

5.6.4 World Bank Grievance Redress Service

Below procedures describe the procedures for complaints, grievances, objections to be addressed to the World Bank's Grievance Redress Service (GRS). Project staff and involved contractors and consultants have to be made aware of these processes and conditions. Project staff will have to actively inform all stakeholders about the World Bank's Grievance Redress Service (GRS) in a way that rights and responsibilities are clearly understood.

Purpose and Background

The World Bank's Grievance Redress Service (GRS) provides an easy way for project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. The GRS will ensure that grievances (complaints) are directed promptly to relevant Bank Task Teams and/or Managers for review and action, as appropriate. The goal is to enhance the Bank's responsiveness and accountability.

Project-level grievance redress mechanisms (GRMs) where they exist remain the primary tool to raise and address project-related grievances in Bank-supported operations. What the GRS does is to allow the Bank to address issues that cannot be resolved at the project level, without undermining existing GRMs.

Thus, grievances that are brought directly to the project team or to the country office should be addressed at the project level, unless the complainants specifically refer to the GRS in their complaint, or Task Team or Management considers that referring the case to the GRS adds value. Complaints that are being addressed at the project-level can always be referred to the GRS at a later stage, especially if successful resolution (perceived or actual) was not possible (escalation).

What the GRS Does

The GRS facilitates corporate review and resolution of grievances by screening and registering complaints and referring them to the responsible Task Teams/Managers. The GRS undertakes the following functions within a defined time frame:

- Receives complaints from stakeholders
- Evaluates and determines their eligibility and category
- Refers complaints to appropriate Task Teams/Managers
- Follows up with Task Teams to ensure complaints are resolved
- Refers project-affected people to the Borrower or other parties where appropriate.

What the GRS Does Not Do

The GRS does not offer independent mediation or conflict resolution services.

Using the GRS does not affect or limit the ability of project-affected people to access the Bank's Inspection Panel, or other recourse avenues in any way.

Who May Submit a Complaint?

A complaint may be submitted by one or more individuals, or their representatives, who believe they are adversely affected directly by an active (i.e., not closed) Bank-supported operation (IBRD/IDA).¹

Procurement related complaints pertaining to Bank-financed operations could be also submitted by bidders or potential bidders (companies or individuals) to the Bank through the GRS. These complaints, however, will be

¹ This includes loans, grants, trust funds, TA, and carbon operations.

processed in line with BP 11.00 and not following the GRS procedures set out below.

How to Submit a Complaint

A complaint can be submitted in several ways.

- Via email: send an email to grievances@worldbank.org.
- Via fax: +1-202-614-7313
- Via mail:

The World Bank ***Grievance Redress Service***
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA

- Via Country Office, Public Information Center:

A flyer with an attached complaint form will be available.

Language of Complaints

Complaints may be submitted in the country's official language. All of the GRS correspondence with the complainant will be in English and where appropriate the language of the complaint. In the event of any discrepancy between the two versions, the English version will prevail.

Processing of complaints not submitted in English will require additional response time due to the need for translation.

Required Information

Substance of Complaint. The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported operation. This should be supported by available documentation and correspondence where possible and appropriate. The complainant may also indicate the desired outcome of the complaint, i.e., how it may be resolved. All pertinent documentation should be provided with the complaint, or upon the GRS's request through further correspondence. Annex 6 provides a suggested format for a submission.

Identity. The complaint must identify the individual(s) submitting the complaint, and whether it is a project-affected individual and/or community or representative. A complainant may ask that the identity of some or all of the individuals be kept confidential. The request for confidentiality, and the reasons for the request, must be submitted with the complaint.

Representatives. Complainants may use a representative (e.g. in cases where confidentiality of the individual or community is deemed necessary), in which cases, name and contact details of the representative need to be included in the complaint.

If the complainants use an authorized representative to assist them in filing the complaint, the authorized representative must sign the complaint and provide written proof (such as signed letter by the complainant) of the authorized representative's authority to represent and act on behalf of the complainant in relation to the complaint. The GRS will communicate directly with the authorized representative as necessary and appropriate, and will keep the authorized representative and complainant informed about the status of the complaint.

Regardless of who submits the complaint, a complaint without contact details of the complainant will not be

accepted. Contact details are vital in ensuring complaints are swiftly and effectively addressed.

Scope and Eligibility of Complaints

Complaints are considered *eligible* if they meet the following criteria:

- The complaint relates to a World Bank-supported project (IBRD or IDA) for which appraisal has begun already and that has not yet closed;
- The complaint is filed by project-affected individuals and/or communities, or their representative, who believe that they are or may be adversely affected by the project.

The following issues are *excluded*:

- Complaints pertaining to IFC or MIGA projects (these will be referred to CAO),
- Issues pertaining to fraud and/or corruption (these will be referred to INT),
- Issues related to employment with the World Bank.

Anonymous complaints cannot be accepted by the GRS, as noted above. However, if an anonymous complaint contains specific information about project related issues, it will be forwarded to the Task Team for their information and action where appropriate.

Complaints that are obviously frivolous or absurd will also not be accepted.

Complaints that have either already been rejected as ineligible, or have been successfully resolved through the GRS, will not be reconsidered unless additional information presented would justify doing so.

If a complaint pertains to a project with an existing project level GRM (see para 2), the GRS will make the complainant aware of this and encourage its use, with the option for the complainant to return to the GRS if resolution is not achieved. If the complainant declines to use the project level GRM, the GRS will inquire about the reasons for doing so, and start processing the complaint under the GRS.

Complaints Handling Procedure

Incoming complaints will be received and logged by the GRS. A category (I, II or III) will be assigned depending on the nature and gravity of the matter; this will determine the corporate level concerned with the case (see table below). The complaint will then be forwarded to the responsible Task Team/Manager for review, response and, where appropriate, redress action. The GRS will then be updated continuously on the status of the complaint and the action (if any) through the central complaint repository that Task Teams will have access to. Where warranted, Task Teams can request support from corporate units or GPs. If issues have a particular legal concern, they will be forwarded to LEG as well.

Registration of Complaint

After receipt of a complaint, the GRS immediately *logs* the complaint and a notification of receipt will be sent to the complainant

Within 10 business days: The GRS *reviews and evaluates* the complaint, determines the eligibility and type of complaint according to the categories in the table below, registers it and forwards it to the appropriate Task Team/Managers, which is noted in the online system. GRS will notify the complainant of the eligibility determination of the complaint.

- If the complaint is *eligible*, the complainant will be notified that the Task Team has been assigned the

- case with a case number and the expected time frame in which s/he will be contacted.
- If the complaint is *unclear*, the complainant will be requested to submit additional information or provide clarifications in order to allow a decision on registration.
 - If the complainant is *not eligible*, the complainant will be notified of this decision and referred to relevant institutions where appropriate and the case will be closed.

Table 1: Complaint Categories and clearances

| Complaint Category | Incoming complaint sent to TTL and copied to: | Complaint is handled by: | Follow-up on resolution efforts are done by: | Proposal to resolve concern is cleared by: |
|--|--|---------------------------------|---|---|
| Type I (e.g., information request) | Practice Manager, CMU | TTL | Practice Manager | Practice Manager, CMU, ECRGP |
| Type II (e.g., minor and medium impacts) | Practice Manager, CMU | TTL | Practice Manager | Practice manager, CMU, ECRGP |
| Type III (e.g., serious issues of corporate relevance, harm, complex policy issues, etc.) | Practice Manager, Senior Director, Country Director | TTL | Director Strategy and Operations (GP) | Senior Director, Country Director, OPCS, LEGEN, ECRGP |

CMU = Country Management Unit; GP ECR = External and Corporate Relations; OPCS = Operations Policy and Country Services; LEGEN = Environmental and International Law.

Review of issues raised and Formulation of Proposal

- (1) Within 30 business days after registration the Task Team will respond to the complainant.
 - (a) For Type I complaints (information requests) the Task Team will provide the requested information in line with the Bank’s AI policy.
 - (b) For Type II and III complaints the Task Team will propose to the complainant how the issue raised in the complaint will be addressed, including a proposed time frame. The proposed time frame for Type II should not exceed 60 days and for Type III 180 days. If Task Team needs more time it will justify the additional time required.
 - (c) If the review by the task team reveals that the issues of concern raised in the complaint are not related to the Bank-supported project or any aspects thereof it will advise the complainant accordingly and refer the complainant to relevant government authorities to which the complaint should be addressed.
- (2) The specific proposal to address the issue or the recommendation to refer it to the borrower will be cleared by the managers shown in table x. The same applies to notifications that the concern is not related to the Bank project and hence the Bank has no means to address it. If the complainant accepts a specific proposal to resolve the concerns, the Task Team implements according to proposed process and proposed timeframe. The Complainant may provide input on all or parts of the initial proposal.
- (3) If the complainant rejects the proposal and/or the issue cannot be resolved through this process, the complainant will be informed by the GRS that the complaint is closed without resolution. The complainant will be referred to other options for remedy if appropriate such as responsible country authorities, relevant local/national grievance redress mechanisms or the World Bank Inspection Panel, if the complaint relates to noncompliance and harm.
- (4) Acceptance of the proposal should be reached within 30 business days after the initial proposal has been presented to the complainant. For extraneous circumstances, request for extension can be submitted if both parties agree for an additional 30 days business at a time.

Implementation of Proposal

Once the proposal is accepted, the Task Team implements the proposal. The Task Teams will update the status and progress of the implementation of the proposal in the GRS log and will keep the complainant informed of such progress until resolution of complaint. The Task Team may request support and advice through the GRS at any point. Such support and advice can be provided by OPCS, LEGEN or relevant GPs, CCSAs or the Region where required and as appropriate.

Role of the GRS

The GRS will maintain close contact with the Task Team/Managers handling the complaint and help to ensure timely response within the allotted time frame.

The GRS will maintain the central complaints database (log) to monitor and track grievance redress progress and ensure that process status is updated in the online system.

The GRS will provide guidance and support to Task Teams if necessary and requested.

The GRS will produce annual reporting and analysis of cases submitted to the GRS, and be responsible for external communications.

Information Dissemination

The GRS will be advertised through Project Appraisal Documents (PADs), Safeguard Documents and the Bank's external and internal websites. The principles and operating procedures of the GRS will be available in all official languages of the Bank, both on the Bank's website and as a hard copy.

For stakeholders who have no access to the internet, an information leaflet with complaint form will be available through Country Offices.

A dedicated GRS page on the Bank's website will allow complainants to submit their complaints as well as check their status. The website will also host materials relevant and helpful to the complainant.

The GRS' intranet website will provide materials and guidance for task teams.

Publication and Reporting

All complaints logged will be shown on the external GRS Internet site with number and country only for purposes of transparency, but without providing the specific details on the case or the complainants.

Access to information concerning any document related to the complaint is subject to the provisions of the Access to Information Policy of the World Bank.

The GRS will collect lessons learned throughout the process. At the end of every fiscal year, the GRS will make note of these lessons, what worked and what did not, in order to continuously improve the system. The first review will occur after 6 months of operation, and thereafter on an annual basis.

Freedom from Retaliation

Bank policies provide for the participation of project-affected people in project preparation and implementation. In furtherance of these policies the Bank also provides access to the GRS, which is the World Bank's corporate grievance redress mechanism. Complainants who use the GRS must not be subject to any form of retaliation, abuse or any kind of discrimination based on the fact that they exercised their right to complain to the GRS.

GRS Review Process Chart

