



## Helpdesk Research Report

# Grievance Redress Mechanisms in Pakistan

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## Question

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

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## 1. Overview

There are a number of Grievance Redress Mechanisms (GRMs)<sup>1</sup> used in Pakistan, many of which have similar components. However, the Pakistan literature is primarily focused on GRMs for World Bank projects and there is limited literature that looks at GRM models in general, or their comparative effectiveness. This helpdesk report looks at a selection of Pakistan GRMs and wider GRM literature to identify, as best as possible, the models used, their approaches, the organisations involved and their respective effectiveness.

Research for this report identified five GRM examples, though with varying levels of evaluation and assessment documentation. Many of these GRMs would not strictly be described as models but rather programmes, or sets of activities within programmes, that provide redressal of grievances.

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<sup>1</sup> Grievance redress mechanisms (GRMs) are the “formal institutions and channels people can use to express their dissatisfaction with service delivery and to demand redress” (Ringold, 2011, p.69). They can provide feedback to providers and policy makers about service delivery performance, and are one way in which to hold service delivery providers to account.

With the Ombudsman and two cash transfer examples, the GRM was an inherent part of the programme. In the first example the GRM supported the Ombudsman in their role in resolving public service grievances. With the cash transfer programme examples, the GRMs were to ensure the correct beneficiaries received payment. In the other two examples, relating to general government services and education, they were standalone programmes. The government service GRM looked broadly to address corruption and poor performance, whereas the education sector looked to address fairness in recruitment, and to confirm receipt of stipends and textbooks. The education example highlights how in some sectors there are established informal grievance processes (e.g. parent-teacher meetings, or visits to the school head). There seems to be little literature on informal GRMs, at least in relation to the provision of public services.

There is not a definitive list of essential components for GRMs. Consequently this helpdesk report identifies a number of factors which the literature suggests have been important in effective GRMs:

- **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. 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 Pakistan

Research for this report found several cases studies of Pakistan GRMs but varying levels of documentation on them. This section looks to present a representative sample of Pakistan GRMs.

## Federal Ombudsman grievances: Strengthening Public Grievance Redress Mechanism (SPGRM)

The UNDP-funded Strengthening Public Grievance Redress Mechanism (SPGRM) looked to support the Federal Ombudsman<sup>2</sup>. An end of project evaluation finds it has improved the service delivery standards in the federal agencies by supporting accountability, transparency and integrity (ATI) practices (Khan & Rana, 2012). The evaluation finds that there has been increased responsiveness to the public but there needs to be continued effort. The project measures should be replicated in other ombudsman offices as well as other ATI-related institutions, so as to provide better administrative justice.

The Strengthening Public Grievance Redress Mechanism (SPGRM) project was based within the Wafaqi Mohtasib (Federal Ombudsman) Secretariat (WMS). The project looked to improve: the capacities of the Mohtasib's Office and its partner federal agencies to receive and redress public grievances; the interface of the WMS with the public; coordination in ATI on service delivery; access to information on ATI, and service delivery; and knowledge management.

The evaluation suggests there was no set model but rather a number of components which made up the SPGRM project. Some of these components relate more to public engagement:

- **Customer Relationship Mechanism (CMR):** The mechanism involved directly responding to visitors and callers, an SMS-based tracking system, and an Interactive Voice Recording System.
- **Communication campaign:** The campaign helped the public and CSOs to know more about the role of WMS. It resulted in an increase in number of complaints during the implementation of the project from 23,107 in 2008 to 38,674 in 2011.
- **Citizen Reporting Cards (CRC):** A CRC exercise was undertaken once to get feedback on the quality and adequacy of the WMS. The exercise concluded that the performance of the WMS was regarded as satisfactory.
- **The Policy Dialogue Forum:** This forum looked to elicit views as to how to improve the ATI situation in public agencies. It was held in 2009 with a wide range of participants, who had expressed interest, invited to share their views.

Other components were more focused on strengthening internal systems:

- **Complaints Management Information System (CMIS):** The introduction of the CMIS helped in monitoring the complaints as well as the performance of investigators.
- **Continuous Improvement Benchmarks (CIB):** The evaluation finds that the CIB in WMS helped in performance measurement of staff. These benchmarks were used by the Ombudsman's office to monitor levels of staff compliance.
- **Standard operating procedure review:** Research and analysis was undertaken on the existing operating procedures that were used to handle public complaints in five federal agencies.
- **Training:** Staff were trained in information technology, investigations and in communication strategies.
- **Infrastructure:** There was some infrastructure development of the working environments of the WMS, the regional offices and in other Ombudsman offices.

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<sup>2</sup> The role of the Federal Ombudsman is to "diagnose, investigate, redress and rectify injustices faced by the public from Federal Government Departments" (Banking Mohtasib Pakistan, 2014).

The evaluation identified a number of challenges during implementation. Lack of available funds and delay in approval of activities added to the existing resistance to change, which the evaluation report argues is common in the public sector. Some targets, such as the accreditation of federal service providers, were not completed due to time and capacity constraints. There was a problem of high project management staff turnover during the project.

The report identifies a number of recommendations:

- Appoint a Federal Ombudsman as a priority.
- Once an Ombudsman has been appointed, employ extra human resources to deal with the backlog of pending cases.
- Ensure women are given due consideration while hiring, so as to keep the gender perspectives in GRMs.
- Train WMS staff in investigation, research and analysis.
- Extend the reach of regional offices to reach the public at a local level to save them having to travel to regional offices.
- Extend the jurisdiction of the Ombudsman to tribal areas.
- Design and implement a creative awareness campaign for illiterate people.
- Make public research studies about different departments. Ensure stakeholders are informed in particular of findings.
- Ensure maintenance and technical support for the calling centre, website and SMS-based tracking system.
- Ensure salaries are compatible with the open market of professionals so as to attract a good team of professionals for project implementation and avoid high turnover.

## **Cash transfer programme grievances: Pakistan Flood Emergency**

The Pakistan Flood Emergency cash transfer programme was funded by the World Bank and undertaken in response to the 2010 floods (Brown et al. 2013). This programme used a grievance redressal process with different actors dealing with different types of grievances. Grievances can be in relation to incorrect personal details, eligibility or targeting grievances, payment problems, and for other types of maladministration or unanswered complaints.

In the case study review, Brown et al. (2013) note that as of December 2012, 49 per cent of eligibility appeals and 85 per cent of complaints have been resolved with roughly 1,087,000 eligibility appeals logged, 536,846 eligibility appeals resolved, and 139,841 of these resolved appeals resulting in acceptance for inclusion and issuance of cash transfer debit cards. The report notes that 5,500 complaints have been logged for issues such as non-working cards or requests for bribes. An evaluation of the cash transfer programme has been undertaken<sup>3</sup> and is expected to be published in July 2014 (expert comments).

Key aspects of the grievance redressal component of the programme were:

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<sup>3</sup> Oxford Policy Management: Evaluation of Pakistan's Flood Response Cash Transfer Program. <http://www.opml.co.uk/projects/evaluation-pakistan%E2%80%99s-flood-response-cash-transfer-program>

- **Facilitation centres** with grievance redress counters, staffed by the National Database Registration Authority (NADRA).
- There was a **public information campaign** on the grievance redress process. This used television, radio, print, and word-of-mouth through NGOs and community networks.
- The grievance redress system is also able to receive complaints through **text messages and phone calls**.

The project team also identified a number of recommendations for future programmes:

- Set up **standard practices** to help administer the case load because of the large and multi-actor grievance redress structure.
- **Train all parties** in standard practices to ensure the same understanding of the process.
- **Promote ownership** of the process by the District Administration so as to improve the functioning of the committee of 'notables'.

Different organisations have different roles depending on the type of grievance, and depending on the stage the complaint has reached in the redressal process:

- **Incorrect personal details:** The National Database Registration Authority (NADRA) handles the updating of personal details. This includes changes in family status, address, and family name. Hotlines operate specifically for such grievances.
- **Eligibility/targeting grievances:** There are a number of steps to respond to grievances related to incorrect eligibility assessments:
  - **Local authority:** Beneficiaries who believe they are incorrectly listed as ineligible must first check with their local authority. Appeals are checked to ensure the appellant lives in a flood-affected area, and whether they have already been included in the programme.
  - **Review by 'notables':** The cleared cases are then reviewed by a panel of local 'notables'. These 'notables' are made up of respected, apolitical professionals who were not involved in the original beneficiary survey. The District Authorities supervise this review process. Eligibility status updates are submitted to the Provincial Disaster Management Authority (PDMA).
  - **Provincial Disaster Management Authority (PDMA):** The Provincial Appeals Secretariat of the PDMA is the final decision-making authority verifying the veracity of the decision taken by the local committee of 'notables'. The PDMA informs the National Database Registration Authority (NADRA) whether an appeal is upheld or not.
  - **National Database Registration Authority (NADRA):** NADRA enters the decisions into the case management system, and the cleared households are enrolled at the facilitation centres.
- **Payment grievances:** Partner commercial banks respond to grievances related to payments, such as lost or nonworking debit cards, or forgotten PIN numbers. Partner banks operate offices and dedicated hotlines to address these grievances.
- **Maladministration or unanswered complaints:** Grievances related to inefficient service delivery, bribery or malpractice (termed 'complaints') are forwarded for resolution to the District Administration or NADRA. If the complainant remains dissatisfied with the resolution of

complaints by the concerned agency, they can approach provincial or federal ombudsmen for redress.

- **The Project Authorities and the Operational Steering Committee:** This entire process is monitored through the case management system. The Project Authorities share the status reports with all stakeholders on a weekly basis, and follow up with provinces where the number of open cases is high. The outstanding issues are discussed at Operational Steering Committee, which meet on bimonthly basis.

## Cash transfer programme grievances: Benazir Income Support Program (BISP)

The Benazir Income Support Program (BISP) is the Government of Pakistan's national social safety net programme. It is considered to have a well-functioning GRM that serves the poor effectively (ADB, 2013). The programme itself is supported by a number of donors including the Asian Development Bank and the World Bank.

The BISP GRM is part of a broader communications strategy that includes training and communication with beneficiaries, a reconciliation mechanism, a review of payment mechanism, and the implementation of monitoring and social accountability mechanisms (World Bank, 2009).

World Bank (2009) notes that interventions to improve BISP drew on previous experiences of social protection. This includes from cash transfers programmes in earthquake-affected areas in Pakistan and in particular the grievance and redressal processes from them. Measures to implement the GRM include (World Bank, 2009):

- **Testing with a poverty score card:** A poverty scorecard approach, based on a 'proxy means testing' approach, was used to help create a national targeting system that could serve multiple purposes. Before a national roll-out of the score card, a test phase was conducted to provide insights and learning for scaling up the programme nationwide.
- **Operational Manuals:** These manuals provide an overview of the targeting, enrolment and payment components of the programme. It shows where beneficiaries might interact with the programme by updating their data, filing complaints in case of non-selection, and appealing, in case of grievances.
- **Public information campaign:** This campaign informs people about the programme, including information on social accountability mechanisms such as the hotline.
- **Use of local level institutions:** The BISP divisional offices look to resolve non-payment issues through local structures.
- **Addressing ethnic and linguistic diversity:** Although Pakistan's official language is Urdu, there are a number of other languages which reflect the ethnic diversity of the population. This means a need for more tailored outreach and targeting mechanisms, including, for example, the translation of materials where appropriate.
- **Integrated management system:** An integrated Management Information System (MIS) was created to bring together information about the selection of beneficiaries, and payments, but also grievances. BISP officers can use the system to access and revise beneficiary information.

## General government service grievances: Punjab Model of Proactive Governance

A GRM approach in Punjab involved contacting citizens through SMS texting and phone calls, to get feedback on day-to-day government services. This approach looks to deter petty corruption, improve service delivery and engage citizens (World Bank, n.d.). The programme has resulted in legal action against four property registration officials in Gujranwala under the Anti-Corruption Act, following consistent complaints against them from citizens. Legal action has been also taken against others in the Bahawalpur district.

World Bank (n.d.) argues that this approach proactively engages citizens to get feedback to improve service delivery, rather of passively waiting for the citizen to file a complaint. The Punjab model consists of three stages (World Bank, n.d.):

- **Mobile number registration:** Citizen mobile numbers are recorded when they go to a government office to utilise public services (e.g. renewing driving licences, registering property).
- **Call centre follow-up:** The citizen numbers are forwarded to a call centre who send SMS messages to citizens and make phone calls to inquire about the quality of service received.
- **Data analysis:** The feedback from these calls and texts are aggregated and analysed for patterns. In particular, the analysis looks for whether there are many cases reported against a particular official or office.

Findings from an early review of evidence conclude that the programme is “intuitively appealing and potentially highly scalable and cost-effective” (Callen & Hasanain, 2011, p. 4). A full evaluation of the programme is currently underway<sup>4</sup>.

## Education service grievances: Sindh Education Sector Project

The Pakistan Sindh Education Sector Project includes a complaints management system. This related to the fairness of teacher recruitment processes, the disbursement of stipends for secondary school female students, and free textbook distribution to public school students (Ringold et al., 2011).

Research for this report was unable to find comprehensive details of the complaints management system. A project agreement document for the second phase of the Sindh Education Project notes that the Sindh Education and Literacy Department should establish and maintain a web-based complaints mechanism for the handling complaints (Serrano, 2013). However, it is not clear if this system relates to the same recruitment, stipend and textbook grievances, mentioned earlier.

Ringold et al. (2011) note that education projects rarely incorporate GRMs except where they focus on transfers such as scholarships. In most cases grievances and complaints are instead raised and resolved informally at the school level. Parents have direct channels to providers in education that do not necessarily

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<sup>4</sup> Devex. (2014). *Evaluation of Mobile Based Feedback Collected through Punjab Proactive Governance Model*. Tender. <https://www.devex.com/projects/tenders/evaluation-of-mobile-based-feedback-collected-through-punjab-proactive-governance-model/144284>

exist in the other sectors. For example, parents can complain to the headmaster of a school or raise a grievance in a parent-teacher meeting.

### 3. General lessons on Grievance Redress Mechanisms

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:

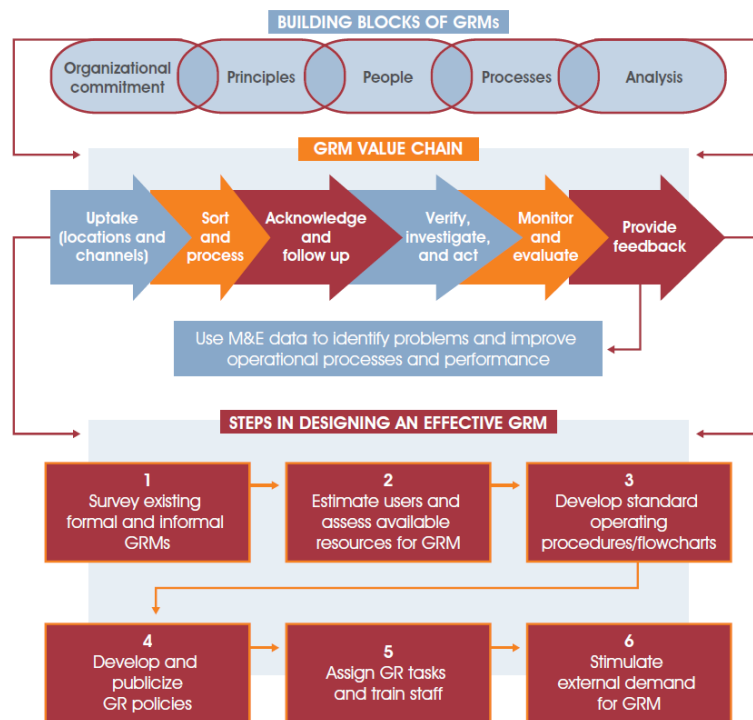
- **Create diagnostic tools to support GRM implementation:** It is important to support and strengthen existing country institutions for grievance redress. Practical diagnostic tools would help this. Other material of use would be case studies of GRM implementation, evaluations of existing GRMs, material 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).



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 Pakistan<sup>5</sup>) 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.

<sup>5</sup> In the 18th Amendment of the Pakistan Constitution, passed in 2010, article 19A reads: "Every citizen shall have the right to have access to information in all matters of public importance subject to regulation and reasonable restrictions imposed by law". See here:

<http://www.pakistani.org/pakistan/constitution/amendments/18amendment.html>

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.

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