



Bank Procedure

Grievance Redress Service (GRS)

Bank Access to Information Policy Designation

Public

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Content

This Procedure sets out instructions to Staff with regard to the Grievance Redress Service (GRS) process.

Applicable to

IBRD,IDA

Issuer

Vice President, OPSVP

Sponsor

Director, OPSES

SECTION I – PURPOSE AND APPLICATION

1. This Procedure sets out instructions to Staff with regard to the Grievance Redress Service (GRS) process.
2. This Procedure applies to the Bank.

SECTION II – DEFINITIONS

1. As used in this Procedure, the capitalized terms and acronyms have the meanings set out in a) Bank Directive: Grievance Redress Service or b) below:
 - a) **Access to Information Policy:** The Access to Information Policy pursuant to the *Bank Policy: Access to Information*, July 1, 2015, Catalogue No. EXC4.01-POL.01
 - b) **AMS 6.21A:** the “Information Classification and Control Policy” dated June 2010, or its successor thereof.
 - c) **Bank:** IBRD and/or IDA, whether acting in its own capacity or in the capacity as administrator of trust funds funded by donors.
 - d) **Bank-financed Operation:** Any IBRD/IDA project or program approved by the Executive Directors or under consideration by Bank management.
 - e) **Borrower:** Borrower or recipient of Bank Financing, and any other entity responsible for the implementation of a Bank-financed Operation.
 - f) **Business Day:** Days on which the Bank’s headquarters is open for business in Washington, D.C..
 - g) **CD:** Country Director.
 - h) **CESSO:** Chief Environmental and Social Standards Officer.
 - i) **Complainant:** the individual or individuals or their authorized representatives, that claim they have been or will be affected by a Bank-financed Operation, whose complaints are received by the GRS.
 - j) **Confidential:** The security classification of “confidential” as defined in AMS 6.21A.
 - k) **Data Privacy Policy:** The Bank’s Personal Data Privacy Policy dated May 20, 2020.
 - l) **DSO:** Director of Strategy and Operations.
 - m) **ES:** Environmental and Social.
 - n) **EBC:** Office of Ethics and Business Conduct
 - o) **ESF:** Environmental and Social Framework of the Bank, which consists of a Vision for Sustainable Development, the Environmental and Social Policy for Investment Project Financing and the Environmental and Social Standards.
 - p) **GRS:** The Grievance Redress Service of the Bank.
 - q) **GRS Risk Classification:** The rating of High, Moderate or Low assigned to

admissible complaints by the GRS, based on the level of risk, urgency, severity and potential for escalation, considering the issues raised and the information available.

- r) **IBRD**: International Bank for Reconstruction and Development.
- s) **IDA**: International Development Association.
- t) **IPF**: Investment Project Financing, as defined in the Bank Policy, “Investment Project Financing.”
- u) **INT**: The Integrity Vice-Presidency of the Bank.
- v) **LEGEN**: Environment and International Law Unit, Legal Vice-Presidency of the Bank, or its successor thereof.
- w) **Manager**: A person identified as a manager in the Bank’s human resources system.
- x) **MD Operations**: The Managing Director of Operations of the Bank.
- y) **OPCS**: The Operations Policy and Country Services Vice-Presidency of the Bank.
- z) **OPSVP**: The Vice President, OPCS.
- aa) **Personal Data**: As defined in the Data Privacy Policy.
- bb) **PforR**: Program-for-Results Financing, as defined in Bank Policy, “Program-for-Results Financing.”
- cc) **PM**: Practice Manager of the Bank.
- dd) **Project-level GM**: A project-level grievance mechanism as defined in the Environmental and Social Framework (ESF), specifically Environmental and Social Standard (ESS) 10 and ESS 2, or a program-level grievance mechanism associated with a PforR Program as referenced in the Bank Directive, “Program-for-Results Financing”.
- ee) **RD**: Regional Director of the Bank.
- ff) **RSA**: Regional Environmental and Social Standards Adviser (previously called a Regional Safeguards Adviser (RSA) or Environmental and Social Standards Adviser (ESSA)).
- gg) **Staff**: Persons holding an appointment under Staff Rule 4.01, “Appointment,” including consultants.
- hh) **Strictly Confidential**: The security classification of “strictly confidential” as defined in AMS 6.21A.
- ii) **TT**: Bank Task Team (headed by the Task Team Leader or TTL).
- jj) **World Bank or Bank**. These terms refer interchangeably to IBRD and IDA.
- kk) **World Bank Group or WBG**: The common name used for concurrent identification of all the WBG Institutions - IBRD, IDA, IFC and MIGA.

SECTION III – SCOPE

1. The mandate, roles and responsibilities, and function of the GRS are outlined in Section III(A) of the Bank Directive “Grievance Redress Service”.

Content of a complaint

2. A complaint must contain:
 - (i) *Identity of Complainants*. The complaint identifies the individual(s) submitting the complaint and their contact details, and, specifying whether they are individuals or communities affected by Bank-financed Operations or an authorized representative(s).
 - (ii) *Authorized Representative*. If the Complainant submits a complaint through an authorized representative, the authorized representative includes their name and contact details and signs the complaint. The authorized representative also provides written proof (such as a signed letter by the Complainant) of their authority to represent and act on behalf of the Complainant in relation to the complaint. The GRS communicates directly with the authorized representative, as necessary and appropriate, and keeps the authorized representative and/or Complainant informed about the status of the complaint. A Complainant may also submit the complaint on their own behalf and/or appoint a contact person or persons for further communications regarding the complaint.
3. A complaint should also contain, to the extent possible:
 - (i) the name and location of the Bank-financed Operation which the complaint relates to;
 - (ii) the adverse impact(s) allegedly caused or likely to be caused by the Bank-financed Operation. The adverse impact(s) are supported by documentation and correspondence, where possible and appropriate, or are provided at a later date upon request by the GRS;
 - (iii) a desired outcome, i.e., how the complaint may be resolved; and
 - (iv) a statement of new evidence or changed circumstances justifying revisiting a complaint, if the GRS has examined the same issues previously.
4. *Confidentiality and Data Privacy*. Confidentiality and data privacy requirements are addressed by the GRS as follows:
 - a. Complaints are assigned the security classification of “Confidential” and subsequent relevant communications to any person, entity or third party about a complaint are marked “Confidential”, or “Strictly Confidential” consistent with applicable policies and procedures, including, but not limited to the Access to Information Policy.
 - b. Complaints are processed in accordance with the Data Privacy Policy.
 - c. The GRS publishes a privacy notice on the Bank’s external website, indicating how personal data relating to complaints is processed by the GRS.

Complaint Channels

5. The GRS receives complaints in two ways: (i) **Direct** – complaints received by the GRS directly from individuals or communities affected by a Bank-financed Operation or their authorized representative; (ii) **Referred** – complaints received by the TTs and referred to the GRS. **Direct** complaints also include complaints received by Bank units

or staff other than the TTs (e.g., INT, procurement Staff, or EBC).

6. complaints must be submitted in writing. The complaints can be sent in any format of the complainant's choosing in one of the following ways:
 - Via GRS complaint form available on the Bank's external website: <https://www.worldbank.org/grs>
 - Via email: grievances@worldbank.org
 - Via mail:
The World Bank
Grievance Redress Service (GRS)
1818 H St NW
Washington, DC 20433, USA
 - Via a World Bank Country Office
7. All Bank Staff are required to refer to the GRS all complaints received from external parties relating to Bank-financed Operations within ten (10) Business Days of receiving such complaint.

Complaint Eligibility

8. *Admissibility criteria:* The GRS only processes complaints meeting all three admissibility criteria:
 - (i) The complaint relates to a Bank-financed Operation, where: (a) the first Project Information Document (PID) has been issued for the relevant Bank-financed Operation and; (b) fifteen (15) months have not yet passed from the date the relevant Bank-financed Operation has closed;
 - (ii) The complaint is submitted by individuals or communities affected by a Bank-financed Operation, or by their authorized representative(s);
 - (iii) Complainants allege that they have been or will be affected by the Bank-financed Operation, regardless of whether the issues raised fall under the Bank's Operational Policies and Procedures.
9. *Exclusions:* The GRS does not process complaints which relate to:
 - (i) IFC and/or MIGA-financed projects where the Bank is not a financing partner;
 - (ii) fraud and/or corruption in a Bank-financed Operation - the GRS forwards these complaints to INT for processing;
 - (iii) Procurement. The GRS forwards these complaints to the OPCS Procurement Team for processing;
 - (iv) Staff grievances with the Bank or grievances of individuals regarding their pursuit of employment with the Bank;
 - (v) Frivolous or anonymous complaints - however, if an anonymous complaint contains relevant information about specific issues in a Bank-financed Operation, the GRS may forward it to the TT for information and follow-up, where appropriate;
 - (vi) Matters already assessed by the GRS unless there is new and/or compelling evidence to revisit the complaint.
10. *Project-level Grievance Mechanisms.* A complaint filed with an existing Project-level GM does not preclude the GRS from processing a complaint received by the Bank.

Processing Steps

11. The GRS processes complaints in five stages: (i) intake; (ii) evaluation; (iii) solution-seeking; (iv) monitoring of implementation; and (v) closure.

A. Intake

12. At intake, complaints are immediately reviewed for *prima facie* admissibility. Inadmissible complaints are not processed further but may be referred to the relevant unit in the Bank where applicable as per Paragraph 8 of this Procedure. The GRS may request further information from the Complainant or the TT to inform the GRS assessment of admissibility. If no response is received within ten (10) Business Days of the second request, the GRS closes the complaint and informs the Complainant of this decision. If the complaint is closed, and the complaint contains specific information about issues related to a Bank-financed Operation, the GRS refers the issues to the TT and relevant PMs for follow up.

13. For **Direct** complaints, the GRS acknowledges the receipt of complainant within two (2) Business Days. For **Referred** complaints, the GRS acknowledges the receipt of complaint to the TT or other Staff within two (2) Business Days.

B. Evaluation

Within ten (10) Business Days of acknowledging receipt of a complaint the GRS reviews the admissibility of the complaint and the nature of the issues and alleged impacts and obtains additional information from relevant Bank Staff where necessary. Depending on the circumstances of the case, this timeframe may be extended. The GRS's review may make the following determinations:

- a. *Request further information:* For **Direct** complaints, the GRS has the option to request further information from the Complainant to inform the GRS evaluation. If no response is received from the Complainant within ten (10) Business Days of the request, the GRS contacts the Complainant again. If no response is received within ten (10) Business Days of the second request, the GRS closes the complaint and informs the Complainant. If the complaint is closed, and the complaint contains specific information about issues related to a Bank-financed Operation, the GRS refers the complaint to the TT and PM for follow up where appropriate. For **Referred** complaints, the GRS has the option to request further information from the Complainant via the TT and/or from the TT within ten (10) Business Days to complete the evaluation.
- b. *Determine the complaint is Inadmissible:* If the GRS determines that a **Direct** complaint is not admissible as set out in Paragraphs 8 and 9 of this Procedure, the GRS notifies the Complainant and the TT of this decision.
- c. *Determine the complaint is Admissible:* If a **Direct** complaint is determined to be admissible after evaluation, the GRS informs the Complainant as well as the following Staff: the CD, DSO, relevant Practice Group RD, CESSO, RSA, relevant managing unit PM and relevant ES PMs, and TT, LEGEN Chief Counsel, and others as appropriate, of complaint admissibility and referral to the Solution

Seeking phase. If a **Referred** complaint is determined to be admissible, the GRS informs the TT to notify the complainant and the Bank Staff per above.

- d. *Decide GRS Risk Classification.* Admissible complaints are to be classified as High, Moderate or Low risk by the GRS Manager in consultation with GRS Staff, based on the level of risk, urgency, severity and potential for escalation, considering the issues raised. This determines the prioritization of actions by the GRS and the level of Bank management engagement and reporting. The GRS Risk Classification of each admissible complaint is an internal prioritization tool, and it is not synonymous with, though may be informed by, the environmental and social risk rating of the Bank-financed Operation associated with the complaint. The GRS may change the GRS Risk Classification of the complaint as new information becomes available.

14. *Timeframe for Communication of GRS Decision.* The notification to the Complainant and Bank staff as to the admissibility or inadmissibility of the complaint must be made within fifteen (15) Business Days of acknowledging receipt of the complaint. Depending on the circumstances of the case, this timeframe may be extended.
15. *Compliance with Timeframes.* The GRS Manager monitors compliance by the GRS with the timeframes set out in this Section III.

C. Solution-Seeking

16. *Formulation of Solution Proposal.* Once a complaint is determined to be admissible, the GRS and the TT review the issues raised by the complaint and discuss options to address the identified concerns. In case of a **Direct** complaint, the GRS serves as the primary contact for the Complainant; in the case of **Referred** complaint, the TT serves as the primary contact unless mutually agreed otherwise. The GRS or the TT contact the Complainant to review the concerns and discuss possible actions to address the complaint. The TT, with support and advice from the GRS and with input as necessary from the RSA, managing unit Practice Manager and relevant ES Practice Managers, CESSO, LEGEN Chief Counsel, DSO, CD, relevant Practice Group RD, and in coordination with the Borrower, prepares a proposal to resolve the complaint (the Solution Proposal).
17. *Communication of Solution Proposal to Complainant.* Within sixty (60) Business Days from the notification to the Complainant of the GRS's decision that the complaint is admissible, the GRS or the TT sends the Solution Proposal to the Complainant. The GRS or the TT, as appropriate, seeks the input of the Complainant on the Solution Proposal. The Solution Proposal includes identified actions with a timeframe for its implementation. Depending on the circumstances of the case, this timeframe may be extended.
18. *Agreement by Complainant.* If the Solution Proposal is accepted by the Complainant within thirty (30) Business Days after the initial proposal has been presented to the Complainant, the TT coordinates its implementation by the Borrower according to the timeframe set out in the Solution Proposal.
19. *Rejection by Complainant.* If the solution proposal is rejected by the Complainant and/or the issues cannot be resolved according to the process outlined in this

Procedure, the GRS will continue in dialogue with the Complainant in the case of **Direct** complaints to see if a solution can be found; in the case of **Referred** complaints, this will be done by the TT. If there is still no resolution within thirty (30) Business Days, the GRS assesses if a solution can be reached, otherwise, the GRS closes the complaint and informs the Complainant accordingly.

D. Solution Proposal implementation and monitoring

20. Once a Solution Proposal is accepted by the Complainant, the Borrower begins implementing it within the agreed timeframe. The TT keeps the GRS informed on the status of implementation until the agreed actions are completed. The GRS or the TT continue to keep the Complainant informed on the status of implementation.
21. The GRS monitors the implementation of the actions in the Solution Proposal, receiving monthly updates from the TT until the actions set out in the Solution Proposal are completed.

E. Process conclusion

22. *Resolution.* The GRS closes the complaint when agreed upon actions are satisfactorily completed and the necessary supporting documents for such conclusion are provided by the TT. The GRS or the TT notifies the Complainant accordingly.
23. *Closure without an agreed resolution.* If the Complainant believes that the actions have not been satisfactorily implemented, the Complainant advises the GRS or the TT within ten (10) Business Days. The GRS and the TT engage with the Complainant to determine the final solution. If such additional engagement does not lead to a further agreement and the agreed actions have been implemented in a manner acceptable to the Bank, the GRS closes the complaint.

Escalation

24. The GRS will escalate high risk complaints (as classified under the GRS Risk Classification) to Bank management, taking into account the severity of the complaint, potential harm to the Complainant, reputational risk to the Bank, or if the GRS is unable to satisfactorily resolve the complaint using the standard complaint processing procedure. The complaint is first escalated to OPSVP and Regional VP by CESSO. OPSVP may then inform the MD Operations as needed.

SECTION IV – REPORTING AND DISCLOSURE

1. The GRS communicates with Complainants and reports to Bank management on the status of complaints it receives, while maintaining confidentiality, as detailed below.
2. **Complainants:** The GRS or the TT provides to the Complainant information relevant to the Complainant's following up of the case, including updates on the status and progress of the complaint process, to the extent possible and consistent with applicable policies and procedures, including, but not limited to the Access to Information Policy.

3. **Staff and Bank Management:** The GRS prepares monthly status reports on complaints, based on updates from TTs and PMs. These reports are shared with the OPSVP, regional DSOs, relevant CDs and Practice Group RDs, OPCS Directors, CESSO, RSA, LEGEN Chief Counsel, managing unit PMs and relevant ES PMs, and TTs. A report on GRS high risk cases is shared with the OPSVP on a quarterly basis.
4. **Public:** General anonymized information regarding the GRS is made available to the public, including individuals or communities who may potentially be affected by Bank-financed operations and other interested stakeholders, as follows:
 - (i) The GRS is disseminated through project documents and the Bank’s external website;
 - (ii) A case log is published on the Bank’s external website and updated monthly. The case log contains information on the relevant Bank-financed operation (name, number and country). No specific details of the complaint or any Personal Data is included in the case log; and
 - (iii) The GRS publishes an annual report, which includes a general analysis of complaints submitted to the GRS.

SECTION V – EXCEPTION

N/A

SECTION VI – WAIVER

The Issuer may grant a waiver of any provision of this Directive in accordance with Bank Procedure, “Operational Policy Waivers and Waivers of Operational Requirements”.

SECTION VII – EFFECTIVE DATE

This Procedure is effective as of the date on its cover page.

SECTION VIII – ISSUER

The Issuer of this Procedure is the OPCS Vice President.

SECTION IX – SPONSOR

The Sponsor of this Procedure is the CESSO

SECTION X – RELATED DOCUMENTS

Bank Directive “Grievance Redress Service,” dated May 5, 2021.

Bank Policy “Operational Policy Waivers”, Catalogue Number OPCS5.06-POL.01, dated April 7, 2014.

Bank Procedure “Operational Policy Waivers and Waivers of Operational Requirements,” Catalogue Number OPS5.06-PROC.185, dated July 1, 2019.

Bank Policy “Personal Data Privacy”, Catalogue Number SEC4.05-POL.103, dated May 20, 2020.

Bank Policy, “Access to Information” Catalogue Number EXC4.01-POL.01, dated July 1, 2015.

SECTION XI – REVISION HISTORY

This June 2023 revision updates timelines and accountabilities for handling GRS cases.

ANNEX

N/A

Questions regarding this Procedure should be addressed to the Sponsor.