



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

Chief Environmental and Social Standards Officer, OPSSP

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

3. 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:** as defined in the Bank Policy, “Access to Information”, as amended from time to time.
 - b) **CD:** Country Director.
 - c) **Data Privacy Policy:** the Bank’s Personal Data Privacy Policy dated May 20, 2020, together with the Bank’s Personal Data Privacy Directive dated January 23, 2020.
 - d) **Direct Complaints:** Complaints received directly by the GRS from Complainants.
 - e) **DSO:** Director of Strategy and Operations.
 - f) **ES:** Environmental and Social.
 - g) **GRS Case Management System:** the system used by the GRS to register and track Complaints received.
 - h) **INT:** the Integrity Vice-Presidency of the Bank.
 - i) **OPSRL:** the Strategy, Risk, Results, Learning Department, OPCS.
 - j) **OPSVP:** the Vice President, OPCS.
 - k) **Personal Data:** as defined in the Data Privacy Policy.
 - l) **PforR:** Program-for-Results Financing, as defined in Bank Policy, “Program-for-Results Financing.”
 - m) **Referred Complaints:** Complaints which are forwarded to the GRS by Staff or other Bank units.

SECTION III – SCOPE

4. 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

5. A Complaint contains:
 - (i) *Identity of Complainants*. The Complaint identifies the individual(s) submitting the Complaint and their contact details, and whether they are individuals or communities affected by Bank-financed Operations or an authorized representative.
 - (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 appoint a contact person or persons for further communications regarding the Complaint.
6. A Complaint also contains, to the extent possible:
 - (i) the name and location of the Bank-financed Operation which the Complaint relates to;
 - (ii) the adverse impacts allegedly caused or likely to be caused by the Bank-financed Operation. The adverse impacts 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.
7. *Confidentiality and Data Privacy*. Complaints are classified as Confidential consistent with the WBG Procedure: [AMS 6.21A - Information Classification and Control](#) and are processed in accordance with the Data Privacy Policy. The notice to the Complainant indicates that some Personal Data may be shared with the borrower or other third parties in order to resolve the Complaint, and the World Bank requests the Complainant's consent to sharing all or part of the Complaint with specified third parties. If the Complainant doesn't provide consent, the Complainant's personal or identifying information is not shared with any third party. All communications to any person, entity or third party about a Complaint are marked "Confidential", including emails.

Complaint Channels

8. 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 or; (ii) referred – Complaints received by Staff and referred to the GRS. Both direct and referred Complaints are processed as outlined in paragraphs 15-29 below.
9. *Direct Complaints*. Complaints are submitted in writing. Complainants may use the GRS complaint form available on the GRS website or any other format of their

choosing. The complaint form may be submitted in any language. Complaints are sent directly to the GRS in one of the following ways:

- Via email: grievances@worldbank.org
- Via mail:
The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA
- Via a World Bank Country Office

10. *Referred Complaints.* Staff forward to the GRS all Complaints from external parties relating to Bank-financed Operations within ten business days of receiving any such Complaint, either directly or indirectly (e.g., through a copy or forward from other Staff).

11. Complaints received directly by INT or procurement Staff which are related to environmental and social issues in a Bank-financed Operation, are forwarded to the GRS.

Complaint eligibility

12. *Admissibility criteria:* The GRS only processes Complaints meeting all three of its 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 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;
- (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.

13. *Exclusions:* The GRS does not process Complaints which relate to:

- (i) IFC 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 - these complaints are governed by the "World Bank Procurement Regulations for IPF Borrowers". 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 TTL 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.

14. *Project-level Grievance Mechanisms.* If a Complaint pertains to a Bank-financed Operation with an existing Project-level GM, the GRS makes the Complainant aware of its existence. An existing Project-level GM and/or a complaint to such Project-level GM does not preclude the GRS from processing a Complaint received by the Bank. It is the decision of the Complainant to withdraw or continue with a Project-level GM and/or the GRS.

Complaint Processing

15. The GRS processes Complaints in five stages: (i) intake; (ii) evaluation; (iii) solution-seeking; (iv) monitoring of implementation of solution reached by the Bank and Borrower; and (v) closure of complaint.

A. Intake

16. At intake, the GRS reviews Complaints immediately 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 13 of this Procedure. Complaints which appear to be admissible are immediately registered in the GRS Case Management System.
17. For Direct Complaints received by the GRS, the GRS notifies the Complainant of receipt of the Complaint within two business days. Also, the GRS notifies the CD, DSO, relevant Practice Group RD, CESSO, RSA, relevant ES Practice Managers, and TT of its receipt. For Referred Complaints, the TT or other Staff refers the Complaint to the GRS within ten business days, as per paragraph 10 of this Procedure. The GRS informs the CD, DSO, relevant Practice Group RD, CESSO, RSA, relevant ES Practice Managers, and TT of receipt within two business days and the TT notifies the Complainant that the Complaint is being processed by the GRS.

B. Evaluation

18. Within 10 business days of acknowledging receipt of a Complaint and once consent is received from the Complainant, the GRS reviews the admissibility of the Complaint and the nature of the issues and alleged impacts, and consults with relevant Staff where necessary. 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 10 business days of the request, the GRS contacts the Complainant again. If no response is received within 10 business days of the second request, the GRS closes the Complaint and informs the Complainant of this decision and the reasons for it. 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, with a copy to the Practice Manager and Country Director, which may take action where appropriate. For **Referred Complaints**, the GRS decides whether to request further information from the Complainant via the TT within ten 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 12 and 13 of this Procedure, the GRS notifies the Complainant of this decision and the reason for such inadmissibility. In the case of **Referred Complaints**, the GRS notifies the TT of inadmissibility and the TT carries out such notification to the Complainant. In both cases, these Complaints are not processed any further and are closed in the GRS Management System.

- c. *Determine the Complaint is Admissible:* If GRS determines that a **Direct Complaint** is admissible after evaluation, the GRS informs the Complainant as well as the following Staff: the CD, DSO, relevant Practice Group RD, CESSO, RSA, relevant ES Practice Managers, and TT of its receipt, LEGEN Chief Counsel, and others as appropriate on a “need to know” basis consistent with the WBG Procedure: AMS 6.21A - Information Classification and Control. The Complaint then moves to the solution-seeking phase. If GRS determines that a **Referred Complaint** is admissible, the GRS informs the TT, which is then responsible for informing the Complainant. The GRS also informs the following Staff: the CD, DSO, relevant Practice Group RD, CESSO, RSA, managing unit Practice Manager and relevant ES Practice Managers, LEGEN Chief Counsel, and others as appropriate on a “need to know” basis consistent with the WBG Procedure: AMS 6.21A - Information Classification and Control. The Complaint then moves to the solution-seeking phase.
 - 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. The GRS Risk Classification determines the prioritization of actions by the GRS and the level of Management engagement and reporting. Such classification 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. The GRS Risk Classification of each admissible Complaint is a prioritization tool for GRS Staff and is not shared with Complainants or other external parties. The GRS communicate the GRS Risk Classification to the Director, OPSRL to ensure that corporate risk systems take the complaints into account.
19. *Timeframe for Communication of GRS Decision and Communication Protocol.* The GRS provides notification to the Complainant as to the admissibility of the Complaint within 10 business days of acknowledging receipt of the Complaint (unless there has been a request for further information). For **Direct Complaints**, the GRS notifies the Complainant and then serves as the primary contact for the Complainant; for **Referred Complaints**, the GRS informs the TT, the TT notifies the Complainant and then serves as the primary contact with the Complainant.
 20. *Compliance with Timeframes.* The GRS Manager monitors compliance by the GRS with the timeframes set out in this Section III.

C. Solution-Seeking

21. *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. The GRS or the TT contacts 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).

22. *Communication of solution proposal to Complainant.* Within 45 business days from the notification to the Complainant of the GRS's decision that the Complaint is admissible, the GRS or TT sends the solution proposal to the Complainant following the communications protocol set out in paragraph 19 for **Direct Complaints** or **Referred Complaints**. The GRS or TT, as appropriate, seeks the input of the Complainant on the solution proposal. The solution proposal includes an action plan with a timeframe for its implementation. In exceptional cases, e.g., for complex Complaints or Complaints supported by a large number of documents or requiring extensive translation of supporting documents, the GRS has the option to extend the time limit for communication of the solution proposal to 60 Business Days. The GRS or TT, as appropriate, informs the Complainant of any extension in a timely manner and explains the reasons for it.
23. *Agreement by Complainant.* The Complainant has 30 business days from the date of communication to consider the solution proposal. If the solution proposal is accepted by the Complainant, the TT coordinates its implementation by the Borrower according to the timeframe set out in the solution proposal.
24. *Rejection by Complainant.* If the solution proposal is rejected by the Complainant, the GRS continues 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 process is conducted by the TT. If there is still no resolution within another 30 Business Days, the GRS determines that no solution can be reached, closes the Complaint and informs the Complainant accordingly.

D. Solution proposal implementation and monitoring

25. 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 TT continue to keep the Complainant informed on the status of implementation following the communications protocol set out in paragraph 19. The TT requests support and advice from the GRS as needed.
26. 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 satisfactorily completed.

E. Process conclusion

27. *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 TTL notifies the Complainant accordingly,

following the communications protocol set out in paragraph 19.

28. *No satisfactory resolution.* If the Complainant believes that the actions have not been satisfactorily implemented, the Complainant advises the GRS or TT within 10 Business Days. The GRS and TTL engage with the Complainant to determine whether and how to achieve a satisfactory outcome. If such additional engagement does not lead to a further agreement, the GRS closes the Complaint.

Escalation

29. The GRS escalates high risk Complaints (as classified under the GRS Risk Classification) to 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 as set out in this Procedure. The Complaint is first escalated to OPSVP and Regional VP by the Director, OPSPF. OPSVP may then inform the MD Operations as needed.

SECTION IV – REPORTING AND DISCLOSURE

30. The GRS reports on the status of Complaints it receives, while maintaining Confidentiality, in the following ways.
31. **Complainants:** Following the communications protocol set out in paragraph 19, the GRS or TT shares with the Complainant all information relevant to the case, including updates on the status and progress of the Complaint process, to the extent possible and consistent with the Access to Information Policy.
32. **Staff and 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, 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.
33. **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 advertised 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”.

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.

ANNEX

N/A

Questions regarding this Procedure should be addressed to the Sponsor.