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HOW-TO NOTES

Feedback Matters:

Designing Effective Grievance Redress

Mechanisms for Bank-Financed Projects

Part 2: The Practice of Grievance Redress

SOCIAL DEVELOPMENT

GAC in PROJECTS
IMPROVING DEVELOPMENT OUTCOMES

The ancient Romans had a tradition: whenever one of their engineers constructed an arch, as the capstone was hoisted into place, the engineer assumed accountability for his work in the most profound way possible: he stood under the arch.

—Michel Armstrong

PART 2: THE PRACTICE OF GRIEVANCE REDRESS

As the World Bank's governance and anticorruption (GAC) agenda moves forward, grievance redress[1] mechanisms (GRMs) are likely to play an increasingly prominent role in Bank-supported projects. Well-designed and -implemented GRMs can help project management significantly enhance operational efficiency in a variety of ways, such as generating public awareness about the project and its objectives; deterring fraud and corruption; mitigating risk; providing project staff with practical suggestions/feedback that allows them to be more accountable, transparent, and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the project. For task teams more specifically, an effective GRM can help catch problems before they become more serious and/or widespread, thereby preserving the project's funds and its reputation. For example, GRMs can help mitigate the risks associated with resettlement (see Box 1).

BOX 1
Laos:
Mitigating Resettlement
Risks through GRMs

The Nam Theun 2 hydroelectric power project in Laos is designed to promote the country's economic growth and contribute to poverty alleviation. However, the project entails a significant number of risks and triggers all 10 of the World Bank's safeguards policies. One major risk is that a large number of villagers will have to be resettled during implementation. In response to this risk, the project has developed detailed mechanisms to address grievances from affected persons and groups. The mechanisms involve several steps, starting at the village level with the Village Resettlement Committees, which aim to resolve grievances through discussions and adjustments acceptable to the affected persons. Since it may not be possible to resolve some issues at the village and district levels, the project has also established a project-level Grievance Committee to resolve particularly difficult cases. Moreover, it has contracted a local nongovernmental organization to act as an adviser and counsel to affected persons so that they will understand both the GRM and their rights during the GR process.

Building on the "theory" of GRM outlined in the first part of this two-part series,[2] this note focuses on the "practice" of GRM by presenting a process for establishing an effective GRM or strengthening an existing one. The design process for GRMs should

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1. The terms *grievance redress* and *complaints handling* are used interchangeably throughout this note.
2. Though it is preferable to draw on both notes when designing a GRM, parts 1 and 2 can also be used separately.

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take into account the building blocks and the value chain (explained in Part 1), as well as the steps involved in designing a GRM (discussed in this Part 2). Figure 1 illustrates the entire framework. Annex A provides useful tips for establishing a GRM in low-resource settings, and Annex B presents a case study from the National Solidarity Program, Afghanistan, where the framework outlined in this note was used to design and pilot a project-level GRM.

FIGURE 1
Grievance Redress
Mechanisms: A Framework

BUILDING BLOCKS OF GRMs

| Organizational commitment | Principles | People | Processes | Analysis |

GRM VALUE CHAIN

Uptake (locations and channels) → Sort and process → Acknowledge and follow up → Verify, investigate, and act → Monitor and evaluate → Provide feedback

Use M&E data to identify problems and improve operational processes and performance

STEPS IN DESIGNING AN EFFECTIVE GRM

| 1 Survey existing formal and informal GRMs | 2 Estimate users and assess available resources for GRM | 3 Develop standard operating procedures/flowcharts |

| 4 Develop and publicize GR policies | 5 Assign GR tasks and train staff | 6 Stimulate external demand for GRM |

Designing an Effective GRM

Figure 2 illustrates a six-step process that project teams can use to assist clients to design effective GRMs for their projects. Given that poor and marginalized communities often face the most obstacles in accessing and using GRMs, throughout the design process special attention must be given to integrating design features that make GRMs participatory and socially inclusive.[3]

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3. In post-conflict and other settings with significant security problems, task teams also need to consider whether complainants or staff members could face security risks and take such risks into account in the design of the GRM.

STEPS IN DESIGNING AN EFFECTIVE GRM

1
Survey existing
formal and informal
GRMs

2
Estimate users and
assess available
resources for GRM

3
Develop standard
operating
procedures/flowcharts

4
Develop and
publicize
GR policies

5
Assign GR tasks
and train staff

6
Stimulate
external demand
for GRM

Step 1: Survey existing formal and informal in-country GRMs and build on them.

Most countries have formal governmental grievance redress systems (grievance redress cells within ministries or departments, access to information centers, judicial systems, etc.) with responsibility for grievance redress and resolution. Wherever possible, project teams should take advantage of these systems and build upon them (see Box 2). In addition, as countries pass access to information laws,[4] they usually set up systems for facilitating citizens' access to information; the formal structures that process requests for information can often be expanded to deal with grievances, yielding significant cost savings.

The Irrigated Agriculture Modernization and Water-Bodies Restoration and Management Project in the Indian state of Tamil Nadu has its own processes to handle grievances related to the tendering process, but it also builds on the streamlined GRM that the Tamil Nadu Government already has in place in project areas. Tender participants and civil society groups can lodge grievances at designated government offices. For grievances that cannot be resolved on the spot, each petition is numbered and the petitioner is given a receipt with the date by which a reply will be given. By building on the existing GRM, the project not only provides additional outlets through which stakeholders can lodge grievances, but also helps the Government continue to develop its capacity in this area.

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4. In some countries, access to information is also referred to as *right to information* or *freedom of information*.

In many instances there are also informal institutions (council of village elders, tribal chiefs, etc.) that are already dealing with grievance redress issues at the community level (Box 3). It is not advisable to attempt to replace these institutions with project-based structures. Instead, task teams should bolster the capacity of these informal institutions while integrating them into the project's GRM. Formalizing informal grievance redress activities in this way ensures that grievances lodged at the community level will be noted (e.g., recorded in a grievance database) and their resolution will be tracked.

BOX 3
Mobilizing Existing
Local Institutions for
Grievance Redress

Formalizing and improving existing informal and traditional structures of grievance redress—such as village councils in South Asia, chieftaincy systems in Africa, and local user groups involved in service delivery projects—is a cost-effective and sustainable approach to grievance redress. For example, projects that create user/beneficiary groups can entrust these groups with project-related grievance redress responsibilities. With proper capacity building and facilitation, these local institutions can be effective conduits for grievance redress at the local level.

Source: http://blogs.worldbank.org/publicsphere/complaints-handling-small-beautiful.

The social assessment undertaken during project preparation can help identify such mechanisms and provide an understanding of local-level complaint resolution processes. If the analysis reveals that existing systems are weak or inadequate, the project should attempt to build on them while addressing their weaknesses. Given that local communities understand the strengths and weaknesses of existing GRMs and the GRM design that would be most effective (and ineffective) at the local level, teams should conduct participatory consultations when possible during the design phase to solicit their input.

When capacity, resource, or political economy considerations make it unfeasible to draw upon existing GRMs (e.g., when the existing GRM is not perceived to be effective, impartial, or fair), project teams should consider creating a stand-alone GRM. If the team ultimately decides to create a dedicated GRM for the project, it can assign responsibility for grievances to a dedicated internal staff member or team, outsource the work to an external entity, or use a combination of internal staff and external monitoring entities. The structure that the GRM ultimately takes will depend on the available resources and nuances of the operating environment (including the capacity of civil society and other nongovernmental organizations to play watchdog roles, technological constraints, and cultural attitudes toward lodging complaints). Regardless of the structure, however, there should be a plan in place to build technical capacity on grievance redress so that the GRMs can be integrated into government programs when the project ends.

Where GRMs are new and understanding of them is limited, it is best practice to allow the GRM to grow organically as awareness increases. Indeed, putting in place a very comprehensive GRM when understanding and experience with grievance redress is limited is neither effective nor sustainable. Thus, it is often better to start the GRM in a strong region and focus initially on just a few issues. After the project demonstrates that the GRM is successful, it will be easier to scale it up and persuade the government to provide additional resources for grievance redress. (Box 4 explains how projects can centralize GRM functions to benefit from economies of scale.)

BOX 4
Grievance Redress and
Economies of Scale

While it is useful for individual projects to have their own dedicated GRM, multiple projects in a country can centralize certain GRM functions to reduce costs and enhance overall effectiveness. For example, whereas it may be expensive for one project to set up an internet-based grievance monitoring system, a group of projects can combine their resources to fund the creation of a centralized database that each project could access. Similarly, projects operating in a common geographic area can share some "uptake points" or a common text messaging (SMS) system to acknowledge the receipt of users' grievances and keep them updated on the progress of investigations.

Step 2: Estimate users and assess available resources for the GRM.

At the outset, project teams should estimate the number of citizens that are likely to use the GRM and assess the resources—human, financial, and technological—that are available (and required) for the GRM to function effectively. Given that GRMs for projects that serve a large number of beneficiaries—such as community-driven development, rural roads, water and sanitation, health, education, and social protection projects—tend to be more complex and costly, teams should conduct a needs assessment to determine the GRM's scope and scale and identify resource gaps. It is important to note that GRMs can be relatively simple and low-tech and can operate effectively in low-resource settings. (Box 5 describes a system that can be useful in any GRM.) Moreover, GRMs can be designed in a modular fashion (with fewer uptake locations, complaint-receiving channels, languages, etc.) so that they can be scaled up gradually as additional resources are mobilized. (Annex A of this note provides ideas and suggestions for establishing effective GRMs in low-resource settings.)

With the rapid spread of mobile phones in the developing world, text messaging represents an increasingly important conduit for collecting complaints and grievances. SMS systems provide an easy and cost-effective way for beneficiaries to engage with project staff and management, even from remote locations. Projects may design their own SMS uptake system or draw on a variety of open-source SMS platforms (e.g., Frontline SMS and RapidSMS) that can be customized to the project's unique needs and priorities. These platforms not only transmit the text message data to a website so that project staff can have real-time access to complaints data statistics, but also send users a reply acknowledging that their complaint has been received. As the costs associated with implementing an SMS platform continue to fall, the technology represents an innovative tool that project teams can draw upon to improve the effectiveness of their GRMs.

Step 3: Develop standard operating procedures and flowcharts that codify how grievances will be redressed for all stages of the process.

If GRMs are to be effective, grievance redress needs to be part of a project's "DNA." Thus, project management should develop operating procedures, guidelines, and flowcharts detailing how the grievance redress process will unfold within the project's operating structures and how it will be monitored and reported on (see Box 6). Grievance redress processes should be outlined in the project's operational manual

India's Andhra Pradesh Road Sector Project has established clear policies to make the GR process transparent to beneficiaries and ensure that it proceeds effectively and efficiently. The project requires the public to submit grievances about the quality of a specific work, good, or service in writing. A complaint handling officer (CHO) reviews each grievance and deals with it according to the following guidelines:

1. The CHO shall record all grievances—whether they are referred from other recipients or directly—in a register to be maintained in a secure location in his own office.
2. The CHO shall, within 10 working days of receipt of complaint, acknowledge receipt in writing to the complainant indicating that he is considering the issues raised and will discuss them with the concerned officers of the project.
3. The CHO shall then consult with the relevant officers of the project and, after a thorough review of the facts, shall make a judgment as to the validity of the complaint.
4. Within 30 working days, the CHO shall instruct the relevant officer to take remedial action as necessary.
5. The CHO shall write to the complainant within 45 working days of the receipt of the complaint as to the final decision of the investigation.

or compiled as a stand-alone publication to be distributed to project staff and GRM users. For large or decentralized projects, it is often useful to set up at the PMU level a two- or three-person grievance facilitation unit (which could be housed in the monitoring and evaluation department) that can oversee the rollout of the GRM. At lower levels of the project, existing project staff can be assigned grievance redress functions. Communities can also be trained to undertake grievance redress activities.

Step 4: Demonstrate management's commitment to the GRM by developing and publicizing project grievance redress policies and guidelines.

Project management should issue and publicize a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for improvement (see Box 7). The policy should identify guiding principles (see Part 1 of this series for a list of principles); define the scope and types of grievances to be addressed; set out a user-friendly procedure for lodging grievances; outline a grievance redress structure; describe performance standards; and spell out internal and external grievance review mechanisms.

BOX 7
Indonesia:
Integrating Grievance
Redress into Project DNA

Facilitators in Indonesia's Java Reconstruction Fund, a community-driven development project, are required to ensure that all community members understand where and how to lodge a complaint concerning any aspect of the project; ensure that all grievances are followed up on at the appropriate level and assist in their resolution; and support parties lodging grievances and parties seeking the resolution of grievances at the community level.

The key to the overall success of GRMs is organizational commitment. Since generating this commitment among government partners is easier said than done, it is often useful to have discussions or workshops with counterparts to enhance their knowledge about the benefits of, and activities associated with, effective grievance redress. For example, in Indonesia's Urban Poverty Project, one of the real turning points in relation to grievance redress happened when the PMU realized that those areas that were not recording grievances were performing relatively poorly in comparison to those that received more grievances. Since even the best performing areas have some grievances, staff began to understand that grievances are not equal to problems. Moreover, staff found that while greater transparency generates more grievances, it also improves overall performance.

Step 5: Assign grievance redress responsibilities and train staff to handle grievances.

Staff in charge of grievance redress should be skilled and professional. Therefore, project management should identify high-caliber staff at all levels of their projects and assign them responsibility for handling grievances. Projects should implement a training program to teach staff (and community members, if applicable) how to handle grievances and why the GRM is important to the project's success. This training should include information about interacting with beneficiaries about grievances, the organization's customer service standards, and internal policies and procedures in relation to grievance redress. It is also useful to establish or build on local and community-based GRMs by providing grievance redress training for stakeholders at the local level; this greatly reduces GRM costs while enhancing beneficiary satisfaction with, and ownership of, the grievance redress process.

Step 6: Stimulate external demand for the GRM through communication.

Even the best-designed GRM cannot function effectively unless people are aware of it and how it functions. As part of a comprehensive communications strategy, projects should publicize the existence of the GRM, its procedures, the levels/officers to which/whom different types of grievances should be addressed, operating service standards, and other relevant information. The communications strategy should also reach out to poor and marginalized groups, who often cannot access GRMs (see Box 8).

BOX 8
Making GRMs
Work for Poor and
Marginalized People

> Poor and marginalized communities face numerous barriers in accessing GRMs. They may not voice grievances because they may be illiterate, lack knowledge about their rights, mistrust government and fear retribution, lack access to technology, perceive that complaining will be a hassle, or believe that project authorities will not act on their grievances. Projects can use a number of strategies to reduce these barriers and make GRMs participatory and socially inclusive, such as establishing complaint uptake locations in areas where poor and marginalized people live; engaging local intermediaries (community-based or civil society organizations) to facilitate the submission of complaints; deploying community-specific communication strategies to allay fears about, and increase comfort levels with, submitting grievances; ensuring that there is no formal or informal charge for making grievances; and treating grievances confidentially.

- Information about the GRM can be provided through such channels as the project website, text message campaigns, mail correspondence with clients, pamphlets, bulletin boards in communities, and outreach campaigns by staff and facilitators (see Box 9). Communication materials should be translated into as many local languages as resources permit.

Colombia's Bogotá Urban Services Project took a number of steps to educate citizens about the project and spur demand for the GRM. First, the project held over 300 information sessions in the project area before and during the construction of the works. Approximately 2,400 participants attended these sessions, which focused on a range of subjects, including overall project design, the construction schedule, and citizens' options for grievance redress. The project also used informational bulletin boards throughout the project area to disseminate informational materials: general brochures on project details, designs and the location of key offices; quarterly project implementation handouts reporting on progress; and specific brochures on such subjects as information meetings, construction details, social services, and grievance redress. Finally, the project established 23 information kiosks throughout the work area where citizens could access this wide range of information.

- Several important messages need to be conveyed and reinforced over time by project authorities and staff:
  – There is no financial charge for making a complaint.
  – Grievances are welcome because they help improve project policies, systems, and service delivery.
  – Grievances will be treated confidentially, and complainants will not be punished for complaining.
- Essential details about a project's GRM should be conveyed to beneficiaries:
  – The types of grievances that can be submitted.
  – How to submit a complaint and where to access the grievances form.
  – The project's standards and timeframes for complaint resolution.
  – The options available to a complainant if s/he is dissatisfied with the GR process or outcome.
  – The project welcomes not only grievances, but also suggestions, recommendations, compliments, and inquiries.

As important as it is to implement a comprehensive communications strategy, task teams should keep in mind that the communications campaign should not be initiated until the project's GRM has the capacity to address the volume of grievances it is expected to receive. In other words, it is not advisable to stimulate demand until the GRM has the "back office" functions in place to respond to grievances. Beneficiaries will not take the GRM seriously and use it if it fails to produce results. Thus it is typically best practice, especially in projects that are anticipating a high volume of grievances, to pilot the GRM in one geographic area first and begin scaling it up as staff build grievance redress capacity and the approach is refined.

Conclusion

As the GAC agenda moves forward, GRMs are likely to be an increasingly important component of Bank-supported projects. The effectiveness of GRMs rests on three interconnected factors: ensuring a clear organizational commitment to grievance redress, creating well-designed internal processes for addressing grievances, and tailoring the GRM to the unique operating environment. In addition to addressing and resolving grievances, GRMs should be designed to serve as a conduit for soliciting inquiries, inviting suggestions, and increasing community participation. To the extent that projects are able to achieve success on these dimensions, GRMs can provide operations with a wide range of benefits, such as curbing corruption, collecting information that can be used to improve operational processes and performance, empowering vulnerable populations, and enhancing the project's legitimacy among stakeholders. Thus effective grievance redress systems represent a step toward greater accountability and, ultimately, better project outcomes.

References and Resources

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Commonwealth Ombudsman (2009). *Better Practice Guide to Complaint Handling.* Canberra: Commonwealth of Australia.

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World Bank Department of Institutional Integrity (2008). "Leveraging Grievance Redress in Projects." PowerPoint presentation, April 16, 2008, Washington, DC.

World Bank Quality Assurance Group (2009). *Governance and Anticorruption in Lending Operations: A Benchmarking and Learning Review.* Washington, DC: World Bank.

Additional GRM Resources

The Social Development Department has compiled a comprehensive set of resources that task teams can draw upon in developing a GRM:

Grievance Redress Mechanism Self-Assessment Tool

GRM PAD Speak—a document that summarizes what various project PADs say about GRMs

Grievance Redress Indicators—a database of indicators on grievance redress used by different projects

Guide to the Kalahi-CIDSS Project Grievance Redress System

Checklist of Activities for Integrating Grievance Redress into World Bank Projects

Better Practice Guide to Complaints Handling

Information Typically Included on a Complaints Handling Form

Introduction to ISO 10002 (and Extended Version of Australia ISO 10002 with annexes)

Helping Local People Understand the Complaints Handling Mechanism

Tips for Making a Complaint

Ways to Present Complaints Data

The resources listed above are available online on the Social Development Department's website at: http://connect.worldbank.org/explore/SDV/DFGG/default.aspx.

Annex A. Grievance Redress Mechanisms for Low-Resource Environments

The framework presented in this note is equally applicable for establishing GRMs in well-resourced and low-resource settings. A rapid assessment that takes into account such factors as types of services delivered, beneficiaries' needs, and technical, financial, and human resource constraints can help tailor the GRM to the project's unique operating context. GRMs do not need to be complicated or resource-intensive to be effective. Indeed, they can be relatively simple and low-tech, and they can operate effectively in low-resource settings. For example, the Azerbaijan Rural Investment Project places locked complaints boxes in communities. Project staff collect the complaints, assess their validity, and publicize the results of the investigations on community notice boards. Moreover, as the note highlights, GRMs can be designed in a modular fashion (with fewer uptake locations, complaint-receiving channels, languages, etc.) so that they can be scaled up gradually as additional resources are mobilized.

A simplified process can be used to establish a GRM in a low-resource environment.

- At the outset, the PMU needs to **entrust someone with the responsibility of coordinating grievances**. This Nodal Coordinator will receive and sort grievances; forward them to appropriate staff members for resolution; track and monitor grievance acknowledgement and resolution; and review and report on grievance data and trends to the PMU (Figure A-1). The Nodal Coordinator is the first point of contact and should try to respond to as many inquiries/comments as possible.
- **Multiple channels for receiving feedback** need to be established. Possible channels for receiving feedback that can be easily and quickly rolled out at minimal expense are mail, fax, e-mail, website, and telephone. It is critical to assign a specific e-mail ID and a phone/fax number, and to set up an easy-to-access suggestion/feedback box. The project website can also be easily modified to create a permanent sub-window that facilitates grievance collection.
- A simple **grievance form/template** (and if need be, other forms of suggestions, inquiries, complaints, etc.) can be designed and uploaded on the external website. Hard copies of the feedback form may be left near the suggestion/feedback box.
- Finally, a **simple, easy to use, Excel-based or log-book-based grievance registration and monitoring database** can be designed to monitor and track all grievances that have been received and resolved. Grievances should be assigned a unique identification number to facilitate their tracking. If resources permit and the amount of grievances received increases over time, the database can be converted into a real-time web-based database.

Key features of a simple, low-cost, easy-to-use GRM are shown in Figure A-1.
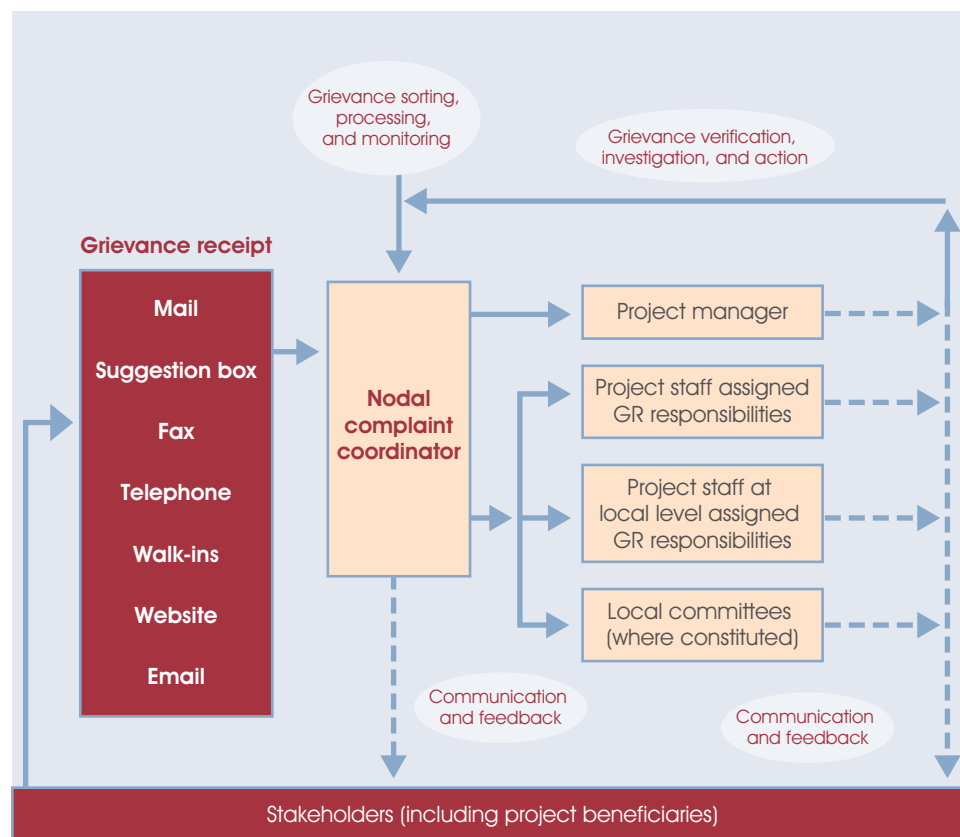
FIGURE A-1
Grievance Flow in a
Basic Low-Cost GRM

Grievance sorting,
processing,
and monitoring

Grievance verification,
investigation, and action

Grievance receipt

Mail

Suggestion box

Fax

Telephone

Walk-ins

Website

Email

**Nodal
complaint
coordinator**

Project manager

Project staff assigned
GR responsibilities

Project staff at
local level assigned
GR responsibilities

Local committees
(where constituted)

Communication
and feedback

Communication
and feedback

Stakeholders (including project beneficiaries)

GRM area	Activities
Grievance uptake and receipt	Assign a specific e-mail ID and phone/fax number for receiving feedback (e.g., inquiries, suggestions, concerns, and grievances).
	Set up a suggestion/grievance box that is easy to access.
	Designate a Nodal GR Coordinator to receive, log, monitor, and track grievances; grievances can be registered in grievance log books manually.
	Modify the project website (if any) to create a permanent sub-window that facilitates grievance collection; include a section of Frequently Asked Questions (FAQs) associated with providing different forms of feedback (inquiries, grievances, suggestions).
Grievance sorting, processing, investigation, and action	Suggest timeframes and procedures to receive, log, monitor, and track grievances and respond to complainants.
	Assign GR resolution responsibilities to existing staff (e.g., those involved in monitoring and evaluation).
Monitoring, tracking, and evaluation	Design a simple, easy-to-use, Excel-based or log-book-based grievance registration and monitoring database (this can be converted into a real-time web-based database if the number of grievances is high and resources permit).
	Regularly review feedback received, cases resolved, and GR trends in project management meetings,.
Communication for effective GRMs	Present GR processes on project website.
	Design, create and disseminate a brochure/flier on "Providing Complaints Feedback" in local languages.
	Include a line inviting feedback on all project publication/communication material.

Annex B. Case Study: Designing a Complaints-Handling Mechanism for the National Solidarity Program, Afghanistan

Project Context. The National Solidarity Program (NSP), a nationwide effort to address the needs of rural communities, reaches 16 million people in all of the country's 34 provinces, or 68 percent of the population. The program empowers citizens to make decisions about their development priorities. Village-level elected Community Development Councils (CDCs) select priority rural infrastructure subprojects—such as water supply and sanitation, roads and bridges, irrigation and rural energy—that are then funded through block grants in a transparent manner. Since the first NSP program in 2003, 22,000 CDCs have been elected and 17 million rural people in all of Afghanistan's provinces have benefitted from improved infrastructure. Over 40,000 village-level projects have been completed, and another 10,000 subprojects are nearing completion. From 2003 until June 2010, NSP had disbursed over $700 million directly to communities.

Complaints-Handling Mechanism: Assessment and Pilot Design. Given the vast scope and scale of the program and the fragile country context, the NSP Project Management Unit realized that there was a need to establish a robust complaints-handling system[5] that would help it not only to identify problems but also to raise awareness, improve service delivery, and enhance project effectiveness. As a result, a six-person Complaints Handling Unit (CHU) was set up at NSP headquarters, reporting directly to the NSP Executive Director's Office. At the regional level, Regional Offices and facilitating partners are responsible for receiving and resolving complaints; complaints received elsewhere (e.g., the offices of parent ministry or the NSP Executive Director) are forwarded to the NSP-CHU or the Regional Offices. At the community level, CDCs are also informally involved in complaint resolution. In early 2010, the Bank's Social Development Department was asked to provide technical assistance to help the NSP design and roll out a comprehensive project-level complaints-handling mechanism.

A rapid assessment of the existing NSP-CHU, which was based on the analytic framework outlined in the GRM notes, yielded some interesting findings:

- ***Complaint uptake and receipt.*** Both written and oral complaints were received. Complainants often came physically to the regional offices or the NSP-HQ. Complaints were received from community members, CDCs, facilitating partners and contractors. Most complaints were submitted jointly in groups; there were very few individual complaints,[6] and almost none from women.
- ***Complaint classification.*** Most of the complaints received by the NSP-CHU and Regional Officers related to delayed disbursements and execution of projects; misuse of block grants; CDC performance; splitting of existing CDCs; poor quality of works; non-payment of contractors; and approval of solar projects.
- ***Complaint monitoring/tracking.*** Most complaints received were resolved informally by NSP project and facilitating partner staff. Complaints received by

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5. The project uses the word *complaint* rather than *grievance*.
6. Of a sample of 271 complaints received by the NSP-CHU 88% were from groups and 12% from individuals.

the NSP-CHU were manually recorded, investigated, and responded to. At the regional and local levels there was no formal system for recording, monitoring, and tracking complaints. The CHU had an excellent electronic and manual archiving system.

- **Investigation and action.** Complaints were investigated at different levels (e.g., headquarters, regional, provincial, and local). In most cases, complaints were resolved at the regional or local levels. Serious complaints were escalated to the next higher level for investigation. Complaints were often investigated by the offices that received them. The concerned parties were either contacted individually or in coordination meetings at the provincial level.
- **Follow-up and reporting.** After the complaint had been amicably resolved, a certified written agreement between concerned parties was generated, filed, and reported to the NSP-CHU. However, there was limited communication with CHS users. While the NSP-CHU submitted monthly progress reports to the NSP Executive Director's Office, they did not have an impact on decision making.

Action Plan. The findings from the rapid assessment helped inform the design of a pilot that would strengthen the CHU. The action plan for rolling out the pilot, which was drafted by the NSP-CHU in close collaboration with other NSP departments, is summarized in Table B-1. Extensive consultations with multiple stakeholders—government officials from various ministries, facilitating partners, CDC members, and NSP management—also informed the design of the pilot. Activities included in the action plan are now being implemented and will later be scaled up.

TABLE B-1
Action Plan for Institutionalizing Complaints-Handling Mechanisms in the NSP

Area	Activity	Actions required
Complaint uptake and receipt	Identifying complaint-receiving locations	Finalizing CH organizational structure (at the PMU, facilitating partner, and community levels)
		Selecting focal points at the community level
	Finalizing operating procedures for receiving complaints	Identifying and assigning staff for the complaint-receiving process
	Activating complaint-receiving channels	Issuing a dedicated phone number and e-mail address for receiving complaints
		Designing and distributing CH brochures to guide users in making complaints
	Designing new forms for receiving complaints	HQ and Field Registration Forms; Field Reporting Form
		Helping design partner and CDC Complaint Registration Books
		(continued)

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TABLE B-1
Continued

Area	Activity	Actions required
Complaint sorting, processing, investigation, and action	Developing and documenting procedures for complaint sorting, processing, investigating, and action	Assigning staff (or creating teams) to develop procedures
		Developing a CH policy for NSP
		Documenting complaint sorting, processing, investigation, and action procedures (in English, Dari, and Pashto)
		Creating brochures on these procedures for dissemination and training within NSP and facilitating partners
Monitoring and tracking complaints; Evaluating complaints data	Complaint registration database design and creation	Design of a web-based real-time complaint registration database (2 modules—one each at PMU and HQ level)
		Conducting staff training at PMU and HQ levels
	Finalizing content of monthly complaint trends analysis report	Assigning staff at HQ level to study existing reporting format; improving format; discussing with SM and NSP task team; finalizing report format
Communication for effective complaint handling	Building communities' and other stakeholders' awareness regarding CHU and its structure	Creating and telecasting TV programs on "How To Provide Feedback/Complain?" and success stories
		Creating content for and broadcasting radio programs
		Documenting CH success stories and publishing them in newspapers
		Including information on CH in existing NSP communication material (both print and electronic)
		Integration of CH content into websites of NSP and partners
		Designing, creating, and disseminating printed brochures on using the NSP-CHU
Capacity building for CHU	Development and rollout of a capacity-building training for CH staff	Designing training content for modules at PMU and HQ levels
		Finalizing schedule and rolling out training program in pilot districts