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**Operational Procedures for the World Bank’s Grievance Redress Service (GRS)**

**Public Consultation on Draft GRS Operational Procedures: June 22, 2016 | Washington, DC**

**Consultation Email:** grsprocedure@worldbank.org

**Consultation Website:** <http://consultations.worldbank.org/consultation/operational-procedures-world-banks-grievance-redress-service-grs>

**SUMMARY**

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| **FEEDBACK DETAILS** | **FEEDBACK SUBMITTED** |
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| **No.** | **Subject of comments** | **Comments & Recommendations** |
| 1 | Timelines  | * *Section IV, No 25 of the GRS operational procedures*:

Please clarify whether the 30 day deadline only refers to the formulation of a solution for a given complaint or also entails the requirement of a formal acceptance by the complainant?* Discrepancies regarding the timelines in the draft procedures and the presentation were criticized. Hence, consistency should be provided to avoid confusion.
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| 2 | Admissibility (Section II) | * Include a footnote to clarify that the GRS deals with all complaints related to World Bank funded projects.
* Lower the bar for complainants to use the GRS:
	+ Erase the paragraph on representation
	+ Erase the paragraph on anonymity
	+ Present the GRS as a window wide open to people to file complaints.
* One comment referred to the desirability of a complete ban of all admissibility criteria to the GRS to make the window as wide as possible.
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| 3 | Interaction and sequencing of the GRS with other complaint mechanisms at the World Bank  | * Greater clarity is needed specifying that there is no sequencing of the GRS with the PLGMs or the IPN.
* Clarify that contacting the GRS is one of the ways to meet the IPN’s requirement to attempt to contact Bank management before filing a complaint.
* Concerns were raised that the GRS might present itself as the only way to do so, which is not the case and what should be made clear.
* Be more precise on the matter that the GRS is not an alternative to the Panel but a complementary instrument.
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| 4 | Language used in the document  | * Change the language to a less legalistic one to reflect the non-bureaucratic ad-hoc interventions that the service provides.
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| 5 | Accessibility of the GRS  | * Circulate more information on which different access channels and alternative avenues exist for complainants to approach the GRS.
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| 6 | Grievance Redress Mechanism (project-level GRMs) | * Ensure that there is no requirement reflected in the procedures or used in practice for project-affected people to go back to the project-level GRM as they might have been dissatisfied with it in the first place.
* Support the design of effective grievance redress mechanisms on the project-level.
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| 7 | Information dissemination on the ground | * Provide enough information material to make people aware that what is happening on the ground is a World Bank funded project and aware of the corresponding avenues for grievance redress.
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| 8 | Anti-retaliation measures | * Make sure there is a paragraph on anti-retaliation, and be specific which provisions the Bank can take to work towards protective measures for the complainant.
* If the Bank is not able to provide protection, be frank about it and include it in the operating procedures.
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| 9 | Outcomes of the GRS process | * Include some sentences about what the desired outcomes of a successful GRS process might look like.
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| 10 | Representation | * Include a paragraph on representation, including how local representatives can speak on behalf of individuals or a whole community.
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| 11 | Additional questions | * What’s the problem with inadmissible complaint, i.e. why were they deemed inadmissible?
* What’s the scope of coverage of the GRS? Does it cover all World Bank funded operations?
* What’s the submission deadline for comments?
* Which services does the GRS actually provide?
* Why didn’t the GRS embrace the IFC Compliance Advisor Ombudsman model for its operating procedure?
* How are you planning to make people aware that it’s an active World Bank project they have a complaint about?
* What’s the day-to-day vision to improve GRMs on the ground?
* What is the relationship between the GRMs and the GRS? Is the GRS helping with their design?
* Do project-affected people or individuals have to get in touch with the GRM before addressing the GRS?
* What does the Bank do to improve its overall efforts to prevent retaliation and protect its complainants?
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