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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](mailto:grsprocedure@worldbank.org?subject=Comments%20on%20GRS%20Operational%20Procedures)

**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. |
| 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. |
| 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. |
| 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. |
| 5 | Accessibility of the GRS | * Circulate more information on which different access channels and alternative avenues exist for complainants to approach the GRS. |
| 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. |
| 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. |
| 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. |
| 9 | Outcomes of the GRS process | * Include some sentences about what the desired outcomes of a successful GRS process might look like. |
| 10 | Representation | * Include a paragraph on representation, including how local representatives can speak on behalf of individuals or a whole community. |
| 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? |