The GM is only available in one language.	The GM is available in all contextually relevant languages, such as minority languages and English for foreigners.
Score	
0	1

12. Are efforts made to remove the financial barriers to accessing the grievance mechanism?

The GM setup implies direct or indirect costs for complainants.	Accessing the GM is free of charge, and potential complainants do not incur any direct or indirect financial costs when filing a grievance.
Score	
0	1

IV. Ensure that there are adequate awareness raising and outreach activities for the grievance mechanism

13. Is the GM's existence and procedures communicated widely and on an ongoing basis?

The GM's existence and procedures were advertised using two or fewer communication channels with the potential to effectively reaching vulnerable groups. Following the launch of the GM, communications regarding it decreased significantly.	At least three communication channels with the potential to reach vulnerable groups are used to communicate about the GM. These efforts are ongoing.
Score	
0	1

14. Are the communication strategy and materials about the grievance mechanism adapted to the needs of vulnerable and marginalized groups and individuals?

Awareness-raising and outreach strategies and channels for the GM are generic and not adapted to the specific requirements of vulnerable groups.	Awareness-raising and outreach strategies and channels for the GM are tailored to the needs of vulnerable groups, such as the provision of materials in a variety of formats and languages.
Score	
0	1



V. Prevent retaliation

15. Are complainants guaranteed confidentiality?

The GM operations manual and staff code of conduct do not specifically address confidentiality issues.	The GM operations manual and staff code of conduct include processes and procedures to ensure confidentiality.	The GM operations manual and staff code of conduct include processes and procedures to ensure the confidentiality of processes. The code of conduct includes sanctioning power if a breach occurs.
Score		
0	0.5	1

16. Are there clear and advertised processes in place to allow stakeholders to submit anonymous complaints?

Anonymous complaints are not accepted, or clear communication is lacking about the process for submitting a complaint anonymously.	Anonymous complaints are accepted, but it is unclear how they are handled.	Anyone can submit an anonymous complaint, and the policy on how they are handled is clear and well-advertised.
Score		
0	0.5	1

VI. Monitor the effectiveness of the grievance mechanism for vulnerable groups, and refine it as needed

17. Are the views of vulnerable groups about the functioning of the grievance mechanism sought after its launch?

The views of vulnerable groups regarding GM performance and ease of access are not actively sought.	As part of stakeholder engagement activities, the PIU verifies if vulnerable groups are aware of and comfortable seizing the GM, for example, by regularly asking vulnerable groups or their representatives about their views on the GM during focus group discussions and consultation meetings.
Score	
0	1

18. Are quality assurance procedures carried out to evaluate the effectiveness of GM processes for vulnerable groups?

The PIU does not proactively test how well the complaint handling processes are working for complainants.	The PIU carries out regular spot checks and/or mystery shopping techniques to gauge the performance of the GM and identify potential weaknesses.
Score	
0	1



3. CHECKLIST FOR ASSESSING THE INCLUSIVENESS OF A PROJECT-LEVEL GRIEVANCE MECHANISM

19. Do grievance logs capture data about vulnerable groups?

<p>The data collected by the GM do not capture detailed information about complainants and thus cannot be used to draw conclusions about how accessible and effective vulnerable groups find the GM.</p>	<p>The grievance log captures limited information on the possible drivers of vulnerability among complainants. For example, it might only include gender and geographic location.</p>	<p>The grievance log collects three or more indicators of potential vulnerability, such as gender, age, disability, geographic location, employment status, and language, which lets the PIU GM focal point determine the exact share of grievances submitted by specific categories of vulnerable people out of the total number of grievances registered by the GM.</p>
Score		
0	0.5	1

20. Is GM data analyzed and used to improve project policies and processes?

<p>GM reports do not suggest an in-depth, disaggregated analysis of complaints data. Only basic elements are readily available, such as the number of grievances received and resolved.</p>	<p>An analysis of the grievance log provides data points such as the average length of complaint resolution and percentage of complaints by category. However, the analysis is insufficiently detailed to identify specific project-related problems for vulnerable groups.</p>	<p>The GM focal point can credibly demonstrate that grievance data, feedback from complainant satisfaction surveys, and/or spot-checking results are monitored and analyzed on an ongoing basis for patterns that would suggest specific project-related problems for vulnerable groups. If a problem is detected, it is highly likely that it would lead to a modification of project policies and practices so as to avoid future harm—or there is evidence that such a scenario has already occurred.</p>
Score		
0	0.5	1

*Particularly relevant during the project preparation phase. GM = grievance mechanism; PIU = project implementation unit.



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