

WORLD BANK GRIEVANCE REDRESS SERVICE (GRS)

Operating Procedures (June 2016)
[DRAFT]

Section I Introduction and Background

1. The Grievance Redress Service (GRS) is a corporate-level grievance redress service created to receive complaints from project-affected people and communities who believe that a World Bank-supported project (Project) has caused or will cause them harm. The GRS facilitates a prompt response to grievances by providing support to Project teams (Task Teams) to address the issues raised in a quick and effective manner.
2. The GRS is led by World Bank Management through its Operations Policy and Country Services Vice Presidency (OPCS). The GRS started operation in January 2015.

Section II Submission of a Complaint

Who May Submit a Complaint?

3. *Complainants.* A complaint may be submitted by one or more individuals, or their representatives, who believe they are directly and adversely affected by an active (i.e., not closed) World Bank-supported Project – this includes Projects financed by the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA).¹
4. *Identity of Complainants.* The complaint must identify the individual(s) submitting the complaint, and whether they are Project-affected individual(s) and/or a community or representative.
5. *Confidentiality.* Complainants may ask that their identity be kept confidential. The request for confidentiality should be submitted with the complaint. The GRS will maintain confidentiality of personal or classified information if requested.
6. *Representatives.* Complainants may submit a complaint through an authorized representative. The authorized representative must include his/her name and contact details and sign the complaint. The representative must also provide written proof (such as a signed letter by the complainant(s)) of his/her authority to represent and act on behalf of the complainant(s) in relation to the complaint. The GRS will communicate directly with the authorized representative, as necessary and appropriate, and will keep the representative and/or complainant(s) informed about the status of the complaint. Complainants may also submit the complaint on their own behalf and appoint a contact person or persons for all communications regarding the complaint.
7. *Anonymous complaints.* Anonymous complaints will be deemed inadmissible. However, if an anonymous complaint contains specific information about Project-related issues, it will be forwarded to the Task Team for its information and follow-up, where appropriate.

¹ This includes loans, credits, grants, trust funds, and technical assistance (TA) operations.

How to Submit a Complaint

8. A complaint can be submitted in any of the ways outlined below.

- Via email: 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.

Format and Language of a Complaint

9. Complaints may be submitted in the Member Country's official language. All of the GRS correspondence with the complainant will be in English and, where feasible, in the language of the complaint. In the event of any discrepancy between the two versions, the English version will prevail.
10. No specific format is required as long as the required information is included: (a) identity of complainant(s) and representatives, if any; and (b) information as detailed in the section below. Complainants may use the complaint form available on the GRS website or any format of their choosing.

Content of a Complaint: Required Information

11. *Subject matter of a complaint.* A complaint must allege actual or potential harm resulting from a Bank supported operation, regardless of whether the issues raised fall under the Bank's Operational Policies and Procedures. Complaints should raise *operational* matters but need not raise matters of non-compliance with such policies to be admissible.
12. *Substance of a complaint.* The complaint must state the adverse impact(s) allegedly caused or likely to be caused by the Project. This should be supported by available documentation and correspondence, where possible and appropriate, or upon the GRS's request at a later date. The complainant(s) may also indicate the desired outcome of the complaint, i.e., how it may be resolved.
11. *Procurement related complaints* pertaining to Projects may be submitted to the GRS by bidders or potential bidders (companies or individuals). These complaints will not be processed following GRS procedures but instead in line with the relevant provisions of the Procurement Framework.

Section II Admissibility

Scope and Admissibility of Complaints

12. Complaints are *admissible* if they meet the following criteria:

- The Project is active, i.e., appraisal has begun and the Project has not yet closed;
- The complaint is filed by Project-affected individuals and/or communities, or their representative;
- The complaint alleges that the Project has caused or will cause harm to the individuals and or communities submitting the complaint.

13. The following issues are *excluded*:

- Complaints pertaining to IFC or MIGA-supported projects;
- Issues pertaining to fraud and/or corruption in a World Bank-supported project;²
- Issues related to obtaining employment with the World Bank and/or the subject Project.

14. Complaints that are obviously frivolous or absurd are not admissible.

15. *Project level GRM*. If a complaint pertains to a Project with an existing project-level GRM, the GRS will make the complainant(s) aware of this and encourage its use. However, it is the decision of the complainant(s) to use the Project-level GRM and/or continue the GRS process. The existence of a Project-level GRM and/or a complaint already lodged with it does not preclude the GRS from processing a complaint it receives.

16. *Complaints lodged with the GRS and the Inspection Panel*. If complainant(s) file a complaint on a Project with the GRS and the Inspection Panel at the same time, or submit it to the GRS after the Panel process has begun, the GRS will review the complaint and discuss with the complainants and with the Panel how to proceed. The GRS may not accept complaints once the Board has authorized an investigation by the Inspection Panel on the issues of concern.

Determination of Admissibility

17. *Registration of complaints*. After receipt of a complaint, the GRS immediately registers it in the Complaints Register.

18. *Within two business days of receipt of the complaint*, the following takes place

- *Notification of receipt*. The GRS notifies the complainant(s) of receipt of the complaint. With the notification of receipt, the GRS may also request additional information from the complainant(s).

² The Integrity Vice Presidency (INT) is an independent unit within the World Bank Group that investigates and pursues sanctions related to allegations of fraud and corruption in World Bank Group-financed projects.

- *Classification of complaint.* The GRS determines whether the issues relate to procurement or to other matters falling within the mandate of the GRS, as set forth in these Procedures. If the complaint is related to procurement, the GRS forwards the complaint to the responsible Regional Procurement Manager.
 - *Notification to World Bank staff.* If the complaint pertains to operational matters, the GRS notifies the Task Team and other relevant World Bank staff including the country team, Global Practices, Regions, the Legal Department, ECR and others as warranted, regarding receipt of the complaint.
19. *Evaluation.* Within 10 business days, the GRS reviews and evaluates the complaint and determines whether the complaint meets the admissibility criteria set forth above, in consultation with relevant staff.
 20. *Request for additional information.* During the 10-day admissibility assessment period, the GRS may request further information from the complainant(s). If no response is received from the complainant(s) within 10 business days of the request, the GRS contacts the complainant(s) again. If no response is received within 10 business days of the second request, the GRS considers closing the case. However, even if the case is closed, if the complaint contains specific information about Project-related issues, the Task Team may take action where appropriate.
 21. *Admissible complaints.* If the complaint is admissible, the complainant(s) are notified of admissibility.
 22. *Non-admissible complaints.* If the complaint is non-admissible, the complainant(s) are notified of this decision and the reasons for it, and are referred to relevant institutions, where appropriate. The GRS then closes the case.

Section IV Formulation of Proposal and Implementation

Formulation of Proposal

23. After declaring the complaint admissible, the GRS opens the Formulation of Proposal phase. The GRS and/or the Task Team review the issues raised and discuss possible ways to move forward. The GRS and/or the Task Team contact the complainant(s) to review the concerns and agree on next steps to address the complaint. This communication occurs no later than 10 business days after the GRS has communicated the admissibility of the complaint to the complainant(s).
24. The Task Team, with support and advice from the GRS, formulates a proposal to address the issues raised in the complaint. Where required and appropriate, the GRS also seeks support and advice of OPCS, LEGEN, relevant GPs, CCSAs, ECR and the Region.
25. *Proposal to complainant(s).* Within 30 business days after determination of admissibility of the complaint, the proposal should be presented to the complainant. In exceptional cases, e.g., for complex complaints or complaints supported by a large number of documents, the time limit provided for in this paragraph may be extended and the complainant(s) will be informed accordingly. The GRS consults with and seeks the input of the complainant(s) on all aspects of the proposal.
26. The proposal should include an action plan with a time frame for its implementation.
27. *Agreement by complainant(s).* If the proposal is accepted by the complainant(s), the Task Team implements it according to the process and timeframe set forth in the proposal. Agreement on the

proposal should be reached within 30 business days after the initial proposal has been presented to the complainant. For extraneous circumstances, additional time can be granted if both parties agree.

28. *Rejection by complainant(s).* If the proposal is rejected by the complainant(s) and/or the complaint cannot be resolved through the process outlined in these procedures, the GRS informs the complainant(s) that no resolution could be reached. The GRS then refers the complainant(s) to other options for remedy, where appropriate.

Implementation of Proposal

29. *Implementation.* Once the proposal is accepted, the Task Team promptly starts implementing the proposal. The proposed time frame will depend on the nature of the actions. The GRS and the Task Team will inform the complainant(s) in advance and explain the scope of the action plan and the timeframe.
30. The Task Team keeps the GRS and the complainant(s) up to date on the status and progress of the implementation of the proposal until resolution of the complaint. The Task Team may request support and advice through the GRS at any point.
31. *Monitoring* The GRS maintains close contact with the Task Team to ensure that the proposal is implemented within the agreed time frame. The GRS also maintains contact with the complainant(s) throughout the implementation period until resolution.

Case Closure

32. *Resolution.* The GRS considers the complaint resolved and closes the case when there is agreement with the Task Team and the complainant(s) that the proposal has been successfully implemented and the issues addressed.
33. *No satisfactory resolution.* If complainant(s) believe that the complaint has not been addressed through the implementation of the agreed upon proposal, the GRS and Task Team engage with the complainant(s) to determine whether and how a satisfactory outcome can be achieved. If these additional consultations do not lead to a further agreement, the GRS refers the complainant(s) to other options for remedy, where possible and appropriate. The GRS then closes the case.

Section V Other Provisions

Information Sharing and Communication with Complainants

34. The GRS shares with the complainant(s) all information relevant to the case, including updates on the status and progress of the complaint handling process, to the extent possible and in compliance with the World Bank Access to Information Policy.³
35. The GRS maintains consistent communications with the complainant(s) throughout the process via email, phone communication or other means as preferred by the complainant(s).

³ See <http://www.worldbank.org/en/access-to-information>

Information Dissemination and Outreach

36. The existence of the GRS is advertised through Project Appraisal Documents (PADs), Borrower's Safeguard Instruments and the World Bank's external and internal websites. The principles and operating procedures of the GRS are made available in all official languages of the Bank, both on the World Bank's website and as a hard copy available in the World Bank's Infoshop and Country Offices.
37. For stakeholders with no access to the internet, an information leaflet with a complaint form is made available through World Bank Country Offices and distributed at outreach events.
38. A dedicated GRS page on the World Bank's external website provides instructions and a form for submitting complaints (<http://www.worldbank.org/grs>). The website also hosts materials that may be relevant and helpful to potential complainants.
39. A dedicated GRS page on the World Bank's intranet provides materials and guidance to support Task Teams in handling Project-related complaints (<http://grs>).

Publication and Reporting

40. The Complaints Register is published on the external GRS website and regularly updated. The Register contains information on the subject Project (name, number and country); specific details of the complaint or the complainant(s) are not included.
41. The GRS is responsible for external communications regarding complaints.
42. The GRS produces an annual report and analysis of cases submitted to the GRS, which are also used to improve the operating procedures as appropriate.

Freedom from Retaliation

43. World Bank policies provide for the participation of project-affected people in Project preparation and implementation. In furtherance of these policies, the World Bank also provides access to the GRS. It is the World Bank's position that complainant(s) who use the GRS must not be subject to any form of retaliation based on the fact that they complained to the GRS.