Citizen-led Grievance Redress for Road Construction and Urban Infrastructure Upgrades
Experiences from Two Projects in Rwanda
Abbreviations and Acronyms

FRDP  Feeder Roads Development Project
GBV  gender-based violence
GEMS  Geo-Enabling Initiative for Monitoring and Supervision
GRC  grievance redress committee
GRM  grievance redress mechanism
IOSC  Isange One Stop Center
km  kilometer/s
PIU  project implementation unit
RTDA  Rwanda Transport Development Agency
RUDP  Rwanda Urban Development Project

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 Hélène Pfeil at the World Bank.

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This case study examines the grievance redress mechanisms (GRMs) put in place for two World Bank-financed projects in the Republic of Rwanda: the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP). Based on consultations and interviews with key informants, such as project-affected parties who submitted complaints to one of the project-level GRMs and members of grievance redress committees,¹ as well as on desk research and data provided by social and safeguards officers of project implementation units and World Bank task teams, section 1 provides an overview of both projects; section 2 describes the social accountability framework in which they were implemented; section 3 explores the way grievances were taken up, investigated, and resolved; section 4 considers key grievance data; section 5 assesses the main strengths of the GRMs; section 6 investigates areas for improvement; and section 7 outlines a few conclusions and recommendations for practitioners.

¹ Due to COVID-19-related restrictions at the time of the research, most interviews were conducted virtually.
Overview of the Feeder Roads Development Project and the Rwanda Urban Development Project

The Feeder Roads Development Project (FRDP) seeks to enhance all-season road connectivity to agricultural market centers in selected districts in Rwanda: Rwamagana in the Eastern Province, Gisagara in the Southern Province, and Karongi and Nyamasheke in the Western Province. The first phase of the project (2014–18) rehabilitated, upgraded, and maintained 500 kilometers (km) of feeder roads. In 2018, the government of Rwanda obtained US$84 million of additional financing for 1,200 km more of feeder roads in another six districts, with implementation beginning in 2020.

With project activities that began in 2016, the Rwanda Urban Development Project (RUDP) provides access to basic infrastructure and enhances urban management in selected urban centers within participating districts. The second RUDP (P165017, US$160 million, 2020–25) seeks to improve access to basic services, enhance resilience, and strengthen integrated urban planning and management in the City of Kigali and in the six secondary cities of Rwanda: Muhanga, Huye, Rusizi, Rubavu, Musanze, and Nyagatare.

Both the FRDP and the RUDP seek to enhance all-season roads and construct asphalt roads. RUDP investments also involve urban upgrading activities, including establishing or improving access streets, stormwater drains, pedestrian walkways, streetlights, and bus stops.

The Rwanda Transport Development Agency (RTDA) implements the Feeder Roads Development Project (FRDP), and the Local Administrative Entities Development Agency implements the Urban Development Project (RUDP). FRDP activities related to feeder road construction and rehabilitation have primarily affected people in rural settings, while RUDP activities have primarily affected urban households.

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2. US$68 million is a grant from a multi-donor trust fund and US$16 million is government counterpart financing to cover compensation of project-affected people.
3. The additional districts comprise Nyagatare and Gatsibo in the Eastern Province, Nyaruguru in the Southern Province, Nyabihu and Rutsiro in the Western Province and Gakenke in the Northern Province.
Social Accountability Framework

2.1. Rwanda’s Decentralized Governance Structure

Rwanda consists of four provinces plus the City of Kigali; these are further divided into 30 districts. Districts are then divided into 416 sectors comprising 2,148 cells. These cells are divided into 14,837 villages—the lowest level (see table 2.1). Rwanda’s governance system is based on a highly decentralized administrative structure organized to increase citizen participation in national development. As stipulated in the 2008 Community Development Policy, this structure is designed to empower local communities in effectively participating in policy making and implementation.

In line with Rwanda’s Law No. 32/2015 of June 11, 2015, regarding expropriation in the public interest, “expropriation ... shall be carried out only in the public interest and with prior and fair compensation” (article 3). Resettlement action plans were prepared for both the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP) before the start of civil works, in compliance with World Bank safeguards policies on involuntary resettlement. They spell out the respective compensation programs for project-affected people as well as the required establishment and training of grievance redress committees (GRCs), which allow project-affected people to voice project-related grievances.

The GRCs established for the two projects mirror the administrative structure of the country, with the lowest-level GRCs meeting at the cell level to resolve issues at the level closest to the complainant, but with the possibility of escalation to the sector or district levels if necessary (see figure 2.1).

A GRC comprises eight members, with the GRC president and vice president directly elected by project-affected parties. Other members include a cell-level women’s representative (member of the National Women’s Council), the village leader, the project’s social safeguards officer, a representative of the contractor, a representative of the contractor’s supervisor, and a local government official (either the cell- or sector-level executive secretary or the vice mayor for district-level social affairs).

GRCs are expected to meet at regular monthly working sessions but can convene at any time deemed necessary based on the nature of received grievances.

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1. Law No. 32/2015 of June 11, 2015, specifies that “any person affected by the decision on expropriation in the public interest shall have the right to request for review of the decision before the organ directly higher than the one having taken the decision” (article 18) and that any person “who is not satisfied with the assessed value of his/her land and property incorporated thereon” can contest the assessed value of land and property in writing “within seven (?) days after the approval of the valuation report by the expropriator” (article 33). Proponents of the project are required to prepare regulation-compliant assessment reports with information on appropriate measures for avoiding or mitigating environmental and social risks and impacts, grievance redress, and proof of needed funding. Ministerial order No 003/2008 regulates the procedures, content, and quality of environmental and social impact assessment reports to ensure the avoidance or mitigation of negative impacts from development projects.

### TABLE 2.1. RWANDA's POLITICAL AND ADMINISTRATIVE SYSTEM

<table>
<thead>
<tr>
<th>Level</th>
<th>Administrative Entity/Decision-Making Body</th>
<th>Mandate</th>
<th>Composition of Administrative Entity/Decision-Making Body</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>District</strong></td>
<td>District council</td>
<td>District-level policy-making and legislative body; formulates and adopts policies and has decision-making and planning powers to determine district development.</td>
<td>The size of each district council is determined by the number of sectors within its boundaries. Each sector sends a representative to the council. Four additional seats are reserved to ensure the representation of marginalized groups: three for the National Youth Council and one for the district coordinator of the National Council of Women. A district’s day-to-day business is conducted by an executive committee headed by a mayor and two vice mayors.</td>
</tr>
<tr>
<td><strong>Sector</strong> (Umurenge)</td>
<td>Sector council</td>
<td>Political organ for policy-making decisions; functions include approval of sector plans and action programs and ensuring their implementation.</td>
<td>Sector councils are elected by residents aged 18 years and older. The number of council members is determined by the number of cells within its boundaries. Sector council members include a cell representative elected by the cell council; members of the sector-level National Youth Bureau; members of the sector-level National Women Bureau; a representative of people with disabilities; women’s representatives constituting at least 30 percent of members; a representative of the heads of all primary schools in the sector; a representative of the heads of all secondary schools in the sector; a representative of nongovernmental organizations operating in the sector; a representative of cooperative societies in the sector; and a leader representing hospitals, health centers, or other health facilities operating in the sector. A 12-member sector executive committee drawn from the council is responsible for day-to-day administration and the implementation of the council’s decisions and plans.</td>
</tr>
<tr>
<td><strong>Cell</strong> (Akagari)</td>
<td>Cell council</td>
<td>Executes functions related to administration and community development, including policy orientation and technical advisory services; charged with identifying, discussing, and prioritizing issues, as well as making decisions on behalf of the electorate.</td>
<td>Elected for five-year terms, cell councils comprise an elected cell councilor; a women’s representative (the cell-level coordinator of the National Women’s Council); the cell-level coordinator of the National Youth Council; a representative of the heads of nursery schools in the cell; a representative of primary school teachers in the cell; and a representative of the private sector in the cell. The cell executive committee, which is composed of the executive secretary and a secretary in charge of coordinating social development, is responsible for the day-to-day administration of the cell and the implementation of decisions taken by the cell council.</td>
</tr>
<tr>
<td>Village (Umudugudu)—the lowest administrative entity in Rwanda</td>
<td>Village Council</td>
<td>Identifies, discusses, and prioritizes issues; makes decisions on behalf of the electorate.</td>
<td>The village council is the supreme organ made up of all village residents who are at least 18 years old. The village executive committee, selected by adult residents of the village for five-year terms, consists of five members: the village chief, a member for development and social affairs, a member in charge of security, a member in charge of youth-related issues and a member for gender-related issues. It is responsible for day-to-day village administration and for implementing decisions made by the village council on behalf of all residents.</td>
</tr>
</tbody>
</table>
FRDP = Feeder Roads Development Project; GRC = grievance redress committee; GRM = grievance redress mechanism; PAP = project-affected person; RUDP = Rwanda Urban Development Project.
2.2. Involvement of Project-Affected Parties in Grievance Redress Committee Elections and Operations

During the project preparation stage, with the support of the project implementation unit social safeguards officers, the district administrations—as owners of the development projects—are charged with identifying and organizing consultations with project-affected parties in specific cells. These meetings fit into the agenda of regular community meetings, such as umuganda (mandatory nationwide community work that takes place on the last Saturday of every month) or general community meetings at the cell level that convene every Tuesday (Inteko Rusange in Kinyarwanda).

The community meetings provide the framework for the election of GRC presidents and vice presidents by project-affected people. The elections are organized by beneficiary district administrations with the support of social safeguards officers at the cell-, sector- and district-level (see photo 2.1).

Photo 2.1. Project-affected people lining up behind their preferred candidates during the election of an FRDP GRC.
3.1. Grievance Submission

Under the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP), complainants can access multiple channels to file a complaint, including:

- In person to a member of a grievance redress committee (GRC) at a village, cell, or sector level administration office during umuganda, at a regular GRC monthly working session, or at any regular community meeting;
- By phone (voice or text) to a GRC member (who are known community members whose phone numbers are easily accessible); and
- In writing to a GRC member or to a village head.

3.2. Grievance Registration

Grievances are written down on a grievance registration form by a GRC member during the committee's monthly working sessions and compiled into a logbook. Information captured includes name and national identification number of the aggrieved person, date and location of grievance submission, category of grievance, summary description of grievance, action taken, date when action was taken, status of grievance, and signatures of the receiver of the complaint and the aggrieved party acknowledging its receipt.

A project implementation unit (PIU) social safeguards officer deployed and reporting to the district authority acts as district focal person, consolidates reports from several GRCs, and submits them to the district authority for further action and to share with the PIU. This focal person assists GRCs in

Photo 3.1. Damaged security wall and home access in Huye Secondary City before (left) and after restoration (right).
following-up on the committees’ decisions with concerned parties to ensure grievances are resolved. Because GRCs have limited time and resources to follow-up on actions such as monetary settlements by district administrations or remediation activities by contractors, they rely on the focal person for the necessary liaison with the responsible parties.

3.3. Grievance Categorization

Some of the road construction and urban infrastructure upgrades funded by the FRDP and RUDP—such as street asphalt paving; construction and paving of pedestrian walkways and cycle tracks; installation of electrical and water utilities including streetlight poles, transformers, substations, and water piping; and the relocation of utility infrastructure to optimize access—require heavy machinery, such as dump trucks, graders, and compactors. These have the potential to cause vibrations; undermine the stability of foundations and thereby cause structural damage to properties; lead to temporary water supply disruptions; and disrupt access to private homes and businesses as well as public, community, and cultural facilities.

The two projects therefore have common grievance categories, as well as categories that are unique to each project, which table 3.1. summarizes.

Box 3.1. Testimonies of Project-Affected Parties About Complaint Resolution

Ms. Kabasinga, resident in Rusizi Secondary City:

“I was compensated for a housing structure that was removed to make way for a road upgrade. A second housing structure in my home had been damaged by the road construction activities and was fully repaired to my satisfaction.”

Ms. Francina, resident in Nyabihu FRDP intervention district:

“The committee assisted me in understanding procedures and helped me open a bank account. I received compensation and still use the bank account to manage my money.”

Mr. Safari, resident in Rubavu Secondary City:

“My property, removed to make way for the Majengo-Byahi road, had been undervalued. I commissioned a counter-valuation which came up with a higher value that became a basis for negotiations. An agreement was reached, and I was paid a compensation that I am satisfied with.”

Note: Names of complainants were changed to protect their anonymity.
3.4. Investigations, Follow-Up Actions, and Proposed Resolutions of Cell-Level Grievances

The maximum duration for resolving a complaint at the cell level is four days, which includes the day the grievance is received by a GRC. Depending on their nature, complaints might be resolved immediately or might require field visits. The field visits are conducted by GRC members to verify complaints involving property damage or loss of land or other assets (see photo 3.3) and to then propose an appropriate resolution. After adequate action has been taken, the GRC confirms that the complainant is satisfied with the proposed resolution and captures the updated grievance status in the grievance logbook. If the complainant is not satisfied with the proposed resolution, this is recorded in the logbook and the complaint is escalated to the next level.

3.5. Grievance Escalation to the Sector or District Level

If a grievance is not resolved at the cell level, it is escalated to the sector level, where the maximum duration for resolution is one week, including the day the escalated complaint is received from the GRC. The GRC reconvenes with the participation of the sector executive secretary, makes a field visit to the relevant site, and recommends a way to resolve the grievance. If the complainant is not satisfied with the sector-level recommendation, the complaint then escalates to the district level, and the GRC reconvenes with the participation of the vice mayor for social affairs and the complainant. GRCs conduct field visits to investigate grievances logged and to verify them, often with the involvement of the local community. For grievances such as damage to property and loss of assets, GRC members can be joined by residents of the site of interest, who are given a chance to provide additional information and share their testimonies regarding the subject of the grievance. If the complaint is not addressed within two weeks, the complainant is advised to seek justice in court.

1. At the time of this writing, actual resolution times were not being recorded; information about the de facto resolution times of complaints was therefore unavailable.
3.6. Data Monitoring and Evaluation

Grievance logbook records are kept at cell-level administrative offices. The social safeguards officers for both FRDP and RUDP collate grievance data from project intervention districts on a bi-weekly basis to use for project monitoring, evaluation, and reporting. GRCs are not involved in organizing or analyzing grievance-related data.

3.7. Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment

Both GRCs and other community members are sensitized to and aware that cases of gender-based violence (GBV) require timely access to quality multisectoral services that guarantee confidentiality and the informed consent of the survivor. GBV complaints are directed to the Isange One Stop Centers (IOSC). IOSCs are specialized referral centers where GBV survivors can access comprehensive services free of cost, including medical care, psychosocial support, police and legal support, and evidence collection. IOSCs work closely with community police stations; sector-, cell-, and village-level leaders; and hospitals and health centers across the country. According to Bernath and Gahongayire (2013), IOSCs utilize the “multi-disciplinary Investigative and Intervention Team (MDIIT) model [and adapt] evidence-based, international best practice protocols for working with victims of gender-based violence and child abuse. Each IOSC staff has been trained in the MDIIT model either through a formal education program or on-the-job. The MDIIT model has aided the range of staff to work together with the highest level of collaboration.”

The project social safeguards officers for RUDP and FRDP ensure that bidding and contract documents clearly define the requirements linked to the prevention of GBV, sexual exploitation and abuse, and sexual harassment, including the need for the contractors and workers to commit to a code of conduct.

The GRC’s women’s representative is trained by the IOSC under the auspices of the National Women’s Council to receive allegations of sexual exploitation and abuse, sexual harassment, and GBV and to refer survivors to IOSCs as required by law. The women’s representative is an elected community member and, as such, is trusted by project-affected parties to extend such services and expertise.

FIGURE 3.1. ISANGE ONE STOP CENTER’S GBV INTERVENTION MODEL

Isange One Stop Center (IOSCs) Quality of Services to GBV Survivors

**Multidisciplinary Investigative and Intervention Team (MDIIT) model:**
- Reception operated by a social worker with access to legal support; medical services; psychological services and police desk

**Free 24/7 services:**
- Emergency contraception; HIV prophylaxis; STI prevention; and other medication

**Capacity building:**
- Training women’s cell-level representatives
- Training GRC members

**Mainstreaming:**
- Received World Bank support for Rwanda Great Lakes Emergency Sexual and Gender Based Violence and Women’s Health Project.
- IOSCs increased from 1 in 2009 to 44 in 2019; expected to increase to over 500

3. GRIEVANCE REDRESS PROCEDURE

GRCs receive training from the IOSC on how to handle and channel GBV cases. GRCs also participate in awareness and sensitization campaigns around project intervention areas about GBV and violence against children.

GBV, sexual exploitation and abuse, and sexual harassment action plans were prepared and are being implemented under the second phase of RUDP and under FRDP’s additional financing, which has contracted independent service providers in six districts to support action plan implementation. The World Bank has provided needed training to the PIU, contractors, service providers, and supervision consultants to strengthen collaboration among service providers and IOSCs in project intervention areas. The World Bank plans to conduct further training in this area for these new service providers in fiscal year 2022.

Under the model adopted by FRDP and RUDP, allegations of GBV, sexual exploitation and abuse, and sexual harassment are thereby clearly separated from other types of complaints. Such allegations are handled by the specialized country structures in place and operational across the country.

3.8. Labor-related Complaints

Grievances stemming from accidents, occupational health and safety concerns, and other issues that concern workers follow the legal procedures as stipulated in Rwandan law and in the contractual agreements between contractors and projects. The law requires contractors to establish grievance redress mechanisms (GRMs) that include elected representatives of workers and that their implementation be supervised by labor inspectors.

The project workers’ GRM comprises a committee of elected workers’ representatives. This committee ensures the representation of all categories of workers, including women, people with disabilities, migrant workers if there are any, and all other vulnerable groups. The workers’ GRC includes a labor inspector as an ex-officio member who intervenes (to resolve or escalate to a higher-level legal framework for labor disputes) in instances when elected representatives cannot resolve the grievance. Labor inspectors are district-level officials of the Ministry of Public Service and Labor mandated to “ensure compliance with all labor protection standards, as well as develop labor relations in an orderly and constructive way in order to enforce the labor laws, related regulations, and applicable International Standards for labor laws compliance” (Republic of Rwanda 2020).
4.1. Volume of Grievances

Overall rates of grievance resolution are high for both the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP) (table 4.1). According to conducted interviews, unresolved grievances are usually linked to family land disputes when compensation cannot be put into effect: compensation-related funds are kept in a district-level suspense account (escrow) pending resolution of the disputes by the mandated institution. Over 90 percent of grievances received under the projects were resolved with monetary compensation for land and/or assets lost or damaged because of involuntary resettlement associated with project activities.

Figures 4.1 and 4.2 illustrate the volume of received grievances under FRDP and RUDP, respectively. Grievance volumes associated with feeder roads in the FRDP intervention

### Table 4.1. Received and Resolved Grievances Under FRDP and RUDP

<table>
<thead>
<tr>
<th>Phase and Location</th>
<th>Received (Number)</th>
<th>Resolved Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FRDP Phase 1 (2016-19) in four districts: Gisagara, Karongi, Nyamasheke and Rwamagana</td>
<td>1,234</td>
<td>1,234</td>
<td>100</td>
</tr>
<tr>
<td>FRDP Phase 2 (beginning July 2020) in an additional six districts: Gakanke, Gatsibo, Nyabihu, Nyagatare, Nyaruguru, and Rutsiro</td>
<td>122</td>
<td>111</td>
<td>91</td>
</tr>
<tr>
<td>RUDP (2019) in six intervention secondary cities</td>
<td>172a</td>
<td>169</td>
<td>98</td>
</tr>
</tbody>
</table>

a. A higher number of grievances, totaling 268, has been received, assessed, and resolved, but some of them were not properly recorded prior to the recruitment of the RUDP social safeguards officer in 2018.

FRDP = Feeder Roads Development Project; RUDP = Rwanda Urban Development Project.
districts are influenced by several factors, including resettlement needs due to road design and length of road segment. As figure 4.2 shows, there were more grievances registered during the RUDP’s first phase (2016–19) in the intervention districts of Gisagara, Nyamasheke, Rwamagana, and Karongi than during the second phase in the intervention districts of Gakenke, Gatsibo, Nyabihu, Nyagatare, Nyaruguru, and Rutsiro, which only began in 2020 but which still received fewer grievances than phase one as the project got underway. More robust budget allocations and larger-scale civil works for the secondary cities of Muhanga, Musanze, and Rubavu probably account for the higher number of grievances registered there (see figure 4.2). These three secondary cities also have larger urban populations and urban growth rates.

Figure 4.3 shows the evolution in the number of project beneficiaries and logged grievances for FRDP. FRDP’s first phase, which benefitted four districts in terms of feeder road construction, ended in 2020, as the second phase began with works in an additional six intervention districts. In 2016, 99 percent of grievances were related to the lack of compensation for expropriated land, which represented less than 5 percent of the private parcel’s size. This was linked to a statutory condition on land titles, which stated that no compensation was required for land acquired for the public interest if it represented less than 5 percent of the entire plot. Following dialogues between the World Bank and the Ministry of Infrastructure and the Ministry of Justice, the latter provided a clear legal opinion on private land, which ruled in favor of fair compensation for land per the 2015 expropriation law. This 2017 opinion helped address most of the grievances related to compensation claims.
In addition, a significant number of project-affected parties did not possess land titles in 2016, and the project initially applied a strict compensation approach whereby those with land titles were paid on time while those in the majority without such titles were instructed to acquire them prior to receiving compensation. This approach resulted in many grievances in 2016. In 2017, the districts and project implementation unit therefore decided that in cases of project-affected people who do not possess a land title, the district and sector administration would confirm that they were the actual landowners, and payments for properties would be channeled through the sectors to fast-track payments. The change is evident in a rapid decrease in grievances, leveling off to just over 100 grievances after 2018. The proper training of grievance redress committees (GRCs) and the joining of women’s representatives may also have contributed to the decline in grievances.

4.2. Grievance Categories in FRDP and RUDP

Figure 4.4 presents analytical charts of the categories of logged complaints during the first phase of FRDP. Data about specific grievance categories were available for only 1,020 out of 1,234 logged grievances (table 4.1). At the time of this writing, information on grievance categories in the six additional intervention districts under the project’s additional financing was not yet available.
Figure 4.5 presents analytical charts of grievances logged during the first phase of RUDP (2016–19) in six secondary cities by grievance category. No gender-based violence or other social complaints were raised by project-affected people.

**FIGURE 4.5. GRIEVANCES LOGGED DURING RUDP’S FIRST PHASE (2016–19) IN SIX SECONDARY CITIES BY GRIEVANCE CATEGORY (PERCENT)**
5.1. Building on Existing Governance Structures

A major strength of the grievance redress mechanisms (GRMs) for the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP) is the way they have successfully built upon existing governance structures, allowing project-affected people to easily understand the process. The use of existing community engagement frameworks accounts for a substantial degree of familiarity with the proposed grievance redress system among those impacted by the projects.

5.2. Independence

The independence of grievance redress committee (GRC) members from implementing agency line managers contributes to the perceived legitimacy of the GRM—another notable strength. Interviews with project-affected people indicate their confidence in the fairness of the grievance redress process and the consistency of outcomes. Interviews with GRC members and project-affected people as well as a review of the implementation reports prepared by the social safeguards officers of the RUDP and FRDP also point to the equitable treatment of stakeholders and an evident respect for rights in GRM operations.

5.3. Oversight by Dedicated Social Safeguards Officers

While the FRDP has benefitted from a dedicated project implementation unit (PIU) social safeguards officer from its beginning, the RUDP only recruited a full-time dedicated social safeguards officer in 2018—two years into project implementation. Prior to 2018, social safeguards were overseen by an officer sent to work temporarily from a subordinate or similar government ministry responsible for several projects. Such additional capacity dramatically improved the oversight and implementation of the RUDP’s GRM, especially regarding the inclusion of women’s representatives on committees (see below), proper recording of grievance data in logbooks, and improved monitoring and evaluation of grievance data for statistical purposes.

5.4. Systematic Representation of Women

Rwanda's national constitution requires a minimum of 30 percent female representation in decision-making positions. The National Gender Policy (2010) also includes this provision. Accordingly, the National Women's Council was created as a statutory institution by Law No. 02/2011 of February 10, 2011, as a “forum for advocacy and social mobilization on issues affecting women, in order to build their capacity and ensure their participation in the development of the country in general,
and the development of women in particular.” To align GRCs with this national framework, the PIUs of FRDP and RUDP decided to systematically include a women’s representative as a GRC executive member beginning in 2018, resulting in cell-, sector- and district-level councils all including at least one women’s representative under the mandate of the National Women’s Council.

The women’s representatives are elected by the members of the communities to which they belong, under the auspices of the National Women’s Council. Each village elects seven women, one of whom is subsequently elected to represent women at the cell level. The representatives perform their duties as volunteers, attending to the interests of women and girls in the community at the cell level, and advocating for equity and equal opportunity. However, the National Women’s Council recently began providing the representatives with a monthly lump sum facilitation allowance for transportation and communications. As members of project GRCs, women’s representatives are also eligible for and do receive a GRC facilitation allowance.

Table 5.1 shows that women accounted for 34 percent and 44 percent of GRC members in FRDP and RUDP respectively.

### TABLE 5.1. LEVELS OF PARTICIPATION AMONG WOMEN IN RUDP’s AND FRDP’s GRIEVANCE REDRESS COMMITTEES

<table>
<thead>
<tr>
<th>RUDP GRC Members</th>
<th>FRDP GRC Members</th>
<th>FRDP-AF GRC Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secondary City</td>
<td>Women</td>
<td>Men</td>
</tr>
<tr>
<td>Huye</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Muhanga</td>
<td>9</td>
<td>6</td>
</tr>
<tr>
<td>Musanze</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Nyagatare</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Rubavu</td>
<td>14</td>
<td>23</td>
</tr>
<tr>
<td>Rusizi</td>
<td>15</td>
<td>19</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>62</td>
<td>78</td>
</tr>
<tr>
<td><strong>Percentage</strong></td>
<td>44%</td>
<td>56%</td>
</tr>
</tbody>
</table>

AF = additional financing; FRDP = Feeder Roads Development Project; RUDP = Rwanda Urban Development Project.
5.6. Capacity Building for Grievance Redress Committees

As evidenced by the statistics presented in table 5.2, both the FRDP’s and the RUDP’s GRC members benefitted from the training provided by PIU social specialists on topics including:

- Rwanda’s expropriation law and how it differs from the World Bank’s involuntary resettlement policies (for example, the Rwandan law does not provide for compensation for the economic assets of squatters who informally occupy land without a title, while the World Bank mandates compensation for such informal settlers, with Bank policy taking precedence and with compensation being determined by applying appropriate instruments, such as resettlement action plans);
- Community health and safety measures;
- Gender-based violence, sexual exploitation and abuse, and sexual harassment;
- Roles and responsibilities of the GRC in receiving, assessing, and resolving complaints;
- Grievance recording in logbooks;
- Assessment, management, and resolution of grievances; and
- Hierarchy of grievance reporting.

### TABLE 5.2. GRC TRAINING STATISTICS OF FRDP (2017 AND 2020) AND RUDP (2019)

<table>
<thead>
<tr>
<th>FRDP: District</th>
<th>Phase 1 (2017)</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th>RUDP: Secondary City</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Women</td>
<td>Men</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Women</td>
<td>Men</td>
<td></td>
</tr>
<tr>
<td>Rwamagana (refresher)</td>
<td>26</td>
<td>50</td>
<td>Gakenke</td>
<td>25</td>
<td>35</td>
<td>Huye</td>
<td>8</td>
<td>8</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Rwamagana</td>
<td>28</td>
<td>42</td>
<td>Gatsibo</td>
<td>23</td>
<td>54</td>
<td>Muhanga</td>
<td>9</td>
<td>6</td>
<td>8</td>
<td>10</td>
</tr>
<tr>
<td>Nyamasheke</td>
<td>14</td>
<td>20</td>
<td>Nyabihu</td>
<td>28</td>
<td>52</td>
<td>Musanze</td>
<td>8</td>
<td>11</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>Karongi</td>
<td>12</td>
<td>25</td>
<td>Nyagatare</td>
<td>32</td>
<td>8</td>
<td>Nyagatare</td>
<td>8</td>
<td>11</td>
<td>10</td>
<td>6</td>
</tr>
<tr>
<td>Gisagara</td>
<td>12</td>
<td>18</td>
<td>Nyanuguru</td>
<td>31</td>
<td>59</td>
<td>Rubavu</td>
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<td>20</td>
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<td>11</td>
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<tr>
<td></td>
<td></td>
<td>Rutsiro</td>
<td>95</td>
<td>139</td>
<td>Rusizi</td>
<td>15</td>
<td>19</td>
<td>9</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>92</td>
<td>155</td>
<td>Total</td>
<td>234</td>
<td>347</td>
<td>Total</td>
<td>60</td>
<td>75</td>
<td>48</td>
<td>52</td>
</tr>
<tr>
<td>Percentage</td>
<td>37%</td>
<td>63%</td>
<td>Percentage</td>
<td>40%</td>
<td>60%</td>
<td>Percentage</td>
<td>44%</td>
<td>56%</td>
<td>48%</td>
<td>52%</td>
</tr>
</tbody>
</table>
5.7. Institutionalizing Project-Level GRMs

A procedures manual for the environmental and social management of transport projects, developed by the Rwanda Transport Development Agency (RTDA)—the implementing agency for the FRDP—emphasizes the importance of the GRM in ensuring that transport infrastructure is constructed and operated in a sustainable manner and in compliance with national and international requirements and standards. The manual is currently in a final draft form and may soon be operationalized, at which time it would apply to all national transport-related infrastructure projects in Rwanda.

The RTDA has already integrated the GRM outside of World Bank-supported operations, including in:

- Projects funded by the Islamic Development Bank for the Rubengera–Rambura road in Karongi District and the Kabuga–Tyazo-Kibogora road in Nyamasheke District;
- The Rubavu-Bralirwa-Burushya road project in Rubavu District, funded by the African Development Bank; and
- The Lake Kivu Water transport project, funded by TradeMark East Africa.

Such a development serves as testimony to the positive perception and effectiveness of GRMs operated under FRDP and other World Bank-financed projects implemented by the RTDA. This step toward embedding the GRM into country systems may later be emulated by the Local Administrative Entities Development Agency and other sister institutions and may eventually be adopted as standard practice for national development projects.
6.1. Accessibility for the Vulnerable and Marginalized

Although the environmental and social risk management instruments of the Feeder Roads Development Project (FRDP) and the Rwanda Urban Development Project (RUDP) provide for consultations with vulnerable and marginalized individuals and groups, including the elderly, people who are illiterate, widows, child-headed households, and people without land titles and/or bank accounts, at the time of this writing, the projects’ respective grievance redress mechanisms (GRMs) did not include any special provisions to ensure their easy accessibility by a variety of vulnerable and marginalized individuals and groups. A stronger emphasis on making the GRM more accessible to people with disabilities, including those with vision and hearing impairments, as well as those with low levels of literacy, as examples, would be useful. Options to explore going forward include providing special assistance to people with disabilities by, for example, engaging employees fluent in sign language; offering communication materials that are easily understood by people who are illiterate (e.g., using explanatory illustrations), and developing procedures that allow a person to submit a grievance on behalf of another person.

6.2. Timely Involvement of District Officials

RUDP reports indicate that resettlement action plans, particularly the provisions related to the compensation of project-affected people for involuntary resettlement, have not been communicated to districts quickly enough to allow for adequate budget planning and financial resource allocation. Such delays have resulted in conflicts with other responsibilities, such as social protection and local economic development activities.

6.3. Timely Establishment of Grievance Redress Committees and Capacity Building

Both the FRDP and the RUDP were delayed in establishing and training grievance redress committees (GRCs), negatively impacting the timeliness of grievance redress for project-affected people. GRCs should be formed and trained as soon as resettlement action plans have been approved. Monitoring reports cite the lack of awareness among the relevant district officials and other GRM stakeholders of its procedures as a challenge in the early years of project implementation. This finding was corroborated in an interview with a GRC member: “District officials do not appreciate the project GRM and the GRC as an essential instrument for the success of the project.” District officials are perceived as not valuing the role and function of GRCs. Consequently, the RUDP report of February 6, 2019, on the implementation of the abbreviated resettlement action plans recommends that workshops be conducted for all stakeholders, with the aim of improving the understanding of best practices for involuntary resettlement in grievance redress prior and during project execution.
6. AREAS IN NEED OF IMPROVEMENT

6.4. Compensation for Grievance Redress Committee Members

The lack of an allowance for a GRC member during RUDP’s first phase has been cited as an issue of concern. Several RUDP and FRDP GRC members who were interviewed cited the lack of insimburamubyizi (the Kinyarwanda word for the compensation of a lost workday and for the facilitation of communications) as a challenge to GRM implementation.

In response, the second phase of RUDP made budget allocations from the project to provide a certain degree of compensation to GRC members starting with project effectiveness in mid-2021. The FRDP paid the allowances out of project funds during its first phase, but challenges related to office time and travel due to the COVID-19 pandemic resulted in delays. During its second phase, the FRDP also made provisions to compensate GRC members. Both projects now indicate that allowances are being paid to their respective GRC members.

As previously noted, GRMs are provided for by Law No. 32/2015 of June 11, 2015, regarding expropriation in the public interest. A regulation is under development to guide operations of the GRCs for project GRMs. Regardless of the funding sources—whether they be the government of Rwanda, development finance and assistance institutions, or multilateral and bilateral development banks—compensation for GRC members comes from project budgets as a matter of good practice. The lessons learned from the World Bank-supported projects presented in this study could influence the form and application of the regulation. As previously mentioned, the Rwanda Transport Development Agency (RTDA) has already taken steps to mainstream the GRM into all its projects through a procedures manual for the environmental and social management of transport projects.

1. This observation was featured in the February 2019 abbreviated resettlement action plan implementation report for RUDP Phase 1.

2. FRDP pays GRC members a monthly facilitation fee of 6,000 Rwandan francs (US$6). RUDP pays GRC members a monthly facilitation fee of 5,000 Rwandan francs (US$5). If GRC members are invited to attend trainings in another sector or at the district level, they are reimbursed for lunch and transportation, with the allowance for the latter ranging from 10,000 to 15,000 Rwandan francs (about US$9.62–14.43) per day.

6.5. Data Collection, Analysis, and Reporting

Project implementation unit (PIU) social specialists produce activity reports, including resettlement action plan implementation reports, in which issues such as planning gaps are identified and targeted recommendations made. For example, this study’s recommendation to integrate key district planning with project preparation was adopted from the RUDP’s implementation completion report on its resettlement action plan. However, no special provisions have been made for the monitoring and reporting of issues unrelated to the resettlement action plans, meaning that GRM data are currently only reported within the resettlement action plan monitoring and reporting framework.

Grievance resolution timeframes could not be established here because the available information is in hardcopy logbooks, which are kept at district offices. A sample of the logbooks obtained for this case study mostly reveal barely legible handwriting. Thanks to the initiative of the FRDP’s and RUDP’s social safeguards officers, the systematic use of logbooks by all GRCs to register grievances and actions taken towards grievance resolution markedly improved in 2020, but prior to that the record is somewhat piecemeal. In addition, because grievance resolution under both projects entails cash compensation, confidentiality must be ensured. District authorities therefore maintain the records of grievance resolutions and only share them with PIUs upon request. Because of this, data on the resolution of grievances are not currently being analyzed. Neither the FRDP nor the RUDP have provisions for obtaining feedback on the satisfaction level of complainants regarding grievance redress.
Investing in digital logging of grievances could therefore prove to be a good investment to improve the monitoring of GRM implementation. A feedback facility could be developed and integrated into the GRM to gather information on satisfaction levels as a means for continuous evaluation and improvement of the service. A digital data collection, analysis, reporting, and feedback facility could be developed and integrated into the GRM to better monitor grievance registration and resolution rates and to improve the quality of resolution based on the feedback of complainants. An example of such a tool is the World Bank’s portfolio tracker Geo-Enabling Initiative for Monitoring and Supervision (GEMS). In this vein, the FRDP’s PIU recently recruited a consultant to conduct a survey on the satisfaction level with the GRM among project-affected people; the survey’s results are expected to be included in the fiscal 2022 reporting framework. As RTDA prepares to launch the newly developed institution-level procedures manual for environmental and social management of transport projects, an opportunity emerges for the adoption of the open source-based GEMS for efficient monitoring and effective grievance redress.

1. GEMS offers a method for enabling project teams to use simple open-source tools to collect structured digital data directly from the field. These data automatically feed into a centralized monitoring and evaluation (M&E) system, allowing for the integration of grievance redress into the project’s system. The tool is adaptable and could integrate a complainant feedback facility to collect data on satisfaction levels of grievance resolution. Some World Bank-supported projects in Rwanda use GEMS in the field to facilitate remote supervision, especially regarding risk and safeguard monitoring and beneficiary engagement.
Conclusion and Recommendations

When implemented with the support of existing legal and decentralized governance structures, project-level grievance redress mechanisms (GRMs) can be highly effective and citizen-led. The close alignment between the GRM and local governance structures ensures easy access to local community engagement frameworks for communication and awareness-raising as well as for the adoption of multiple grievance uptake channels.

Gender inclusion, ideally through the leveraging of national policy and legal frameworks, can also enhance the effectiveness of a GRM. The example of Rwanda shows how trust can be built in terms of addressing grievances related to gender-based-violence by relying on women’s representatives elected at the community-level, with proper training, and with legal backing.

This case study highlights the importance of involving projects’ social safeguards specialists in the capacity building of grievance redress committees (GRCs) and relevant local administration officials to ensure the proper functioning and success of the GRM. It also emphasizes how crucial it is to maintain effective communication with districts, including the early involvement of district administration officials in the preparation of environmental and social risk management instruments.

This study recognizes the laudable initial steps taken by the implementing agencies of the Feeder Roads Development Project and the Rwanda Urban Development Project toward institutionalizing their GRMs beyond short-term projects and highlights the opportunity for the World Bank to leverage its convening power to provide input into the regulatory guidelines that will operationalize GRMs in Law No. 32/2015 of June 11, 2015. This development reinforces the lesson that the support of legal instruments can lead to the mainstreaming of GRM as a good practice to ensure the greater sustainability of positive project impacts.

To enhance the accessibility of the GRM to the vulnerable and the marginalized, proposed approaches include engaging employees with appropriate sign-language skills to assist people with impaired hearing, engaging employees with drawing and other specialized communication skills to assist those who cannot read, and allowing for the appropriate use of proxies to assist people with other types of vulnerabilities.


