

# Global Review of Grievance Redress Mechanisms in World Bank Projects

Public Disclosure Authorized

Public Disclosure Authorized

Public Disclosure Authorized

Public Disclosure Authorized



THE WORLD BANK

Dispute Resolution  
& Prevention

## **Acknowledgements**

This note was completed in February 2013 and summarizes the findings of a desk review of GRM usage and implementation issues in the Bank's portfolio. The principal author was Marie Brown, with research assistance from Bruce Jenkins, Patricia Leon and Aaron Seyedian. It was prepared under the guidance of Amar Inamdar, Manager, OPSOR. A detailed study on GRMs was also prepared for the LCR region by Juan Dumas; this paper includes some of the findings from the LCR report. The following staff provided advice and inputs or commented on earlier drafts: Sanjay Agarwal, Sadig Aliyev, Andre Bald, Christopher Bennett, Paul Bermingham, Alexandra Bezeredi, Greg Browder, Jacques Buré, Sergio Coltrinari, Kevin Crockford, Ibrahim Dajani, Fei Deng, Juan Dumas, Benedictus Eijbergen, Soulemane Fofana, Parthapriya Ghosh, Nagaraja Harshadeep, Peter Johansen, Kelly Johnson, Markus Kostner, Pilar Larreamendy, Iftikhar Malik, Maria Elena Garcia Mora, Glenn Morgan, Grant Milne, Satya Mishra, Somin Mukherji, Knut Opsal, GNV Ramana, Cordula Rastogi, Julie Rieger, IUB Reddy, Sona Thakur, Miguel Vargas-Ramirez, Harvey Van Veldhuizen, Chaohua Zhang.

# Global Review of Grievance Redress Mechanisms in World Bank Projects



THE WORLD BANK

Dispute Resolution  
& Prevention





# CONTENTS

ABBREVIATIONS AND ACRONYMS.....	v
INTRODUCTION AND BACKGROUND .....	1
REVIEW METHODOLOGY .....	5
FINDINGS .....	7
RECOMMENDATIONS .....	19
ANNEX 1: Summary Table of GRMs .....	21
ANNEX 2: Case Studies .....	31





---

# ABBREVIATIONS AND ACRONYMS

AFR	Africa Region	IFC	International Finance Corporation
ARD	Agriculture and Rural Development sector	INT	Integrity Vice Presidency
CAO	Compliance Advisor Ombudsman	IPP	Indigenous Peoples Plan
CPS	Country Partnership Strategy	IPPF	Indigenous Peoples Planning Framework
CSI	Core Sector Indicators	ISDS	Integrated Safeguards Data Sheet
DPL	Development Policy Loan	ICR	Implementation Completion Report
DRP	Dispute Resolution and Prevention unit (OPCS)	ISR	Implementation Status Report
EAP	East Asia and Pacific Region	LCR	Latin America & Caribbean Region
ECA	Eastern Europe and Central Asia Region	MENA	Middle East and North Africa Region
EDU	Education sector	OPCS	Operations Policy & Country Services
ENV	Environment sector	ORAF	Operational Risk Assessment Framework
FPD	Financial and Private Sector Development	P4R	Program for Results Loan
GAC	Governance and Anti-Corruption	RAP	Resettlement Action Plan
GRM	Grievance Redress Mechanism	SAR	South Asia Region
HNP	Health, Nutrition and Population	SDV	Social Development
IBRD	International Bank of Reconstruction and Development	SP	Social Protection
ICT	Information and Communication Technology	WBI	World Bank Institute
IDA	International Development Association		







---

# INTRODUCTION AND BACKGROUND

**1.01 Effectively addressing grievances from people impacted by World Bank projects is a core component of managing operational risk and improving a project’s results.** Grievance redress mechanisms (GRMs) can be an effective tool for early identification, assessment, and resolution of complaints on projects. Understanding when and how a GRM may improve project outcomes can help both project teams and beneficiaries improve results. However, there is little data available on the prevalence, quality, or impact of GRMs in existing World Bank projects. This note provides a snapshot of current usage of GRMs in World Bank projects, a qualitative assessment of selected GRMs, and recommendations for improved risk management via GRM implementation and design.

## WHAT IS A GRIEVANCE REDRESS MECHANISM?

**1.02 A grievance redress mechanism is a locally based, formalized way to accept, assess, and resolve community feedback or complaints.**<sup>1</sup> They are increasingly used to improve project outcomes through creating more predictable, timely and results-oriented responses to citizen concerns. There are several development and operational benefits of a well designed GRM:

- *Improve project outcomes at lower cost:* GRMs focus on corrective actions that can be implemented quickly and at a relatively low cost to resolve identified implementation concerns before they escalate to the point of harm or conflict.
- *Help to prioritize supervision:* Using citizen feedback, GRMs are a channel for early warning, helping to target supervision to where it is most needed.
- *Identify systemic issues:* As part of a management system, GRMs can be used to identify some systemic implementation issues and trends that need to be addressed.
- *Promote accountability:* Because most GRMs rely to some degree on local people and institutions, an effective GRM can help improve local ownership of development projects.

---

<sup>1</sup> CAO Advisory Note “A Guide to Designing and Implementing Grievance Mechanisms for Development Projects.”

**1.03 Many countries and municipalities have their own GRMs** which can receive feedback on a broad range of issues, for example through an Ombudsman office or grievance mechanism tied to a line ministry. “Project-specific” GRMs can be linked to existing institutions or stand-alone entities. They are designed to receive feedback on issues related directly to a project’s design and/or implementation and generally refer grievances on unrelated issues elsewhere. This note assesses project-specific GRMs and does not review local or national grievance entities.

## THE BUSINESS CASE FOR MANAGING GRIEVANCES


**1.04 A recent Goldman Sachs report found that seventy percent of 192 major infrastructure projects around the world were stalled because of land issues.** Similarly, the Compliance Advisor Ombudsman (CAO) at the IFC found that “land, water, and labor are the source of the majority of complaints” on IFC projects.<sup>2</sup> Factors such as demographics, the spread of democracy, and advances in communications contribute to increasing demand for accountable, participatory processes—especially on projects with significant impacts on local communities.

**1.05 The costs of ignoring such conflicts—or responding too late—are high.** Research from the extractives industry found that the greatest costs of conflict with communities are the delays in project execution, the most frequent costs are lost opportunities, and the most overlooked cost is management distraction.<sup>3</sup> A core characteristic of an effective grievance mechanism is the ability to identify minor community incidents before they escalate into unmanageable disputes. In many instances, the grievance process can provide the opportunity for resolution via independent mediation or alternative dispute resolution, versus a lengthy court proceeding or compliance investigation. At present, mediation is rarely used to facilitate resolution of disputes on World Bank projects. However, it can be a powerful tool under the right circumstances to achieve rapid, low-cost, and lasting development solutions.

**1.06 When linked to existing country institutions, GRMs can have lasting impact that continues even once Bank engagement ends.** Building and strengthening existing country systems for managing grievances allows for greater impact, improved sustainability and an increase in potential value to the Borrower and beneficiaries. Simply using existing systems however, does not automatically strengthen them. The decision to use a local or national GRM structure to capture concerns on a Bank project requires a credibility assessment and, in certain instances, targeted capacity building. The goal is to create stronger, more credible institutions capable of managing risks and conflicts in many different areas.

<sup>2</sup> “CAO at 10”

<sup>3</sup> Davis, Rachel & Daniel Franks, (2011), “The costs of conflict with local communities in the extractive industry.” In: David Brereton, Dante Pesce and Ximena Abogabir, “Proceedings of the First International Seminar on Social Responsibility in Mining, First International Seminar on Social Responsibility in Mining,” Santiago, Chile, (1–13), 19–21 October 2011.



1.07 **The Bank has taken steps to strengthen operational grievance management by creating the Dispute Resolution and Prevention (DRP) team within OPCS.** DRP was created to strengthen the Bank’s work on grievance redress and support project teams in their supervision and implementation efforts.<sup>4</sup> Recognizing some of the findings on project delays noted above, DRP’s objective is to help the Bank to better support countries to achieve improved development outcomes via lower cost, more rapid resolution of operational complaints. DRP’s work is complementary to existing initiatives within the Bank, including the GRM-related work of the Social Development anchor, GAC agenda, WBI and others.

The Dispute Resolution and Prevention Facility provides in-house support to project teams in the following areas:

- **Practical advice** on approaches to better predict and resolve citizen grievances addressed to the Bank—including through the use of borrower systems and project mechanisms;
- **Mediation services** through its extensive regional roster of independent experts;
- A **knowledge platform** and skills development program to improve the capacity of project teams to better respond to citizen feedback and complaints.

## MANAGING GRIEVANCES ON BANK PROJECTS

1.08 **Borrowers and Bank staff focus on grievance redress during both project preparation and implementation.** During preparation, the goal is to work with the borrower to better predict and prevent potential disputes before they arise. Risk assessments, structured collaboration, dialogue and stakeholder consultations are an essential part of the toolkit for building trust and credibility. Identifying project beneficiaries (and potential losers) or vulnerable groups is critical to achieving results. Some of this work is built into Resettlement Action Plans and Indigenous Peoples Plans, but there is scope for much broader risk assessments that take into account the concerns of impacted communities, whether related to our safeguards or not. The Forest Carbon Partnership Facility is a good example where the Bank allocates resources to identify issues during project preparation and build capacity with countries *before* major project investments start to flow.

1.09 **Not all complaints can be predicted, but the Bank can design more predictable systems to help staff and borrowers manage potential problems during implementation.** Grievance redress mechanisms help the borrower as well as external stakeholders to have a more systematic and managed approach to addressing questions or concerns. This helps ensure that project-affected people have a place to register a complaint or grievance—and helps the project sponsors and government work to resolve issues early on. GRMs give the Bank and the borrower real-time feedback on issues and concerns and allow for better service delivery and ultimately better

<sup>4</sup> For additional information on DRP’s mandate and work, see “Addressing Grievances in Bank Operations: A Risk-Based Approach” circulated to the Board May 24, 2012. (SecM2012-0245)

results. This concept—of using GRMs to enhance results, strengthen accountability, and improve risk management—is embedded into the theory behind Program-for-Results and is increasingly advocated by senior management. Our findings, however, indicate there is room for improving implementation in this area.

“GRMs can help not only identify and address implementation problems in a timely manner, but also be the conduit to receive suggestions to improve agency services or project implementation, and can significantly contribute to improving program or project outcomes.”

—Ede Jorge Ijjasz-Vasquez, Sector Director, SDN LCR

**1.10 Due to the scale and complexity of the Bank’s work, some disputes and conflict between stakeholders are inevitable.** Ensuring that access to low cost, relatively rapid processes for dispute resolution, including mediation, facilitation or other informal problem solving, can make a difference between project success and failure. Mediation has been mainstreamed into the operations and legal contracts of many large private sector developers as well as other international financial institutions (the IFC and regional development banks all have a complaints handling office that encourages the use of mediation to resolve disputes) but still remains a relatively unknown tool inside the World Bank. Unlike in the private sector, the active promotion of mediation and/or alternative dispute resolution (ADR) as an option for resolving disputes is not part of our standard bidding documents, policies, or procedures.

**1.11 Increasingly, project teams working in difficult regions or sectors are looking for independent experts who can provide a neutral forum for resolving project-related disputes.** The Natural Resources Management Project in Kenya is just one example where the project team brought in a regionally-based mediator to work with communities and the borrower to agree an action plan for resolving some controversial and challenging issues. Given the increased focus in some regions on fewer, larger-scale projects—especially big infrastructure projects—we anticipate increased demand for ADR options to keep projects on schedule and delivering results. While mediation does not work in all situations, it can be a powerful tool for resolving grievances and creating greater ownership over projects.



---

# REVIEW METHODOLOGY

## 2.01 The goal of the review is to provide project staff and managers with:

- A quantitative overview of current GRM application in project design;
- Qualitative assessment of GRM implementation issues;
- Recommendations for improved risk management via GRM design and implementation.

2.02 **For the quantitative assessment, DRP staff conducted a desk review of all new approvals in FY2011 (463 total projects; \$44 billion in total commitments).** The product lines include: IBRD, IDA, GEF, and Recipient Executed Trust Funds (RETF).<sup>5</sup> For each project, the team reviewed the PAD and, where available, the Resettlement Policy Framework, the IPP (Indigenous Peoples Plan), or the IPPF (Indigenous Peoples Planning Framework).

2.03 **DRP staff also solicited input on GRM case studies from regional managers, safeguards specialists, and SDV specialists and conducted qualitative reviews of 23 projects spread across the six regions.** The qualitative reviews are based on interviews with the relevant TTLs and Social Development Specialists along with a desk review of the project documents. We asked a series of yes/no questions designed to measure the quality of GRM design and implementation; these responses are summarized in Annex 1 for all 23 cases. Written write-ups of 9 of these projects provide additional detail (Annex 2). The projects included in the qualitative reviews were approved between 2005 and 2011 to ensure that we captured projects with a sufficient track record of implementation. We used the interviews to understand how GRMs worked in practice and what challenges arose during implementation. Where available, we requested supporting documentation in order to verify input received from the interviews. We were not able to conduct field visits to verify information received from staff or found in project documents.

---

<sup>5</sup> Only RETFs over \$5 million were included, consistent with IEG's methodology for assessing total projects in a given fiscal year.

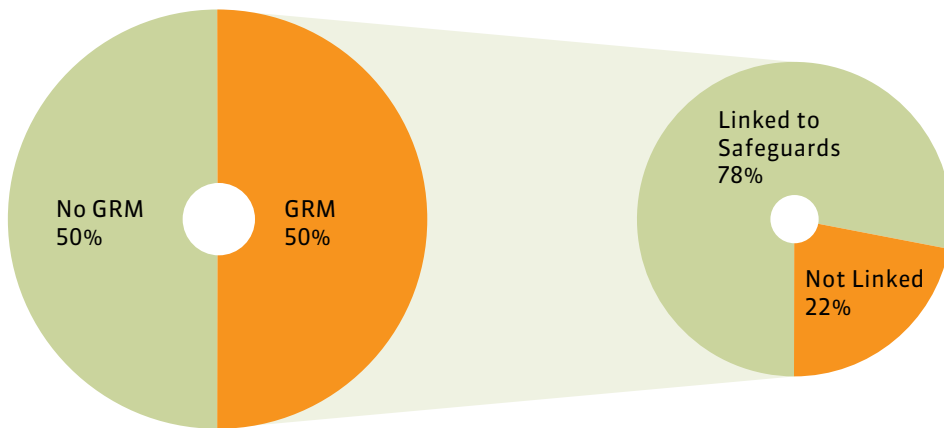
**2.04 Based on the quantitative and qualitative data, we developed recommendations for project teams and managers to improve GRM implementation and design.** Opportunities for improved project and portfolio risk management are also considered. Throughout this process, we have not considered GRMs as a cure-all for every project risk. Rather, we consider an effective GRM to be one tool among many, and the decision to include a GRM in a project should be risk-based. All the projects reviewed predate the creation of the DRP unit in 2012. This note will thus serve as baseline data against which progress can be measured in future years.

# FINDINGS

## QUANTITATIVE RESULTS

**3.01 GRMs are included in a much larger share of the portfolio than previously thought.** Of all FY11 projects, exactly 50 percent include a grievance mechanism in the project design, either as an explicit reference in the project documents<sup>6</sup> or because the project triggered the Involuntary Resettlement (OP 4.12) or Indigenous Peoples (OP 4.10) safeguards (see Figure 1). An earlier study based on a limited sample of FY08 approvals found that just 28 percent of projects contained GRMs, thus there has been a significant increase in GRM coverage in recent years.<sup>7</sup> OPs 4.10 and 4.12 both require grievance redress mechanisms, either as part of an Indigenous Peoples Plan (IPP), Indigenous Peoples Planning Framework (IPPF), or a Resettlement Action Plan (RAP). Program-for-Results, which was approved in 2012, also requires an assessment of a borrower’s capacity for managing grievances.

**Figure 1. World Bank projects with a Grievance Redress Mechanism**



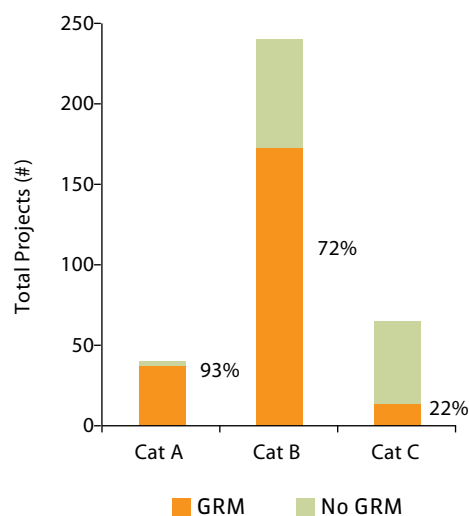
<sup>6</sup> This includes the PAD, IPP, IPPF, and/or RAP where applicable.

<sup>7</sup> “Governance and Anticorruption: A Benchmarking and Learning Review” produced BY QAG in 2009. The QAG statistic is based on a limited sample of FY08 approvals and the exact methodology is unclear. Therefore, the data are not strictly comparable but can be considered a rough comparator.

3.02 However, the relatively broad usage of GRMs in projects is primarily linked to projects that trigger OP 4.10 or OP 4.12. 78 percent of GRMs are included because of these two safeguard requirements. Thus, it is still too early to say that grievance mechanisms are being mainstreamed into project design outside of the safeguards requirements.

3.03 Almost all Category A projects (93 percent, or 38 out of 41) have a GRM. The same number (38 out of 41) triggers either OP 4.10 and/or 4.12 (Figure 2).<sup>8</sup> This is consistent with the increased corporate attention and budget devoted to Category A projects, both in the design and implementation phases, and consistent with the risk profile of Category A projects.

**Figure 2. GRM Coverage by Categorization**



3.04 72 percent of Category B projects included a GRM in project design (173 projects out of 240). Unlike Category A projects, which generally entail “irreversible” risks, there is a much broader spectrum of risks within the Category B portfolio. And unlike the Cat A projects, where GRM usage is required under certain circumstances, there is no consistent basis for determining whether the risks in Cat B projects merit a GRM or not. It is unclear whether this is the “right” number, i.e. whether GRMs are appropriately targeting the right universe of projects based on risks.

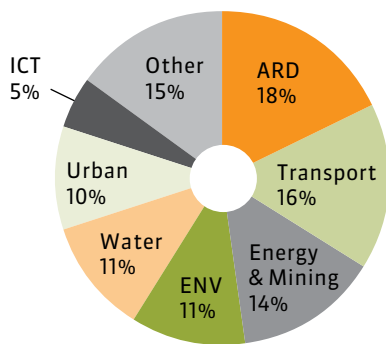
3.05 Interestingly, 22 percent of Category C projects contained a GRM in the project design (14 out of 65). None of these Category C projects were required to have a GRM, and yet they did. To get a better sense for which types of projects included GRMs even when they were not a requirement, we looked at the full universe of projects (not just Category C) that had a GRM *not* triggered by a safeguards policy, and compared the sectoral breakdown of this group with those GRMs linked to OP 4.10 and/or 4.12. We found that GRMs triggered by the safeguards were clustered in infrastructure-related sectors (Figure 3). GRMs not triggered by the safeguards (Figure 4) also covered infrastructure projects (Transport, Energy, Urban, and Water made up 20% of the total), but there was significant coverage within social sectors (Social Protection and Education in particular), Agriculture and Rural Development

<sup>8</sup> However, two of the projects with no GRM do trigger OP 4.12, thus they are technically out of compliance with the Bank’s requirements.

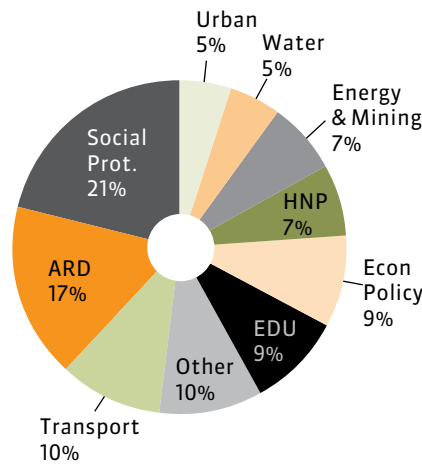


(17 percent), and Economic Policy (9 percent). This is consistent with anecdotal evidence that GRMs are being increasingly used in Community-Driven Development (CDD) projects, and especially cash-transfer projects that would fall under Social Protection or Education.

**Figure 3. GRM Triggered by the Safeguards: Where are They?**

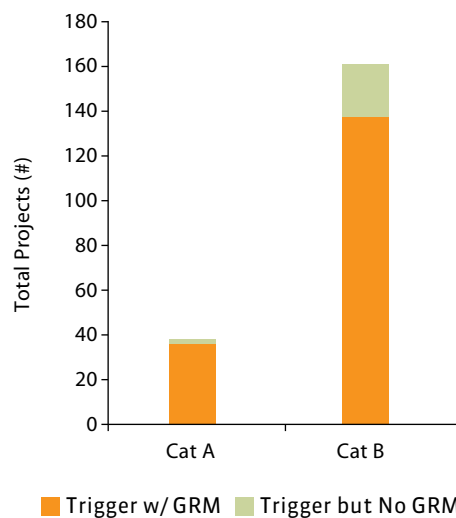


**Figure 4. GRM not Triggered by the Safeguards**



**3.06 In terms of compliance with the Bank’s safeguards policies, the data show broad compliance but some gaps.** We looked at breakdowns according to Categorization (Figure 5) and policy triggered (Figures 6 and 7). 95 percent of the Category A projects that were required to have a GRM did indeed have one (36 out of 38). The comparable number for Category B projects is 89 percent (145 out of 163). Compliance within the Category B universe is clearly weaker than in Category A, where almost all projects that were required to have GRM had one.

**Figure 5. GRM Compliance**



**3.07 We also wanted to understand whether compliance with the GRM requirement varied across the two policies, OP 4.10 and OP 4.12.** Figure 6 shows the share

Figure 6.

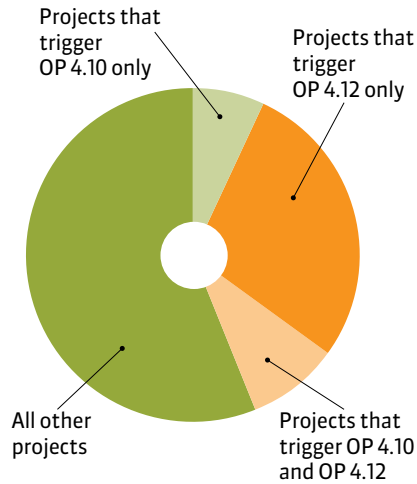
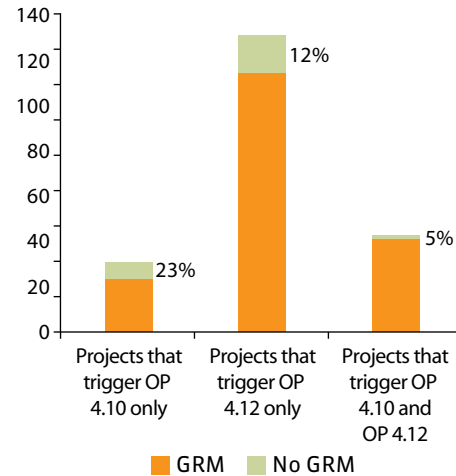


Figure 7.



of projects that trigger one or both policies; Figure 7 indicates compliance coverage within each sub-group. Projects that triggered both policies had the best compliance with the GRM requirement: only 5 percent of these projects had no GRM (Figure 7). Of the 131 projects that triggered only OP 4.12 (Involuntary Resettlement), 12 percent had no GRM. However, of the 31 projects that triggered only OP 4.10 (Indigenous Peoples), a surprising 23 percent had no GRM. The absence of GRMs in even a small number of the projects where their use is mandated indicates a need for further management attention and better monitoring and tracking by project teams.

**3.08 Many have asked whether grievance redress mechanisms are also being used in the World Bank’s budget support loans, i.e. DPLs.** The Program-for-Results instrument (P4R) is also budget support, but it was approved in FY12 and thus is not part of our FY11 data set. DPLs are a significant part of the Bank’s portfolio: in the FY11 portfolio, 15 percent of projects were DPLs (71 of 463), which equated to 26 percent of total lending by volume (\$12 billion out of \$44 billion total). Only three of these DPLs included a grievance redress mechanism in their project design.<sup>9</sup> Two of these included specific actions on GRM design and implementation that would be measured during implementation.<sup>10</sup>

**3.09 Are some regions performing better than others in terms of application of GRMs to their higher risk projects?** This is a broad question, which the data can only partially address. Figure 8 shows the share of Category A and B projects by region, along with each region’s share of projects with and without GRMs. Some interesting points: Africa has the most Category A and B projects and MENA has the fewest,

<sup>9</sup> Mongolia – Development Policy Credit 2; Indonesia – 7th DPL; India – E-Delivery of Public Services.

<sup>10</sup> These were listed as “key measures” or “benchmark actions,” i.e. actions that would get monitored during implementation but are not required for disbursement of funds.

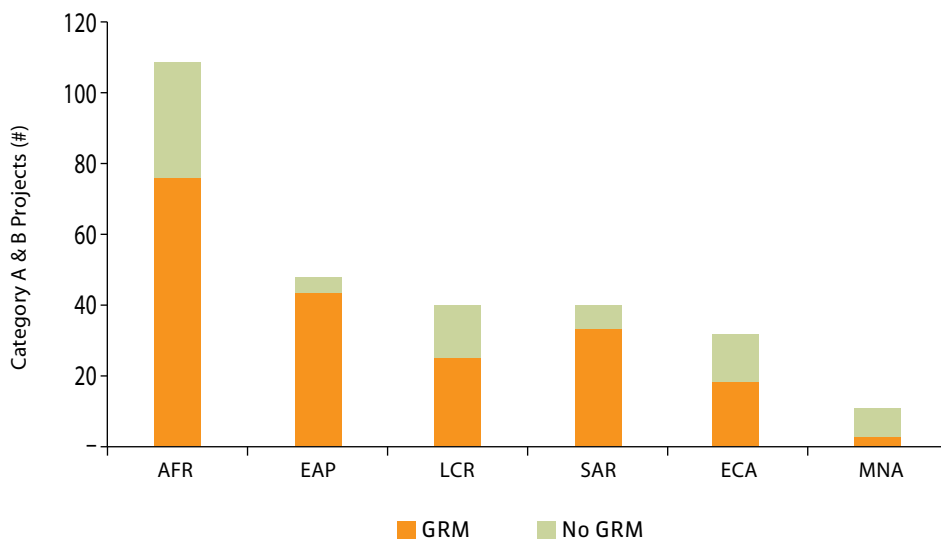


however almost none of MENA’s Category A and B projects contain GRMs (only 2 out of 9) whereas 70 percent of Africa’s higher risk projects have a GRM (76 out of 109). EAP and SAR similarly “outperform” relative to their peers in terms of GRM coverage within their Category A and B portfolio.

**3.10 Figure 8 of course only tells part of the story. What is harder to assess is whether the regions are targeting the “right” projects in terms of using grievance redress mechanisms,** and how do regional staff determine what these projects are. Most regions we interviewed had their own internal list of higher risk projects—based not just on categorization or sector but broader criteria. However, only some regions could identify the specific criteria that would place a project on their internal risk list, and there are no consistent criteria for assessing project risks that are used across the Bank. Triggering of specific safeguards is an important determinant—but not the only one. Staff and managers have significant discretion in determining which projects are deemed higher risk. Despite the increased focus on collecting beneficiary feedback—via GRMs and other means—we found few instances where this feedback made it back into the Bank’s internal system and was factored into the Bank’s risk management and supervision.

**3.11 While it is appropriate for Bank clients to operate and manage GRMs, the fact that project-based GRM data rarely if ever reach the TTL illustrates a major lost opportunity for the Bank to improve its own supervision.** We found one innovative TTL who identified this problem and designed a simple SMS system for projects that

**Figure 8. Category A & B Projects by Region**



“Any GRM where the Bank doesn’t get the data isn’t worth it.”

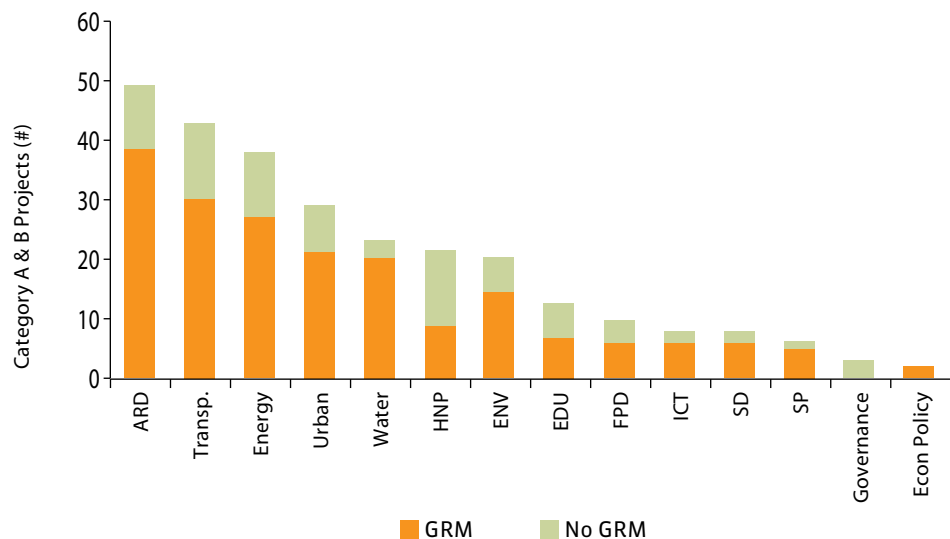
—TTL (EAP)

automatically sends all grievances received to not only the project manager, but also the TTL and other World Bank staff in real time in an unfiltered format. This allows the TTL to monitor and support response and resolution of issues by the implementing agency. The data on grievances received and resolved is then input into the projects’ ISRs and ICRs and used to drive supervision attention. This system was produced

quickly (2 months) and cheaply (under \$5,000) and has been replicated in a number of projects in this TTL’s portfolio. However, this example is unique.

3.12 As with the regional data, there were some points of divergence when the data is broken down by sector (Figure 9). Of the 22 Category A and B projects classified as Health, Nutrition, and Population (HNP), for example, more than half had no GRMs. On the other end of the spectrum, Water sector projects had very good GRM coverage (21 out of 24 Category A and B projects, or 88 percent). There were only three Governance projects in the sample, but none of them had a GRM—especially interesting given that GRMs themselves are a key tool of demand-side governance in projects. Similarly, HNP bears closer scrutiny: one hypothesis is that HNP projects are not triggering OP 4.10 or 4.12—and therefore are less likely to have a GRM—but still involve other risks that are not being captured by safeguards.

Figure 9. Category A & B Projects by Sector





**3.13 The sectoral and regional breakdowns don't provide the full picture, and there are other types of projects that could trigger concerns, disputes, and conflicts**—for example CDD projects with large numbers of beneficiaries or budget support loans (i.e. DPLs or P4R) in countries with limited capacity to manage risks. It is important to remind ourselves that it's not just projects with negative impacts (i.e. involuntary resettlement) that can trigger conflict, but also projects where the direct impacts are overwhelmingly positive (i.e. cash transfers) due to concerns and disputes over who should receive benefits. Similarly, budget support loans that support contested reforms or programs can exacerbate pre-existing conflicts if not managed well; conversely, they also can provide opportunities to strengthen domestic capacity to manage such conflicts.

## QUALITATIVE REVIEW

3.14 We solicited input for case studies from sector directors and managers, safeguards advisors, and other staff. We encouraged submission of cases that reflected a wide range of experience, with the goal of identifying and learning from the more challenging issues. In practice, however, most of the cases referred to us by managers were above-average in their GRM implementation and many had already received prior recognition as 'best practice.' We thus supplemented the cases referred to us by managers with a random selection of additional cases from the FY11 database. When we randomly selected cases from the 2011 sample, we found that many of the GRMs existed on paper but not in practice. This was consistent with the findings of a review on GRMs commissioned by the LCR Social Development network,<sup>11</sup> which found a much wider range of implementation experience. We received over 30 examples and completed interviews on 23, with at least one project from every region. Interviews were conducted with either the TTL or the Social Development Specialist, or both. We solicited cases that were not triggered by OP 4.10 or 4.12 but did not receive any. While the case studies are not a representative sample, several trends emerged from our discussions that are worth highlighting.

**3.15 Most project teams understood that strengthening grievance redress capacity at the country level is preferable to creating stand-alone or duplicative grievance systems.** In most instances, the Bank team either relied completely on existing grievance structures or paired a Bank-designed grievance system with existing capacity. Both are consistent with two principles of effective grievance redress, i.e. (i) keeping the process as close to the source (i.e. the complainant) as possible and (ii) using culturally appropriate systems. However, we found no examples where the Bank worked with the client to assess the credibility of pre-existing grievance systems against objective

<sup>11</sup> The review covered 70 projects in the LCR SDV portfolio approved since 2008 and was completed in 2012.

criteria and then used this assessment to help prioritize how to best strengthen grievance capacity.<sup>12</sup> Many staff acknowledged that existing systems were weak, but their responses to this tended to fall in one of two extremes: either (i) relying on existing systems completely but with limited or no effort to improve them; or (ii) setting up an independent, stand-alone system that reflected best practices but was ultimately not used because it was not linked to existing systems. We found few instances where staff worked with the client to either assess credibility of existing systems or try to link up existing systems to a Bank-designed GRM.<sup>13</sup>


**3.16 Political and cultural context matters.** Not surprisingly, we found that in countries with strong domestic support for grievance redress (i.e. via legislation or existing institutions), Bank projects had better GRM design and implementation. India is a good example of this; grievance redress is mandated by law as part of the government's public service delivery responsibilities and all Bank projects in India have a grievance component. Some borrowers are skeptical of the value of a GRM—they don't want to hear about complaints. Presenting a GRM not as a forum for complaints but rather as an opportunity to improve service delivery helped in some instances. Some TTLs said that when grievance redress is a tough sell to the borrower, they introduced the issue only after trust had been established working on other issues. On other projects, TTLs created stand-alone GRMs in order to ensure some of the basic principles of transparency, fairness, and accessibility. These, however, tended to be less used by the locals.

**3.17 In all regions—even those with GRM issues mainstreamed into project design—GRM implementation, monitoring, and evaluation is sketchy at best.** Only 7 of the 23 projects covered in Annex 1 had data on grievances received—one indication that GRMs may be included in project documents but not put in place. Staff acknowledged this is a problem and voiced a number of possible causes: (i) Bank budgets are allocated primarily to project preparation, not implementation; (ii) GRM implementation is rarely included in results frameworks and therefore is not monitored; (iii) beneficiaries still strongly rely on informal country systems versus Bank-designed GRMs; (iv) Environmental and Social Specialists—who tend to be better versed in GRM issues—are hired by TTLs and are not always asked to join supervision missions, and (v) GRMs are just not a priority for clients.

**3.18 When a GRM is fully operational in a project and its value is undisputed, the TTL will prove knowledgeable about it and sufficient documentation will be easily available to account for its operation, even if it is not fully developed.** On the contrary, when a GRM is not considered essential for the project, the TTL is likely to know little about it and rely on the Social Specialist to meet with policy require-

<sup>12</sup> DRP has prepared a two-page diagnostic tool, "Evaluating a GRM," to help clients and staff discuss how well existing grievance mechanisms are working.

<sup>13</sup> The latter is happening in several projects that have received Inspection Panel complaints and are working to improve grievance handling on the ground: Honduras Land Management is a good example.



ments. In these cases, some additional documentation may describe the GRM but it is not readily accessible. We found many champions of GRMs internally, but little institutional support or guidance for those seeking implementation support (versus support in the design phase).

**3.19 In the same vein, projects with thorough descriptions of specific GRMs in their IPPF, IPP, RFP, or RP turned out to have good mechanisms working on the ground.** Those that only offer a description—no matter how extensive—of all the options available to citizens in the national legislation to exercise their right to seek redress but do not describe any institutional arrangements to apply them to the project, do not necessarily have good GRMs on the ground. These projects may have been able to “check the GRM box” during the preparation stage but cannot provide information to understand how many complaints have been filed about the project, who they have been handled, and how the project has improved thanks to this interaction.

**3.20 Generally, GRMs appear to be set up only to meet the requirements of OP 4.10 and 4.12.** Good GRM practice found in only a few projects seems to stem more from the individual conviction of the TTL or the Social Development Specialist, or from the already existing practices of the borrower, than from an institutional commitment of the Bank.

## SUMMARY FINDINGS

3.21 The following points summarize our key findings from the interviews and group discussions with key Bank staff and managers. In many instances, issues raised during the interviews echoed the quantitative data or provided a more nuanced picture of the Bank’s current approach to grievance redress.

### GRMs IN PROJECT PREPARATION:

- 1. Overall usage of GRMs has increased in recent years; currently almost half of all projects include a description of a GRM in the project documents.** There is increased management attention to beneficiary feedback systems, including GRMs, and their ability to provide real-time information on project risks and effectiveness.
- 2. GRM usage among Category A projects is almost universal (93 percent), whereas it is much lower among Category B projects (only 73 percent have GRMs).** Category A projects tend to have better documentation of risks at approval and almost all contain a GRM in the project design. GRM references in Cat A projects are explicit and often detailed whereas most Cat B projects do not

include explicit references.<sup>14</sup> Aside from the two safeguards policies, there are no risk-based criteria used to determine whether a project may benefit from a GRM.

3. **GRMs are primarily tied to projects that trigger OP 4.10 or 4.12.** Most (but not all) staff viewed GRMs as something you do only if your project triggers OP 4.10 or 4.12. There is limited consideration of either the development impact or cost implications of using a GRM to address other types of risks. In some instances, mandated usage turns the GRM into a “box-checking” exercise that is not truly owned by the Bank or the client.
4. **Project design documents emphasize reliance on a country’s existing grievance systems but do not explicitly identify the strengths and weaknesses of those systems.** Assessing credibility to the users is not something the Bank has articulated or attempted to document in a systematic way. The absence of a capacity assessment is often reflected in implementation, for example in projects that underestimated social risks or fail to learn from (and link to) existing traditional ways of managing grievances.

#### GRMs IN IMPLEMENTATION:

1. **GRMs exist on paper but not always in practice.** Many PADs reference a GRM, but the findings from our random sampling indicate that many have not been put in place. Only 7 of 23 projects in the qualitative sample were able to provide data on grievances received and resolved. Reasons vary: lack of dedicated financial resources, project staff overburdened and/or uninformed, GRMs are rarely in results matrices and therefore are not monitored, etc. We found that a key driver of whether a GRM moved from paper to reality was whether both the TTL and the borrower are convinced of the GRM’s value to the project. When the business case is not clear to those in the driver’s seat, the GRM often falls by the wayside.
2. **Of the GRMs in existence, many are not being used.** This was most evident in projects that set up stand-alone GRMs and didn’t link them to existing structures (i.e. village chiefs, local councils, etc). In Vietnam and China, for example, we found GRMs in place but most project beneficiaries with concerns sought redress through existing channels such as village leaders versus the ‘formal’ project GRM.
3. **The Bank does not systematically document or measure GRM implementation.** There is a wealth of literature on GRM design principles, best practices, and “how-to” notes. However, we found no accessible documentation on experience with GRM usage and impact, either in Implementation Status Reports, Implementation Completion Reports, Country Partnership Strategies, the ORAF, or the Corporate Scorecard. GRM data is not systematically tracked at either a project level (via ISRs and ICRs) or a corporate level.<sup>15</sup>

<sup>14</sup> We defined a project as having an “implicit” reference to a GRM if it triggered OP 4.10 or OP 4.12 but had no explicit reference in the PAD to either a grievance or feedback mechanism. An explicit reference means the PAD or supporting documents described the GRM, irrespective of whether OP 4.10 or 4.12 was triggered.

<sup>15</sup> There is a Core Sector Indicator (# grievances received/# grievances resolved) that is an optional metric staff can track in certain projects. When selected, CSI data are intended to be incorporated into a projects’ results matrix and tracked in ISRs and ICRs. As of early 2013 however, no staff had opted to include the CSI on grievances received and resolved.





### GRMs AND INTERNAL WORLD BANK RISK MANAGEMENT:

1. **There is no link between GRM data received on projects and internal Bank risk management on those projects.** Because borrowers ultimately implement projects, there is no automatic link that sends grievances filed on individual projects to the relevant Bank staff. While it is appropriate for the implementation agency to be the first line of response for most grievances, the Bank could use grievance data to better prioritize its supervision efforts. As one TTL noted, “any GRM where the Bank doesn’t get the data isn’t worth it.”
2. **Basic knowledge of grievance mechanisms among staff is mixed.** With some notable exceptions, TTLs often had only cursory knowledge of GRM design and implementation techniques and no understanding of how a GRM could help with overall risk management. Many TTLs relied on Social Development specialists to handle all aspects of GRM design.
3. **Bank systems do not have the capability to quickly pull up data on GRM usage or implementation.** Many of the Bank’s internal systems (Business Warehouse, Business Intelligence, Client Connections, etc) are hampered by inconsistent and poor quality data combined with complicated user interfaces. The ORAF is an attempt to correct some of these problems, but data quality is variable and the data is not searchable. None of our existing systems (ORAF, Business Warehouse) or reports (ISRs, ICRs, or CAS) systematically track the existence or content of grievance mechanisms. With the exception of a small number of high profile projects,<sup>16</sup> monitoring of GRM implementation is non-existent, and data on GRMs can only be found by manually searching individual project documents. This means Bank staff and managers can’t do quick portfolio reviews, systematic knowledge sharing on project implementation isn’t possible, and basic questions about regional or sectoral portfolios are hard to answer.

## AVAILABLE GRM GUIDANCE FOR STAFF

There is some in-house material on GRM principles and best practices and a wealth of information from external sources. While there is a good amount of material on principles and best practices related to GRM design, we found limited guidance on GRM implementation; DRP created the first three documents to respond to this need. Key internal and external resources on GRM issues are listed below:

### Internal Resources:

Items 1-3 can be found on the internal DRP website (furl “disputeresolution”)

<sup>16</sup> Mumbai Urban Transport Project is a good example, as a detailed monitoring report of the resettlement process, including the GRM structures, was completed by an independent consultant.

Items 4-6 can be found at the Social Accountability and Demand for Good Governance (DFGG) internal website ([furl "dfggdb"](#))

1. *The World Bank's Approach to Grievance Redress in Projects*: A practical framework that can be used by clients and project teams to (i) assess anticipated grievances, (ii) review the credibility and capacity of existing grievance systems, and (iii) build or strengthen grievance redress capacity.
2. *Evaluating a Grievance Redress Mechanism*: A two-page checklist of questions to evaluate an existing grievance redress mechanism.
3. *Grievance Redress Mechanisms: Frequently Asked Questions*.
4. *GAC How-to Notes: Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-financed Projects, Part 1 & 2*.
5. *Using Demand-Side Governance Approaches to Identify and Manage Risks in Projects*
6. *Beneficiary Feedback and Third Party Monitoring in Bank-Financed Projects*.
7. *IFC CAO: A Guide to Designing and Implementing Grievance Mechanisms for Development Projects*.



# RECOMMENDATIONS

Based on our findings, we offer the following recommendations to enhance the impact of grievance redress mechanisms and, more broadly, improve service delivery and risk management on projects. Many of the recommended actions were proposed by Bank staff and managers in our discussions with them; others are our own. The Dispute Resolution and Prevention team is already working on a number of immediate issues and is prepared to provide support on other items, as needed.

- 1. Create diagnostic tools to support GRM implementation and strengthening of existing country capacity in a credible manner.** The strong push to support and strengthen existing country institutions for grievance redress is a good start, but staff needs practical diagnostic tools to do this in an informed way. Products that staff said would be useful include: case studies of GRM implementation, evaluating existing GRMs, linking a GRM to existing country systems, and a manual of basic GRM principles and procedures. (Action: Completed – DRP Team)
- 2. Improve risk assessment within the Category B portfolio in order to better prevent and avoid conflict.** We need to assess the portfolio—Category B projects in particular—and risks that could lead to conflict beyond those required in OP 4.10 and 4.12 (for example, projects that take place in an area where land tenure is weak or CDD projects with large cash transfers in areas with weak governance). The objective would be to identify where GRMs could add value. (Action: Regional and Sector Managers, with DRP support)
- 3. Use feedback received via GRMs to prioritize supervision.** Having real-time information from local citizens on project implementation is an obvious tool to help Bank teams target and prioritize limited supervision budgets. This is especially relevant for geographically-dispersed projects and/or projects with large numbers of beneficiaries. However, very few TTLs receive GRM data—even in summary form—that would allow them to make small course corrections during implementation. (Action: Regional Managers)
- 4. Create incentives for monitoring and improving GRMs during implementation.** At present there is no systematic monitoring or evaluation of GRM implemen-

tation at the project or corporate level. One relatively easy option would be to require all projects with a GRM to track the existing CSI related to grievances in project ISRs and ICRs. At present, CSIs are optional selections for project teams; as of early 2013, no team had chosen to track the grievance-related CSI (Action: OPCS, Regions).

5. **Improve our own internal handling of complaints on projects.** The Bank could improve the predictability around its own handling of complaints by encouraging all complaints to be routed to the TTL, setting clear timetables for responses, and putting in place corporate tracking to ensure all grievances are responded to and addressed (if not ultimately resolved) in a timely manner.<sup>17</sup> (Action: OPCS, Regions).

<sup>17</sup> A similar procedure is in place for the handling of complaints related to procurement on Bank projects (BP 11.00).



# ANNEX 1: Summary Table of Grievance Redress Mechanisms

Project name	Tanzania: Zanzibar Urban Services Project	Uganda: Electricity Sector Development Project
Region	AFR	AFR
Country	Tanzania	Uganda
Project number	P111155	P119737
Approval date	February 2011	June 2011
Closing date	June 2016	February 2017
World Bank commitment (\$ mil)	\$38	\$120
Total project amount (\$ mil)	\$38	\$153
Instrument	SIL	SIL
Environmental categorization	A	A
Safeguards triggered	EA, PCR, IR	EA, NH, PCR, IR, F
Sector	Flood protection, sub-national govt admin, solid waste mgmt	Transmission/Distrib electricity, public admin
World Bank contact(s)	Andre Bald	Somin Mukherji
<b>Questions – Grievance Redress Mechanism</b>		
Is there a register or database that records complaint handling?	Yes	Not specified
How many complaints have been received?	Data not available	Data not available
Are there rules or procedures to ensure timely responses?	If not resolved in 14 days, referred to Regional Manager of Resettlement Coordination Unit who seeks resolution w/in 21 days. If no resolution, recourse to courts.	Village GC to respond within 3 days. If not resolved, District Land Tribunal to decide w/in 1 week.
Is the GRM appropriately advertised and communicated to project-affected people?	PAPs provided notification of GRM	Yes
Do multiple uptake channels exist?	Yes, through local leaders (Shehas) or grievance officer. Form not specified	Verbal and written forms specified
Can anonymous grievances be filed?	Not specified	Not specified
Is there a system to categorize, assign priority, and route grievances to the appropriate entity?	Not a formal system	Yes, Resettlement Unit classifies as local (route to Village GC) or central (to Resttl Unit)
Are complaints acknowledged in writing?	Not specified	Not specified
Does the acknowledgment outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance?	Not specified	Not specified
Are there clear timetables that are publicly available?	Yes	
Is action taken on every grievance?	Yes	Not specified
Are there indicators to measure grievance monitoring and resolution?	Database is to record resolution and time required for resolving each complaint	Indicators not specified but indep monitoring required to look at overall status of PAPs
Is there right to appeal? If yes, are GRM users informed about this right?	Unresolved disputes forwarded to Resettlement Coordinating Unit. PAPs informed of right to appeal to courts.	May appeal to District Land Tribunal and, if not resolved, to courts. Weakness of Land Tribunals noted.
Innovations/Addl Info		Utilizes a 3 tier grievance process all resting on local/national systems. Village GCs primary, District Land Tribunals serve as 1st referred instance, then courts. Project acknowledges some weaknesses in existing country systems (for example, complainant generally needs to pay for travel, food, allowance for District Land Tribunals to hear complaint).

Chad: Local Development Program Support APL II	Cameroon: Sanitation APL	Lake Victoria Phase II, APL 2	Indonesia: Upper Cisokan Pumped Storage	Lao PDR: Nam Theun 2 Hydropower
AFR	AFR	AFR	EAP	EAP
Chad	Cameroon	Burundi, Rwanda	Indonesia	Lao PDR
P113030	P117102	P118316	P112158	P076445
March 2011	June 2011	June 2011	May 2011	March 2005
June 2015	August 2015	June 2017	December 2018	2017
S25	S30	S30	S640	\$20 mil (IDA grant); \$50 mil (IDA PRG); \$200 mil (MIGA guarantee)
S77	S39	S30	S800	\$1,450
APL	APL	APL	SIL	IL
B	B	B	A	A
EA, PM, PCR, IR, PIW	EA, IR	EA, NH, F, PM, PCR, IP, IR, Dams, PIW	EA, NH, PCR, IR, SoD	EA, NH, PM, CP, IR, IP, DS, PID, PDA, F
Agriculture & fishing, health, prim edu, water supply, public admin.	Sanitation, public admin.	Water sanitation and flood protection, agriculture and fishing, public admin.	Large hydro	Large hydro
Soulemane Fofana	Miguel Vargas-Ramirez	Nagaraja Rao Harshadeep	Peter Johansen (TTL) Lis Nainggolan (SDV)	
Not specified	Not specified. Notes that Commission records complaint and sends to Local Resettlement Committee	Grievances to be registered but unclear at what stage and by which entity	Yes	Yes
None to date	Data not available	Data not available	None to date	Data not available
Not specified	Not specified	No, "response time depends on issue," but should be addressed efficiently	Yes, 7 days to classify and refer to agencies which respond w/in 14d, GTF responds to complainant w/ in 21 days	Yes
Not specified	Not specified	PAPs directly informed but unclear re broader outreach and comms	Yes	
Not specified	No, RPF states complainants fill out form and send to Commission	Multiple channels noted (local chief, PPCT, PAP Committee), but process and relationships could be further clarified. Form of complaints (verbal, written, etc) not specified	Yes, in writing, phone, email, SMS	
Not specified	Not specified	Not specified	Not specified	Not specified
Not specified	Not specified	Not specified, but implied in role of PAP Representative Committee (inform PPCT of serious issues, refer cases to GRC)	Yes	
Not specified	Not specified	Not specified	No (notice sent after decision if issue not addressed on the spot)	
Not specified	Not specified	No acknowledgment specified	No initial acknowledgment	
	Not specified	Not specified	Yes	
Not specified	Not specified	Not specified	Yes	Yes
Not specified	Not specified	Not specified	Yes	Yes, both internal and external monitoring
Yes, to courts.	May appeal to courts only after rejection by Commission	Yes, if not satisfied by decision of local chief, may appeal to courts	Not specified, may go to court	Yes, to District Grievance Committee, then to Provincial Court

In addition to reference to local and traditional bodies, 2 structures noted: Commission on Findings and Evaluation and a Local resettlement Committee.

Project provides technical assistance for mediating committee, legal counseling, independent monitoring agency, external compliance monitoring

(continued on next page)

(continued)

Project name	China: Hubei Yiba Highway Project	Vietnam: Trung Son Hydro
Region	EAP	EAP
Country	China	Vietnam
Project number	P101258	P084773
Approval date	March 2009	April 2011
Closing date	December 2015	December 2017
World Bank commitment (\$ mil)	\$150	\$330
Total project amount (\$ mil)	\$2,194	\$412
Instrument	SIL	SIL
Environmental categorization	A	A
Safeguards triggered	EA, NH, PCR, IR	EA, NH, PM, PCR, IR, IP, DS, PIW
Sector	Roads and highways	Power
World Bank contact(s)	Fei Deng (current TTL), Chris Bennett (former TTL)	Pilar Larreamendy
<b>Questions – Grievance Redress Mechanism</b>		
Is there a register or database that records complaint handling?	Yes	Yes, maintained and reviewed by an independent entity
How many complaints have been received?	< 300	Data not available
Are there rules or procedures to ensure timely responses?		Yes
Is the GRM appropriately advertised and communicated to project-affected people?	Yes	Yes, leaflets include info on both the Bank-designed GRM and Vietnamese GRM
Do multiple uptake channels exist?	Yes	Yes
Can anonymous grievances be filed?	Yes, web, SMS, in person	Not specified
Is there a system to categorize, assign priority, and route grievances to the appropriate entity?	Yes, but none received	Yes
Are complaints acknowledged in writing?	Yes	Not specified
Does the acknowledgment outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance?	Not specified	Yes
Are there clear timetables that are publicly available?	Yes	Yes
Is action taken on every grievance?	Client says yes	Not specified
Are there indicators to measure grievance monitoring and resolution?	Yes	No
Is there right to appeal? If yes, are GRM users informed about this right?	Not specified	Yes

Innovations/Addl Info



Turkey: ECSEE APL#6	Azerbaijan: Highway 3	Azerbaijan: Highway 2
ECA	ECA	ECA
Turkey	Azerbaijan	Azerbaijan
P110841	P118023	P094488
August 2010	May 2010	January 2006
December 2015	March 2015	February 2014
S220	S242	S675
S240	S356	S1,028
APL	SIL	SIL
B	A	A
EA, IR	EA, IR	EA, IR
Transm & distrib electricity	Roads & highways	Roads & highways
Sergio Augusto Gonzalez Coltrinari	Jacques Bure	Jacques Bure
Not specified. Appeals filed with court	Yes	Yes
Data not available	No complaints received so far as land acquisition and civil works on sections with potential impact to population have not started yet	33
15 days to complain upon filing of expropriation lawsuit; 15 days to challenge court-specified compensation	Yes, framework is defined in the RAP and also in the Presidential decree on Review and Solution of Complaints.	Yes, framework is defined in the RAP and also in the Presidential decree on Review and Solution of Complaints.
Affected persons notified of expropriation process and rights. Expropriations announced in local papers	Yes	Yes
Complainants either directly negotiate or appeal to court	Yes, there are number of available channels such as directly applying to Road Agency or through Monitoring Specialist and Supervision Engineer. There are also many cases when grievances are directly submitted to contractors and resolved without escalating to higher level.	Yes, there are number of available channels such as directly applying to Road Agency or through Monitoring Specialist and Supervision Engineer. There are also many cases when grievances are directly submitted to contractors and resolved without escalating to higher level.
No	Yes	Yes
No. Only narrow range of grievances allowed, appeals filed with court	There is not a formal categorization system—but if solution of complaints depend on other agencies, the road administration forwards the grievances accordingly and supervise till the issue addressed.	There is not a formal categorization system—but if solution of complaints depend on other agencies, the road administration forwards the grievances accordingly and supervise till the issue addressed.
Not specified	Not specified	Not specified
Not specified	Not specified	Not specified
Yes, 15 days to appeal	Yes, complaints that do not require investigations are replied to within two weeks. Complaints requiring investigation are replied to within a month.	Yes, complaints that do not require investigations are replied to within two weeks. Complaints requiring investigation are replied to within a month.
Yes, on every appeal filed	Yes	Yes
Not specified	Yes, reports of a supervision consultant and monitoring consultant	Yes, reports of a supervision consultant and monitoring consultant
Yes, only to courts	Yes	Yes
Complaints 100% through courts and Turkish legal system, no additional GRM process.		International consultant was involved under the project to support the road administration in designing GRM. Local NGOs were also involved in channeling complaints to respective agencies.

(continued on next page)

(continued)

Project name	Kazakhstan: South West Roads Project	Kyrgyz Republic: National Road Rehabilitation (Osh transport)	Colombia: Rio Bogota Environment Infrastructure	Southern West Bank Solid Waste Management
Region	ECA	ECA	LAC	MENA
Country	Kazakhstan	Kyrgyz Republic	Colombia	West Bank
Project number	P099270	P107608	P111479	P105404
Approval date	April 2009	November 2009	December 2010	May 2009
Closing date	June 2015	December 2014	June 2016	December 2014
World Bank commitment (\$ mil)	\$2,150	\$25	\$250	\$12
Total project amount (\$ mil)	\$2,500	\$31	\$487	\$26
Instrument	SIL	SIL	SIL	SIL
Environmental categorization	A	B	A	A
Safeguards triggered	EA, IR	EA, IR	EA, NH, PM, PCR, IR	EA, PCR, IR
Sector	Roads & highways/ transportation	Roads & highways/ transportation	Wastewater treatment, flood protection, public admin.	
World Bank contact(s)	Jacques Bure (TTL) Lola Ibragimova (SDV)	Cordula Rastogi	Greg J. Browder	Ibrahim Dajani (TTL)
<b>Questions – Grievance Redress Mechanism</b>				
Is there a register or database that records complaint handling?	Yes	Yes	Yes	Yes
How many complaints have been received?	< 10; includes group grievances	6	Data not available	Multiple; exact data not available
Are there rules or procedures to ensure timely responses?	Yes	Yes	Yes, 15 days. If cannot address w/in 15 days, partial response	Yes
Is the GRM appropriately advertised and communicated to project-affected people?	Yes	Yes		Yes
Do multiple uptake channels exist?	Yes	Yes	Yes, website, telephone, main office, neighborhood office	Yes
Can anonymous grievances be filed?	No	Yes	Not specified	Yes but none received
Is there a system to categorize, assign priority, and route grievances to the appropriate entity?	No specific categorization and priority	No (informal)	Time bound routing process to appropriate authority. Unclear on prioritization	Yes
Are complaints acknowledged in writing?	Yes	Only complaints involving significant funding	Not specified	Not required; written or verbal confirmation acceptable
Does the acknowledgment outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance?		No	Not specified	Yes
Are there clear timetables that are publicly available?	Yes	Yes	Yes	Yes
Is action taken on every grievance?		Yes	Yes, requires follow up on each complaint	Yes
Are there indicators to measure grievance monitoring and resolution?	Yes, progress reports	Yes	Monthly status reports	Yes
Is there right to appeal? If yes, are GRM users informed about this right?	Yes, court appeals are typically used	Not explicit, can go to courts	Not specified	Yes, but only after review and negotiation
Innovations/Addl Info	GRM is primarily designed to channel grievances related to the RAP although it has also been used to channel issues related to non-resettlement impacts from civil works	Very proactive PIU and direct high-level govt presence. State Secretary has directly attended consultations.	Utilizes existing grievance procedures of client.	WB encouraged getting political commitment upfront from the local mayor AND neighboring mayors.

India: Mumbai Urban Transport Project (MUTP)	India: Vishnugad Hydropower	India: National Ganga River Basin Project	India: Tamil Nadu Empowerment Project
SAR	SAR	SAR	SAR
India	India	India	India
P113028	P096124	P119085	P079708
June 2010	June 2011	May 2011	July 2005
June 2015	December 2017	December 2019	September 2014
\$971	\$648	\$1,000	\$120m (\$154m add)
\$430	\$922	\$1,556	\$159
SIL	SIL	SIL	SIL
B	A	A	B
EA, IR	EA, NH, PCR, IR, F, DS, PIW	EA, PCR, NH, IR, IP, PIW	EA, IP, PM, CP
Railways, public administration	Power, renewable energy		Agriculture/social services
Satya Mishra, IUB Reddy	Parthapriya Ghosh	Parthapriya Ghosh	Kevin Crockford
Yes	Yes	Yes	Yes, at District/State levels, not in each village
~3700	Data not available	100+	No central database
Yes	Yes, 2 weeks	Yes, 15 days	Partial
Not avail	Yes, word of mouth and brochures	Yes	Varied across villages; contact information clearly presented
Written only	Yes	Yes	Yes
Not specified	Yes, but none filed to date	Not specified	Yes
Yes	Yes	Yes	No (informal)
Not specified	Yes	Yes	After complaint addressed
Yes	Yes, the aggrieved person is informed about the process and time required either by the NGO contract for RAP implementation or Senior Manager Social and Environment of THDC who is also the member secretary of the GRC.	Yes	No initial ackn
Not specified	Yes	Yes, 15 days	Yes, in some villages; no at District/State levels
Yes	Yes and PAPs are informed in writing.	Procedures say yes	Unclear
Yes	Yes, M&E consultants keeps track of the complaints filed and decisions taken. They also evaluate whether PAP is happy or not with the decision.	Process says web accessible database	Not formalized, but sig monitoring
Yes	Yes	Yes	Not formal, but Yes
Participatory mechanisms create space for addressing grievances without formal grievance procedures.			

(continued on next page)

(continued)

Project name	India: Second Madhya Pradesh District Poverty Initiatives	India: Eastern Dedicated Freight Corridor	Pakistan: Floods Emergency Cash Transfer Project
Region	SAR	SAR	SAR
Country	India	India	Pakistan
Project number	P102331	P114338	
Approval date	June 2009	May 2011	March 2011
Closing date	December 2012	June 2017	June 2013
World Bank commitment (\$ mil)	\$100	\$975	\$125
Total project amount (\$ mil)	\$110	\$1,458	\$580
Instrument	SIL	APL	
Environmental categorization	B	A	C
Safeguards triggered	EA, PM, IP, NH, F	EA, IR, PCR	
Sector	Agro-industry/agriculture	Railways	
World Bank contact(s)	Kevin Crockford	Benedictus Eijbergen	Kelly Suzanne Johnson, Iftikhar Malik
<b>Questions – Grievance Redress Mechanism</b>			
Is there a register or database that records complaint handling?	Not at village level but at PFT, district and state	Yes	Yes
How many complaints have been received?	Data not available	Data not available	1.1 million appeals/ 5500 complaints (see case study)
Are there rules or procedures to ensure timely responses?	Partial	Yes	Yes
Is the GRM appropriately advertised and communicated to project-affected people?	Contacts made clear but GRM process unclear	Yes	Yes
Do multiple uptake channels exist?	Yes	Yes	Yes
Can anonymous grievances be filed?	Yes	Not specified	No
Is there a system to categorize, assign priority, and route grievances to the appropriate entity?	No (informal)	Yes	Yes
Are complaints acknowledged in writing?	After complaint addressed	Yes	Yes
Does the acknowledgment outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance?	No initial acknowledgment	No	Yes
Are there clear timetables that are publicly available?	No	Partial	No
Is action taken on every grievance?	Yes	Yes	Yes
Are there indicators to measure grievance monitoring and resolution?	Yes	Tracking, but unclear on indicators	Yes
Is there right to appeal? If yes, are GRM users informed about this right?	Not formal, but Yes	Yes	Yes
Innovations/Addl Info	Participatory mechanisms create space for addressing grievances without formal grievance procedures.	Project-level Ombudsman serves as appeals body empowered to review and recommend resolution. Two-level grievance committees with CSO reps enhance accountability and legitimacy	

# ANNEX 2: Case Studies







---

## Kazakhstan SW Road Project

### Overview

At the time of approval, this was one of the largest investment loans the Bank had ever done. The team was under pressure from the Borrower to finalize the project details and start implementation quickly. As a result, the initial EIA and RAP had some flaws, including a significant underassessment of social impacts and project affected persons. Bank management—with strong support from the MD on down—worked proactively with the Borrower to improve the documents prior to approval. However, once implementation began, it became clearer that social risks—which had been deemed relatively minor at first—were in fact going to be considerable. In particular, the project required mobilization of a massive work force (over 35,000 people employed directly or indirectly) which generated significant issues that needed to be managed. In addition, there were several requests for an Inspection Panel investigation.

### GRM Structure

During implementation, the Bank team realized they needed a much more structured grievance mechanism to handle the questions and complaints coming in on the project. They put in place a multi-level structure that encouraged immediate resolution of issues on the ground but created access to more senior authorities to handle issues that could not be resolved on the ground.

The contractor and PIU focal points were encouraged to log all complaints on the spot and resolve immediately. Grievances that couldn't be immediately resolved on the ground by the contractor or PIU focal points moved to the local multi-stakeholder committee. Issues that could not be resolved at that level would move to a national multi-stakeholder committee.

#### Project Details:

\$2.125 billion IBRD Investment Loan to upgrade 1,062 km section of the old Silk Road trade route linking China to Russia and Western Europe. The total project cost is \$7.5 billion.

- Project Approval: April 2009
- TTL: Mr. Jacques Bure

#### GRM Rationale

The project triggers OP 4.12.

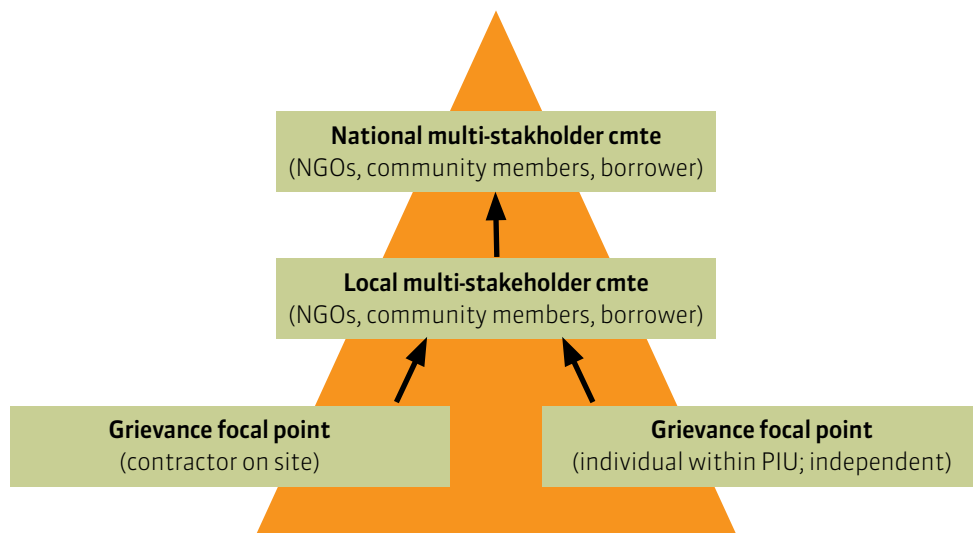
“You understand better because you have information coming from the field with the real concerns of the people.”

—Jacques Buré, TTL

## Implementation Issues

In practice the ad hoc local and national committees were never formed. Instead, beneficiaries went to their local authorities since that is what they were used to doing. Some cases were referred to the local Kazakh courts. Thus, a key implementation challenge was creating the conditions necessary for locals to use the Bank-designed grievance system, and to appropriately link this system to the traditional practice of resolving issues through local authorities. The numbers of

complaints received by the Bank-designed system (less than 200 total) indicates that this remains a challenge.



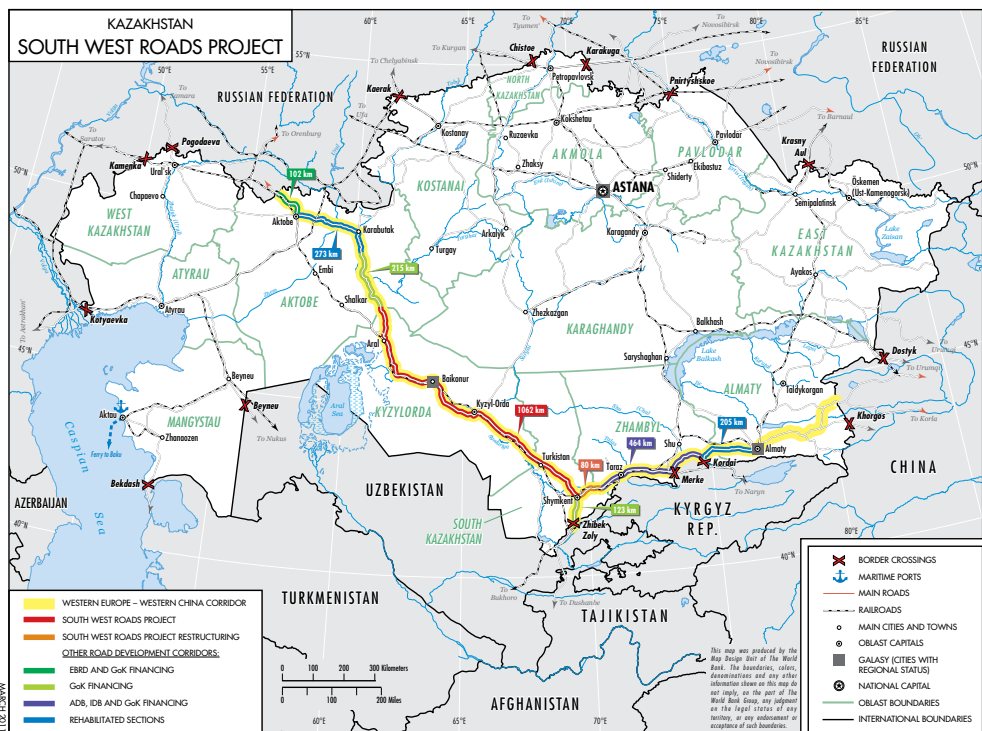
However, once complaints did start coming in, both the Bank team and the client acknowledged the value of the feedback. According to the TTL, even the client, who was initially skeptical, took the GRM seriously. While only a small portion of the total complaints were lodged with the Bank-designed GRM (< 200 total), the TTL said the system was very effective at picking up many of the indirect impacts of the road on both the local communities and the more than 35,000 people indirectly employed by the project. Employee issues that were raised and addressed via the GRM included low salaries and sexual harassment. In addition, there were compliance concerns that needed to be addressed at a higher level, related to improper land acquisition on behalf of the government.



## Lessons Learned

The project team has identified a number of opportunities for improved outcomes:

- Better up-front assessment of the potential social impacts and risks related to the workforce;
- Need to do a more structured assessment of capacity and credibility of existing GRM mechanisms in the Kazakh system;
- Train project staff in mediation and conflict-resolution skills prior to implementation to better manage discussions with both the Borrower and the impacted communities;
- Going forward, improve the link between the Bank-designed GRM and the traditional systems for resolving disputes. One basic step is to ensure all complaints lodged through local authorities are logged and tracked, and that data on resolutions is made public.







## Pakistan Flood Emergency Cash Transfer Project

### Overview

Over the course of July and August 2010, Pakistan experienced the worst floods in its history, affecting nearly 10 percent of its population across a vast geographical area. 60% of flood-affected households were without a main source of livelihood post-floods and 53% of households reported a 76–100% decline in household income.

Given the infancy of Pakistan’s pre-existing social safety nets, the government of Pakistan set up a rapid response cash transfer program focused on supporting flood-affected families—the Citizen’s Damage Compensation Program. Phase I of the CDCP provided immediate relief to 1.8 million families. The Flood Emergency Cash Transfer Project provided technical assistance and helped finance emergency cash grants for Phase II of the CDCP’s post-flood assistance.

Actions to address the shortfalls of Phase I were included in the MOU signed by the government of Pakistan and its development partners for the project: the World Bank, DFID, USAID and the Government of Italy. Among the improvements agreed upon were the strengthening of CDCP grievance redress mechanisms and the institution of a robust public information campaign.

### The GRM

Each of the program’s facilitation centers includes a grievance redress counter staffed by the National Database Registration Authority (NADRA). A public information campaign spread information about the grievance redress process through television, radio and print, as well as word-of-mouth communication facilitated by NGOs and community networks.

In addition to the centers, the grievance redress system is able to receive complaints through text messages and phone calls. Depending on the nature of the grievance, different stakeholders are responsible for providing solutions:

- **Grievances related to Computerized National Identity Cards:** National Database Registration Authority: NADRA handles the updating of CNICs to include changes

#### Project Details:

\$125 million IDA Emergency Recovery Credit to support Phase II of the Government of Pakistan’s flood recovery cash transfer program.

- Project Approval: March 2011
- TTL: Andrea Vermehren & Iftikhar Malik

#### GRM Rationale

Large-scale cash transfer project in an emergency situation.



**685** people help to administer the grievance redress mechanism across the various service providers (Pakistani government, World Bank, other donors).

**As of December 2012:**

- **49% of eligibility appeals and 85% of complaints have been resolved**
- **1.087 million** eligibility appeals have been logged
- **536,846** eligibility appeals have been resolved
- **139,841** of these resolved appeals were accepted for inclusion and issuance of cash transfer debit cards
- **5500** complaints (nonworking cards, requests for bribes, etc.) have been logged

in family status, address, family name, etc. Hotlines operate specifically for CNIC grievances.

- **Grievances related to eligibility/targeting:**

- Beneficiaries who believe they are incorrectly listed as ineligible first check with their local authority (village level).
- Appeals are run through basic filters in the national database (does the appellant live in a flood affected area? Have they already been included in the program?) and reviewed by a panel of local notables made up of respected, apolitical professionals who were not involved in the original survey.
- Eligibility status updates are then sent to the District Administration, which turns them over to the Provincial Disaster Management Authority.
- The Provincial Appeals Secretariat of the PDMA is the final decision-making authority. The PDMA informs NADRA whether an appeal is verified for inclusion or disapproved.
- NADRA enters the decisions into the case management system and formal lists for issuance of debit cards are released.

- **Grievances related to payments:** Partner commercial banks respond to grievances related to payments, such as lost or nonworking debit cards, forgotten PIN numbers, etc. Partner banks operate offices and dedicated hotlines to address these grievances.

- **Grievances related to maladministration or unanswered complaints:** Grievance related to inefficient service delivery, bribery or malpractice (termed ‘complaints’) are forwarded for resolution to the District Administration or NADRA depending upon the agency to which these complaints pertain (e.g there are complaints against NADRA or District Administration staff asking for bribes, etc.). If complainant remains dissatisfied with the resolution of complaints by the concerned agency, she can approach provincial or federal ombudsmen for redress.



## Lessons Learned

The project team has identified a number of points for improved outcomes:

- Communication strategy is key – public information campaign critical to participation.
- Developing standard practices – given the large and multi-nodal grievance redress structure, standard practices are essential for successfully administering the case load.
- Training for all parties to the GRM – links to standard practices. All nodes of the grievance redress process must have the same understanding of the process.
- Ownership of District Administration is essential for efficacious functioning of the committee of notables.





---

## Tamil Nadu Empowerment and Poverty Reduction Project (India)

### GRM Structure

The project does not have a formalized, uniform GRM. Village committees, self-help groups, and other participatory bodies involved in project priority setting provide open fora for addressing grievances without formalized grievance procedures. Village may innovate in grievance redress. For example, publicly posted “problem tree” information boards provide contact information for appropriate authorities, timelines for complaint handling, and to whom appeals may be directed (see accompanying blog post). District-level Public Grievance Committees may receive complaints and route to appropriate authorities. In addition, grievances may be filed at the project level, though the project website or contact person. The Project Director, plus nominated staff at state and district levels, may categorize grievances and establish enquiry committees to investigate and report back.

#### Project Details:

\$120 million (restructured with additional \$154 million) IDA credit to improve the livelihoods and quality of life of the rural poor in Tamil Nadu (particularly women and other disadvantaged groups) through social, economic and democratic empowerment. This is a CDD project with over 581,000 target households in 2500 villages.

- Project Approval: July 12, 2005 (Restructured Nov 18, 2010)
- TTL: Kevin Crockford

#### GRM Rationale

OP 4.10 triggered

### Implementation Issues

*Existing systems and structures:* Grievance redress relies principally on established local and state structures. Villages utilize local committees and decision-making structures. Existing administrative processes for grievance redress, including those instituted to ensure implementation of India’s Right to Information Act, provide more formalized approaches.

*Participation and accountability:* The participatory nature of the project provides multiple opportunities for identification and redress of emerging grievances within the community-driven structures of the project. Social accountability mechanisms and

## A “Problem Tree” Assures that Complaints are Quickly Addressed in Tamil Nadu

Submitted by Kalesh Kumar on Thu, 07/07/2011, 19:31



The multi-colored ‘problem tree’ on the branch of a Banyan tree in Elamangalam Village in the Kadaloor district of Tamil Nadu grabs your attention. You see it as soon as you enter the village and English letters ending in [@worldbank.org](mailto:@worldbank.org) immediately piqued our curiosity despite our lack of knowledge of the local language. This poster, placed around the Village Poverty Reduction Committee (VPRC) and established under the World Bank supported **Tamil Nadu Empowerment and Poverty Reduction Project (TNEPRP – “Vazhndu Kaatuvom”)**, in Elamangalam and other villages in Tamil Nadu gives the title, addresses and phone numbers of all the responsible project leaders from the government and the World

Bank to help solve any complaints.

This innovative **Complaint Redressal System** provides a timeframe within which a complaint is expected to get a response. If unsatisfactory, the plaintiff can appeal to a higher authority. Having clear time lines for escalation and resolution of problems is an essential cornerstone of good governance and social accountability in projects that are implemented at the grass root level. The last row of the poster has the name and email address of the project leader from World Bank and suggests 48 hrs as the time available for her to provide a response! The former project team leader confirmed to have received about 20 emails from across Tamil Nadu in her Washington office over two years reflecting the utilization of the system.

The beneficiaries in other villages also had stories to tell about the effectiveness of this sort of complaint redressal systems. In Keerapalayam Village, 14 hand pumps were distributed without any loss. Feedback prompted water pipelines to be more evenly distributed across the village. Taking the process to the next level, in some villages we visited like Pathur, the

external process monitoring (undertaken by competitively elected CSOs) strengthens downward accountability to project beneficiaries.

*Information tracking:* Grievances filed through the public district authorities as well as at the project level are recorded and tracked. At the village level, it is unclear the



Social Audit Committee had also set up a complaint and suggestions box in a central location.

**TNEPRP** is an empowerment and poverty alleviation project implemented by the Rural Development and Panchayat Raj Department of Government of Tamil Nadu with World Bank assistance. The project covers **2509 Villages** in 70 Blocks in 16 districts. The target population of this project are poor households, the most vulnerable including the physically challenged and the marginalized communities. The project follows the community driven development (CDD) approach where village communities identify their own needs, design and plan interventions and implement and monitor them.



An operation manual was developed by the community and project staff, listing the principles of the livelihood approach to poverty reduction and the institutions that should be established or strengthened. It includes guidelines on how procurement should happen, how finances should be managed and how social accountability should be handled. This involvement of the community in generating user friendly guidelines helps ensure that the community knows what third party oversight entails and a series of workshops ensured that the community was informed.

Communication materials targeted to rural households of illiterate and semi literate populace has been a hallmark of the project, pictorial posters (shown in pictures) are used to communicate community procurement procedures and processes. The project has thus far received much recognition for its pro poor approach and has set the stage for adaptation of its key principles in many grass root level initiatives of the state government.

How can this be useful for your community? Source: Ending Poverty in South Asia blog, World Bank, at <http://tinyurl.com/3esv37r>

degree to which grievances are registered. However, there is no centralized tracking of all grievances received under the entire project.

*Service standards:* While the lack of uniform GRM procedures at the start of the project provided flexibility to address grievances through a variety of community-driven

mechanisms/processes, the initial lack of standards (i.e., process guarantees regarding acknowledgements, response times, appeals procedures) at the village level could also have led to idiosyncratic approaches in addressing grievances. Subsequently, procedures regarding response times and appeals were incorporated.

### **Lessons Learned**

CDD projects present a challenge given the geographic dispersion of the projects and the number of unique sub-projects. In this instance, the client could improve greater consistency and credibility among sub-project GRMs by applying the GRM Evaluation tool produced by DRP (available at [furl “disputeresolution”](http://www.furl.org)). This is a short 2-page checklist of questions to ask of a GRM to assess it against some basic principles: legitimacy, accessibility, predictability, fairness, rights compatibility, transparency, and capability. It is not prescriptive but rather a tool that clients can use to strengthen existing structures and ensure they are credible and effective for the targeted users.



---

## Upper Cisokan Pumped Hydroelectrical Power Project (Indonesia)

### GRM Structure

A two-level Grievance Task Force (GTF, with grievance units in the project area and a grievance center in Bandung) includes NGO and academic community development experts charged with assisting complainants with filing grievances and navigating the redress process. While part of the project team, the GTF is to operate independently. Multiple uptake channels, including a hotline number and SMS, reach the GTF which then classifies grievances and routes them to appropriate actors. In addition, the GTF may assist complainants to access additional support services funded by the project, including a mediating committee and legal counseling

### Project Details:

\$640 million IBRD Specific Investment Loan for construction of a dam and 1040 MW power generation station, transmission lines and access roads; and design and feasibility studies for an 880 MW pumped storage power project.

- Project Approval: May 26, 2011
- TTL: Mr. Peter Johansen

### GRM Rationale

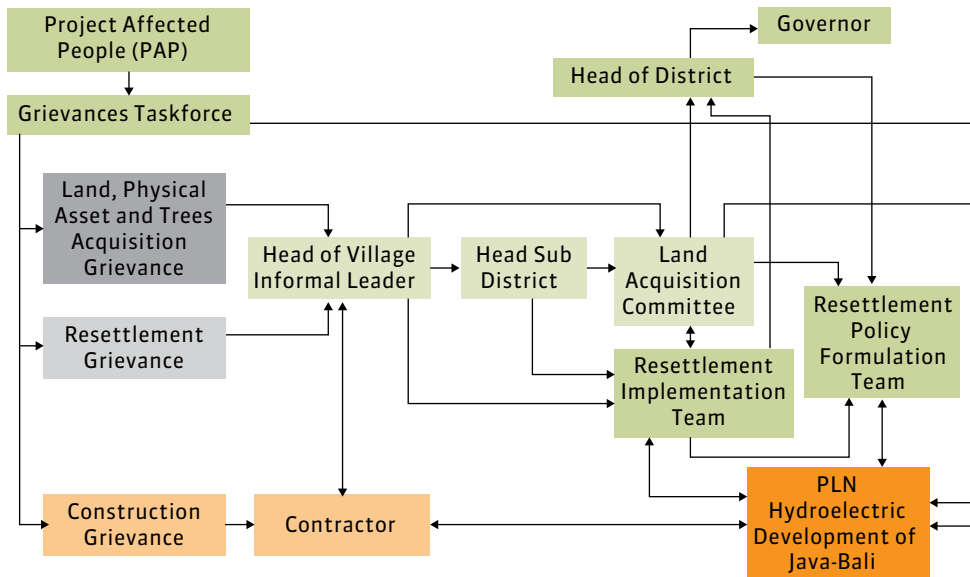
OP 4.12 is triggered, with both land acquisition and displacement of households expected. Pre-feasibility focus group discussions found that project affected peoples had insisted that a complaints handling mechanism be established.

### Implementation Issues

The GTF is consciously designed to be quasi-independent from the project team (its Terms of Reference were approved by the Bank team) and to serve as an advocate for project affected persons which may help drive complaints toward rapid resolution. Tight timetables for grievance processing (initial action/referral within 1 week, response of competent office/authority within 2 weeks, completed handling within 3 weeks) also support quick resolution. The project also supports additional services (such as legal counseling and a mediating committee) to help complainants obtain satisfactory redress.

The project engages an Independent Monitoring Agency to track implementation of project commitments. Grievance forms a central part of the monitoring process with grievance tracking forms and indicators for number of cases, meetings and field visits,

### Mechanism of Grievance Handling for the Upper Cisokan Pump Storage Project



and satisfactory disposition of cases. Independent verification of the GTF’s handling of grievances should strengthen accountability and delivery of results. Monitoring indicators include (i) cases of land acquisition referred to court, pending and settled; (ii) number of grievance meetings; (iii) number of village-level meetings; (iv) number of field visits by PLN/RIT/RPFT officers; (v) number of cases resolved to the satisfaction of PAPs.



---

## Hubei Yiba Highway Project (China)

### Overview

This road construction project required significant resettlement (around 10,000 people) and the road went through a national park with sensitive environmental features. The project documents lay out a good basic GRM structure that includes multiple access points, an appeals process, and a centralized complaints database.

### Implementation Issues

Once implementation was underway, it became clear that the system had some considerable drawbacks, namely that it was not being widely used and, when it was being used, not all grievances were being entered into the central database. Thus, the data that was received was less useful to the client (and the Bank team) since it wasn't giving the full picture.

The first indicator that something was not working right was the number of complaints received (fewer than 200) compared to the scale and scope of the project, which involved the resettlement of 10,000 people and went through a national park. Christopher Bennett, the TTL at the time, said "As a TTL, I should have been really happy with no complaints, but I just didn't believe it." The team was concerned that not all grievances were making it into the system. To assess whether this was happening, the TTL and Social Development Specialist surveyed impacted communities to verify their concerns, and their review confirmed that not all project-related grievances were making it into the formal records.

To address this issue, the Bank team hired a consultant to design an SMS system and web interface that would allow individuals the opportunity to directly input grievances and concerns. The design of the SMS system and accompanying web interface were

#### Project Details:

\$150 million IBRD Investment Loan for highway construction through an ecologically sensitive area (Three Gorges Geological Park). The total project cost is \$2.2 billion.

- Project Approval: March 2009
- TTL: Ms. Fei Deng (current)  
Christopher Bennett (former)

#### GRM Rationale

The project triggered both OP 4.10 and OP 4.12, and the client requested Bank assistance in managing the environmental impacts of the project.



L–R: World Bank TTL Fei Deng, resettled person, Mr. Tang, director of Hubei Yiba Highway Project Construction, in charge of resettlement

simple, practical, and easy-to-use, but it was not embraced by the Chinese locals, who preferred to direct their complaints to local village authorities. The Bank estimated that over 95% of grievances were ultimately channeled through traditional mechanisms versus the SMS system. The chiefs recorded these grievances in writing, but there was no direct link to the Bank’s SMS system (or vice versa) that allowed for a comprehensive view of the concerns of the local communities.

## Lessons Learned

The team identified the need to assess existing grievance systems and incorporate these systems into the Bank-designed structure, to ensure all grievances are logged, tracked and responded to. A shared database and Memorandum of Understanding with the local village authorities could be one option to ensure a clearer picture of local citizens’ concerns in real time. The database would include all grievances received by the chiefs as well as grievances channeled through the SMS and web. Training villagers to manage a centralized database and implementing regular performance reports on all grievances received could significantly improve the effectiveness and credibility of both systems.

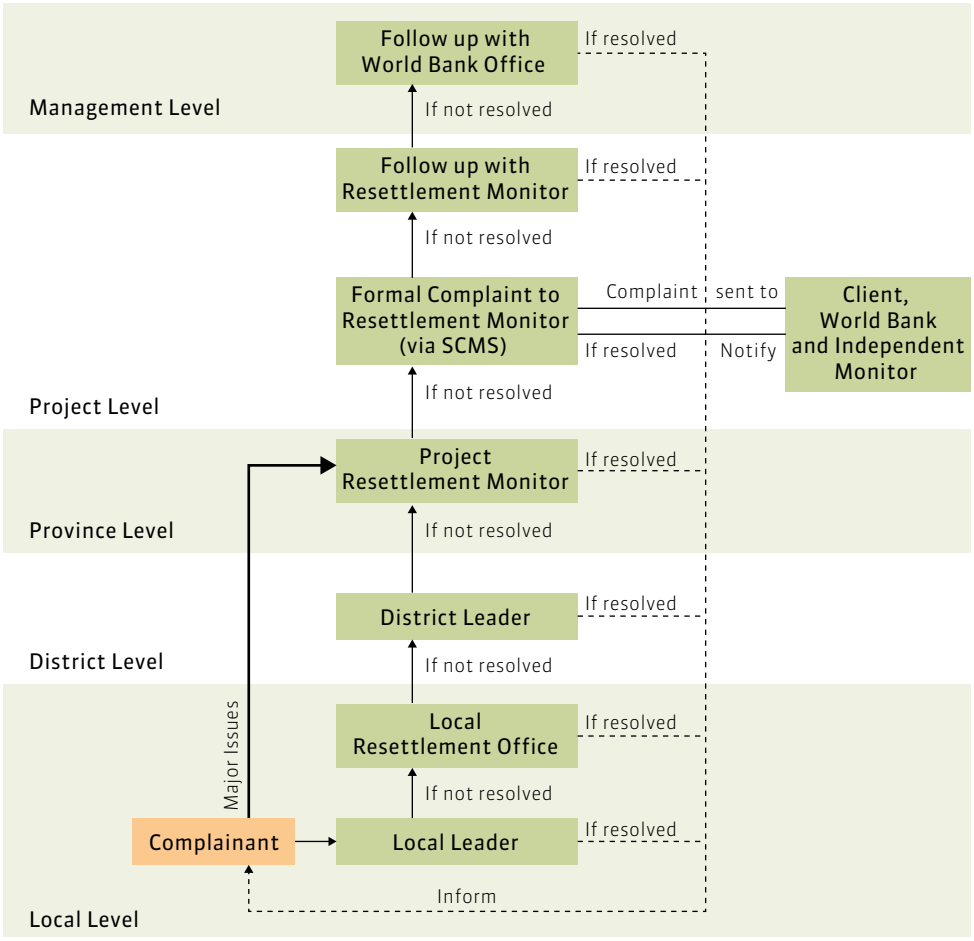
### EXCERPT FROM PAD

*“Complaints are dealt with in up to four stages:*

- *Stage 1: The DP’s may present their grievances either orally or in writing to the village committee or local resettlement office. If oral, a written record must be made and a clear response given within two weeks. If it is a serious matter, it must be reported to a higher level resettlement office and a reply received within two weeks.*
- *Stage 2: If the complainant is not satisfied with the outcome of Stage 1, they may appeal to the higher level resettlement office within one month after receiving the Stage 1 reply. The county or district level resettlement office must reply within three weeks to this appeal.*
- *Stage 3: If the complainant is not satisfied with the district or county resettlement office response they*
- *may appeal to the regional resettlement office within one month of receiving the Stage 2 response. The resettlement office shall respond within one month.*
- *Stage 4: If the matter is still not satisfactorily resolved the complainant may appeal to civil court within 15 days of receiving the response from the resettlement office.*

As mentioned above, the ‘Safeguards Compliance Monitoring System’ will be piloted as part of this project. It will allow for workers, residents and farmers to access project information as well as file grievances and concerns related to project actions, specifically issues related to resettlement, environment, or worker rights, using the text messaging feature on their cell phones, or through the internet—via e-mail or web-based form. Complaints can be filed anonymously or with contact information in order to receive a follow-up message. These complaints, which will be received by the Bank, the client, and an independent monitor, will be logged and addressed appropriately and in a timely manner.”

The chart below indicates the grievance process and includes both the local traditional systems (i.e. village leaders) as well as the Bank-designed SMS system that routs complaints directly to the resettlement monitor in the implementing agency:









---

## Chad Local Development Program Support Project 2

### Overview

The first phase of this CDD project focused on establishing a decentralized, community-based approach to local development, including ensuring support from stakeholders and government officials. Once that was achieved, the second phase of the project was developed, and it was agreed that it would focus on sub-projects in rural areas across the country. Chad is a fragile state with severe poverty, ethnic diversity, and a history of conflicts and elite capture/corruption.

### The GRM

Since individual projects were not defined at the time of project approval, a Resettlement Policy Framework (RPF) was developed to guide future projects. The GRM section in the PAD is fairly general, and states that grievance redress may be an informal consensus process, a formal process, or a court case. The PAD does not include guidance on what a GRM should look like in the event site-specific RAPs are required. The Bank team, however, has flushed out a general approach to developing project-specific GRMs.

Projects will rely on existing traditional structures in the villages to handle grievances. The villages form committees (procurement committee, management committee) to oversee their respective sub-project. These committees are the first point of uptake. If they cannot resolve issues, grievances are escalated to the village chiefs. Although not described in the project documents, there is a grievance redress hierarchy: local committees, chiefs/elders, regional project implementation team, and a central team in the government ministry. There are no standard procedures, monitoring or tracking but the Bank team has emphasized quick redress at the local level to avoid conflict

### Project Details:

Second phase of community-based development program to improve access to infrastructure and basic social services. Bank committed \$25 million of \$77.25 million countrywide project. Local communities submit plans for micro-projects (i.e., schools, health clinics) that are managed and monitored by local committees. Some micro infrastructure projects may impact land holdings or assets, triggering OP 4.12 and the GRM requirement.

- Approval: March 18, 2011
- TTL: Soulemame Fofana
- Categorization: B

### GRM Rationale

Triggers OP 4.12.

escalation. The Bank team has also encouraged greater use of local citizens versus government employees to manage grievances in order to reduce corruption. There is an outreach campaign, open meetings, public announcements, and public contracts to educate citizens of the process and reduce conflicts. As of early 2013, implementation was just getting underway and Bank staff was not aware of any complaints. No data was available to check this view.

### **Lessons Learned**

The project is still in its early stages, so lessons are preliminary. This project rightly identifies the need to work with existing local systems for grievance redress, given the operating environment in Chad. The emphasis on on-the-ground resolution and simple systems is appropriate. Building a complicated GRM system in this instance would likely not be used, given that the projects will impact rural citizens who likely have limited/no electricity and may be illiterate. Working directly with the local committees is likely the best option for strengthening capacity to manage issues. This could include walking through the GRM Evaluation tool, which is a short checklist of questions to get clients thinking about ways to strengthen their existing systems. Similarly, putting in place timelines for responses and a basic monitoring and evaluation system (run by the villages) could improve outcomes for users in a “light-touch” manner.



---

## Uganda Electricity Sector Development Project

### Overview

The right of way and substation construction requires land acquisition, affecting 13,596 persons. 1,152 persons will be resettled. As of early 2013, the project was still in the bidding process, and no land acquisition or construction had begun. Thus, the GRM was not up and running but is fairly well-defined in the project documents.

### The GRM

The proposed GRM uses existing systems and structures and has three levels of redress. The Village Grievance Committees (with representatives of project-affected communities) are the first point of contact and seek to resolve complaints using customary rules. Where the village committee cannot resolve the complaint, complaints are referred to the District Land Tribunal. Where the Land Tribunals cannot solve the dispute, the aggrieved party is free to evoke their constitutional right to file a case with the court system. The courts take a long time to process cases so it is expected that most issues will get resolved at lower levels. A project-level Resettlement Unit, reporting to the implementing agency (Uganda Electricity Transmission Company, or UETCL), coordinates RAP implementation, including complaints processing, convening Village Grievance Committees, and resolving complaints that the Village Committee is unable to. Some service standards are specified. UETCL has experience with complex projects and grievances (Bujugali dam) and will hire a consultant to help manage the GRM.

The RAP identifies that the second level of the proposed GRM structure is weak, since there is a lack of capacity in the Land Tribunals, and complainants must finance their own travel, meals, and allowance for tribunal members. The Bank team is emphasizing

#### Project Details:

\$120 million IDA credit (total project cost \$153.2 million) to improve reliability and access to electricity in southwestern Uganda through construction of a 137km transmission line and related substations.

- Approval: June 30, 2011
- TTL: Somin Mukherji
- Categorization: A

#### GRM Rationale

Project triggers OP 4.12.

the Village Grievance Committees to resolve issues, with Resettlement Unit tasked with addressing unresolved complaints. The Finance Ministry, not the implementing agency, will do monthly reporting and external monitoring, and these reports will be shared with the World Bank in their entirety.

### **Lessons Learned**

This project emphasizes on-the-ground resolution of issues, includes at least one level of escalation, and includes processes to ensure complaint-handling is predictable and transparent. Furthermore, it appears that complaints will be tracked in a central database that is monitored by an independent entity—a key component that often is missing. Importantly, the Bank will receive the monthly monitoring reports which will allow for faster support to the client and early responses to developing risks. Suggested areas for improvement could include (i) ensuring anonymous complaints can be filed; and (ii) having the client evaluate the effectiveness of the Village Grievance Committees to identify potential weaknesses. Finally, given a project of this size, grievance procedures should be written down in a manual and shared publicly with local communities.



---

## Zanzibar Urban Services Project (Tanzania)

### Overview

As of early 2013, civil works had not yet commenced and key GRM elements (i.e., database, focal points, Resettlement Coordination Unit) had not yet been put in place.

### GRM Structure

Project-affected persons (PAPs) are notified about the grievance mechanism and their legal rights to file complaints with the courts (i.e., handed a letter of notification that is verbally explained to those who cannot read by a trusted intermediary). PAPs may file complaints with either local community leaders (e.g., Shehas) or with the community liaison and grievance redress officer appointed by the project's Resettlement Coordination Unit (RCU). The liaison and grievance officer is responsible for receiving, recording, and processing of complaints. Local leaders who receive complaints must channel them to the officer within three days. PAPs may file grievances with community leaders at anytime. In addition, twice a month the officer informs the PAPs in a timely manner of the time and location he will be stationed (on site), and where the PAPs can lodge their grievances.

If the dispute cannot be resolved within fourteen (14) days, it will be referred to the Regional Manager of the project resettlement coordination unit (RCU) where amicable resolution will be sought between the RCU and the PAP within another established period of twenty-one (21) days. However, if the dispute is not resolved, the aggrieved party is free to take the matter to a Primary Court of Law as their final resort. Compensation will be paid upon resolution of the grievance or dispute. The

### Project Details:

\$38 million IDA credit to improve access to urban services in Zanzibar and conserve physical cultural heritage by provision of storm water drainage, sanitation services; and construction of a sea wall and promenade. Although no physical resettlement is anticipated, the project involves some land acquisition and temporary dislocation during construction.

- Approval: February 24, 2011
- TTL: Andre Bald
- Categorization: A

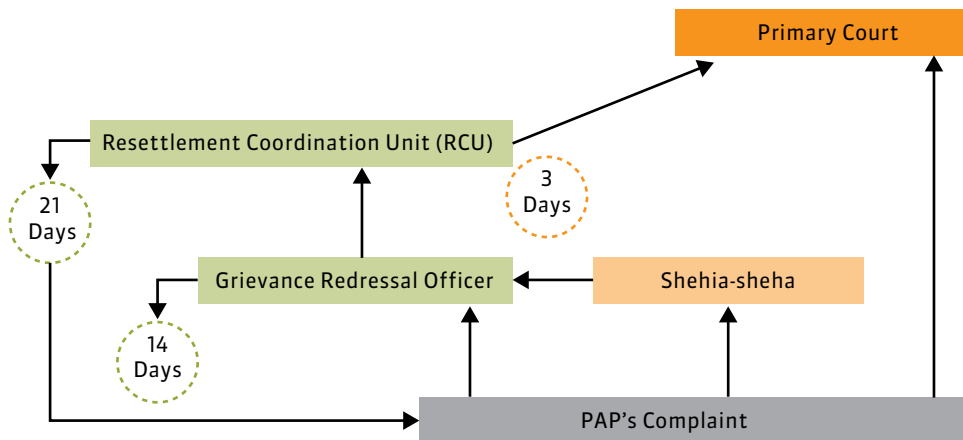
### GRM Rationale

Triggers OP 4.12.

grievance team must keep a database of all grievance claims as well as the period it took to resolve the disputes which will be kept on record by the RCU.

### Lessons Learned

While there is no implementation experience as of early 2013, this appears to be a well-designed, fairly “light-touch” grievance redress mechanism, consistent with the scale and scope of the project. It relies on local existing structures and keeps redress close to the PAPs, which is good practice. Timelines and processes are well-defined, along with appropriate escalation for more serious grievances. The design anticipates a centralized database of all grievances and requires monitoring. Some details remain unclear: whether anonymous grievances can be filed, whether all grievances are acknowledged in writing, the composition of the Resettlement Coordinating Unit, and how triage/prioritization of grievances occurs.



## NamTheun 2 Hydroelectric Project (Lao PDR)

### GRM Structure

A three-step grievance process was developed for the project. Complainants first raised complaints to Village Grievance Committees (VGC) which sought resolution through dialogue and discussion. If the issue could not be resolved at the VGC, complainants could raise their grievance with District Grievance Committees (DGC) which were comprised of the public District Justice Department, supplemented by representatives of village and women organizations. DGCs were required to respond to complaints within 15 days. If complainants were not satisfied with outcomes of the DGC, they could

#### Project Details

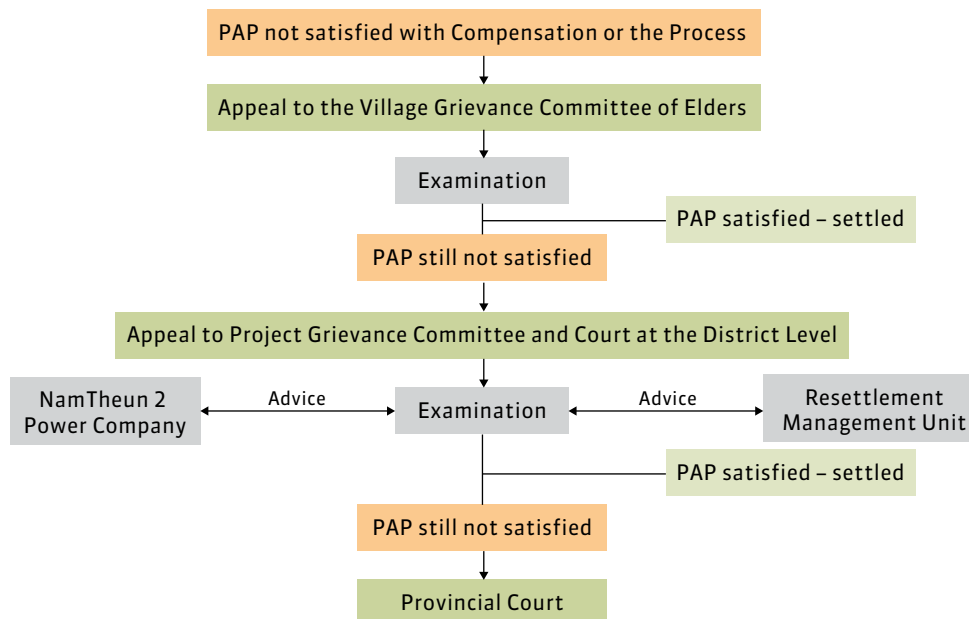
\$20 million IDA grant to support construction of 1,070 MW hydropower facility, management of environmental and social impacts, and monitoring and evaluation arrangements

- Project Approval: March 31, 2005 (closed)
- TTL: Ingo Wiederhofer

#### GRM Rationale

The project required resettlement of approximately 6,300 people in 15 villages, triggering OP 4.12.

### Steps in the Grievance Process Regarding Issues of Compensation and Resettlement



appeal to the Provincial Court as a last resort. The project engaged a local NGO to act as an adviser and counsel to affected persons to navigate the grievance process. In addition to internal monitoring, an Independent Monitoring Agency was tasked with reviewing and reporting on grievance cases and their resolution.

### **Implementation Issues**

Reliance on local grievance systems: The project relies largely on the local governmental dispute resolution processes, augmented with village and women organization representatives and supported by the project sponsor. The final report of the International Advisory Group (IAG, reporting to the World Bank President) found that the local institutions handled the complaints well if occasionally slowly. The IAG questioned whether reliance on local grievance structures would have worked as well if the government had been the direct project sponsor), an issue that may require attention with the handover of the Downstream Program (which has given rise to numerous complaints) from the Nam Theun Power Company to the Provincial Government.







**THE WORLD BANK**

1818 H Street, NW  
Washington, DC 20433