

Helpdesk Research Report

Grievance Redress Mechanisms in Bangladesh

Brigitte Rohwerder with Sumedh Rao

23.01.2015

Question

Identify literature on Grievance Redress Mechanisms (GRMs) used in Bangladesh. Where possible identify the models used, their approaches, the organisations involved and also their respective effectiveness.

Contents

1. Overview
2. Grievance Redress Mechanisms in Bangladesh
3. Evaluations of Grievance Redress Mechanisms in Bangladesh
4. General lessons on Grievance Redress Mechanisms
5. Further references

1. Overview

The rapid literature review identifies literature on types of grievance redress mechanisms (GRM) in Bangladesh. They range from examples from different social protection programmes to urban planning projects and the various line ministries of the Government of Bangladesh. A lot of literature describes *proposed* GRMs rather than ones that are currently in use. There were very few evaluations of grievance redress mechanisms, internal or external.

Many grievance redress mechanisms in Bangladesh have a number of similar features including:

- An assigned focal point or grievance redress officer who manage the grievance redress mechanism. There are different focal points for different levels to which people can appeal if they are unhappy with the decision made at their level.
- The provision and process of the grievance redress mechanism is well publicised.
- A complaints form for which a receipt is given.
- Information about the complaint and its resolution is documented, often in a management information system (MIS). This information is generally supposed to be available to all.

- A committee based hearing process, which is often open. A resolution is generally sought using the applicable guidelines.
- If the aggrieved person is female, they will be assisted in hearings by a female Union Parishad member, and if from a tribal community, by a tribal representative.
- Complaints should be dealt with within a specific timeframe, generally around two weeks.
- The grievance redress mechanism does not pre-empt a person's right to seek redress in the courts of law.

Generally, complaints are to be written complaints but some mechanisms are expanding to include verbal complaints to call centres, SMS, and email.

BRAC's grievance redress mechanism takes into account that many people have limited literacy and provides customer service assistants in many of its centres to help people fill in the formal complaints forms (BRAC, 2015).

An innovative grievance redress approach comes from the Union Information & Service Centres (UISC) blog, which connects government officials with the public (Access to Information (a2i) Programme).

Christian Aid's grievance redress mechanism distinguishes between non-sensitive and sensitive complaints, indicating that sometimes sensitive complaints concerning abuse will need to be dealt with by local laws (Christian Aid Bangladesh).

This helpdesk report also identifies a number of factors which the literature suggests have been important in effective GRMs¹:

- **Communication campaigns:** These campaigns use different forms of media, such as television, radio and print, to raise awareness about grievance mechanisms. NGOs and community networks have helped further publicise information by word-of-mouth.
- **Management information systems:** These, mainly computer-based, systems often have a primary role in dealing with standard work caseload (e.g. in registering cash transfer beneficiary details) but can be used to handle and monitor grievances. Their benefit is in bringing together relevant information in one place for officials to respond to grievances.
- **Standard operating procedures or manuals:** Certain practices are established, reviewed and disseminated, often through operating manuals. These can provide a clear overview to staff of programme cycles so as to identify points in which grievances can be addressed, as well as how to address them.
- **Normalisation and incentivisation of grievance redressal:** Treating grievances as a normal and valuable part of the workload, for example through performance benchmarks or training, can improve staff performance in redressing grievances.
- **Mobile telephones:** The use of mobile phones, and in particular SMS texts, seem to be a particularly valuable medium for dealing with grievances. Phone-based mechanisms can involve call centres or automated voice systems.
- **Building on existing mechanisms:** There can already be established formal systems (e.g. within ministries or departments, information centres, or judicial systems) and informal systems (e.g.

¹ Taken from: Rao, S. (2014). Grievance Redress Mechanisms in Pakistan. GSDRC Helpdesk Research Report 1117. Birmingham, UK: GSDRC, University of Birmingham. <http://www.gsdrc.org/go/display&type=Helpdesk&id=1117>

councils of village elders, or chiefs), on which to build grievance redressal systems. These systems can be especially useful in dealing with ethnic and linguistic diversity, or hard to reach groups.

2. Grievance Redress Mechanisms in Bangladesh

Most descriptions of grievance redress mechanisms in Bangladesh can be found in project proposals rather than in programme evaluations.

Government of Bangladesh - 'Income support program for the poorest project': proposed Grievance Redress Mechanism

Programme description: The objective of the proposed Income Support Program for the Poorest (ISPP) is to provide income support to the poorest mothers in selected Upazilas², while (i) increasing the mothers' use of child nutrition and cognitive development services, and (ii) enhancing local level government capacity to deliver safety nets. The programme is being implemented by the Government of Bangladesh with financial support from the World Bank. The project beneficiaries would include pregnant women and mothers with young children below the age of five years from the poorest households. Beneficiary mothers will receive cash benefits if they use growth monitoring and promotion services, and attend child nutrition and cognitive development (CNCD) awareness sessions.

Grievance Redress Mechanism: The proposed³ ISPP Management Information System (MIS) will include a grievance redress mechanism which will address beneficiary complaints concerning targeting, payments, information updates, and complaints on quality of service. The GRM will be managed by Grievance Redress Officers (GROs). They are appointed at various levels to address grievances according to the Operations Manual; and keep a record of the details of cases lodged, cases RESOLVED, pending cases and actions taken. Tracking grievances will provide additional insight on the challenges of implementation. There will be a feedback loop which includes informing the complainant about the action taken, and feeding this information into the implementation of the programme. The Upazila Nirbahi Officer (UNO)⁴ and the Deputy Commissioner (DC) will be the GRO at the Upazila and District levels respectively. The Project Director (PD) will act as the GRO at the central level.

Complaint forms⁵ will be made available at the Safety Net Beneficiary Cells (SNCs). Completed forms must be submitted to the Safety Net Program Assistant (SPA), who will issue applicants with a stamped receipt confirming that the form has been received. SNC staff will make a fortnightly inventory of the complaints received, and enter the information into the MIS. In the case of valid complaints about payments, the office of the UNO will make the correction and inform the banks to release the corrected amount with the next payment.

² Upazilas are rural administrative units within a District, while Unions are sub-Upazila level administrative areas.

³ Information on the grievance redress mechanism came from a proposal document rather than any current project evaluations. This is the case for a number of other grievance redress mechanisms described below.

⁴ Chief executive of an upazila.

⁵ A sample complaint form from another programme can be found on p.28 of: Dhaka Water Supply and Sewerage Authority. (2013). *BAN: Dhaka Environmentally Sustainable Water Supply Project - Distribution Network Improvement* (Package No. ICB 2.7). Government of Bangladesh. Retrieved from: <http://www.adb.org/sites/default/files/linked-documents/42173-013-ban-rpab-02.pdf>

If beneficiaries fail to receive a solution they can appeal. Appeals for Upazila level complaints will be decided by the DC of respective district, while District level complaints will be decided by the PD of the programme.

Source: World Bank. (2014). *International Development Association project appraisal document on a proposed credit in the amount of SDR 202.4 million (US\$300 million equivalent) to the People's Republic of Bangladesh for an Income Support Program for the Poorest Project*. World Bank. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/11/25/000470435_20141125101408/Rendered/PDF/PAD9570PAD0P14010Box385378B00OU090.pdf

Government of Bangladesh and NGOs - 'Reaching out of school children project II': proposed Grievance Redress Mechanism

Programme description: The second Reaching out of school children project (ROSC II Project) expanded the original ROSC Project to an additional 100 upazilas. The project supported access to learning opportunities for out-of-school children by providing a stipend to students and grants to learning centres. It is managed at the community level through a partnership between the government and NGOs, and supported by the World Bank.

Grievance Redress Mechanism: The proposed grievance redress mechanism will be set up at the central ROSC unit in the Directorate of Primary Education (DPE) and at the local level to deal with complaints about environmental and social issues. The grievance redress focal point at the local level will be the Center Management Committee (CMC). The focal point at the Upazila level will be the Upazila Education Committee (UEC). Students, parents, or community members can submit their grievance to the chairman of the CMC, who will register the grievance and issue a receipt. There will be open meetings to discuss complaints, scheduled by the chairman in consultation with other members. Attempts to resolve them will be made using the applicable guidelines. If the aggrieved person is female, they will be assisted by a female Union Parishad member⁶, and if from a tribal⁷ community, by a tribal representative. Complaints should be dealt with in 15 days. If not, resolution can be sought from the focal person at the UEC at the Upazila Headquarters.

At any time, people can also direct their complaints directly to Project Director of the ROSC unit, who will try to resolve the complaint. People also have the option of logging their complaints directly with the Secretary of the Directorate of Primary Education if they are not satisfied with the resolutions proposed by the Project Director. A decision agreed by the complainants at any level of hearing will be binding on the concerned CMCs and DPE. However, the grievance redress mechanism does not pre-empt a person's right to seek redress in the courts of law.

The provision and process of the grievance redress mechanism will be well publicised to the community, local NGOs, Union Parishads and the beneficiaries of the programme. Upazila level Training Coordinators will inform all the relevant parties of the grievance redress mechanism, and keep the records of all resolved and unresolved complaints and grievances and make them available for review. The case records will also be posted in the Directorate of Primary Education website.

⁶ Union Parishads are the smallest rural administrative and local government units in Bangladesh.

⁷ Programmes involving indigenous peoples also suggest including members of traditional conflict resolution bodies in the grievance redress committees (Government of Bangladesh, 2010).

Source: Government of Bangladesh. (no date). *Reaching out-of-school children project II: Social Inclusion and Safeguard Framework (SISF) Draft 0*. Government of Bangladesh. Retrieved from: http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CCEQFjAA&url=http%3A%2F%2Fold.mopme.gov.bd%2Findex.php%3Foption%3Dcom_docman%26task%3Ddoc_download%26gid%3D537%26Itemid%3D99999999&ei=Yfy_VP-8AtDY7AbRi4GIBQ&usg=AFQjCNF_-7naqKrjJrk21tWlBwjqYaRkng&sig2=luj5D3CUQjw38fJp1xxqA&bvm=bv.83829542,d.ZGU

World Bank. (2014). *Implementation Status & Results – Bangladesh - BD: Reaching Out of School Children II (P131394)*. World Bank. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/SAR/2014/06/03/090224b0824c0dbb/1_0/Rendered/PDF/Bangladesh000B0Report000Sequence003.pdf

Government of Bangladesh - ‘Safety Net Systems for the Poorest Project’: proposed Grievance Redress Mechanism

Programme description: There are major challenges with regards to coverage, targeting, leakage and administration of Bangladesh’s five major safety net programmes, and the Ministry of Disaster Management and Relief (MoDMR) has requested support to improve its performance. The Bangladesh Safety Net Systems for the Poorest Project is designed to improve the equity, efficiency and transparency of major social safety net programs to benefit the poorest households. The implementing agencies are the MoDMR and the Statistics and Informatics Division, with support from the World Bank. The project aims to: (i) improve targeting of programme resources to the poorest households to promote more pro-poor coverage; (ii) strengthen management, programme information systems and monitoring capacity to ensure efficient administration; and (iii) strengthen governance and accountability measures for increased transparency. This includes tracking increased use of the Grievance Redress System.

Grievance Redress Mechanism: Spot checks on how the Employment Generation Program for the poorest (EGPP) has been implemented suggest that grievance redress mechanisms still remain weak. There is a high risk of corruption around the delivery of safety net programmes. The Grievance Redress System will address beneficiary complaints in relation to targeting, payments, information updates, and complaints about quality of service for the five major safety net programmes. The Project Director will be responsible for developing appropriate formats for complaints and redress as well as disseminating information about the Grievance Redress System. ICT will be used to simplify processes. The MIS will include a grievance redress module, which will help keep a record of these grievances and the time needed to resolve them. Grievance Redress Officers will help keep a record of grievances, and monitor the details of cases lodged, resolved cases, pending cases and action taken. The Upazila Nirbahi Officer (UNO) will be the GRO at the upazila level and the Deputy Commissioner (DC) at the district level. One of the Directors at the Department of Disaster Management will be the GRO at the central level. These GROs will help establish the Grievance Redress System.

Complaints will be entered in a Grievance Redress Register at each level and complainants will be given a receipt. All grievances should be addressed within 15 days, after which people can appeal. For Upazila level complaints, people should appeal to the district commissioner of the respective District, and to the Deputy Project Director for District level complaints. The Project Advisory Committee (PAC), headed by the Secretary of MoDMR, will act as the final level of appeal.

Tracking of these grievances will provide additional insight on the challenges associated with implementation and help draw out lessons. There will be a feedback loop which includes informing the

complainant about the action taken, and feeding this information into the implementation of the safety net programmes.

The most recent (December 2014) implementation status and results report from the World Bank on the programme found that there has been increased use of the Grievance Redress System⁸.

Source: World Bank. (2013). *International Development Association project appraisal document on a proposed credit in the amount of SDR 331.4 million (US\$500 million equivalent) to the People's Republic of Bangladesh for a safety net systems for the poorest project*. World Bank. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2013/06/07/000350881_20130607113137/Rendered/PDF/764830PAD0P1320disclosed060701300SD.pdf

Sharif, I. A. (2014). *Bangladesh Safety Net Systems for the Poorest Project (P132634) (Implementation Status & Results Report)*. World Bank. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/SAR/2014/12/08/090224b0828f0a3a/1_0/Rendered/PDF/Bangladesh000B0Report000Sequence003.pdf

Government of Bangladesh – ‘Shombhob Conditional Cash Transfer Project – Small Ethnic Communities Plan’: proposed Grievance Redress Mechanism

Programme description: The World Bank has been supporting the Government of Bangladesh, through the Local Government Division (LGD), in implementing the *Shombhob* Conditional Cash Transfer (SCCT) pilot project since 2011. The *Shombhob* Conditional Cash Transfer pilot project was meant to test mechanisms for better delivery of social protection services to the poorest households to promote human development outcomes, specifically children’s nutrition and education. As a result of positive results emerging from the pilot the proposed SCCT project is expected to be implemented in up to 28 upazilas with the highest poverty rates and poor nutritional outcomes. The project will consist of: (i) cash transfers for beneficiary households; (ii) strengthening local level capacity and coordination; and (iii) monitoring and evaluation. The SCCT Project is expected to provide benefits to small ethnic communities through better maternity and child health care as a result of better understanding of, and participation in, the Conditional Cash transfer project.

Grievance Redress Mechanism: The project will ensure that small ethnic community people are aware of and have easy access to grievance redress mechanisms at the local level. The project will develop and mainstream a grievance redress system which will be refined and incorporated within its Operations Manual.

The first point of contact for a small ethnic community member with a complaint will be the Upazila Nirbahi Officer (UNO). They will register the complaint and form a committee comprising of the Upazila Parishad (UP) Chairman, two UP members (one female), one ethnic community leader, one member from the local community (school head master or imam) and one representative from a local NGO/CSO. The committee will hear the complaint and resolve it, and document the nature of the complaint and steps taken to resolve the issue. If no resolution is possible at this level (and the records must show this), then the case will be transferred to the Deputy Commissioner’s (DC) office. The DC will work with the UNO to resolve the issue (the UNO will keep all records of this). The final stage of the grievance process is the intervention of the

⁸ No description was provided of the GRM in place but it is likely to be as described in the proposal.

Project Management Unit, whose Project Director's decision is final. The complainant can still seek legal recourse following national laws.

Source: World Bank. (2014). *Shombhob CONDITIONAL CASH TRANSFER PROJECT: Small Ethnic Communities Plan*. World Bank. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/09/01/000442464_20140901113706/Rendered/PDF/IP7430SAR0IPP00Box385306B00PUBLIC0.pdf

BRAC Microfinance: Grievance Redress Mechanism

Programme description: The BRAC microfinance programme is part of its holistic approach to supporting livelihoods of the marginalised. It works with other programmes to tailor microfinance products that meet the unique needs of rural women, youth, landless and land-holding farmers, migrant workers, and small entrepreneurs.

Grievance Redress Mechanism: The clients who are part of BRAC's microfinance project which issues loans and savings to poor women, can submit complaints via a designated complaints box situated in every branch office. As many clients have limited literacy, BRAC provides assistance through its 900 customer service assistants who can support clients in completing the formal complaints form.

Area managers have the key to the complaints box and accesses the complaints every time they visit the branch office (at least twice a month). They then register a small summary of the complaint in a register.

Alternatively, clients can call a number where they can issue complaints. This service began in September 2014. The complaints coming through the call centres are transferred from the Head Office to the respective area managers.

Area managers investigate and try to resolve the problems with necessary action within three weeks. They then follow up with the client and inform them of any action taken. The area manager files a report to the regional manager with the respective sector specialist operating in the area. The regional manager will consolidate these and include any complaints in the regional report, which is sent to the senior regional manager.

Customer service assistants can address non-formal complaints and concerns by answering general questions and clarifying information, with the support of field officers.

Source: BRAC. (2015). BRAC Microfinance: Grievance redress mechanism for BRAC clients. BRAC.

Christian Aid Bangladesh: Complaints and Response Procedure (CRP)

Grievance Redress Mechanism: Christian Aid Bangladesh has a complaint management system and a policy and procedures document which aims to ensure consistency in practice across Christian Aid Bangladesh and its complaints management provision. The policy applies to everyone connected with the work of Christian Aid. Advice is given on how to respond to different types of complaints and a complaint registration form is supplied.

Non-sensitive complaints concerning the quality of programme delivery will be dealt with differently from sensitive complaints concerning issues related to abuse, misconduct or negligence. Sensitive complaints are treated with the utmost confidentiality and will often require a more detailed investigation. Sometimes they will need to be dealt with by the local laws.

Informal complaints can be made verbally during field visits and events or by visiting the Christian Aid office. Formal complaints can be made over the phone, at the complaint box at Christian Aid's Dhaka office, by post, or by email.

Complaints should ideally be made no later than two weeks from the date of the occurrence. Complaints are encouraged to be lodged within twenty four hours of the occurrence in case of sensitive complaints. Departures from this time limit will be allowed only in exceptional circumstances.

There are nine steps in the management of complaints: **(i) acknowledgement** by the programme support officer within two working days; **(ii) exploration and analysis** by an enquiry committee made up of country staff; **(iii) complaint confirmation** which summarises the validity or otherwise of the complaint within two working days; **(iv) conflict resolution** whereby a complaints handling committee provides recommendations for corrective action within two weeks; **(v) feedback** should be gathered from the complainant within seven working days; **(vi) review and appeal** if the complainant is not happy with the decision, within two weeks; the country director or head of region deal with the second round of appeals; **(vii) recording** of all complaints and responses by the programme support officer; **(viii) effectiveness** of the system will be periodically reviewed by the country director and regional head; and **(ix) accountability** of the complaints procedure, through a complaint audit.

Complaints are stored on an internal complaints register which has restricted staff access. Reports will be generated and distributed regularly to senior management. There will be an annual complaint audit carried out by an internal team and external expert.

The complaints procedure has been rolled out across the organisation and partners have been involved through consultations (expert comment). Christian Aid has also provided support to other partners on developing and rolling out their own complaints redress system (expert comment).

Source: Christian Aid Bangladesh. (2012). *Christian Aid Complaints and Response Procedure (CRP)*. Christian Aid.

Government of Bangladesh - 'Pro-poor Slum Integration Project': proposed Grievance Redress Mechanism

Programme description: The Government of Bangladesh's Pro-poor Slum Integration Project aims to improve housing and security of tenure of poor urban communities across the country. It will be a demonstration project implemented by the National Housing Authority (NHA) under the Ministry of Housing and Public Works (MoHPW) with financial support from the World Bank. The project's aims will be achieved by enhancing security of tenure, improving infrastructure, and facilitating access to credit for improvements in shelter based on plans developed by the community.

A Social Management Framework (SMF) has been prepared for the Pro-poor Slum Integration Project as the guidance for NHA and target communities. One of the SMF's objectives is to promote inclusion, participation, transparency and social accountability partly through the use of grievance resolution.

Grievance Redress Mechanism: The project will establish a grievance response mechanism to answer queries, receive suggestions and address complaints and grievances about any irregularities in application of the guidelines adopted in the SMF. The NHA will ensure that communities are fully informed about the grievance response mechanism and their rights to offer suggestions and make complaints, and the different mechanisms through which they can do so. The grievance response mechanism process is based on

consensus and meant to help to resolve issues/conflicts amicably and quickly, saving people from having to resort to expensive, time-consuming legal action. However, people still have the right to go to the courts of law if they are unhappy with the final decision.

Grievance response focal points will be available at the city level at the Urban Resource Centers and at the project level within the NHA. A Grievance Redress Committee (GRC) will be formed for each city with the Urban Resource Center. The Community Housing Societies (CHS) at the community level will be the first focal point on project grievance response mechanisms. The GRC at the city level will be authorised to deal with all suggestions and complaints at the sub-project level. GRC procedures and operational rules will be publicised widely through community meetings, notices and pamphlets in the local language (Bangla) so that people are aware of their rights and obligations, and procedure of grievance redress. All grievances must be submitted in writing to the Chair of the GRC at the local level. The complainant can be represented by themselves or by an appointed agent such as a locally elected official/legal advisor.

The membership of the GRCs will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations, and transparent resolutions. The GRC Chairman will call the concerned Ward Councillor from which the complaint was received to the hearing. If the person with the complaint is female, a female Ward Councillor will be asked to participate in the hearings.

Members of the GRC at the project level include: the Project Director (convener); the Superintending Engineer (member); the Deputy Director (Land and Asset Management) (member); a Social Development Specialist (member secretary); and a locally active NGO representative (member). Members of the GRC at the local level include: the Executive Engineer of the NHA (convener); a community architect (member secretary); representative of the Paurashava (member); a representative of CHS (member) – female when the complainant is a woman; and a locally active NGO representative (member). There needs to be a minimum three members for the meeting of the GRC.

To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the GRC Chairman will apply the following guidelines:

- Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons.
- Remove any recommendation by any person that may separately accompany the grievance redress application.
- Disqualify a GRC member who has made a recommendation on the application or separately before the formal hearing.
- Where a GRC member is removed, appoint another person in consultation with the Project Director.
- The GRC Chairman will also ensure strict adherence to the guidelines of social management and impact mitigation policies adopted in the SMF and the mitigation standards, such as compensation rates established through market price surveys.

The GRC will review, consider and resolve all grievances received by the committee, related to social/resettlement and environmental mitigations during implementation of the project. Grievances should ideally be resolved on the first day of hearing or within a period of one month for more complicated cases. Grievances of indirectly affected persons can also be reviewed by GRC. GRC decisions should ideally be arrived at through consensus, and if not, resolution will be based on a majority vote.

The judgment made by GRC will be communicated to the concerned person in writing. If they are unhappy with the decision they can place a request through the convener of local level GRC for a further review of the judgment of GRC by the Project-level GRC. The convener of the project-level GRC will be supplied with all documentations by the local level GRC to judge the case.

To ensure impartiality and transparency, hearings on complaints at the GRC level will be open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures⁹.

The NHA will set up a central Data Bank of all complaints received and handled, segregated by the types of complaints. The data base should be accessible by all key project staff. The NHA will send a quarterly grievance response mechanism report to the World Bank. This report will provide detailed information on the number and types of complaints received by districts, followed by status of resolutions. The Urban Resource Centers will also prepare periodic reports on the grievance resolution process and publish these on their websites. The NHA will consolidate reports from the URCs on grievance redress and post it on their website.

Source: National Housing Authority. (2014). *Pro-Poor Slums Development Integration Project: Social assessment and social management framework report*. World Bank & Ministry of Housing and Public Works. Retrieved from: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/09/02/000470435_20140902131147/Rendered/PDF/IP7440PPSIP0S00Box385313B00PUBLIC0.pdf

Government of Bangladesh – ‘Bangladesh Urban Resilience Project’: proposed Grievance Redress Mechanism

Programme description: The Bangladesh Urban Resilience Project focuses on: (i) improving emergency response and preparedness capabilities, (ii) establishing an understanding of risk for critical facilities and essential facilities, (iii) supporting improvements in urban development and construction, (iv) providing the institutional arrangements for implementation, monitoring and evaluation to ensure efficiency, transparency, and accountability in the implementation of project activities.

Grievance Redress Mechanism: The project will have a three tier grievance redress mechanism and commit itself to proactive disclosure and sharing of information. The project will have a communication strategy for the GRM, focusing on efficient and effective usage of print and electronic media, bill boards, posters, wall writing, and adoption of any other method suiting local context, logistics, human and financial resources.

The first tier of the mechanism involves a grievance redress focal point who is a project facilitator at the City Corporation Zonal Office. On a fixed date each month they will visit the wards and people can approach them with their complaints. People can also register their complaints at the ward and zonal level and the facilitator will examine those complaints and arrange appointments with aggrieved persons during their visit. The complains , whether written complaints, phone calls, SMSs or emails, will be registered in books kept at the ward level and zone level.

The second tier allows people who are unhappy with how their complaint has been dealt with to appeal to the designated officer at the Integrated Grievance Redress Mechanism (IGRM), which will be established

⁹ Details of how complaints are registered in the books are provided in National Housing Authority (2014).

at the City Corporation level. At this level, only written or email complaints will be recorded. The third tier is the Grievance Redress Cell (GRC), which will be set up at project headquarters at the Department of Disaster Management.

Source: Government of Bangladesh. (2014). *Bangladesh Urban Resilience Project – Phase I (URP): Environmental Management Framework (EMF) Draft*. Government of Bangladesh. Retrieved from: http://www.plancomm.gov.bd/wp-content/uploads/2014/12/EMF_-URP.pdf

UISC Blog: innovative grievance mechanism

Programme description: Union Information & Service Centres (UISC) are ICT equipped centres providing government and private information and services to grassroots' entrepreneurs and associated Local Administration officials. In 2010, a UISC blog was created to connect UISCs across the country. It connects entrepreneurs, Local Government Division focal points, Cabinet Division focal points, and Access to Information (a2i) Programme support staff.

Grievance Redress Mechanism: As well as its original purpose, the blog has also become one of the most popular virtual platforms for citizens to voice their concerns and public service delivery demands. It allowed for quick communication with government officials as they are involved with the blog. Realising the potential of blogs in grievance redress, the Cabinet Division has instructed all officers in local administration to become members of the UISC blog. Other institutional blogs have emerged in 2013 within government offices in the Directorate General Health Services (DGHS), the Department of Social Services, Bangladesh Bureau of Statistics (BBS), the Department of Women Affairs, and the Department of Mass Communication.

Authorities have taken note of issues raised by members and acted upon them. For example, in the Moheshkhali Upazila of Cox's Bazar district a patient sought medical advice by calling the Upazila Health Complex (health advisory service through mobile phone is available from all 483 Upazila Health Complexes) and failed to receive a response. A UISC entrepreneur posted the incident on the UISC blog and similar complains about this particular service started pouring in from UISCs across the country, exposing the deteriorating quality of service. As this feedback caught the attention of the Directorate of Health under Ministry of Health and Family Welfare, the Directorate quickly established a monitoring system to oversee the performance of health services in all Upazilas. Grassroots demand mobilised through the UISC blog helped hold the relevant authority to account to ensure the delivery of a quality service.

Source: Access to Information (a2i) Programme. (2014). *UISC Blog: Hearing the Unheard*. Prime Minister's Office, USAID, & UNDP. Retrieved from: http://a2i.pmo.gov.bd/sites/default/files/UISC%20Blog_09_Janu_14.pdf

UISC Blog - CONNECTING STAKEHOLDERS: <http://www.a2i.pmo.gov.bd/content/uisc-blog-connecting-stakeholders>

3. Evaluations of Grievance Redress Mechanisms in Bangladesh

Government of Bangladesh line ministries: internal evaluation of their Grievance Redress Mechanism

The Government of Bangladesh carried out an evaluation of the Grievance Redress System in its line ministries in 2011. The grievance redress system was established in all line ministries in 2008 and has

helped reduce public grievances and improve service delivery by the public sector as a whole. Focal points for grievance redress have been appointed in each Ministry/Division/Agency. The Cabinet Division monitors the overall progress of the grievance redress system. The focal points ensure that: (i) all staff members and the general public are aware of the current grievance redress procedures; (ii) all grievances are addressed and resolved fairly, impartially and transparently; (iii) that all grievances are dealt with by the appropriate levels of authority. They also: (iv) review the available measures and make appropriate recommendations in relation to mediation and conciliation to ensure early resolution of grievances; (v) depending on the seriousness of the complaint they keep the complainant informed of the process; and (vi) keep all records of complaints and settlements.

Citizens now expect a response, whereas in the past they had to wait months for a response. It is suggested that the central control system and coordinating role of the Cabinet Division has encouraged citizens to file complaints.

To improve the grievance redress system the Cabinet Division has given a number of directives. The websites of the Ministry/Division should have information about the current grievance redress system and the contact details of the focal point. Information on grievances should be shared monthly by letter with the Cabinet Division. Monthly coordination meetings aimed at reviewing the activities of the Ministry could be used to highlight the importance of the grievance redress system. Grievances could be classified into three groups (severe, medium, low) in relation to their sensitivity and complainants informed and dealt with accordingly. Ministry/Divisions should also engage in more publicity to raise public awareness of its current grievance redress system. In addition a Taskforce of different Ministry/Division officials will meet every six months to review the system.

In the future, the Cabinet Division plans to set up an online grievance redress system to help update the present management of the system and expand its services. They anticipate a fundamental change in the grievance redress system once e-filing of complaints and an electronic response system is introduced with proper monitoring; application of technology; accurate reporting; decentralisation of power and further delegation; change of typical work flow; and change in the attitudes of public officials.

Cabinet Division. (2011). *Report on Grievance Redress System in Line Ministries*. Government of Bangladesh. Retrieved from: http://cabinet.portal.gov.bd/sites/default/files/files/cabinet.portal.gov.bd/publications/1fcb8c4b_a7fc_4d8d_a89f_ca9e4c3fe6a1/CD_PUBLICATION_bn_1_192.pdf

Public Grievance Redressal System in the Rajshahi City Corporation

A study of public grievance redress systems in municipalities in India, Cambodia and Bangladesh found that in Bangladesh attempts to institutionalise grievance redress in the Rajshahi City Corporation included setting up complaint boxes and register books in ward offices. This is where people preferred to lodge their complaints. The ward offices keep detailed complaint registers and most problems are being solved within a week. Local media was used to disseminate information on the public grievance redress system. Stories of significant complaints being redressed were published in print media on a regular basis for wider dissemination to increase demand. The number of complaints being registered had increased and ward councillors and service providers are increasingly becoming more accountable to citizens.

Srivastava, A. (no date). *Enabling Public Grievance Redressal Systems in Municipalities: An Operational Manual*. PRIA, SILAKA, PRIP Trust, & UNDEF. Retrieved from: http://www.silaka.org/resource/Booklet/PGRS%20Manual_English_p.pdf

4. General lessons on Grievance Redress Mechanisms¹⁰

In a global review of World Bank GRMs, Brown et al. (2013) highlight a series of recommendations to enhance the impact of grievance redress mechanisms and, more broadly, to improve service delivery and risk management on projects:

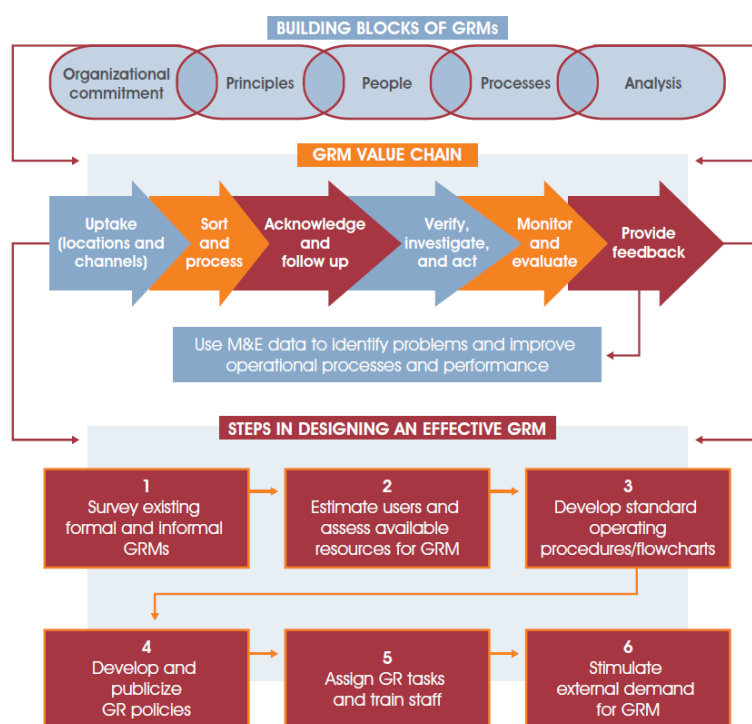
- **Create diagnostic tools to support GRM implementation:** It is important to support and strengthen existing country institutions for grievance redress. Practical diagnostic tools would help this. Other material of use would be case studies of GRM implementation, evaluations of existing GRMs, material on linking a GRM to existing country systems, and a manual of basic GRM principles and procedures.
- **Improve risk assessment:** This is important for projects that have potential adverse environmental impacts on human populations or environmentally important areas, so as to prevent and avoid conflict.
- **Use feedback received via GRMs to prioritise supervision:** Real-time information from local citizens on project implementation can help target and prioritise limited supervision budgets, especially over geographically-dispersed projects and/or projects with large numbers of beneficiaries.
- **Create incentives for monitoring and improving GRMs during implementation:** Require all projects with a GRM to track the existing indicators related to grievances in project status and completion reports.
- **Improve internal handling of complaints on projects:** Donors, such as the World Bank, can improve the handling of their own complaints by encouraging all complaints to be routed to the project leader. There would need to be 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.

A series of World Bank How-To Notes looks at the how to design effective GRMs for projects (World Bank, 2012a; 2012b). These documents note that well-designed and well-implemented GRMs can improve project outcomes by: generating public awareness about the project and its objectives; deterring fraud and corruption; mitigating risk; and providing project staff with practical suggestions and feedback. This allows them to be more accountable, transparent, and responsive to beneficiaries. GRMs can help assess the effectiveness of internal organisational processes; and increase stakeholder involvement in the project. For project teams, an effective GRM can help catch problems before they become more serious or widespread.

World Bank (2012a, 2012b) outline a GRM framework and 6 steps for designing an effective GRM (see figure 1).

¹⁰ Taken from: Rao, S. (2014). Grievance Redress Mechanisms in Pakistan. GSDRC Helpdesk Research Report 1117. Birmingham, UK: GSDRC, University of Birmingham.
<http://www.gsdrc.org/go/display&type=Helpdesk&id=1117>

Figure 1: GRM Framework



Source: World Bank (2012a, 2012b)

The key steps for designing an effective GRM are broken down as follows (World Bank, 2012b):

- 1. Survey existing formal and informal in-country GRMs and build on them.** Formal systems can be within ministries or departments, information centres, or judicial systems. Informal systems can be councils of village elders, or chiefs. These may already have responsibility for grievance redress and resolution, and can be built upon rather than replaced. Countries that have access to information laws (which includes Bangladesh¹¹) have systems for facilitating citizens’ access to information. These structures, which process requests for information, can also be expanded to deal with grievances.
- 2. Estimate number of users and assess available resources for the GRM.** Projects can have a variable number of users and different levels of human, financial, and technological resources. Projects with many users tend to be more complex and costly. There may therefore be a need to determine the GRM’s scope and scale, and to identify resource gaps in advance. GRMs can be also designed to start small and be scaled up gradually as additional resources are mobilised.
- 3. Develop standard operating procedures and flowcharts.** This helps to codify how grievances will be redressed for all stages of the process. Project management should develop operating procedures, guidelines, and flowcharts detailing how the grievance redress process will unfold within the project’s operating structures and how it will be monitored and reported on.

¹¹ The Right to Information Act (2009) recognizes that stakeholders can exercise their rights to access information in context of development programmes and the public institutions are obligated to place information in public domain.

4. **Develop and publicise project grievance redress policies and guidelines.** This helps demonstrate management's commitment to the GRM, and that management looks at grievance reports as opportunities for improvement. The key to the overall success of GRMs is organisational commitment.
5. **Assign grievance redress responsibilities and train staff to handle grievances.** Project management should assign responsibility for handling grievances to staff at all levels of their projects. Training should include information about interacting with beneficiaries about grievances, the organisation's customer service standards, and internal policies and procedures in relation to grievance redress.
6. **Publicise the GRM to stimulate external demand.** As part of a comprehensive communications strategy, projects should publicise: the existence of the GRM; its procedures; details of those to whom different types of grievances should be addressed; operating service standards; and other relevant information. It is particularly important to reach out to poor and marginalised groups, who often cannot access GRMs.

5. Further references

Brown, M., Jenkins, B., Leon, P. and Seyedin, A. (2013). *Global Review of Grievance Redress Mechanisms in World Bank Projects*. Washington, D.C.: World Bank.

<http://siteresources.worldbank.org/PROJECTS/Resources/40940-1366729852427/GlobalReviewofGRMs.pdf>

Government of Bangladesh. (2010). *Indigenous Peoples Framework – Primary Education Sector Development Program 3 (PEDP III): ADB TA NO. 7169-BAN*. Government of Bangladesh. Retrieved from: <http://www.adb.org/sites/default/files/project-document/62218/42122-01-ban-ippf.pdf>

World Bank. (2012a). *Part 1: The theory of grievance redress. Vol. 1 of Feedback matters: designing effective grievance redress mechanisms for Bank-financed project*. Washington, DC: World Bank. <http://documents.worldbank.org/curated/en/2012/01/16306144/feedback-matters-designing-effective-grievance-redress-mechanisms-bank-financed-project-vol-1-2-part-1-theory-grievance-redress>

World Bank. (2012b). *Part 2: The practice of grievance redress. Vol. 2 of Feedback matters: designing effective grievance redress mechanisms for Bank-financed project*. Washington, DC: World Bank. <http://documents.worldbank.org/curated/en/2012/01/16306146/feedback-matters-designing-effective-grievance-redress-mechanisms-bank-financed-project-vol-2-2-part-2-practice-grievance-redress>

Expert contributors

Vicky Murtagh, Christian Aid
 Dulon Domes, Christian Aid
 Isabel Whisson, BRAC Bangladesh

Suggested citation

Rohwerder, B. with Rao, S. (2015). *Grievance Redress Mechanisms in Bangladesh* (GSDRC Helpdesk Research Report 1188). Birmingham, UK: GSDRC, University of Birmingham.

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