

Policy Brief

Grievance Redress Mechanisms in Cash transfer programme Global approaches and practices

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Introduction

In recent decades social protection programmes have increased across the developing world¹. Like other development projects, cash transfer programmes which form an important component of social protection regime, are vulnerable to fraud, errors of inclusion and exclusion, corruption, clientelism and misuse of funds for political purposes². While concerns persist about the vulnerability of cash-based social assistance programmes to corruption along the delivery chain, there is no conclusive proof of cash transfer programmes being more prone to corruption as compared to other social protection programmes³.

Cash transfer programmes can either be unconditional where cash is disbursed to beneficiaries with no conditions such as attending a clinic attached. On the contrary, conditional cash transfer programmes involve cash payment pegged to certain conditionalities such as sending beneficiary family's children to school. Conditional cash transfer programmes come with increased expense tag as they tend to involve expenditure on the monitoring of conditionalities attached to them.

Cash transfer programmes are also unique in the sense that they provide sustained site of citizen-state interaction due to regular interaction of beneficiaries, cash transfer programmes and other stakeholders. This uniqueness has attracted discussion about, and application, of social accountability tools to cash programmes to test and improve the quality of state-citizen interface and contract. In recent years there has been an increasing recognition of the need for building social accountability mechanisms into the design of such programmes from very early on to improve transparency. In most Latin American countries, the pioneers, and early adopters, of cash transfer programmes, two types of citizen oversight mechanisms have been in operation: collective and individual accountability mechanisms. Collective accountability mechanism involves a broader set of actors – civil society, monitoring committee – and the use of accountability tools such as social audits and community score cards. On the contrary, individual mechanism is one where beneficiaries play a greater part in initiating grievances through rules-based official grievance procedures with little support from civil society groups. In practice, however, individual-based grievance redress mechanisms are the most commonly used accountability and transparency mechanisms in cash transfer programmes. An effective Grievance Redress Mechanism (GRM) consists of both supply side which involves setting up an office and GRM machinery as well as demand side focussing on encouraging greater uptake of the GRM service through information campaigns.

GRM have been defined as the “formal institutions and channels people can use to express their dissatisfaction with service delivery and to demand redress⁴. They can provide feedback to providers and policy makers about service delivery performance, and offer one route to hold service delivery providers to account. Effective GRM are known to speedily process and resolve received complaints, impose sanctions as well as protect whistle-blowers⁵. As such GRM form a key component of cash transfer programmes, offering a formal avenue through which grievances of the beneficiaries are processed and acted upon. In this way, GRM not only serves the purpose of redressing programme related grievances but also fulfil the larger purpose of contributing to the process of holding government to account for

¹ World economic inclusion report 2018

² Rohwerder, B, Civil Society Organisation Supporting Accountability in Cash Transfer programmes (2014), IDS, UK

³ Marie C, 2010, Corruption Prevention strategies in cash transfer programmes, U4 resource Centre

⁴ Sumedah, R, 2014, Grievance Redress Mechanism in Pakistan, GSDRC, UK

⁵ Marie C, 2010, Corruption Prevention strategies in cash transfer programmes, U4 resource Centre

programme delivery⁶. Globally, countries are increasingly incorporating GRM into the design of social cash transfer in line with international best practices. The ILO recommendation 202 under article 77 stipulates that social protection laws should specify complaint and appeal procedures that are 'impartial, transparent, effective, simple, rapid, accessible and free of charge'. The same standard applies to appeal process that is required to be independent, accessible, fair and effective⁷.

In Pakistan, since the roll out of the Benazir Income support programme in 2008 (now renamed the Ehsass programme) complaint handling mechanism has been in place. Various studies and evaluation of the GRM have identified some areas of improvements while appraising the system as well-functioning and incorporating elements of the best international practices. The evaluation of the Citizens Damage Compensation programme (CDPC) during the 2010 flood showed functioning grievance handling systems in place. Over the years, however, GRM has been further evolved in the light of various assessments.

Global landscape

Over last decades social protection programme has taken off in the developing world⁸. Inevitably with the expansion of social protection programme has arisen the demand for building in elements of social accountability and transparency into social protection programme, in particular cash transfer programme, to prevent fraud, corruption and clientelism⁹. Globally, this trend is reflected in the growth of literature on social protection related social accountability mechanism. Available literature, broadly, classifies social accountability mechanisms into collective and individual accountability mechanisms. Collective grievance redress mechanism is the one which involve a range of actors from monitoring committee, civil society participation and the use of social accountability tools such as social audits, community score. On the contrary, individual mechanisms rely on individual beneficiaries making use of the officially available complaints systems to seek redress.

Collective social accountability mechanism in cash transfer programme

Social protection programme such as cash transfer programme have become intimately tied up with social accountability process in recent decades. Social accountability is defined as 'the extent and capacity of citizens to hold the state and service providers accountable and make them responsive to needs of citizens and beneficiaries'¹⁰. Social accountability has been advocated because of its positive impact on improving quality delivery of social protection programme on top of building up better rapport between citizens and the state. There are four elements of social accountability which pertain to cash transfer programme:

A) citizen action in terms of offering feedback and raising concerns about aspects of the programme not fit for beneficiary purposes; b) state action in terms of state response to the concerns and complaints raised; c) interface between the citizen and state which may be physical or virtual; d) civic mobilisation which mobilizes citizen for public action¹¹.

More crucially, effectiveness of social accountability depends upon the type of social accountability mechanism being applied. Though individual grievance redress mechanism is the default mechanism for

⁶ Review of Recommendations for Grievance mechanism for social protection programme, 2012, Oxford Policy Group

⁷ Global Research on governance and social protection, global overview, 2021 UN & ILO

⁸ World Economic Inclusion report 2018

⁹ Marie C, 2010, Corruption Prevention strategies in cash transfer programme, U4 resource Centre

¹⁰ Tasmin, A, et al, 2018, social accountability in the delivery of social protection, DFID

¹¹ Ibid

social protection cash transfer programmes, they not ideal for handling community wide larger concerns. Collective social accountability mechanism is appropriate for issues that are collective in nature and involve community wide issues¹².

However, since social protection beneficiaries happen to be poorer and more marginalised as compared with an average citizen, this constrains their ability to take part in broader and collective social accountability mechanisms. This weakened and marginalised position also adversely impacts on their ability to mobilise collectively and participate in public action. More significantly, institutional capacities in social protection sectors have been historically weak which has a bearing on the effectiveness of state response to complaints raised

Cash transfer programme and civil society collective mechanism

Globally, civil society organisations have supported social accountability process in cash transfer programme. This role has ranged from vetting beneficiary list for error, assessing programme vulnerability to high risk and gathering grass roots information on the program besides catalysing civic mobilisation. NGO involved in cash transfer programme have also documented best practices in GRM in cash transfer programming¹³. Yet, there are fewer few studies which look systematically at civil society engagement with cash transfer programme. One report exploring the role of civil society in cash transfer programme has looked at Mexico, Brazil, Philippines, Mozambique, Occupied Palestine Territories, Peru, Kenya, Turkey and Paraguay as case studies¹⁴. The study has identified various roles civil society can play in enhancing accountability aspects of cash transfer programme. Civil society organisation has aided the accountability process in the following ways¹⁵.

- By assessing the available and quality of information and suggesting ways of improving transparency through accessible management systems.
- By acting as independent third-party monitoring body to cash transfer programme
- By facilitating implementation of cash transfer programme by connecting beneficiaries and government and encouraging beneficiaries to engage in the programme design and implementation an all stages.
- Improving grievance or complaint reporting and redressal systems by raising awareness and facilitating grievance filing and follow-up.
- Imparting right education to beneficiaries thus empowering them to hold government to account.
- By providing technical input to political parties on how to prevent political abuse of the programme
- By supporting communities to scrutinise beneficiaries roll to reduce exclusion and inclusion errors.
- By improving compliance of beneficiaries with cash transfer conditionalities by educating benefices into conditionalities and benefits. By assisting in the collection of beneficiaries feedback and use it constructive to improve the programme

¹² Global Research on governance and social protection , global overview , 2021 UN & ILO

¹³ Rohwerder, B , Civil Society Organisation Supporting Accountability in Cash Transfer programme (2014), IDS, UK

¹⁴ Ibid

¹⁵ Ibid

Figure 4: Utility of different social accountability mechanisms for solving different issues



Source: Tasmin, A, et al, 2018, social accountability in the delivery of social protection, DFID

Grievance Redress Mechanism

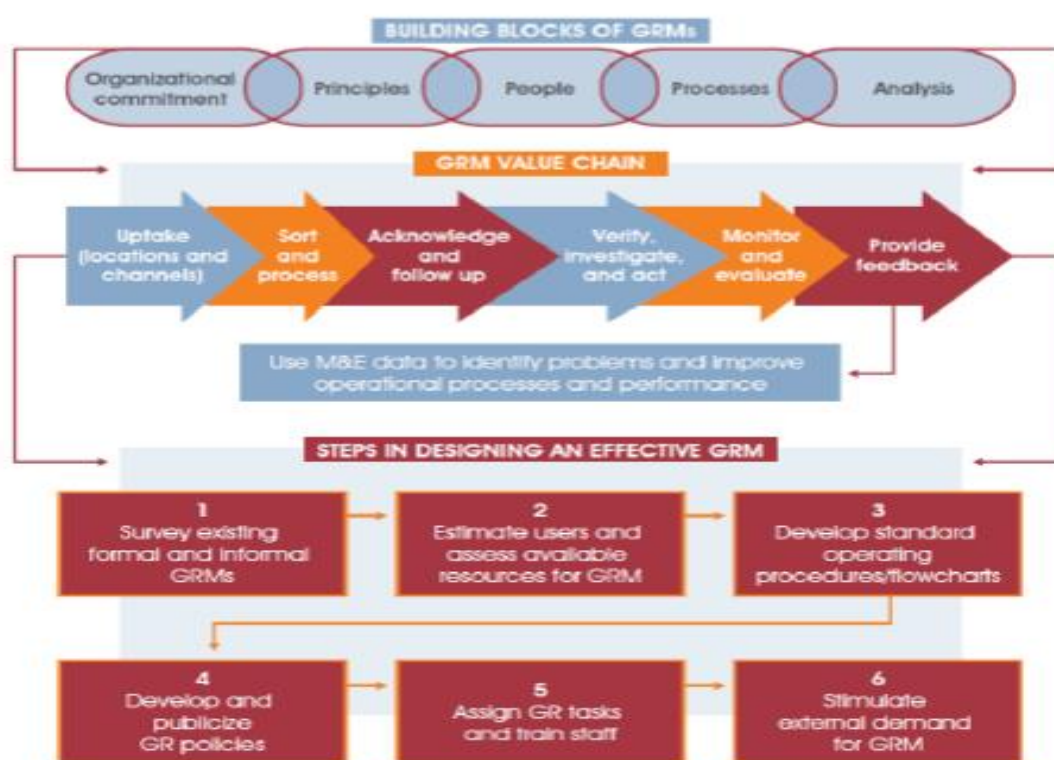
States usually enforce social protection programme in a unidirectional way: programme enforcement flows from state to citizen. Despite top-down enforcement of cash transfer programme, there are obligations to set up formal grievance and complaint mechanisms for citizens to hold government to account. The right to lodge complaints and appeals about underperforming parts of the programme is also factored in as a necessary condition enshrined in international instruments¹⁶.

ILO Recommendation 202 (Article 7), stipulates that GRM should be built-in in social protection programme and GRMs should be “impartial, transparent, effective, simple, rapid, accessible and

¹⁶ Global Research on governance and social protection , global overview , 2021 UN & ILO

inexpensive and free of charge”. The same applies to the appeal process in case of complaints not being upheld at the first tier. The appeal process, too, should be “independent, accessible, simple, fair and effective.” In addition, cash transfer programme should provide “multiple channels for presenting complaints, provision for anonymous complaints, protections for the confidentiality of the complainant; and provision for low levels of literacy or alternative languages of the complainants¹⁷.”

GRM enable beneficiaries to file in complaints and appeals regarding any aspects of the cash transfer programme from payments to inclusion and exclusion. Complaints are entertained and official response is given in a time-limited frame. GRM are very useful where complaints regarding application or misapplication of simple rules and guidelines are concerned. Most Latin American countries, where cash transfer programmes were pioneered, have adopted GRM to the extent that they have become the default social accountability mechanism for social protection. The building block of GRM are shown in table 1.



Source: *The theory of GRM Design World Bank 2012*

GRM have been defined as the “formal institutions and channels people can use to express their dissatisfaction with service delivery and to demand redress¹⁸”

Literature has, broadly, identified four main types of complaints and appeals procedure¹⁹

¹⁷ Ibid

¹⁸ Ibid

¹⁹ Global Research on governance and social protection , global overview , 2021 UN & ILO

- 1) Internal administrative procedures, where a change in programmatic decision is sought through the administrative routes
- 2) Special judicial procedures, such as labour tribunals or courts.
- 3) Judicial procedures before general courts.
- 4) Mixed procedures, where initial complaints can be lodged with administrative bodies, and appeals are processed in the various types of courts²⁰.

International literature has documented many best practices respecting the operation of the GRM. One such practice suggests that an effective GRM and appeals process should consist of three 'tiers': First, a simple procedure for reporting non-payment, errors or fraud; second tier for easing access to programme administrator; and a third tier facilitating the referral of complaints to an independent authority²¹. Literature on international best practices also identifies the necessity of allowing multiple channels of complaints as the cheapest and closest to citizens options. The pros and cons associated with each channel of complaints is illustrated in the figure below.

Table 1 - Main types of programme grievance channels: pros and cons

Type of grievance channel	Pros	Cons
Social assistant/ social worker	<ul style="list-style-type: none"> - Strong understanding of social protection programmes - Very accessible locally - Regular contact with social protection programme management - Can be easily trained 	<ul style="list-style-type: none"> - Potential conflict of interest (cannot complain to them about their conduct) - Not always capable of solutions (e.g. targeting) - Not anonymous or confidential - Could be biased against certain community members
Complaints box	<ul style="list-style-type: none"> - Easy to set up - Can be anonymous (if form clearly states that name and address are not needed) 	<ul style="list-style-type: none"> - Not appropriate for those who are illiterate - Conviction on behalf of complainants that it would not be acted on
Call centre	<ul style="list-style-type: none"> - Direct - Simple - No problems linked to illiteracy - Theoretically can be anonymous/confidential - Useful in decentralised contexts 	<ul style="list-style-type: none"> - Poor people are less likely to have access to a phone or to be willing to pay for the call - Less trust in revealing their identity and problems to someone they do not know - More difficult for the household to follow up on how the complaint is being managed - Needs to operate very well, or can backfire
Community grievance committees	<ul style="list-style-type: none"> - Members are from the community; widely known and trusted - Easy to access (direct and simple) - No problems linked to illiteracy 	<ul style="list-style-type: none"> - Not anonymous or confidential - More costly to set up (identify actors) and train - Cannot make up for general programme weaknesses
Mobile unit	<ul style="list-style-type: none"> - Direct - Simple to access - No problems linked to illiteracy - Theoretically can be anonymous/confidential - Unbiased/external 	<ul style="list-style-type: none"> - Reluctance to involve external actors (no trust in revealing their identity/problems to someone they do not know) - Not easily organised throughout the country - Costly to set up - People can only complain periodically

Source: Baraca, V, *Grievance mechanism for social protection*, 2015 International policy centre for growth

Literature review has also thrown up a consistent finding that programme design matters hugely when it comes to exercising citizen right to lodge complaints. More crucially, human rights experts emphasize the centrality of appeals mechanism in relation to targeting of beneficiaries where many eligible poor households find themselves excluded from the programme²². Literature review offers examples of Kenya

²⁰ Ibid

²¹ Sumedah, R, 2014, *Grievance Redress Mechanism in Pakistan*, GSDRC, UK

²² Global Research on governance and social protection, global overview, 2021 UN & ILO

programme, Pakistan's BISP, where complaints have "flooded the systems but remained largely unresolved". These cases also demonstrate that positive results are not automatic and depend largely on the state's capacity to respond. For example, in Kenya, Zimbabwe and Pakistan, state response has been identified as the weakest link in the complaints system²³.

Case studies GRM

FIJI

Fiji's Department of Social Welfare (DSW) Grievance and Complaint's Mechanism is consistent with most international standards of good practice. The GRM, however, has remained marred with challenges ranging from access, low awareness of the GRM process, the long waiting times, slow GRM process to a lack of third tier grievance mechanism

Brazil

Bolsa Família has four GRM channels: (i) toll-free hotlines managed by the Ministry of Social Development (MDS) that provide information and collect complaints; (ii) emails and letters sent to the Bolsa Família address, which are processed by the MDS; (iii) complaints made to publicly constituted councils at the municipal level; and (iv) a public oversight network. The Secretariat examines complaints and takes action, but many local level complaints are addressed by municipal level programme coordinators.

Philippines

The Philippines' Pantawid Pamilyang Pilipino CCT uses a publicly accessible database to enter and track complaints, which are received via text message, websites, Facebook, Twitter and a telephone hotline. In 2010, 80 per cent of complaints were related to payments.

Yemen

In Yemen complaints are received through a complaints box at the worksites. An officer gathers complaints, reviews them and takes action, and reports back to programme management on the complaints and the actions taken every month.

Colombia

The CCT programme in Colombia includes several accountability mechanisms both at the national and municipal levels:

- At the municipal level, each municipality signs an agreement with the national programme, committing to specific obligations and responsibilities. If fraud is discovered, the programme can be suspended. Committees are also established at the municipal level to handle complaints and allegations of ineligible beneficiaries participating in the programme.
- At the national level, a system of complaints mechanisms consisting of a call-centre and mail boxes has been established for receiving and handling complaints.

²³ Ibid

Mexico

In Mexico, accountability mechanisms include:

- The introduction of an extensive system for reception and handling complaints, including several points of reporting at payment points for beneficiaries and an established set of procedures for handling complaints;
- A semi-annual survey of beneficiaries and service providers at sentinel points, including checks of compliance with procedures;
- Extensive publicly available data on the programme, including programme evaluations, targeting results and selection of beneficiaries.

GRM in BISP 2008-2018

In 2010 the worst ever flood in history swept vast extent of the country, affecting 10 percent of its population. In response, the government of Pakistan put in place a rapid cash transfers the Citizen Damage Compensation programme (CDCP) which provided relief to 1.8 million affected families²⁴. As part of the CDCP, a grievance redress mechanism was also instituted. GRM systems operated through facilitation centre which also housed grievance redress counter staff installed by the national registration authority. This ran in parallel with public information campaign about the availability of the GRM. Besides the facilitation centre, multiple channels were also set up for receiving complaints through text message or phone calls. Different department responded to the complaints depending upon the nature of the complaint raised. NADRA dealt with grievances related to the Computerised National Identity Cards (CNIC) while matter related to targeting were dealt at a local level. The eligibility updates were then sent to the district administration which, in turn, shared it with the Provincial Disaster Management Authority (PDMA). The issues related to payments were handled by commercial banks which ran dedicated hotlines of their own. The office of the ombudsman was the channel of last resort. The study assessing the functioning of the CDCP also listed a number of lessons learned

- Communication strategy and public information campaigns are critical for proper functioning of the GRM
- Developing standard practices are critical to the GRM
- Training on the GRM imparted to all stakeholders for a uniform understanding of the process is a key.
- Ownership of the District Administration is essential for efficacious functioning of the GRM
- Ensuring adequate human resources for the GRM was vital
- Making GRM simple and easy to navigate CPD

The BISP also put in place e GRM which allows for several channels to lodge complaints and grievances. These include (i) visits to BISP offices; (ii) BISP hotline; (iii) BISP website and (iv) mail. On top of these channels NADRA and banks operate their GRM related to Ehsaan programme. The GRM includes grievance related to targeting, enrolment, payment and other complaints related to staff behaviour ²⁵

Despite BISP Cash Transfer System adopting some of the best practices, the GRM is a work in progress and evolving. The same study found that personal visit to the BISP tehsil office seems to be the most commonly used channels which often involved more than two visits. In the same survey on enrolment 95

²⁴ Global Review of Redress Mechanisms in World Bank Projects , 2013 , World Bank

²⁵ Spot checks and Beneficiary feedback in national cash transfer , Pakistan , 2014 , Matt Macdonald

percent felt that their complaint had been heard, yet the average time to solve enrolment grievance was 383 days and payment related given to 77 days to resolve²⁶. The respondent level of satisfaction varied. While 48 percent were not satisfied with the registration systems for enrolment grievance, 67 percent were not satisfied with the payment grievance systems.

The GRM under the broader umbrella of the Ehsass programme

Now with the expansion of the Ehsass programme, and the elimination of underserving beneficiaries which has seen the exit of 3.6 million beneficiaries, there has been an enormous increase in complaints and inquiries respecting inclusion and exclusion errors, verification of bio-metric finger prints, delayed payments and other complaints²⁷. Many new channels of grievance registration have been opened up to encourage and facilitate greater uptake of GRM. The complaints that reach the complaint management cells comes through citizens portal, twitter accounts, phone calls the call centre and the registration desks set up for the second wave of the just concluded National Socio-economic Survey. Beneficiaries can also move judicial courts and the office of the Ombudsman as independent channels. The complaint management service has also been advertised through media and other social media outlets. Yet, despite putting in place multiple channels, the number of unresolved complaints is remains high. The required period of 30 days in which grievance need to resolved does often get stretched to 60 days²⁸.

Ehsass-affiliated Bank 's GRM

At the beginning of the roll out of the Benazir Income Support programme, cash transfer was directed through the post office. However, now payment is made through banks. The participating banks are mandated to set up their own GRM systems to deal with complaints related to payments, balance inquiry, card blocking, or capture card and PINS. Call centres have been established by the banks to deal with complaints.

Key Recommendations

Designing women friendly GRM

Since Ehsass cash transfer is targeted at women beneficiaries, the GRM should be designed with the needs of women at the front and centre of its design. Greater involvement of beneficiary's women in the GRM design and implementation will help improve GRM design and implementation. Recruitment of more female staff in the GRM workforce would be the step in the right direction in order to gain the confidence of women beneficiaries. Research should also be undertaken to look at how the GRM can be made more women friendly to enhance uptake of the service.

Staffing level of the GRM machinery

The Ehsass programme at tehsil level is thinly spread to deal with the growing burden of the GRM. As well as undertaking rational allocation of staff at tehsil and district level, the staff specifically dedicated to the GRM should be beefed up to expedite disposal of growing number of grievances and complaints due to

²⁶ ibid

²⁷ Interview with official of complaint management cell in cash transfer wing, Ehsass programme

²⁸ Ombudsman office

expansion of the Ehsass programme. Recruitment of more female staff in the GRM workforce would be the step in the right direction in order to gain the confidence of women beneficiaries. Increased and dedicated staffing at local level will not only help resolve complaints at the point of service delivery but also cut costs.

Training of the staff and other stakeholder

Continuous training of the staff at the Ehsass offices and other stakeholder involved in the GRM such as NADRA and Banks should be trained on the GRM process and how to deal speedily with the complaints in coordinated and joined up operation.

Improving access to independent channels for redress

Though Ombudsman is the channel of last resort, there is a need to bring in more independent channels such as Ombudsman and NGO into the GRM regime to open up more channels where beneficiaries can lodge their complaints. As well as wellbeing international best practice, it will further improve transparency and accountability and enhance uptake of the service.

Improving Communication strategy and public information campaigns

Communication strategy and public information campaign on the GRM is crucial to enhance take up of the GRM and making GRM process available to beneficiaries and the larger public. A widespread information campaign also ensures that the public fully understand the programme and are clued in as to how to access the grievance channels. All channels of communication such as social media, print and broadcast media and theatre should be utilized in this regard.

Developing standard practices and procedures

GRM involves many actors such as NADRA, banks, NGOs and other such institutions. Therefore, it is important to develop standard practices to forge common understanding of the GRM and make the GRM more interconnected and uniform in operation. Developing standardised practices and response for the most common complaints will go a long way in making the programme smooth, accountable and transparent.

Improving data collection and analysis system for compiling grievance data

As the number of grievances is growing in the wake of the expansion of the Ehsass programme, there is a need to improve system wide data collection system to aggregate and compile grievance data with a view to improve the functioning of the GRM in the next phases of the programme implementation.