



Human-Rights-Based Assessment Tool for Country-Level Grievance Mechanisms



ASSESSMENT TOOL

Acknowledgments

This report is 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 el ene Pfeil at the World Bank.

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Introduction

Country-level (or central-level) grievance mechanisms (GMs) are routinized nonjudicial, state-based grievance mechanisms administered by a branch or agency of the state or by an independent body on a statutory or constitutional basis. Examples include national human rights institutions, such as Albania's People's Advocate and Armenia's Human Rights Defender; ombud's offices, such as Australia's Commonwealth Ombudsman; and government-run complaints offices, such as Malaysia's Public Complaints Bureau, Morocco's Chikaya complaints and feedback platform, and Nigeria's Public Complaints Commission.¹ Country-level grievance mechanisms are key to fulfilling foundational principle 25 of the 2011 UN Guiding Principles on Business and Human Rights, which reads:

States must take appropriate steps to ensure ... that when ... abuses occur within their territory and/or jurisdiction, those affected have access to effective remedy, [lest the state's duty to protect is] rendered weak or even meaningless.

Through such GMs, people can raise complaints and seek to remedy their grievances.²

The general purpose of the human-rights-based assessment tool presented in this note is to capture how different country-level GMs operate and how they can serve complainants by providing prompt, equitable, and effective grievance resolution while

guaranteeing the principles of equality and nondiscrimination, participation, inclusion,³ and accountability as well as the rule of law. The questions are aimed at helping public agencies self-assess their grievance handling processes, allowing for the identification of core strengths and weaknesses.

The specific objectives of the tool are: (1) to support institutions and organizations that are mandated to provide grievance uptake and resolution channels to the public conduct a rapid overview of their current processes; and (2) to help such agencies detect areas that require reinforcing to improve the quality of their GMs.

It is expected that the findings of this assessment will be useful in enhancing the GM. The responsible agency can decide if results are kept internal, made public, or revealed to donors. Ideally, respondents will be candid on their views concerning the current functioning of the GM, including its shortcomings⁴.

Possible incentives for public sector agencies to use this tool include gaining a fuller understanding of what a well-functioning grievance redress mechanism looks like, getting clarity on the types of actionable steps that could be taken to improve current processes, and making the organization eligible to receive support or capacity-building assistance from international development partners such as the World Bank.

1. For a more in-depth examination of country-level grievance mechanisms selected from across the globe, see the forthcoming *Global Stock-Take of Country-Level Grievance Mechanisms* (Masud and Agarwal 2022).

2. According to the 2011 United Nations Guiding Principles on Business and Human Rights, a grievance is a "perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities."

3. An assessment tool to evaluate the extent to which project-level GMs foster the inclusion of disadvantaged and vulnerable groups has also been developed (See Pfeil and Agarwal, 2021).

4. Notably on the few questions which are of a subjective nature, for example the assessment of the system's speed and clarity of complaint resolution, or approach to customer service in section II.



1. INTRODUCTION

The chief officer in charge of complaint handling at a given institution/department and/or any other public sector official familiar with the GM (e.g., a communications or monitoring and evaluation specialist) should complete the questionnaire. This tool can also be used by third parties with no direct stake in operating the grievance mechanism, including World Bank staff, or for collaborative assessments.⁵ While the tool presented here is intended primarily for assessing GMs targeting public service users, other types of agencies might find it useful by customizing it to a particular context, which may imply revising, adding, and deleting questions, as appropriate.

The tool is human-rights-based in the sense that it is intentionally focused on how the human rights principles and norms of equity, nondiscrimination, participation, transparency, and accountability are considered in the operations of the GM, including an examination of the extent to which the responsible agency:

- ✓ Provides easy access for complainants and publicizes the mechanism (questions 1–5, 8–12);
- ✓ Has involved stakeholders in the design of the mechanism and explored their preferences (questions 6–7, 33);
- ✓ Offers everyone, including vulnerable or marginalized individuals and groups, the chance to use the GM to uphold their rights (see questions 13–15);
- ✓ Protects a complainant’s identity upon request (questions 16–20);
- ✓ Communicates about the process in a transparent manner (questions 21–25); and
- ✓ Monitors key performance indicators to allow the mechanism to be a source of continuous learning (questions 52–58).

The tool is presented in five sections:

- ✓ **Section I: General Information about the Grievance Mechanism** collects basic information about the responding agency and the environment in which its GM operates.
- ✓ **Section II: GM Design and Communications** examines the effectiveness of the provision of information about the GM, its procedures, the user-centricity of grievance uptake channels, the extent to which the needs of vulnerable groups are considered, and if confidentiality and anonymity for complainants are guaranteed.
- ✓ **Section III: Grievance Handling and Resolution** looks at the processes in place to acknowledge, log, categorize, and resolve grievances, and how well different enablers, such as a strong customer service culture, standardized processes, interagency/interinstitutional cooperation, and capacity building serve the organization’s purpose.
- ✓ **Section IV: Monitoring and Evaluation** explores the depth and systematic character of data collection about complainants’ satisfaction levels, user demographics, and complaint resolution, as well as the extent to which these data are publicly communicated.
- ✓ **Section V: GM Strengths and Areas for Improvement** invites a strategic reflection on the GM’s strengths and weaknesses, as well as opportunities for its improvement. Its unscored, open-ended questions are intended to encourage bigger picture reflection and to prompt a discussion on further actions that can be taken in the future to bring the GM to the next level, possibly with external support.

The questions in sections II to IV include a scoring system with a maximum possible score of 50 (section II = 19-point maximum, section III = 24-point maximum, and section IV = 7-point maximum). The GM’s overall score and the section-by-section breakdown provide a snapshot of areas to address to improve its accessibility, quality, and efficiency.⁶

5. Because of the Covid-19 pandemic, which restricted opportunities to conduct in-person GM diagnostic missions, at the time of this writing, the self-assessment tool had not yet been field-tested.

6. The score should not be interpreted as a value judgment or a ranking by the World Bank.



Human-Rights-Based Assessment Tool for Country-Level GMs

I. General Information about the Grievance Mechanism

Country: _____

Name of Organization: _____

Survey respondent(s):

Name(s): _____

Job title(s): _____

Email address(es) _____

Agency responsible for the GM:

- Ombud's office
- Human rights institution/commission
- Ministry-, agency-, or departmental-level GM
- Country-wide GM platform that receives and processes grievances from the public
- Anticorruption agency
- Other: _____

What is the legal framework under which the responsible agency operates in terms of grievance management?

Is there a dedicated budget to cover the functioning of the GM?

Yes No

If yes, amount of the annual budget: _____

Is there a GM policy/framework and procedures for the responsible agency?

Yes No

Annual volume of complaints received and handled by responsible agency: _____

Are there dedicated staff assigned to work specifically on complaint handling?

Yes No

If yes, provide details (e.g., number of staff, staff capacity allocated to complaint handling responsibilities, and administrative levels): _____



II. GM Design and Communications

A. Effective provision of information

1. How is the existence of the GM and its procedures communicated to potential users? (Select all that apply.)

- Website
- Social media (e.g., Facebook, Instagram, Twitter, and YouTube)
- Display boards, posters, banners, or billboards
- Magazine or newspaper advertisements
- Radio
- Television
- Printed brochures and/or flyers
- Public meetings (e.g., roundtable discussions and seminars)
- Local leaders
- Nongovernmental organization and/or civil society partners
- Events (e.g., road shows and community theater)
- SMS/text, including WhatsApp message
- Public criers
- Other: _____

Number of communication channels	Score
0	0
1	0.25
2-3	0.5
4-5	0.75
6 or more	1

2. Have the following communication tools been developed, adopted, and/or applied to help the public make use of the GM? (Select all that apply.)

- Display boards, posters, banners, and/or billboards
- Printed brochures and/or flyers
- Radio spots

- Television spots
- An online video
- Online infographics
- A downloadable manual that explains necessary steps
- A frequently-asked-questions section on the responsible agency's website
- An online click-through presentation

Number of communication channels	Score
0	0
1	0.25
2-3	0.5
4-5	0.75
6 or more	1

3. How would you evaluate the quality of information provided by the GM to users?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

4. How would you evaluate the level of effectiveness of the GM's information delivery?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]



B. User-centric uptake channels

5. What uptake channels are available for users to provide feedback or file a complaint? (Select all that apply)

- Verbally/in-person (e.g., at a physical facility, to a GRM focal point, or to a grievance committee)
- By letter (mail)
- Phone/call center (hotline)
- Email address
- Online form
Website address: _____
- Tablet/smartphone application
- Social media (e.g., Facebook and Twitter)
- SMS/text, including WhatsApp message
- Grievance boxes
- Other: _____

Number of uptake channels	Score
0-1	0
2-3	0.25
4	0.5
5-6	0.75
7 or more	1

6. Have you asked users what access channels they prefer using?

- Yes [1] No [0]

If yes, elaborate: _____

7. Have users been involved in the design of the grievance mechanism?

- Yes [1] No [0]

If yes, elaborate: _____

8. How would you evaluate the ease/difficulty for users to submit grievances?

- Very difficult [0]
- Somewhat difficult [0.25]
- Easy [0.5]
- Very easy [0.75]
- Extremely easy [1]

9. Can users submit grievances online?

- Yes No [unscored]

If no, skip to question 13. If yes, answer questions 10-12.

10. How would you evaluate the performance of the GM's online interface in terms of ease of navigation, presentation, and clarity?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

11. How easy is it to upload materials on the online interface?

- Very difficult [0]
- Somewhat difficult [0.25]
- Easy [0.5]
- Very easy [0.75]
- Extremely easy [1]

12. How well does the online interface function in terms of providing instructions and support?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]



C. Protection of vulnerable individuals and groups

13. Has the GM been tailored to the needs of vulnerable groups in the following ways? (Select all that apply.)
- By providing documentation in Braille/sign language/ captioned videos? [.25]
 - By simplifying documents (e.g., conveying content in plain language, easy to understand for the public) or providing visuals/pictures for users with low literacy levels? [.25]
 - By translating documents into all languages relevant to your target audience (for example, other national languages and English for foreigners) or providing interpretation options? [.25]
 - By adapting GM processes to the requirements of specific groups (e.g., offering a woman the option of interacting with a female interlocutor; ensuring that the physical reception offices for grievances are accessible to people with mobility restrictions; and proposing dedicated channels for refugees, internally displaced persons, indigenous peoples, and others)? [.25]
14. During the set-up phase of the agency's GM, were marginalized or vulnerable groups asked about their preferences regarding its design (e.g., what channels they prefer for submitting their grievances)?
- Yes [1] No [0]
- If yes, how and with whom were these consultations conducted (e.g., discussions with specific focus groups, individual interviews, and consultations with organizations representing marginalized groups) and what actions were taken to accommodate expressed preferences? _____
15. Has accessibility testing ever been conducted to assess how easily users with specific needs (e.g., people with disabilities) are able to submit grievances?
- Yes [1] No [0]
- If yes, elaborate: _____

D. Confidentiality and anonymity

16. Is a complainant obliged to provide an official identification number when submitting feedback or a grievance?
- Yes [1] No [0]
- If yes, provide details (e.g., the legal framework that requires it): _____
17. Is it possible to submit a grievance to the GM anonymously?
- Yes [1] No [0]
- If yes, provide details on how such submissions are handled: _____
18. Are there specific procedures for handling complaints confidentially (for example, for allegations of sexual exploitation, abuse, or harassment)?
- Yes [1] No [0]
- If yes, provide details: _____
19. Are clear guarantees of confidentiality provided to all people submitting complaints? In other words, are users informed if and why their personal data are being collected, who will have access to their case, and so on?
- Yes [1] No [0]
- If yes, provide details: _____
20. Is there a clear policy and sanctioning system in place to prevent the inappropriate disclosure of sensitive information?
- Yes [1] No [0]
- If yes, provide details: _____

Overall score for section II: _____ /19 points



III. Complaint Handling and Resolution

A. Acknowledgment of receipt of complaints

21. Does the user receive automatic confirmation of the submission of their complaint?
 Yes [1] No [0]
22. Is the receipt of the complaint systematically acknowledged in writing?
 Yes [1] No [0]
23. Does the complaint submission confirmation include timeframes for the stages of the complaint-handling process?
 Yes [1] No [0]
24. Does the confirmation of grievance submission include information about who the complainant can contact to follow-up or receive status updates about the resolution of their grievance?
 Yes [1] No [0]
25. Do users receive systematic status updates on the progress of their complaints?
 Yes [1] No [0]

B. Recording and categorization of complaints

26. How are submitted complaints recorded?
 Paper log or book [0.25]
 Spreadsheet (e.g., Excel) [0.5]
 Dedicated management information system (MIS) [1]
 Other: _____
27. When complaints are received, are they sorted into different categories?
 Yes [1] No [0]
28. Are there specific procedures in place to ensure that sensitive and urgent complaints are appropriately handled (e.g., an accelerated process, referral to another department, or notification of higher management)?
 Yes [1] No [0]

C. Resolution of complaints

29. How does the GM rank in terms of length of time between the submission and resolution of a complaint?
 Poor [0]
 Below average [0.25]
 Average [0.5]
 Above average [0.75]
 Excellent [1]
30. How clear/straightforward is the grievance resolution process?
 Poor [0]
 Below average [0.25]
 Average [0.5]
 Above average [0.75]
 Excellent [1]



2. HUMAN-RIGHTS-BASED ASSESSMENT TOOL FOR COUNTRY-LEVEL GMS

31. What are the service standards (in days)⁷ for the following stages of the complaint handling process?

Acknowledgment of receipt: _____

Resolution (If times depend on type of complaint, provide a range): _____

Other, describe: (e.g., all calls to the hotline are answered within 2 minutes): _____

32. Is there a quality control system in place to confirm that all grievances have been acknowledged and addressed and that any needed follow-up actions have been taken?

Yes [1] No [0]

33. Has the agency consulted with users to identify their definition of a timely complaint resolution? In other words, do the agency's service standards reflect the public's expectations?

Yes [1] No [0]

D. Approach to customer service

34. How well does the GM's user-facing staff perform in terms of politeness and fairness?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

35. How well does the GM's user-facing staff perform in terms of knowledge/competence and helpfulness?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

E. Standardized processes

36. How would you evaluate the agency's performance in terms of paperless procedures?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

38. Is the agency testing the suitability and strength of its complaint resolution processes using mystery shopping,⁸ usability testing,⁹ and/or unannounced spot checks?

Yes [1] No [0]

If yes, elaborate: _____

37. How would you evaluate the agency's performance in terms of streamlined internal processes?

- Poor [0]
- Below average [0.25]
- Average [0.5]
- Above average [0.75]
- Excellent [1]

39. Are the following documents available?

A GM manual for users [0.25]

Additional information: _____

A GM manual for actors involved in the GM outlining standard operating procedures for the GM [0.25]

Additional information: _____

GM training materials [0.25]

Additional information: _____

7. *Service standards* are specific delivery targets or commitments established by an organization that it promises to honor when delivering a service.

8. *Mystery shopping* is a technique where trained individuals pretend to be potential customers or service users and report back on their experiences in a detailed and objective way. It differs from other research techniques in that evaluators do not declare themselves to the service provider during the interaction.

9. *Usability testing* involves small-scale (3-5 users) or large-scale (20-100 users) qualitative tests for service providers to observe users' behavior and ability to complete tasks. It is commonly used to measure metrics such as error rate, number of clicks, and time spent as well as to collect general feedback on user experience.



- A code of conduct for staff involved in complaint handling [0.25]
Additional information: _____
40. Which of the following relevant documents are available for handling sensitive complaints?
- Dedicated guidelines regarding confidentiality guarantees [0.25]
Additional information: _____
- Safeguards and sanctions for the breach of confidentiality [0.25]
Additional information: _____
- Dedicated guidelines regarding the handling of anonymous complaints [0.25]
Additional information: _____
- Dedicated training materials and procedures for allegations of gender-based violence, sexual exploitation and abuse, and sexual harassment [0.25]
Additional information: _____
41. How is a complainant informed of the proposed resolution of the grievance?
- Phone call
 Letter
 Email
 SMS/text, including WhatsApp message
 Verbally by GM focal point, grievance committee member, or other grievance-handling staff
 Other: _____
42. Can a complainant appeal if not satisfied with the proposed resolution?
- Yes [1] No [0]
If yes, elaborate and indicate the percentage (if available) of complainants who appeal proposed resolutions or who take the matter to court: _____

F. Inter-agency/inter-institutional Cooperation

43. What entities does the responsible agency coordinate with to resolve grievances? _____

44. How do you evaluate the quality of cooperation between the agency and other involved entities?
- Poor [0]
 Below average [0.25]
 Average [0.5]
 Above average [0.75]
 Excellent [1]
45. Do existing legislation, memoranda of understanding, and bilateral agreements adequately foster effective cooperation?
- Yes [0.25] No [0]
Comments: _____
46. Does poor cooperation across institutions/organizations occasionally cause delays?
- Yes [0] No [0.25]
Comments: _____
47. Do technical problems/incompatibilities (such as the use of multiple information technology systems) slow down cooperation?
- Yes [0] No [0.25]
Comments: _____
48. Is there an interagency management information system that enables coherent data management and avoids replication of data?
- Yes [0.25] No [0]
Comments: _____



G. Capacity building

49. Is there a adequate number of staff with sufficient capacity tasked with grievance-handling responsibilities?

- Yes [1] No [0]

50. Do the staff involved in complaint handling have training opportunities?

- Yes [1] No [0]

If yes, what types of training have been conducted (and when): _____

51. Which of the following training opportunities would be useful for staff of the responsible agency?

- Best practices in grievance redress

Comments: _____

- Gender-sensitivity and nondiscrimination in complaint handling

Comments: _____

- Using information technology to better handle complaints

Comments: _____

- Capturing and analyzing grievance data to improve internal processes

Comments: _____

Overall score for section III: _____ /24 points

IV. Monitoring and Evaluation

A. Collection of data on complainants' satisfaction levels

52. Is the agency capturing data on the satisfaction levels of complainants?

- Yes, systematically [1]
- Yes, periodically [0.5]

- No [0]

If yes, elaborate how (for example, a systematic user survey being sent out after a grievance is resolved): _____

B. Demographic data collection

53. Beyond contact details, does the GM systematically collect and log demographic data on its users? (e.g., gender and geographic location)?

- Yes [1] No [0]

If yes, is it possible to sort the data according to the following categories? (Select all that apply.)

- Age
- Gender

- Geographic location

- Disability

- Employment status

- Belonging to a specific group (e.g., indigenous, linguistic, or ethnic minority)

- Other: _____



C. Collection of statistical data related to complaint resolution

54. Is the agency collecting the following statistical data?
(Include data for the previous calendar year, if available.)

Total number of complaints submitted by year/month

Yes [0.2] No [0]

Data: _____

Total number of complaints submitted by access channel

Yes [0.2] No [0]

Data: _____

Total number of received/resolved complaints
(resolution rate)

Yes [0.2] No [0]

Data: _____

Total number of complaints resolved within the stipulated
timeframe

Yes [0.2] No [0]

Data: _____

Average time required to resolve a grievance

Yes [0.2] No [0]

Data: _____

D. Communications about complaints data

55. Is the responsible agency making the following data
publicly available (e.g., by publishing it online)?

Total number of complaints submitted by year/month

Yes [0.2] No [0]

Comments: _____

Total number of complaints submitted by access channel

Yes [0.2] No [0]

Comments: _____

Total number of received/resolved complaints (i.e.,
resolution rate)

Yes [0.2] No [0]

Comments: _____

Total number of complaints resolved within the stipulated
time frames

Yes [0.2] No [0]

Comments: _____

Average time to resolve a grievance

Yes [0.2] No [0]

Comments: _____

56. Are the data presented well visually (e.g., with graphs,
visuals, and/or infographics)?

Yes [0.5] No [0]

57. Are the data included in an annual report?

Yes [0.5] No [0]

58. Are the data being analyzed and used to improve existing
processes?

Yes [2] No [0]

If yes, elaborate: _____

Overall score for section IV: _____ /7 points

Total score: _____ /50 points



V. GM Strengths and Areas for Improvement

Questions in this final section are intended to encourage a big picture, strategic reflection on the strengths and weaknesses of the GM, and opportunities to bring it to the next level, possibly with external support.

A. Strengths

59. What are the GM's current main strengths?

B. Areas to improve

60. What are the main obstacles/bottlenecks that are currently impacting the proper functioning of the GM?

61. Which of the following would help make the GM more effective?

(Select all that apply.)

- Additional and/or full-time human resources
- Additional budget resources
- Training and technical assistance for staff managing the GM at the central level
- Training and technical assistance for staff managing the GM at the subnational level

- Improving standard operating procedures
- Improving coordination and collaboration with other government agencies to resolve complaints
- Adopting a management information system to help process, escalate, and analyze data and to generate reports on the feedback
- Improving transparency/reducing corruption and nepotism
- Other: _____

C. Additional observations

62. Are there any additional comments, suggestions, questions, or concerns you would like to share?

End of checklist.



References

Masud, H., and S. Agarwal. 2022 (forthcoming). Global Stock-Take of Country-Level Grievance Mechanisms. Washington, DC: World Bank.

Pfeil, H., and S. Agarwal, 2021. Fostering the Inclusion of Disadvantaged and Vulnerable Individuals or Groups in Project-Level Grievance Mechanisms. Washington, DC: World Bank.



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