

**Piloting a Grievance Mechanism
For
Government of Bangladesh's Social Protection Programmes**

Manusher Jonno Foundation (MJF)
SGSP-Civil Society Component

Final Report

By

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July 2015

Acknowledgements

I would like to thank Shaheen Anam, executive director of Manusher Jonno Foundation (MJF), for recruiting and using my expertise for such a valuable piece of work. This has been a great opportunity for me to contribute as well as learn from MJF's challenging work. My great appreciation goes to the programme team, especially to Shoma Datta for taking all the troubles of coordinating schedules and participating in all external meetings with me; Mohashin Kabir for providing all background documents, engaging and contributing to conversations so diligently; Md Ziaul Karim, MJF coordinator, for his practical advice and sharing his knowledge about the programmes and helping me to better understand them and their challenges. I am thankful to Tofail Ahmed too for his time – though very short, it has been extremely useful.

I would like to thank Nina Schuler, social development adviser of the DFID UK, for providing technical support to this study. It was a great privilege to work with her along with the Bangladesh DFID team members Naved Choudhury, Bishojit Deb and Karishma Zaman – thanks for their contribution, including the field trips.

Two local NGOs – PUSPO and SKS – for their time, organising all local meetings and providing valuable inputs and analyses from the ground reality.

Finally, a very special thanks to my good friend Tahmina Rahman for volunteering to support the study by undertaking some fieldworks for data collection and analysis.

List of abbreviations

CAO	The Office of the Compliance Adviser/Ombudsman
CBO	Community Based Organisation
CSO	Civil Society Organisation
DFAT	Australian Government Department of Foreign Affairs and Trade
DFID	Department for International Development
EGPP	Employment Generation Programme for the Poorest
FGD	Focus Group Discussion
FSP	Forum for Social Protection
GDP	Gross Domestic Product
GM	Grievance Mechanism
GO	Government Organisation
GRM	Grievance Redress Mechanism
GSDHC	Governance Social Development Humanitarian Conflict
HIES	Household Income and Expenditure Survey
MJF	Manusher Jonno Foundation
MoDMR	Ministry of Disaster Management and Relief
MoF	Ministry of Finance
MoSW	Ministry of Social Welfare
MoWCA	Ministry of Women and Children Affairs
MP	Member of Parliament
NFSP	National Forum for Social Protection
NGO	Non-Government Organisation
NSSS	National Social Security System
OAA	Old Age Allowance
SGSP	Strengthening Government Social Protection System for the Poor (SGSP)
SOP	Standard Operation Procedure
SP	Social Protection
SPU	Social Protection Unit
SSN	Social Safety Net
SSP	Social Security Programme
SSS	Social Security Strategy
SW	Social Welfare
TA	Technical Assistance
UFSP	Union Parishad Forum for Social Protection
UNDP	United Nations Development Programme
UNO	Upazila Nirbhahi Officer
UP	Union Parishad
VGD	Vulnerable Group Development
WB	World Bank
WDO	Women Development Officer
WFP	World Food Programmes

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Summary of the main findings

This study was commissioned to examine what could be the entry point to set up a simple and easy practice of grievance mechanism within the Social Protection Programmes of Bangladesh. The objective of this study was to provide a plan for setting up a pilot Grievance Mechanism (GM) for at least two government social protection programmes (within a given geographic area).

Bangladesh's social protection system is complex. Estimates vary, but they range between 120 and 145 programmes. Inevitably, they vary greatly in size and scope and are spread across a large number of ministries. The Government of Bangladesh spent around £2.5 billion in the fiscal year 2013-2014 or 2.5 percent of the GDP on social protection. This reaches around 78 million people. As a proportion of the GDP, an average 1.8 percent has been spent on social protection between 1996 and 2008. The expenditure is currently skewed towards a few large programmes, the ten largest of which account for two-thirds of the total social protection budget. The major government programme categories are food-based subsidy; emergency/seasonal relief and public works programmes; cash allowances to vulnerable groups such as the elderly, widows and the disabled; and 'development sector' programmes, including student stipends and school feeding.

Reforming the schemes by itself, however, does not guarantee that the poor will benefit from the transfers. This is because they are often actively excluded from forums at the local level where decisions are made without them having any say in how services are run and monitored. To change this, poor people need to be able to voice their concerns, be heard by decision-makers and be able to hold them accountable.

Citizens' capacity to express and exercise their views is vital for poverty reduction. To engage with public service providers and move beyond consultation to real influence, citizens need rights to a more meaningful form of participation.

This study was done to examine what could be some possible entry points to set up a manageable grievance mechanism within the Social Protection system of Bangladesh government, first by implementing it as a pilot and then by eventual scale up based on the demand and acceptance by the government.

As methodology, the study has taken available relevant documents into consideration both from Bangladesh and other countries to draw best practices about GM; held discussions with the MoWCA and the MoSW; met with Maxwell Stamp, WB, UNDP, Help Age Intl., WFP and think-tank researchers; and facilitated partner coordination meetings. This includes field visits to two sites, discussions with UNOs, UP chairmen and members, VGD and OAA group, staff of partner organisations, union and upazila-level social protection forums, and MJF, DFID and NFSP members.

Highlights of the study

- On various government papers, there is ample evidence of grievance mechanisms for Social Protection programmes, but there is no evidence that any of them is actually functioning. Main challenges around generating adequate number of complaints are: a lack of citizens' awareness about lodging complaints, reluctance of LEBs in addressing local-level GM issues and a lack of government monitoring to collate and resolve complaints.
- The pilot presents a good opportunity to test out a GM and to generate lessons that can be applied when the government has the appetite or the need for scaling up grievance mechanisms nationally.

- This study is proposing a GM pilot to consider three programmes, namely OAA, VGD and EGPP, at least in three upazilas for a period of 12 months.
- The proposed pilot focuses on mobilising and lodging grievances at Union Parishad level, with strong linkages to the upazila administrative structure to address grievances that can be solved at that level.
- Information campaign and string communication needed for the pilot to succeed.

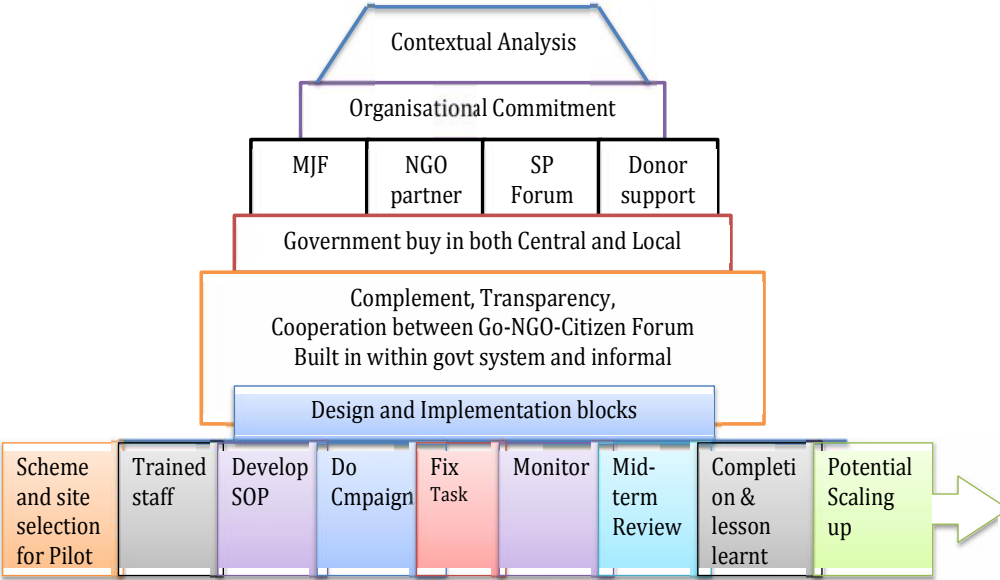
Summary of the main concerns

- The study acknowledges that implementing a GM before the reforms are at an advanced stage *is not optimal*, but it is equally unrealistic to halt all activities to wait for reforms. Given this, it is important to be clear about what the pilots are trying to achieve. Simply strengthening communication at union level, thus creating space to lodge complaints and address those, might be effective. But this may not be sustainable without institutionalising it.
- Selection issues relating to improper targeting, manipulation of lists and political interference are significant. These are the issues that create anger and frustration, but these are also issues that a grievance mechanism pilot alone cannot address. Managing expectations across the board will be an important challenge for the pilot.
- While the approach is to focus on the role of civil society as a mobiliser, it is important to understand that the efforts too dependent on CSO partners or which require significant investment from them (i.e. MJF) might not be sustainable.
- The grievance mechanism is just one small element of MJF's larger work on SGSP to support the demand side accountability for social protection. The activities and interventions of the two components are likely to complement each other, although it is important that the grievance mechanism activities are clearly defined and monitored.

Conceptual framework for the pilot

The following diagram explains the conceptual framework of the pilot that is based on principles of complement, transparency, cooperation between GO-NGO and citizen platform, built in within the government system and the informal patterns of grievance resolution.

Figure 1: Conceptual Framework for the Pilot



A. INTRODUCTION

A.1. Background: An Overview of Social Safety Net Programmes in Bangladesh

Over the past two decades, Bangladesh has made remarkable progress in poverty reduction. It has maintained robust annual economic growth averaging 6 percent since 2001. Poverty has decreased from 48.9 percent in 2000 to 31.5 percent in 2010 and the most recent reports published in daily newspapers estimate further reduction of poverty to around 27 percent, and the rates of hardcore poor now stand at 9.95 percent.¹ Yet poverty remains a significant and persistent challenge in Bangladesh. Over 50 million men, women, girls and boys live in poverty, out of which 28 million live in extreme poverty, without the means to even feed themselves properly. The Social Safety Net Programme in Bangladesh is more than simply a necessary element in fighting poverty.

Household Income and Expenditure Survey (HIES) shows that the coverage of Social Safety Net Programmes for poor and vulnerable households has increased, and they have helped lower poverty. But data also suggests that a large section of the poor and vulnerable households do not have any access to these programmes. The average benefit of safety net is low and in many cases falling in real terms. There is considerable leakage of allocated funds and a significant percentage of the beneficiaries are non-poor. For example, in 2010, of the 24.5 percent households that reported benefiting from at least one of the 30 SSPs covered in the HIES, 82 percent of the beneficiaries belonged to the poor and vulnerable group while some 18 percent were non-poor. Importantly, this means that 64 percent of the poor did not have access to any Social Security Programme. Existing safety nets bypass or ignore a large section of the extreme poor in Bangladesh. As a result, the impact on poverty reduction from the amount of money spent on these programmes is much less than what it could have been with a better Social Security System (SSS)².

Bangladesh's current National Social Security System (NSSS) is complex, comprising a large number of programmes managed by many ministries. According to a comprehensive official compilation prepared by the Ministry of Finance, there are 145 programmes under the Social Security System currently being financed through the budget. The total amount being spent on these programmes in FY14-15 was Tk 307.5 billion or 2.3 percent of the GDP. These programmes are administered by as many as 23 line ministries/divisions and there is no formal mechanism for sharing information among the implementing ministries/agencies.

Recently the Government of Bangladesh has developed a National Social Security Strategy (NSSS final draft/March 2015) to harmonise all these programmes into the largest poverty alleviation programme for sustainable development. The NSSS highlighted the absence of effective monitoring and evaluation (M&E) in the present Social Security System as one of its major shortcomings.

The NSSS builds on the past rich experience of Bangladesh and seeks to streamline and strengthen the existing safety net programmes with a view to achieving better results from the money spent.³ This reflects the strong commitment of the Government of Bangladesh to reducing

¹Source: Finance div., Bangladesh Bank and BBS.

²Social Safety Net Programme is now called Social Security System.

³NSSS, page 2, para 3.

poverty and inequality, including eliminating all kinds of discrimination in accessing services and social transfer.

A.2. Strengthening Government Social Protection System for the Poor (SGSP)

The Strengthening Government Social Protection System for the Poor project (SGSP) was initiated at the request of the Ministry of Finance (MoF) to provide technical assistance to the MoF and is expected to improve the efficiency and effectiveness of the expenditure on Social Safety Net (SSN) programmes. The DFID is in the driving seat in this (with 90 percent of funds) along with the DFAT. This programme provides TA to the MoF to set up a Social Protection Unit (SPU) that will run an MIS to track social protection expenditure and results (not just coverage but also outcomes such as income, health and nutrition). It includes TA for SID to link the poverty database to the SPU's dataset – explained by the DFID staff in Bangladesh.

The United Nations Development Programme (UNDP), the World Bank (WB), the World Food Programme (WFP) and Maxwell Stamp Ltd. are taking part in this project to improve the efficiency of the government department and staff concerned for effective implementation of the social protection programme. It is expected that the SGSP will enable the Government of Bangladesh to establish policies, budgets and cost plans to make delivery of social transfers more efficient and effective. Among other outcomes, this will result in a higher proportion of the poorest people benefiting from social protection schemes, an increase in the size of the benefits, less leakage of benefits to corruption and patronage, and more regular and reliable transfer to beneficiaries.

However, reforming the schemes and improving the efficiency of government departments and staff does not by itself guarantee that poor people will benefit. The poor also need to have a say in how services are run and supervised. The poor are often deliberately left out of forums at the local level where decisions are made. In order to change this, it must be ensured that poor people can voice their concerns, are heard by decision-makers and can hold them to account. To this end, a civil society component has been designed under the umbrella of SGSP.

Manusher Jonno Foundation (MJF) is implementing this civil society component by increasing accountability of the duty bearers and collating evidence of the grassroots for effective policy advocacy. Please see the table in annex 13 for SGSP partners and their responsibility.

A.3. MJF and the civil society component of SGSP

As part of the SGSP, the DFID is supporting MJF and through it, its partners, to strengthen citizens' participation and improve accountability of the social protection sector. Major interventions and approaches of this component are: a) Citizen engagement in social protection services, b) Introducing social accountability tools, c) Interface with service providing institutions, d) Grievance mechanism, and e) Capacity-building of the civil society.

The MJF has already organised citizens' Forums for Social Protection (FSP) supported through its NGO and CBO partners looking into the effectiveness and impact of social protection at union, upazila, district and national levels.

The National Forum for Social Protection (NFSP) is currently being set up. The NFSP is linked to the citizen forums at implementation level that is facilitated at district, upazila, union and municipal levels. Recipients and potential recipients of various schemes are represented in these

local forums along with local civil society members. The NFSP is the highest organisational structure of citizen forum with both individual and organisational representation. The key role of the NFSP is to bring grassroots views to policymakers for necessary policy reform. Therefore, setting up of a grievance mechanism is likely to complement NFSP's wider component of policy advocacy issues as it will provide a mechanism that will gather evidence from beneficiaries in a systematic way.

Recently a baseline survey was conducted to gather feedback from beneficiaries on the effectiveness and reach of social protection schemes, which will provide evidence for the NFSP for its advocacy to influence good governance in the sector.

A.4. What is grievance mechanism and why should we pilot it?

A grievance redress mechanism is a locally based, formalised way to accept, assess, and resolve community feedback or complaints (CAO Advisory Note – A Guide to Designing and Implementing Grievance Mechanisms for Development Projects-2008). The recognition of the need for an effective GM is not new in the context of social protection programmes. They are a crucial component of social assistance programmes, providing a formal mechanism or process for receiving, evaluating and redressing programme-related grievances from affected communities and citizens.

A review of GM in four Social Protection Programmes in Indonesia by Oxford Policy Management suggests that they (GMs) serve two functions. First, GMs help redress problems and improve performance in the implementation of social assistance programmes such as targeting errors, payment delays and corruption. Second, they provide a formal channel for citizens to hold governments to account for programme performance. As such, GMs are important to the broader objective of improving accountability, basic fairness and 'voice' of citizens in social assistance programmes.⁴

Literature from CAO also highlighted: "Well-functioning GMs provide a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, and lasting; build trust ... ; enable more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement." (CAO, 2009).

Global Review of Grievance Redress Mechanisms in World Bank Projects⁵ highlighted several operational benefits of a well-designed GRM:

- Improving project outcomes at a lower cost: GRMs focus on corrective actions that can be implemented quickly and at a relatively low cost to resolve identified implementation concerns before they escalate to the point of harm or conflict.

- Helping to prioritise supervision: Using citizen feedback, GRMs are a channel for early warning, helping to target supervision to where it is most needed.

⁴Review of, and Recommendations for, Grievance Mechanisms for Social Protection Programmes Oxford Policy Management, ValentinaBerca, 2012

⁵Global Review of Grievance Redress Mechanism in World Bank Project, 2014, Page 1..<http://documents.worldbank.org/curated/en/2014/01/20182297/global-review-grievance-redress-mechanisms-world-bank-projects>

-Identifying systemic issues: As part of a management system, GRMs can be used to identify some systemic implementation issues and trends that need to be addressed.

- Promoting accountability: Because most GRMs rely to some degree on local people and institutions, an effective GRM can help improve local ownership of development or SSN projects.

The Government of Bangladesh recognises that an effective grievance mechanism is an essential addition to social protection schemes. Through past reviews, the NSSS has identified a number of areas that need to be reformed, and one of the key priorities is establishing a grievance redress system so that all citizens have recourse to appeal decisions on selection and can notify the competent authorities about instances of misconduct and failures in the delivery of the promised benefit (NSSS, page 98, para 1).

The GoB encourages NGOs to continue and deepen the partnership and be a helpful assistance in the piloting of innovative ideas for possible scale up that includes helping redress grievances and disputes relating to the implementation of the NSSS.⁶

Therefore, a pilot with an aim to create lessons and examples that can potentially be scaled up by the government is important.

Desk research report by GSRDC in January 2015 highlighted that in Bangladesh a lot of literature describes 'proposed' GRMs rather than the ones currently in use.

The grievance redress system was established in all line ministries in 2008 and the Government of Bangladesh carried out an evaluation in its line ministries in 2011.⁷ To improve the grievance redress system, the Cabinet Division has given a number of directives and there are future plans to improve the system by using modern technology. However, they are non-functional due to a lack of complaint generation and the absence of a systematic enforcement from the supply side.

Much of the good practice around GM on a large scale involves the use of digital MIS systems and online platforms. This is the practice supported by the WB in the context of EGPP. brac's GRMs for microfinance programmes take into account that many people have limited literacy. It, therefore, provides customer service assistance in many of its centres to help people fill in the formal complaints form.

The GSRDC report⁸ mentions a number of factors which the literature suggests have been important for effective GRMs. They are: i) Communication campaigns; ii) Management Information systems; iii) Standard operating procedures or manuals; iv) Normalisation and incentivisation of grievance redress; v) Mobile telephones; and vi) Building on existing mechanisms.

⁶NSSS, Page 107, last para.

⁷ GSDRC, Help desk Research, Grievance Redress Mechanisms in Bangladesh, page 12, para 1.

Brigitte Rohwerderwith Sumedh Rao 23.01.2015

⁸ GSRDC report – page 2; Taken from: Rao, S. (2014). Grievance Redress Mechanisms in Pakistan. GSDRC Help desk Research Report 1117. Birmingham, UK: GSDRC, University of Birmingham. <http://www.gsrdc.org/go/display&type=Helpdesk&id=1117>

B. CONTEXT, FINDINGS AND ANALYSIS

B.1. Selection of three schemes

The study suggests considering OAA, VGD and EGPP for the GM pilot. Partners have been thoroughly consulted before making this choice.⁹ However, the main points for choosing them are the large scale of these schemes and their beneficiaries, most of whom are vulnerable women and older people; partners' engagement; and involvement of other SGSP stakeholders (WFP for VGD, WB for EGPP). EGPP's consideration has another additional point that it is the only scheme which, in agreement with the line ministry, has a well-designed GM in place with support from the WB, but is facing challenges to make it functional in the absence of complaints generation.

B.2. Current accountability mechanisms and approaches

There is no formal mechanism for systematically reviewing the performance of the SSS either at the national level or by individual programmes. Some limited efforts aimed at studying the impact of programmes supported by donors have been done in recent years. The findings of these one-off exercises illustrate the critical importance of instituting a well-designed formal M&E system for the SSS.¹⁰

The Government of Bangladesh understands that it is impossible to always make correct decisions on recipients. To address this, the Ministry of Social Welfare in close consultation with the SID will develop a nationwide complaints and grievance redress mechanism. The exercise will run in parallel with the task on selection processes, the recommendations will be implemented starting in 2016.¹¹

As per government operational manual, there are some complaint systems which exist in all individual schemes. But these are largely either informal or non-functioning for some *or* other reasons.

During a meeting with the WB, a member reiterated that GM is written in many policy papers in Bangladesh, but it is not tried, therefore it is not appropriate to say that GM is not working in Bangladesh context. The main challenge faced by EGPP is that of complaints generation, despite its use of technology like MIS and online platforms.

During a field visit, the complaints register book in Mithapikur UNO office showed only five complaints in the previous six months for all of its programmes. The website of MoWCA summarised only one complaint over the entire year (from January 2014-December 2014). (See annex 10).

A number of accountability tools such as social audit, community score cards, citizen charter and public hearing are being introduced through this citizen forum. During the field visit in Varatkhal Union, staff members from local NGOs and UFSP members were found familiar with and enthusiastic about using some of it. Particularly, the application of social audit generated

⁹ Please see annex 4 for details of partner consultation.

¹⁰NSSS, page107

¹¹NSSS, page xxi.

good sparks in the community. A beneficiary feedback survey was recently conducted by MJF for 10 selected schemes.

For measuring long-term impacts, I suggest relying on standard household survey data, captured periodically, for example, through HIES. The HIES will be in a three-year cycle from this year.

B.3. Institutional issues

Both ministries – MoWCA and MoSW – were broadly supportive of the pilot but at the same time acknowledge that the main challenges they face are around the combination of manipulation of targeting and insufficient funds to reach all eligible people. They suggest that local manipulation practices are ‘out of their hands’ and are ‘just the way things are.’

Most of the formal complaint mechanisms focus on the upazila level. This is chiefly because it is the lowest level of central government. However, findings suggest that individual beneficiaries find it incredibly difficult to access the upazila-level officials. MJF is interested in focusing its efforts in mobilising and lodging grievances at the union level, with strong linkages to the upazila administrative structure to address grievances that can be solved at that level. As a pilot, the approach will aim to see how/whether the union level can be empowered to be more responsive in collating and addressing complaints. This will need to be tested, critically.

The approach will aim to make use of the newly formed Social Protection Forums that the MJF is supporting. These are new and untested institutions and the pilot will see how effective they are with operational tasks.

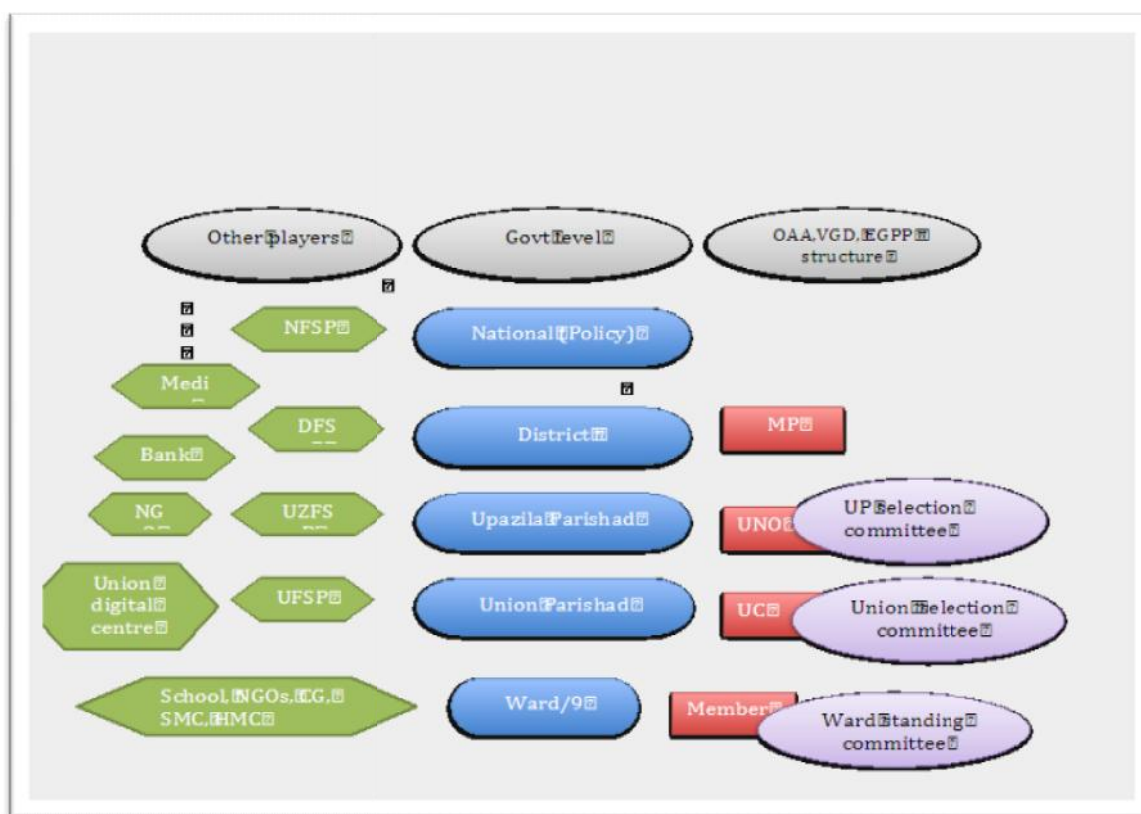
The Union Digital Centres are computer centres open at the union level to help people with simple computer-based administrative functions (applying for passports, paperwork etc.). These are new and apparently functioning and could be a potential resource in the programme, but more information is required. It is not yet clear if/how they will be engaged in the pilot but they may have a role to play if/when the approach becomes more digital.

The tag officers/social welfare officers from the upazila administration are supposed to play an important role in the implementation and supervision of social protection programmes. However, their engagement and availability appears inconsistent. They can play an important role in helping to address complaints, and it is important that the MJF pilot programme is able to effectively engage with them. Strategies for how to engage with these officers should be integrated into the pilot design.

The National Forum for Social Protection is a valuable audience and champion of this work. They will have an important role in helping to shape how the lessons from the pilot are translated into policy advocacy.

SGSP partners are broadly supportive of the idea of piloting a GM from the civil society perspective. Doing a GM before SP reforms are in place is not optimal – this has been flagged up by Maxwell Stamp. However, a communication campaign as part of the GM sounds ideal to them. Testing a GM could be an ambitious plan in WB’s view, but information campaign and awareness-raising about it is crucial in the community. The WFP appreciated that the pilot is likely to focusing at union level, with an interest to see that it takes f2f facilitation into consideration in its design.

Figure 2: Stakeholder at different level



B.4. Analysis of the three programmes

VGD is somewhat unique in that it provides food and training (unlike most of the programmes). VGD and EGPP are on cycles, whereas OAA is a lifetime enrolment. During FGD with OAA recipients, sticking points arose in the issue of how to replace people who have died. EGPP apparently has, with WB funding, a grievance mechanism in place but it has largely been unsuccessful, mainly because the mechanism starts at the UNO level, and with limited mobilisation, there are limited complaints. The following chart shows some features of the three programmes:

Table 1: Analysis of Three Safety Net programmes

	OAA	VGD	EGPP
Existing mechanism	Union committee to resolve selection-related complaints	Selection-related grievances to be addressed to the UNO in writing	Inbuilt GM agreed by ministry and supported by WB
Type of scheme	Life-long scheme	2-year scheme	Seasonal scheme – employment generation for 2 seasons
Type of transfer	Cash transfer	Food transfer and skill training	Public works or training-based cash or kind transfer
Mode of transfer	Transfer through designated bank	Food grain distributed at union level; Skill training	Bank and manual both
Key challenges	Less clear how list is generated	Food transfer; 24-month cycle (1st January 2015-31st December 2016)	Political issues Programme design
Opportunities	Direct bank transfer	Clear cycle	MIS introduced; GM inbuilt
Ministry partner	Ministry of Social Welfare (MoSW)	Ministry of Woman and Children Affairs (MoWCA)	Ministry of Disaster Management and Relief (MoDMR)/ DDM
Approval of	Requires MP-level	UNO	UNO

	OAA	VGD	EGPP
beneficiary list	approval		
Upazila committee	Headed by upazila chairman	UNO	UNO
Beneficiaries	Men and women both	Women-focused	Men and women both
MJF engagement (through partner and CBOs)	Yes	Yes	Yes
Common complaints	Selection and replacement-related	Selection-related	Selection and payment-related

B.5. Summary of type of complaints

Table 2: Type of Complaints in These Three Schemes

Type of complaints	OAA	VGD	EGPP
Target/allocation	Size of target is always an issue that causes grievance amongst eligible (as per criteria) but non-recipient community members. An average target is 3 times less than the actual need.	Same as OAA.	Basic designing of this scheme leads to many errors in targeting, mostly politically influenced.
Selection of beneficiaries	It is less clear how the final list is generated. As per the OAA operational manual, final approval of the list comes from MPs. Nepotism and inclusion of MP/chairman/member's vote bank is a common complaint.	Nepotism, bribing to receive the VGD card, non-adherence of procedure and political pressure are grave concerns.	Apart from nepotism and bribing, there are mentions of manipulation of the list in many ways such as migrant labour, ghost names etc.
Transfer	<ul style="list-style-type: none"> -Tedious collection process – distance of bank & UP, long waiting time, no facility for refreshment -Collection has transport cost -Sometimes collection by others has hidden cost -Delay in transfer -Some banks charge Tk 10 per transaction -Treatment in banks is good when upazila SW staff is present but their presence is irregular 	<ul style="list-style-type: none"> -Difference between quantity of food allocated and amount distributed -Not receiving training -Distributed food is not packed. It results in long waiting time, wastage and misappropriation -Treatment goes smooth when upazila staff is present. Presence of them is not regular 	<ul style="list-style-type: none"> -Payment through bank – 69% -Payment through UP member –17% -Payment from UP office – 10% -Payment received at home – 4% (Data taken from Baseline survey report) - Money paid to middleman, UP/ward member
Quality of product/transfer	Allowance is not enough to cover both food and medicine	<ul style="list-style-type: none"> -Food grains are of low quality -Quantity of food is not enough to cater to a whole family 	-Wages are often lower than the market rate
Replacement	Once the person dies, replacement is not done according to guideline	NA	NA
Who to complain	Not known by beneficiaries	Not known by beneficiaries	Not known by beneficiaries

B.6. Existing complaints mechanism in OAA, VGD and EGPP

This study focuses on three programmes – OAA, VGD and EGPP. Following are some details about existing GM in these schemes:

It is mentioned in the VGD circular 2015-2016 that once the UP notice board has published the list of selected women, any complaint about this list is to be addressed to the UNO in writing and the upazila VGD committee will investigate it. The UNO as president of the committee will form a three-member investigation team, which will report in five working days. Then the upazila VGD committee will take the final step to resolve it.

In the context of VGD, the grievance mechanism is to address selection-related complaints only and is largely non-functioning for a lack of formal complaints. First of all, the entitlement for complaint is not known, and secondly, 'complaints in writing to the UNO' can feel scary and a long way to deliver.'

In the case of OAA, the union committee will primarily resolve selection-related complaints. However, if there is a need for appeal, it will be sent to the upazila committee. (16.4, scope of work, Union Committee, Implementation Manual of Old Age Allowances Programme (Revised) 2013). There is no mention of how the upazila committee would handle it.

In EGPP, the first step of receiving complaints is at upazila level. However, it can be lodged at any level. The UNO at upazila level and the DC at district level are responsible as Grievance Redress Officers respectively, along with the project director at the central level. There are mechanisms for appeal at every level. A national steering committee led by the secretary from the Division of Disaster Management and Relief is the ultimate authority to resolve any appeal. Complaints can be filed in writing or verbally but must be made directly to the GRO. A grievance register book is available at every level. Complaints received at upazila level will ideally be resolved within 15 days. There is a telephone hotline in the office of the project director. The address of the project director is displayed on the project signboard. Once a grievance is resolved, the upazila committee is to inform the complainant about the decision.

B.7. Existence of informal grievances

Draft report of recently completed baseline survey (SGSP-Civil Society Component) finds 'one-third of the service providers claimed that there are existing grievance mechanisms to receive/accept beneficiaries' complaints as mandates of the respective circulars.' But the beneficiaries are not aware about the process. A rather meager portion of beneficiaries tend to claim their entitlements informally/verbally to the respective UP representatives. For instance, most of the service providers said that complaints are usually lodged to ward members and UP chairmen. The survey report says that 14 percent of complaints from beneficiary and potential beneficiaries are placed to local elites for onward placing to the respective UP representative.¹²

The following table summarizes from the findings of the survey against three schemes about existence of informal grievance and redress:

¹² Draft report of Baseline Survey of Enhancing Accountability & Transparency of Govt Social Protection System in Bangladesh (SGSP-civil society component), Page 62, by MJF.

Table 3: Type of Grievance and Redress Found in Baseline Survey

Grievance and redress found in survey	
Schemes	Type of grievances
OAA	10% of the respondents said that they had some grievances, but the majority (67%) said that their grievances were resolved after they had complained. 69% of the non-recipients applied for the allowance. Only 13% of the non-recipients lodged complaints against their non-selection and only 13% of the grievances were resolved with assurance to them to be considered for future selection.
VGD	70% of the non-recipients applied for the allowance. Only 15% of the non-recipients lodged verbal complaints against their non-selection to the UP representative and none of them had their complaints resolved.
EGPP	20% of the recipients said that they had some grievances, but all of them said that their grievances were resolved after they had complained. 45% of the non-recipients applied for the allowance. Only 11% of the non-recipients lodged verbal complaints to the respective UP representatives against their non-selection and none of them had their complaints resolved.

C. PILOT ITSELF

'There is no ideal model or one-size-fits all approach to grievance resolution. The best solutions to conflicts are generally achieved through localised mechanisms that take accounts of the specific issues, cultural context, local customs, and project conditions and scale.'¹³

International good practice on grievance mechanisms highlights the importance of (i) using existing systems (both at government level and informal); (ii) having responsible individuals and ensuring that the key players are trained; (iii) using communication campaigns; (iv) having a clear Standard Operation Procedure (SOP); and (v) ensuring that GM practices are built into staff work and supervision and are not add-ons. For programmes that aim to achieve momentum, measuring the expected demand (number of users) and having an appropriate MIS system are also critical.

The pilot will take into consideration the good practices and build on what the system already has in place, but with clear focus at the union level. So far, the evidence of existing systems shows that generating complaints is the biggest challenge for any GMs to become functioning even if there is a sophisticated GM design in place (WB supported EGPP).

A good lesson for integrating customer service into the grievance mechanism comes from brac microfinance. This helps in many ways. First of all, the complaint is listened to in order to

¹³CAO Advisory Note, A guide to designing and Implementing Grievance Mechanisms for Development Projects, page 28.

determine if it is at all a complaint or not. Customer service assistants may help to write it. And the conversation itself can be a learning process for the client. Another feature is having female customer officers for female clients – a natural comfort for vulnerable women.

Given MJF's area of expertise (social mobilisation), the level of engagement from government (limited but with interest), and the timeframe, the proposed MJF approach is to focus (initially) on more traditional approaches – complaint box/call centre, along with facilitated mobilisation. This approach will aim to focus on the challenges around (i) generating meaningful complaints; (ii) encouraging transparent and formal processes of logging and managing complaints; and (iii) creating feedback loops to ensure that beneficiaries are aware of the actions. This approach can easily be integrated/fed into a more digital approach, but the initial emphasis will be on establishing the system (without being distracted by new technologies).

Therefore, realistically the pilots are likely to:

- (i) Strengthen communication at local levels around the SP programmes;
- (ii) Identify what kind of grievances people have (and channel these upwards); and
- (iii) See whether/how institutions at the union/upazila level respond to the opportunity to engage in a grievance mechanism (lessons on their interest or lack of interest will prove useful for future learning).

Managing expectations throughout the pilot will be a challenge. Therefore, it would also be helpful to focus what this pilot will not achieve:

- i) Like any GM, it is not to fix the issues of corruption around it;
- ii) It is unlikely to address selection-related complaints that are entirely political. However, this needs to be tested; and
- iii) It will not address the complaints that are locally non-fixable, but they can be logged and sent upward as appropriate. For example, if it is a wider policy issue, MJF and NFSP will note it as evidence for policy advocacy.

C.1. Preconditions for pilot

There are universal preconditions for any GM to work, that is, people both in the demand and supply side are aware of it. In the context of SSS programmes in Bangladesh and the larger socio-political environment that it is operating in, the pilot proposes the following two preconditions be addressed effectively:

- a) People (all concerned) should know about their i) rights and entitlement, and ii) the complaints mechanism;
- b) Government buy in, and that is i) buy in by local authorities, and ii) line ministry support.

People (all concerned) should know: This part of the project is basically done through media campaigning – to have the national media (television, radio and offline) take the lead and then further spread through word of mouth by partners/stakeholders in the project area. In the case of the pilot, it will focus on UP level and use popular folk forms of communication such as folk

theatre, songs etc. so that poor people can identify with it and can engage in conversation/discussion. During the partners' coordination meeting, the formal communication that has been used for awareness-raising so far has been identified as 'bookish' and 'difficult' for the poor people with limited/no literacy to learn. These more popular approaches of communication will complement other communication approaches/products/tools that are being used in the field to introduce accountability measures like the citizen charter and score cards, public hearing and social audit.

The following table shows the detailed elements of the precondition and effective communication approaches:

Table 4: Summary of Rights and Complaints Mechanism

Rights and entitlement	
What is it	How
<ul style="list-style-type: none"> -Size of allocation -Criteria of selection -Structure and mechanism -Transfer amount and package -Understand rights vs. charity 	<ul style="list-style-type: none"> -Information campaign that includes popular form of communication, community radio and dish channel -Displaying info: picture and flyer -Awareness approaches – facilitated group discussion, dialogue
Complaints mechanism	
What is it	How
<ul style="list-style-type: none"> -Entitlement to complain -Who to complain to -What to complain about -Where and how -Mechanism for resolution/process 	Same as above

2. Government buy in: It is crucial that the government not only shows interest, but buys in and participates in the pilot. Without the local authorities' active participation, the pilot will not move. Local authorities also need to see that their line ministry is taking interest and supporting it. During conversations, both the MoWCA and the MoSW sounded supportive. Challenges are anticipated at upazila level – even if there is political buy in and support from the line ministry, the current workload of respective staff and UNO office itself might be an issue. Tag officers/social welfare officers are assigned to more than one Union Parishads which can make it difficult for effective follow up and investigation.

The following table shows detailed elements of the precondition and how it will be achieved:

Table 5: Summary of Government Buy in

Local authorities buy in	
What is it	How
<ul style="list-style-type: none"> -Tag officer/SW officer -UNO -Union council chairman -Women development officer -Ward member -Upazila chairman -Member of Parliament (MP) 	<ul style="list-style-type: none"> -Committee member and the process itself -Proactive dialogue by MJF partner -Support from line ministries

Ministry support	
What is it	How
Recognition from line ministries/ related authorities. For example – a letter to UNO and Local Govt would work	NFSP/MJF to approach ministries and related authorities. DFID can engage for consultation

C.2. The proposed Grievance Redress Mechanism – The Design

The proposed design is not to replace inbuilt complaints mechanisms that already exist in operational manuals, but to complement them. It will connect upward with the respective schemes – OAA, VGD and EGPP. The main thrust of this approach is to bring all informal complaints that exist into a formal system, document them, create feedback loops and learn from it.

Organisation for grievance redress at union level will be in the form of a three-member team headed by a tag officer and two SP forum members – one male and one female. An NGO staff member will join this team with specifically the responsibility of documentation, preparing a monitoring report and assisting all formal communications. The team will meet at the UP office for a monthly planning, coordination and monitoring meeting.

Step 1: Generation of complaints

The pilot will use multiple approaches for generating complaints from both recipient and non-recipient community members. From talking to the beneficiaries and staff in the field it seems that a complaints box, a phone to call, and facilitated mobilisation are the common approaches that they like to adopt. However, writing a complaint and going to the location to drop it is not an easy method for community members. Therefore, the idea is to develop a popular tool – a complaint card with common complaints written on it to be marked (ticked) as they apply. This card will be made easily accessible through more than one channel to the community/individuals. Complainants can be assisted to fill in the card. The complainants may remain anonymous if they wish to, but the persons collecting/delivering the card must place their own names on it.

Approaches to complaints generation:

This will include:

- i. Complaint box on the UP office premises. They can also be placed at additional places depending on local geography and context.
- ii. Ward meeting to include agenda for card familiarisation and distribution, and who can help writing and collecting it to drop in the box.
- iii. SP forum facilitates meeting – a point for familiarising the card, distribution and collection of complaints.
- iv. Service booth on the day of selection and distribution – with a point for card collection and lodging complaint.
- v. SP forum, while using social accountability tool (social audit, public hearing), will collect complaints using the card.

- vi. A phone number to register voice complaints with the UNO.

Whoever completes it and in whatever way, all completed cards with date, signature and address should be dropped into the box. The tag officer will open the box on a fixed day of every month. There will be an opportunity to walk in and lodge verbal complaints on that day too.

Step 2: Send it to the right person in the right way

Tag officers will open the box and do the following:

Categorising: on a practical level, it will be important to distinguish between types of complaints/issues – (i) things that can be fixed at union level, (ii) things that can be fixed at upazila level, (iii) things that need to be acknowledged and logged, but are unlikely to be fixable immediately, (iv) things that are policy related, (v) things that are not relevant at all. Other points include:

- Registering complaints in the logbook
- Discussion and complaint resolution
- Creating a complaints summary template, with a plan of action
- Welcoming anyone to walk in to lodge a complaint/receive feedback

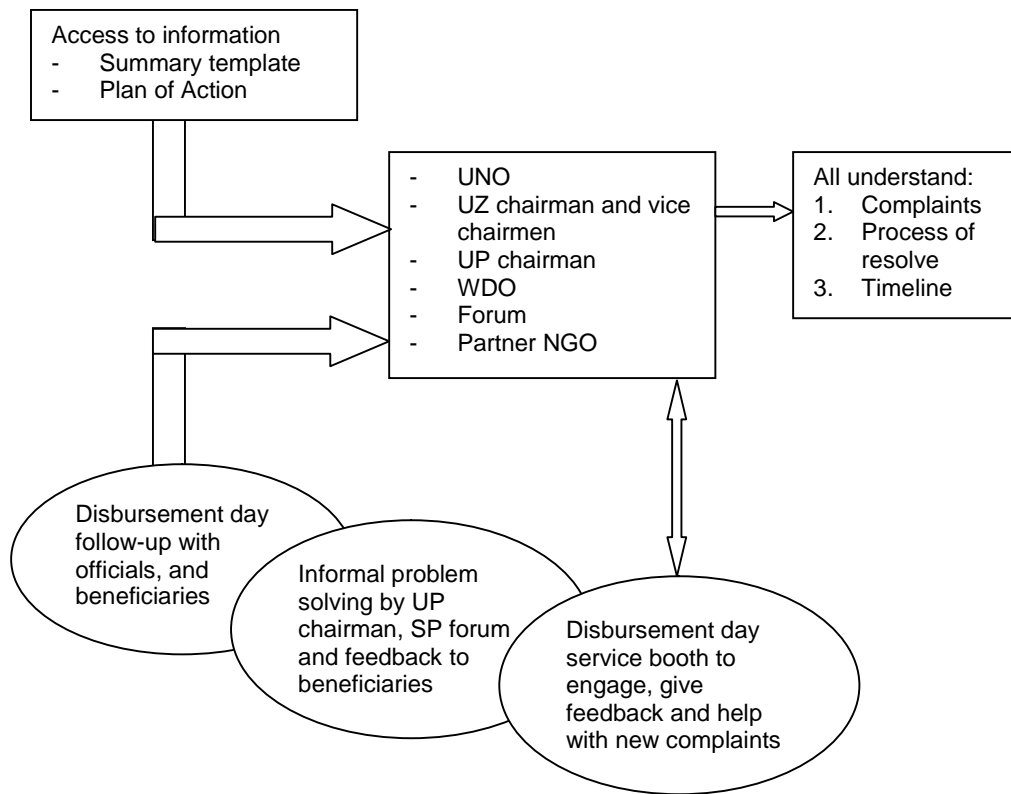
The tag officer (and the team members as delegated) will address the issue within three days of receiving it.

Step 3: Act for resolution

The complaints summary template, including the plan of action, will be shared with all concerned – UNO, upazila chairman and two vice-chairmen, UP chairman, WDO, UP SW officer, MJF/partner NGO and SP forum – to maintain a clear understanding of complaints, the process for resolution, and timeline.

The diagram explains how this would work. The tag officer is to share complaints summary template and plan of action at union level. The plan of action will show who is going to do what. For example, it can say, ‘complaint number five is requested to be addressed by the UP chairman within three days’; or ‘complaint number two – SP forum to give feedback to the complainant that her issue has been sent to the UNO for action from that level.’ Therefore, members/participants can communicate, meet each other, make phone calls, give feedback, and interact as much as needed in order for conflict resolution.

Figure 3: Act of Resolution



Step 4: Monitoring, resolution, documentation and feedback to beneficiaries

The GM team will sit for a monthly meeting to review the last month and to open the box for new complaints. The meeting will do the following:

- Logbook updates with results
- Review plan of action
- Discuss progress/further investigation/ resolution
- Forward any unresolved complaints to the UNO at upazila level

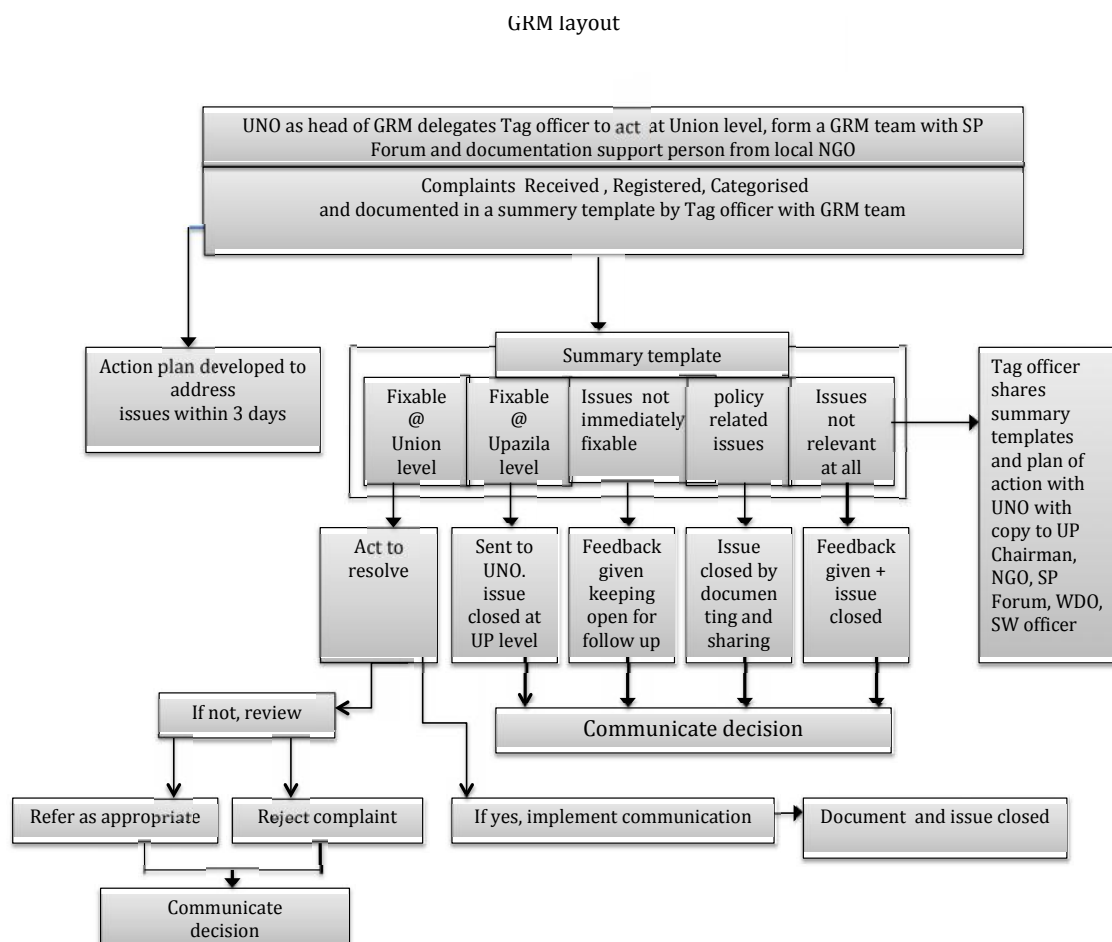
Step 5: Producing a quarterly monitoring report

Quarterly monitoring reports will be produced every three months.

The report should be shared with all key players – UNO, upazila chairman, upazila SP forum, union SP forum, UP chairman and MJF/partner.

The UNO will bring the total safety net review report of the upazila as an agenda for information and discussion in the Upazila Parishad meeting twice a year, as all UP chairmen, mayors, elected women members and officials concerned are likely to be present in these meetings.

Figure 4: GRM layout



How to connect with upazila-level structure: At upazila level, the structures for GRM for each individual scheme are different as per their operational manuals. Therefore, making effective connections might be different for each one of them. In the design, first of all we are proposing sending the complaints, which are fixable at upazila level, straight to the UNO upon analysing and categorising them. The UNO is likely to come back to the tag officer to help with the investigation, particularly in the case of VGD and EGPP. Secondly, the complaints, which are not resolved successfully at the union level, can be forwarded upward. Once the concept and the design are accepted, there is a need to work with each of the scheme’s structures to set it out clearly.

C.3. Monitoring and review of GM

Recognising that this is a pilot, it is recommended that the pilot take an iterative approach—testing and revising the approach in a systematic way. The proposal will likely include this issue. As such, areas for reflection may be around: design of complaint card, functioning of various committees, relevance and usefulness of grievance log template, modalities for generating complaints, addressing issues of capture/manipulations, generating buy in from local partners.

The pilot is for 12 months, with quarterly monitoring report in the first quarter. The MJF review is suggested in the 2nd quarter, on the 6th month of implementation, and the project completion evaluation will take place on the 12th month.

Table 6: Monitoring and review with specific timeline

Months	Activity
1-3 months	Preparatory phase
3rd month of implementation	1st quarterly monitoring report by GRM team
6th month of implementation	Review by MJF
9th month of implementation	3rd quarterly monitoring report by GRM team
12th month of implementation	Final review and lessons learnt

C.4. Deliverables at preparatory phase

At least a three-month preparatory phase is anticipated. During that period, it is expected that the following will be delivered:

- Plan for information campaign in selected upazila/union, including products such as print material, folk theatre, community radio etc.
- Complaint card – developed, pre-tested and printed
- Complaint box
- Communication material: summary documents of government scheme (VGD, OAA, EGPP)
- Upazila and union-specific communication products for displaying – allocation, timeframe, disbursement dates (specific to geographic area), place etc.
- GM booklet – guide for forum, staff and volunteers
- Template for logbook to register complaints

C.5. Pilot site selection criteria

Administratively, it might not be helpful to pilot all the three schemes in several unions in one upazila because then it will be difficult to coordinate with the different line ministries involved in these three schemes.¹⁴ It would be better manageable to pick one upazila for each programme, and that way the MJF will select a minimum of three upazilas.

The study team has visited two programmes, including the beneficiary group – the SP forum and KII informant in Mithapukur and Shaghata.

¹⁴ Annex 3, summary notes from field visit

The current UNO of Mithapukur was found very enthusiastic about piloting the GM. The observations are also quite positive about partner NGO PUSPO's engagement with local government on accountability issues. Recently, PUSPO with the SP forum was successful in monitoring and identifying the wrong selection of three recipients in one of the schemes (see annex 11).

In Shaghata, partner NGO SKS is a reputed one in terms of achieving results, and is also influential. Our observation about using social accountability tools together with the SP forum was very encouraging. The Varatkhal Union Parishad is also successful in implementing schemes with utmost transparency and upholding good practices.

The Poverty Map 2010 shows that Rangpur and Barisal divisions have the highest incidence of poverty. However, in general, more people in northern Bangladesh are living both below the lower and upper poverty lines. From that point of view, it makes sense for the pilot to focus on northern Bangladesh, learn best from that situation and then scale up. Therefore, it is suggested that all the three upazilas are selected from northern Bangladesh.

The study team recommends piloting the grievance mechanism for i) EGPP at Saghata, Gaibandha, ii) VGD at Mithapukur, Rangpur, iii) OAA, Kazipur, Sirajganj, after considering, among other things, local government buy in, vulnerability and concentration of poor people, willingness and capacity of the partner NGO to implement the pilot activity and partner NGO's ability to influence (in case of managing risk for whistleblower).¹⁵

D. Capacity issues

The MJF will need a full-time human resource person for a year in addition to its current capacity to lead this pilot project. It should also be mentioned that as GM is not very functional or well practised yet in Bangladesh, it would be hard to get a person with substantial knowledge and implementation experience. Therefore, capacity-building in a form of training and exposure can be considered.

The MJF recognises that documentation is sometimes an organisational challenge. In order to be meaningful, the pilot should include good documentation and reporting resources to help convey the usefulness of the lessons learned. Documentation is a challenge for MJF and its partners in general. While meeting SKS, the director specifically flagged it up. It will require a specific skill recruitment to run the pilot, he mentioned.

Regarding capacity of the local government, it feels as though tag officers are already stretched over a number of unions. It would be good to provide incentives to the tag officers for improving efficiency.

Finally, I would suggest that for capacity-building of the pilot team (includes tag officer, union forum member and local NGO staff) it would be helpful to have an exposure visit to the employment guarantee scheme (MGNREGA) in India. This will contribute to the element of team-building for the pilot team, which is crucial in a project like this.

Apart from all the regular and human costs of the project, the cost of complaint investigation should be considered, including local transport, subsistence for investigation and the cost of monthly GM meeting.

¹⁵ A selection grid (Annex 3) developed with traffic light indicator is attached as annex 4.

E. Expenditure/cost of piloting

Table 7: Cost of Pilot to Include Following Line Item of Expenditure

Sl	Line item	Some details	Amount
1.	Cost of human resource	MJF-1, Partner NGO-3	
2.	Capacity building	-Exposure trip to India for a team of 20-30 - Incentive for tag officer	
3.	Enhance communication	Mobile phones for GRM team Laptop for documentation	
4.	Complaints investigation	Local transport and subsistence	
5.	Cost of monthly meeting	Simple refreshment/tea and stationeries	
6.	Training/orientation for all concerned		
7.	Material development for the project and printing	Complaints card, GM booklet, posters etc	
8.	Media campaign development	Working with external/local agency and product development	
9.	Cost of media campaign	For first three months	
10.	Monitoring cost	At MJF level and field level	
10.	Mid-term review		
11.	Final review with external consultant and lessons learnt		
12.	Consultation and feedback for potential scale up		

F. Road Map

Table 8. Milestones towards Implementing the Pilot Project

Milestone	Some details and how to achieve	Who to lead	Timeline
Final draft report accepted	-Final draft shared on 15th June -Feedback received from DFID -Final report accepted	-MJF -DFID	By July 15
Organisational commitment	-MJF making clear commitment – a decision to moving forward with the PILOT -NFSP on board with required level of commitment -Commitment from DFID to support the project	-MJF -NFSP -DFID	By July 15
Generating buy in from GoB	-Consultation with government and relevant ministries – MoSW, MoWCA and MoD -SGSP partners consultation -Consultation with UNO/local government	-MJF with support from DFID	By 15 September
Selection of upazila and union	-Consultation with local government -Consultation with NGO partners -Consultation with upazila and union-level forums	MJF, local NGO partners	End of September
Staff recruitment	MJF recruit project staffs	MJF	By September
Developing a detailed pilot mechanism	-Based on feedback from all concerned, a detailed mechanism is designed including developing SOP -Developing guiding questions for monitoring	MJF with local NGO partners and local government	By October
Assigned staff are in place in project area	-Local NGO assigns/recruits staff for documentation -UNO assigns tag officer (s)	Local NGO with support from MJF	By October
Training of relevant staff and forum members	-Staff and all concerned in 3 selected upazilas/unions take part in training and orientation on how to handle grievances according to the SOP -Capacity building initiative of staff completed	MJF with support from DFID	By November
Plan for information campaign	-Simple strategy including operational plan for local campaign is ready	Local NGO with support from MJF	By November
Material development	Material and product for both information campaign and implementing GRM developed, pre-tested as required	MJF – local NGO partners	By December
Launch of information campaign	Campaign to start at least a month before the actual project launch	MJF with local government and forums	By December 2015
Implementing pilot for GRM starts	All required logistics are in place	MJF with local government and forums	By January 2016

G. Risks/challenges

Grievance mechanisms are notoriously difficult to get traction on for a number of reasons. In Bangladesh, using an NGO to pilot a grievance mechanism for a government programme is particularly challenging. This is why it is a pilot – to learn, try, reflect, improve and bring together key lessons.

A table is added as annex 14 to indicate some of the risks/challenges to the pilot that the MJF and the DFID should be aware of.

H. CONCLUSION AND RECOMMENDATIONS

1. This pilot is not a new layer within the existing structure. It is, however, an extension of the existing grievance mechanisms to bring the system close to the community, bring existing informal complaints into a formal system, to see how different institutions engage with it and how all these activities contribute to empowering local institutions for potential scale up by the GoB, when there is a desire.

2. There is a significant opportunity to strengthen communication and transparency at all levels with simple public information. This may be an easy win for the pilot and should be emphasised. An information campaign should be a prerequisite and the GM pilot project itself should get equal emphasis. During scale up, the national media should do the communication campaigns and then it can be further spread by partners through word of mouth in the project area. The WB-supported GM for EGPP largely lacks the campaign part. In case of this pilot, the three selected upazilas can have an alternative, a locally tailored information campaign plan to create expected transparency, awareness and knowledge for the GRM to be effective.

3. Scale up by the government – supporting MJF’s approach to evidence-based advocacy, the pilot implementation will need to be clear on (i) what they want/expect to achieve, (ii) how they will monitor it, and (iii) how they will document/convey the story. Though we are not proposing a full-fledged double-difference research approach (as one informant suggested), there should be clear learning/monitoring questions guiding the pilot. While the approach is focusing on the role of civil society as a mobiliser, it is important that the aim continues to be on how the approach/lessons learned can be scaled up. Efforts that are too dependent on CSO partners or require significant investments in MJF-facilitated forums might not be sustainable.

4. As the information campaign should be given importance, it is recommended that the pilot activity have a comprehensive design for it. The information campaign should include the instruments for facilitating discussions that encourage people to engage in conversation, and eventually this would contribute to creating an environment where people will have less fear to lodge complaints.

5. How to fit the pilot project to the upazila level’s existing GM structure for each individual scheme (OAA, VGD, EGPP) needs discussion with the respective authorities at local and central levels.

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J. Annexure

Annex 1: Simple consideration for a Grievance Mechanism
Annex 2: Geographic Location of the Civil Society Component
Annex 3: Upazila Selection Grid for Pilot
Annex 4: Note from Partner Coordination meeting
Annex 5: Existing GM in NGO
Annex 6: Notes from field visit
Annex 7: Some more issues from Field Visit
Annex 8: Notes of meetings with SGSP stakeholder
Annex 9: Meeting with Line Ministry
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Annex 11: Grievance addressed/solved in 2014 in MoWCA
Annex 12: International Experience of GMs
Annex 13: SGSP partners and their responsibility at a glance
Annex 14: Key Risks/Challenges

Annex 1: Simple consideration for a Grievance Mechanism

a. Setting the stage- preconditions
People know (i) their rights (criteria/process/amount) and (ii) about the complaint mechanism itself.
Local authorities are interested & willing to participate and try to resolve complaints.
b. Main elements of a Grievance Mechanism
1. Generating meaningful complaints. Distinguishing <i>what can be resolved locally and what is a larger policy issue.</i>
2. Bring the complaint to the right person in the right way. (logged, formal)
3. Advocate for resolution of the complaint. (Informal/Formal)
4. Monitor the resolution- and feedback to person lodging grievance
5. Support documentation and learning.

(Source: Discussion summary with experts)

Annex 2: Geographic Location of the Civil Society Component

SL#	District	Upazila	# Local Government Unit(LGUs)	
			UPs	Municipality
1	Rangpur	Mithapukur	8	0
2	Satkhira	Kolaroa	10	1
3	Gaibandha	Saghata	10	0
4	Cox'sbazar	Moheshkhali	8	1
5	Sirajgonj	Kazipur	10	1
6	Sunamgonj	Jamalganj	5	0
7	Faridpur	Sadar	10	1
8	Chittagong	Banshkhali	10	1
9	Laksmipur	Ramgati	8	1
10	Pabna	Sujanagar	6	1
11	Barisal	Banaripara	5	1
12	Rangamati	Borkol	5	0
Total			95	8

Annex 3: Upazila Selection Grid for Pilot

Sl	Selection Criteria	Traffic light indicator		
		Green	Amber	Red
1	Local government buy in			
2	3-5 Union implementing the selected scheme			
3	Vulnerability and concentration of poor people			
4	Completed MIS (for EGPP)			
5	Database of poor people is accessible (for VGD)			
6	Partner NGO is willing and have capacity to participate in pilot project.			
7	Partner NGO's ability to influence (in case of managing risk for whistle blower and initiate protection if needed			
8	Social Protection Forum (SPF) at Union level is active and credible.			
9	Social Protection Forum (SPF) at Upazila level is active and credible.			
10	GO-NGO coordination is healthy at Upazila and Union level.			

Annex 4: Note from Partner Coordination meeting - 09/04/2015

Participants: All partners - 2 staff from each organisation, 3 colleagues from MJF (Total 27).

Perceptions of GM amongst partners are very clear. A 3 minute exercise was done to write down individual understanding about GM. Everyone understands that it is a system/process to solve current and potential disputes in a systematic way. A significant number of staff has described it from a rights point of view and seen it as one of the accountability measures to improve the programme effectiveness and transparency.

The following are some of the mentioned as tools/ approaches to be used for GM:

Facilitated mobilization - UthanBoithok, Complaints box at Ward level. SP Forum member can make grievance complaint in writing and connect with journalists to use media, network of old age people as Old Age Forum , Registered SPF member at Ward level, mobile phone to call, verbal complaints - some one can help writing- maybe an assigned forum member.

Which programme to select for pilot: first choice is VGD. The reason given is

- i. The number of beneficiaries are greater in this scheme
- ii. Target is most vulnerable women for poverty reduction, include women empowerment issue. it is on a 2 year cycle, so monitoring and measuring

achievements would be consistent, political interventions are there in selection process. Almost all partners are engaged with this scheme for monitoring purposes.

Second choice is OAA and the reasons given are:

- i. Life long scheme needs scaling up as many eligible people are out of reach of this scheme just because of the size of allocation, which is quite small.
- ii. The fact that MPs intervene for selection and finalising the recipient list is something that UP level people cannot do anything about.
- iii. Programme design is good - nowadays, money is disbursed through banks but collection is a real hassle if the bank is not close by. Government should find a way to send the money through 'Bikash' !

The third choice sparks debate between School stipend and EGPP.

- i. School stipend is not entirely considered as safety net on other hand EGPP design is faulty (at first it was 100 days and now 40 days; design was done for extreme poor pockets of the country and now it is everywhere for political reason –doesnot suit everyone) and the programme looks disorganized
- ii. Wages offered by the schemes is lower than market price that creates problems to attract local labour, migrated labour are there. **What should we be considering for geographic location for the pilot - Upazila:**

Database for vulnerable people is available, GO-NGO coordination is healthy, MJF partner has capacity and willingness to take part in the pilot.

What should be the likely entry point for this pilot:

-Developing Local Leadership: through access of information, training and creating a local platform for people to act. Strengthening newly build SP forum can achieve that.

-Campaign: government circulars are ineffective; the training and information developed from them lack creativity. Even many ward members do not understand them. Only popular information campaign at local level can make things easily understandable for the community

Annex 5: Existing GM in NGO

brac Microfinance has an inbuilt Grievance Redress Mechanism for its clients. Two types of clients- DABI (woman only) have 4 million members, and PROGOTI (men and women, both as entrepreneurs) has 3 million members. Clients can submit complaints via a designated complaints box situated in every branch office. There are a total of 2200 offices. As many clients have limited literacy, brac provides assistance through its 900 Customer Service Assistants (all woman), who can support clients in completing the formal complaints form. Area manager have the key to the complaints box and access the complaints at least twice a month. The Area manager writes a small summary of complaints in the register book.

From September 2014, a phone number is given to register complaints. Through the call, centre, it goes to a higher level and is then forwarded to the respective Area/Branch manager to deal with it. Mostly PROGOTI clients use this option.

The call centre is multi-functioning, mainly does tele marketing and has a register book to receive complaints.

Apart from this formal complaints system, the branch manager deals with informal complaints every month - brac is currently thinking about how to embrace the informal complaints into formal system.

Complaints generation at a glance in brac Microfinance

Through Call centre	5 complaints per month
Through Complain Box	5-10 per month
Informal by Branch manager	20-30 per month

Christian Aid: CA Bangladesh has a complaint management system and a policy and procedure document which aims to ensure consistency in practice across CA Bangladesh and its complaints management provision. The policy applies to everyone connected with the work of CA. There are nine steps in the management of complaints from acknowledgement to accountability of the complaints procedure, through a complaint audit. (please see Annex * for details)

Help Age International: It monitors and follow up OAA in their working area as part of their programme. Old People Association (OPA) (include OAA beneficiaries and non-non beneficiaries) was formed in 1991 at grassroots level and now have a National Association. Credible OPAs in some places have good examples of effective lobbying and advocacy to resolve grievances. However, the organisation does not feel that any formal GM would work in Bangladesh context.

SKS: HR system has clear guideline for Grievance Procedure (10.5) for its employees.

Annex 6: Notes from field visit

23/04/2015

FGD with VGD group at MithaPukur

The group has limited knowledge about their entitlement. During discussions, they talked about the low quantity of allocation, low quality food grain and long waiting times during distribution day without any resting place, refreshment etc. They also mentioned that they don't know who to complain to, They also opined that are afraid to lodge any complain because of fear of losing the membership of VGD.

During the discussion of cash transfer as a substitute food grain, their opinion was that though food transfer limits their choice to commodities, they think food grain (instead of cash is required to ensure household food security. As they have various basic demands to fulfil, they are in a trade-off in terms of the choice to meet that demand when they have cash, but if they reserve their food, they can think one step further to increase their livelihood

Meeting with UP Chairman - MithaPukur

Discussion with UP Chairman exposed some challenges of VGD and OAA schemes. According to him, OAA is a good programme. It allows transfers through banks, and therefore there are less errors. **But the main errors happen when the beneficiary selection and replacement process takes place. Political influence is high in this scheme and they have lower control over this scheme.** UP is closely involved in the VGD scheme. They receive some informal

complaints that are solved on a one to one basis. He mentioned the lack of coordination among the ministries as a chief problem in trying to hold anybody accountable for the errors and capacity of staff in terms of number and clarity as well. Finally, he bemoaned the third party involvement in monitoring the GM.

Meeting with Union Level Forum-MithaPukur

The forum ensures that there are members from all strata of the society. They sit every 2 months. They usually talk with beneficiaries, collect their voice and feedback to Union Parishad. They mentioned some of their achievements regarding how they included some eligible beneficiaries and mentioned about their knowledge gap and training. Their main concern about grievance was less allocation of membership card while there are huge number of poor and old people remain excluded in the community.

Meeting with UNO, MithaPukur

He is enthusiastic about piloting the GM in his area. According to him, good practice involves bank transfer, public awareness before member selection and distribution.

He added that improvements were required in terms of monitoring the schemes. In terms of receiving complaints, he added that people have a lack of awareness about complaints, and that most are informal. He emphasized on having an information campaign about introducing GM mechanism. His suggestion was to use government Information Center at Union level which is known as Digital Centre to introduce GM. At one point of the conversation, he tried to establish that all schemes have an in-built complaints mechanism (including his phone number has been circulated) and in his Upazila he is receiving many complaints and addressing them as required. Later we found in the register book that only 5 complaints were registered over the last 6 months.

However, towards the end of the meeting, he sounded very positive and even said he will try to use Prime minister innovation fund for the pilot if needed. He also appreciated PUSPO's recent success of identifying wrong selection of 3 women, that he has replaced with sufficient evidence.

Meeting with Staff at PUSPO Bangladesh

In the staff meeting, the staff mentioned a lack of information about Grievance in supply and demand side as a major concern. They added that as the VGD and OAA card holders get their card after passing several steps and hassle, they feel discouraged to lodge any complaint for fear of losing membership. They mentioned about political pressure on selection process.

Staff mentioned about importance of dedicated staff at Union Parishad and Upazila level to collect complaint and capacity of Forum members to deal with GM.

24/04/2015

FGD with Bharatkali VGD Group

The group is new in the to discussion about the VGD scheme and GM. Very few members know about their entitlements. They have complaints about low amounts of food, low quality food and threat of sexual harassment. They discuss their worries usually with Forum members and in some cases with the Ward members. They think if there is any dedicated person at Union level, it will be helpful to discuss their entitlement and any complaints with them.

Meeting with Bharatkali OAA group

It was an old group. Most of the members of the group are aware about the selection criteria but about they have no clear idea about replacements. When one member died in this group, the allocation was passed to his son who most of the time lived in Dhaka for construction work and visited his family only once every 3/4 months for collection. They do not know about waiting list.

The bank is 2 km away from the village. Collection is hard and treatment by bank people not always good. The bank maintained one line for both male and female member is uncomfortable most of the time.

They mentioned another group who come from far to collect their money in the same bank had to spent tk100-200 for van and food. Some people have an arrangement to collect through others/nominee and sharing their allocation with them. They mentioned allocation should be increased to cover their medical cost and more people of their age should get it.

Meeting with UP Chairman, Bharatkhal

He said that the main reason for grievances was low allocation. He told that in the mentioned Union, there is approximately. 2500 people, but he got less than one-fourth of the allocation in the members list which creates huge discontent among rest of the old people. He gave the example of his personal initiative in minimizing political pressure during selection. He used his personal relationship with MP of the area to minimize the peer pressure to give allocation to eligible beneficiaries. He suggested paid remunerated staff for the schemes, capacity building of Union Parishad, packed food grain to avoid wastage and massive popular campaign about the GM.

Meeting with Upazila Forum (Shaghata)

This Forum is operating since last year. It has representatives from 10 unions with combination of 10 female and 13 male members. This Forum monitors 10 Social Protection scheme. This forum emphasizes physical capacity, such as an office to operate. Forum members mentioned that there are general complaints about being excluded, quality of food, etc. in an informal way. They suggested having a complaints box at every level, Mobile number of UNO, using Union Digital center for introducing GM. They also mentioned about their lack in policy and guideline about schemes.

Re Forum's role for GRM-, they mentioned -forum member can generate complaints in formal way examples -help writing complaint + dropping it to the box. Inclusion of 2Forum members into Upazila committee can support investigation and help UNO for making informed decision. One of the members told us the story - how they used Social audit and found more than 10% recipient getting allocation without participating in physical labour.

SKS Staff meeting

Present: 15, including director.

The UNO of Shaghata was not receptive in the beginning of this programme - Civil Society component and developing Forum to intervene for social audit. It took time and energy to establish this programme. Except Varatkhal Union Parishad leadership (the current one), almost all are politically influenced. Amongst 3 schemes - they mentioned EGPP as the most complicated in terms of design, manipulation and vested interest. Selection for VGD and OAA both are politically biased and manipulated. Introducing GM might be hard but doable. And they would like to take the challenge.

About entry point: Information campaign should be done in a popular way so that it helps to break the fear of losing allocation and help poor people to believe that it is their entitlement and right. Dish channel is a popular communication that every one has access, for example. For GM, complaints box is familiar but need encouragement to use it specially writing the complaints. Complaints card sounds better option that can be made popular and easily available to them. Mobile phone to register voice complaints can be another option to think. In some cases complainants might need protection so there should be a mechanism of anonymity but not in all cases.

Re documentation and monitoring: there is a need for capacity enhancement, special skill recruitment will be needed.

How to fit this design into existing structure some incentive for tag officer should be included in the design. It is going to be hard work. Another point is we need to think how to keep UP chairman in the loop, otherwise it might be non-cooperation from his side. Poor people are reluctant to make any complaints against Chairman and if he intimidates people they no one would come forward with a complaints.

Types of complaints from field visit

- Selection related complaints are most common:
Discussion with VGD members and other Civil society members mentioned that nepotism, bribing to receive the VGD card, non-adherence of procedure and political pressures are grave concern in the area of complain.

Allocation of VGD and OAA scheme are less compared to the actual number.

- Transfer related complains:

Beneficiaries mentioned about difference between quantity of food allocated and amount distributed.

Another common complain was that food grain are of low quality.

Tedious collection process (distance of bank & UP, long waiting time, no facility for refreshment)

- Allowance and quantity of food are not enough to cater family.
- Distributed food are not packed. It results in long waiting time, wastage and misappropriation.
- No information about who to discuss/committee for taking grievances.
- VGD beneficiaries are not receiving training.
- OAA beneficiaries complained about delay in payment.
- Another complains was about replacement of member. Once the member died, another person should be replaced from waiting list, but it is not happening according to guideline, rather member is including based on nepotism.
- In presence of Upazila Social Welfare staff, treatment during disbursement in Bank for OAA and Union Parishad for VGD goes smooth.

Annex 7:Some more issues from Field Visit

Challenges-Supply-side

Lack of coordination: During the discussion with UP Chairman and UNO, it shows that different line ministry is involved in these 3 schemes, but there is no such coordination. UP Chairman is responsible for selection and disbursement of schemes but there reporting line is different. As a result, it becomes ambiguous to hold account for grievance from beneficiaries and redressal procedure.

Lack of clarity: Lack of clarity among lowest tire of Administrative unit about Social Protection schemes is another challenge. Responsible persons lack orientation about the updated guidelines, and philosophy of Social Protection (rights or charity) issues that leads to error in process.

Absence of designated persons: At Union level, in some places, Social welfare worker and Women Affairs officers are not regularly attending in the office who are responsible for receiving grievances. It is because some officers are sharing job at 2 Unions and some are not simply attending.

Insufficient cost: No cost is planned for distribution of goods for VGD ,i.e, carrying cost from storage to distribution point, remunerated staff. As a result, UP is managing that cost from the allocation of beneficiaries and they are getting less amount of food grain. This creates grievances among beneficiaries but they are not raising this point officially, least they should lose their allocation.

Political influence: Study founds political influence is one of the leading factors for wrong targeting and failing to distribute limited resources to eligible persons. In this regard, distribution units can take little or no measure to avoid errors in selection.

Challenges - Demand side

Lack of information about their scheme: As the target people of these schemes are extreme poor and vulnerable, they demonstrated their lack of information about their allocation, selection criterion, point of contact etc. Very often, this situation leads to not generating any complain if they have.

Limited access to skill and knowledge: According to guideline of VGD, beneficiaries are entitled to skill training. The reality is either they are not receiving the training or training session ended up only with discussion during savings meeting.

Annex 8:Notes of meetings with SGSP stakeholders

06/04/2015

Maxwell Stamp Ltd

Maxwell Stamp team felt that doing a GM before the SP reforms are in place is not realistic, however, an awareness campaign can be started and well suited in the middle of this reform process. Recruitment of a communication person is in progress to start in next 2-3 months. They expect to improve their communication with MJF once the person in place.

In their view, the best example of GM functioning comes from MP, India. The success of this because of Chief Minister personally is on top of it and monitoring regularly through online. They express very little hope that GM will work in Bangladesh unless top leadership takes interest of acting directly on it.

09/04/2015

UNDP

UNDP shared the current status of NSSS. In general appreciate the initiative of piloting Grievance Mechanisms within the civil society component of SGSP, though it was felt that the programme would have been more matured in order to get best results from the pilot.

20/04/2015

Meeting with World Bank,

Discussion started about the issue of Grievance Mechanism in World Bank supported programme. The members mentioned about the challenges of beneficiaries access to information about grievance mechanism as they are not aware of where to file the complain/grievance or who is the right person to lodge the complain, information gap among Information Officer at Union level, and fear of retaliation.

They mentioned that World Bank funded EGPP programme which is created to support seasonal employment for poor people where MIS system was introduced but it is underutilized. Member reiterated that GM written in many policy paper in Bangladesh, but it is not tried. Therefore it is not appropriate to say that GM is not working in Bangladesh context.

Finally the members in the meeting mentioned that testing Grievance Mechanism could be ambitious plan, but information campaign, awareness raising about GM (it is not to policing, but to increase programme efficiency) is critical in the community as first step of introducing GM in the field.

Meeting with BinayakSen, Research Director, BIDS

He mentioned that Grievance Mechanism is existed in different policy and strategies of Bangladesh Government but yet to in practice. It happens due to the culture and lack of clarity among people in general. But it is necessary to improve the efficiency of the development interventions and over all performance as well. He added that globally no study commissioned yet to see the impact of GM. In that case, Bangladesh could take the pride of being piloting country. He suggested for "Double-difference" to see the impact of GM in a small unit of the working area as a pilot basis. Double-difference is to see the difference between the programme where GM used and where GM not used. He suggested for Civil Society + campaign, means to involve media as programme partner to make people familiar with the issue.

For Government buy-in, he mentioned about convincing policy makers in way that GM is not for political correctness, but to improve efficiency.

In terms of monitoring the programme, he uttered that improved programme monitoring is critical to introduce GM. According to him, local media and community groups are credible stake to monitor the programme with GM and non-GM.

27/05/2015

WFP

Members explains the complexity of VGD operation as more than one government department are involved. from Finance money comes to MoWCA, MoWCA rely on Food department for purchasing and storing. In the operation design - non-inclusion the cost for local transportation and labors creates frustration and mismanagement.

A complaint system is mentioned in the operation manual but people are unlikely to use it due to lac of access to information and awareness, and fear of loosing entitlement.

Piloting grievance mechanism is welcomed with suggestion to focus on facilitated information campaign at ward and union level. Focus on right based message for the people in both demand and supply side. Whistle blower should have a choice to be anonymous to avoid unnecessary harassment.

Annex 9: Meeting with Line Ministry

Notes: VGD

MoWCA

Date: 21 April 2015

Meeting with Mr Tariq-Ul-Islam, one of his staff partly to share the

Presents: Nina, Shelley, Shoma

Existing GM practice and Policy:

- There is scope for people to complain.
- One Tag officers per Union are assigned to observe and listen complains under the supervision of UNO. Any major observation and complains are shared in coordination meeting and UNO is responsible to address those through the chain and make necessary adjustment. However, the mechanism exists in operational manual - in the book, in practice - everything is informal, there is no practice of registering formal complains and monitoring. So system is there, it just needs to be formalised.
- Overall monitoring of the programme seems very weak. While discussing this instead of commenting or explaining the monitoring system he invites one of his staff travelled to see the programme join discussion. The staff mentions that he was in one of the field during VGD programme and saw women getting IGA training and also standing outside with there sac to collect 'sahajjo' that is given from them. He poorly couldn't say any more things about the training quality and subjects, no more observation and/or any interaction with beneficiaries. It seems like secretary himself is not aware about what system exist there for systematic monitoring and evaluation.
- With ref from NSSS 4th draft - he is aware about GM and role of Ngos to work with govt to redress grievances. He appreciates piloting ideas for GM by MJF. MJF has to write to him when it is ready and he will issue a note for UNO to support it.
- Selection process: Main problem of VGD lies here includes bribing and nepotism. It is the most difficult level to make thing happen the way it should be. Now a days distortion of beneficiaries list doesn't happen from top such as from MP, Upozilla Chairman (they have wealth, they look for big construction project etc) - it is a myth, it actually happened at Word level by the Word members and Union Council Chairman. The fabrication of society at that level is so intertwined that formal system of complains lodge seems something in distance.
- He believes, if NGOs can work to bring grievances at that selection level then it is possible to reduce leakage significantly. But there is danger of trying to fix that level is one might even be killed!
- Grievance generated during pilot should be online/published/public to get be seen by all parties including PM office.

Date: 21 April

Ministry of Social Welfare

Present: Nurul Kabir Siddiqui, Joint Secretary and Md. Sazzadul Islam, Social Services Officer.

Perception/understanding GM

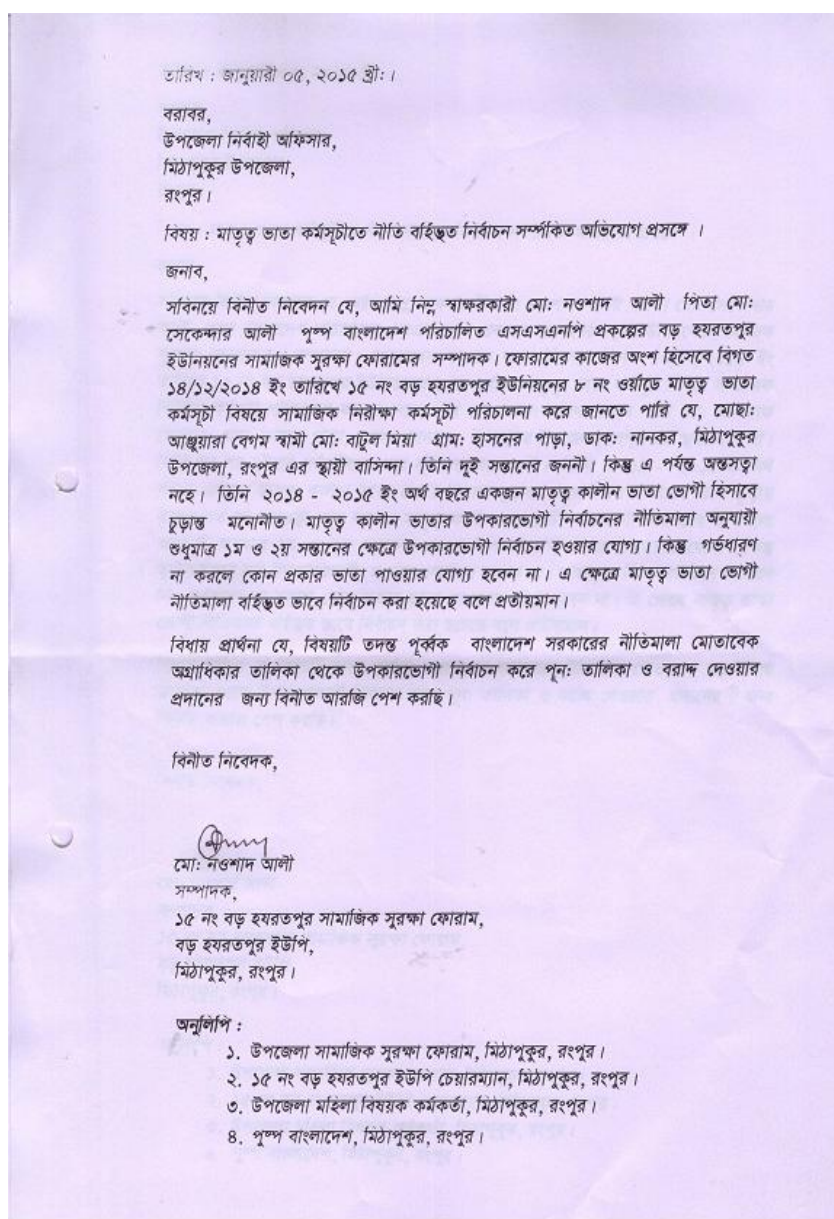
They are aware about the term GM and its inclusion in the 4th draft of the NSSS. A 3rd party complaints collection other than programme staff from village level is suggested.

They are proud for their achievement re Bank transfer that has reduced leakage in this scheme. However, they also agree about the transfer related complaint - long travel time, monetary cost for collection etc, and considering a pilot project to introduce mobile banking to bring the service at door step.

Biggest challenge in their view is political interference in selection of beneficiaries. At the same time they think criteria is too broad and size of allocation is too small has make it difficult to minimise the selection related grievances.

They appreciate the idea of GM pilot to focus on complaint generation and awareness raising .However they expect to have an MoU between MJF and them at first point.

Annex 10: Success story of SP Forum supported by PUSPO



Annex 11: Grievance addressed/solved in 2014 in MoWCA

संज्ञक संख्या	प्राप्तितारी तिथि	समाप्तितारी तिथि	विवरण	स्थिति	टिप्पणी
2014/1/108	01/01/2014	01/01/2014	मि. राजेंद्र प्रसाद शर्मा (संज्ञक संख्या: 2014/1/108) को एक शिकायत प्राप्त हुई कि वे अपने पते पर बिजली का बिल नहीं दे पा रहे हैं। उन्होंने बिजली कंपनी को सूचना दी है, लेकिन वे अभी तक बिजली का बिल नहीं दे पा रहे हैं।	समाप्त	बिजली कंपनी को सूचना दी गई है और वे बिजली का बिल दे रहे हैं।

मि. राजेंद्र प्रसाद शर्मा (संज्ञक संख्या: 2014/1/108)
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Annex 12: International Experience of GMs

There are a number of international examples that manifest different approaches to design, implement and operate an effective grievance redress, allowing beneficiaries and non-beneficiaries alike to register complaints, and to receive satisfactory resolution to any problems.

In India, the employment guarantee scheme (MGNREGA) has been underpinned by social audit mechanisms that have helped to streamline the implementation processes, made people aware of their rights, improved accountability for programme delivery, and strengthened the social contract between the state and the rural poor. More info will be found here: <http://www.mgnrega.co.in>

The NSSS process has reviewed a number of programmes internationally and here is a short summary of their findings:

The Hunger Safety Net Programme in Kenya <http://www.hsnp.or.ke/operated> local 'Rights Committees' that monitored norms for delivering cash transfers as set out in a 'Citizen's Service Charter'. The Vision 2020 Umurenge Programme (VUP) <https://www.gov.uk/government/publications/vision-2020-umurenge-programme-rwanda-business-case-and-intervention-summary--3> in Rwanda piloted an 'Appeals and Complaints Process', underpinned by a Beneficiary Charter of Rights and Responsibilities', which specified similar participant rights to those in Kenya's HSNP. Mozambique is currently strengthening its systems for implementation of Social Security programmes, which will include designing community case management and grievance procedures. (This summary is taken from NSSS final draft)

Annex 13: SGSP partners and their responsibility at a glance

Partner	Major Responsibilities
<p>Government of Bangladesh (GoB) will establish social Protection unit with internal resources.</p> <p>(Maxwell Stamp Ltd. working as a managing agent to provide technical assistance to the GoB)</p>	<p>Create a space to enhance capacity in MoF to monitor programme finance & analysis;</p> <p>Establish MIS at MoF to track social protection programme spend and outreach;</p> <p>Design and implementation of National Social Protection Strategy;</p> <p>Incorporate social protection issues in the seventh five year plan;</p>
UNDP	<p>Build capacity in GED of the planning commission to align schemes with national planning;</p> <p>Capacity & skill development for govt. staff to align schemes with national planning;</p> <p>Develop a platform for strategic oversight of the sector;</p> <p>Engage with cabinet division to support strategic direction;</p>
WFP	<p>Work with MOWCA for enhanced nutritional outcome of VGF;</p> <p>Support BBS in the design and implementation for improving the Household Income and Expenditure Survey (HIES) including a module on SSN;</p>
World Bank	<p>Institutional analysis and assessment of key SSN programmes;</p> <p>Policy briefs on Public expenditure reviews of the social protection schemes;</p>
<p>ManusherJonno Foundation (MJF)</p> <p>(Civil Society Component)</p>	<p>Collate feedback on the reach, effectiveness and impact of social protection schemes;</p> <p>Establish NFSP;</p> <p>Pilot grievance mechanism for selected schemes;</p> <p>Perception survey on selected schemes;</p>

Source: Background paper for GM prepared by MJF, draft 05 March 2005).

Annex 14: Key Risks/Challenges

Key Risks/ Challenges	Approach to mitigate the risk
Central government is not motivated to engage in the pilot and/or not supportive.	DFID to influence Central government NFSP to engage with line ministries to get buy in and support for the pilot.
Local government – notably tag officers and social welfare officers- are not motivated to engage in the pilot.	As appropriate UNO and/or Upazila Chairman to be on board for pilot.
The grievance mechanism process becomes politicised and is perceived as antagonistic.	A strategic information campaign with possible inclusion of media as precondition can mitigate some risk.
Capture of grievance mechanism by Union Chairman and vested interests.	Strengthening Union level SPF.
All grievances and all attention are focused only on the selection process.	This is high risk. Knowledge building about GM as precondition is important.
There are no grievances collected.	F2F facilitation. Capturing informal Grievances in formal way.
Grievances that are collected are not ‘fixable’ and beneficiaries become frustrated/lose faith.	Close contact with beneficiaries and effective feedback giving in place.
Grievances are raised, but people face retribution/ threats because of them.	As a choice - grievance can be anonymous.
The Social Protection Forums are not credible or effective.	Criteria to be followed for selecting pilot area.
The local NGO partner has limited capacity and/or perceives grievance mechanism as a policing function.	Training on GM is included in preparatory phase.
MJF does not allocate sufficient attention and support to the Grievance Mechanism.	Discussion between DFID and MJF prior to the implementation and agreed actions for piloting.
Activities are implemented well, but documented poorly.	Adequate resource allocation and capacity enhancement for documentation.