



SOCIAL PROTECTION POLICY PAPER – 3

Grievance Redress Mechanisms in Cash Transfer Programmes: Best Practices and Recommendations

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1. Introduction

In recent decades social protection programmes have been increased across the developing world.¹ Like other social protection programmes, 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 purposes.² While concerns persist about the vulnerability of cash-based social assistance programme to corruption

along the delivery chain, there is no conclusive proof of cash transfer programmes being more prone to corruption as compared to other forms of social protection programmes.³ 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 payments linked to certain conditionalities

1. World economic inclusion report 2018
2. Rohwerder, B, Civil Society Organisation Supporting Accountability in Cash Transfer programme (2014), IDS, UK
3. Marie C, 2010, Corruption Prevention strategies in cash transfer programme, U4 resource Centre



such as sending beneficiary family's children to school. Therefore, conditional cash transfer programmes involve increased administrative expense due to monitoring and enforcement of conditionalities.

Cash transfer programmes are also unique in the sense that they provide continuous site of citizen-state interaction because of regular interaction of beneficiaries, and cash transfer programme 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. With this purpose in view, there has been an increasing recognition of the need for building social accountability mechanisms into the design of social protection programmes from very early on to improve transparency and accountability. In pioneers and early adopters of cash transfer programmes in most Latin American countries, two types of citizen oversight mechanisms have been put in place: collective and individual accountability mechanisms. Collective accountability mechanism

rest on 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 envisages beneficiaries playing greater part in initiating grievances through rules-based official grievance procedures with little support from civil society groups. Of the two, however, individual-based grievance redress mechanisms are the most commonly used accountability and transparency mechanisms. An effective Grievance Redress Mechanism (GRM) consists of both supply side measures such as setting up an office and GRM machinery as well as demand side measure such as encouraging greater uptake of the GRM service through information campaigns and community outreach.

The GRM can be defined as the “formal institutions and channels people can use to express their dissatisfaction with service delivery and to demand redress.”⁴ They can provide feedback to providers and policy makers about service delivery performance, and to hold service delivery providers to account. Effective GRMs

are the ones where complaints are processed and resolved speedily, sanctions imposed and whistle blowers are protected.⁵ Given the possibility of corruption in cash transfer programme, the GRM has formed a key component of such programme, offering a formal avenue through which grievances of the beneficiaries are processed and acted upon. In this way, the GRM not only serves the purpose of redressing programme related grievances but also fulfil the larger purpose of contributing to the process of holding programme managers to account for programme delivery.⁶ As more and more countries are increasingly incorporating GRM into the design of social cash transfer, so adoption of good practices is also increasing. 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 effective.⁷

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

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

6. Review of, and 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

2. Global Landscape

Over last few decades social protection programmes have expanded in the developing world.⁸ Inevitably with the expansion of social protection programmes, the demand for building in elements of social accountability and transparency has arisen with a view to prevent fraud, corruption and clientelism.⁹ Globally, this development has also led to the profusion of associated 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 involves diverse actors ranging from monitoring committee, civil society participation and the use of social accountability tools such as social audits and community score. On the contrary, individual mechanisms rely on individual beneficiaries making use of the officially available complaints systems to seek redress.

2.1 Social accountability mechanisms in cash transfer programmes

Cash transfer programmes 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 as the key of cash transfer programme because of its positive impact on improving quality of delivery of social protection programme on top of building up better rapport between citizens and the state. Four elements of social accountability are of special relevance 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 response to the concerns and complaints raised; c) interface between the citizen and state which may be physical or virtual; and d) civic mobilisation which mobilises citizen for public action.¹¹

More crucially, effectiveness of social accountability depends upon the type of social accountability mechanism being applied. Though individual grievance redress mech-



anism is the default mechanism for social protection cash transfer programmes, they are 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 issues.¹²

However, since social protection beneficiaries happen to be poorer and more marginalised as compared to 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.

2.2 Civil society participation in social accountability and GRM

Globally, civil society organisations have supported social accountability processes in cash transfer programmes. This role has ranged from vetting beneficiary list for error, assessing programme vulnerability to high risk and gathering grass roots information on the programme besides catalysing civic mobilisation. NGOs involved in cash transfer programme have also documented best practices in GRM in cash transfer programming.¹³ However,

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

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

there are a few studies which look systematically at civil society engagement with cash transfer programmes. One report exploring the role of civil society in cash transfer programme has looked at Mexico, Brazil, Philippines, Mozambique, Occupied Palestine Territories, and Peru, as case studies.¹⁴ The study has identified various roles civil society can play in enhancing accountability aspects of cash transfer programmes. Civil society organisations have aided the accountability process in the following ways.¹⁵ Figure 1 shows the utility of different social accountability mechanism for solving accountability and complaints related issues:

- By assessing the availability 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 programmes.
- By facilitating implementation of cash transfer programmes by connecting beneficiaries and govern-

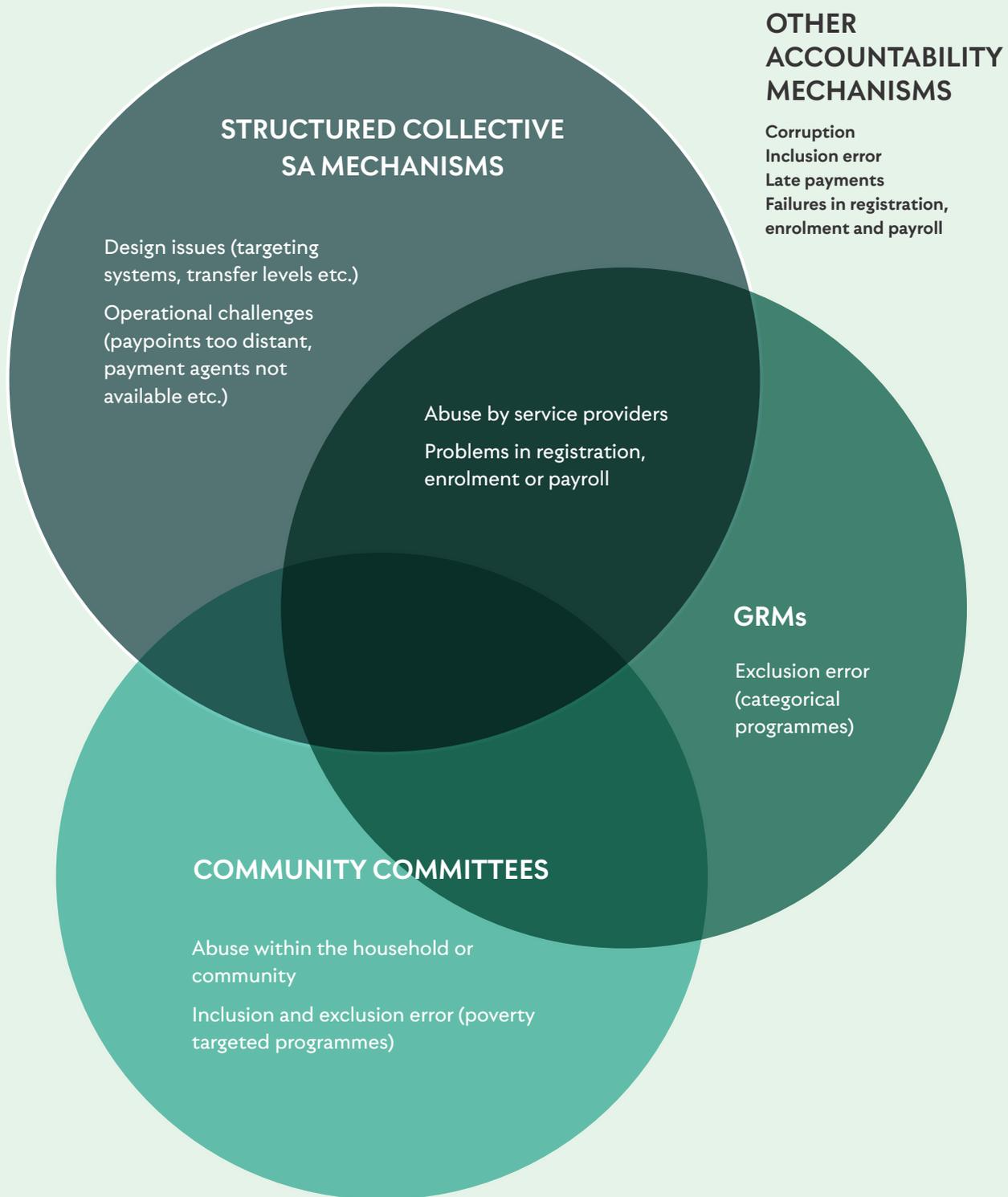
ment and encouraging beneficiaries to engage in the programme design and implementation at all stages.

- By improving grievance or complaint reporting and redressal systems by raising awareness and facilitating grievance filing and follow-up.
- By imparting right education to beneficiaries 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 them on conditionalities and benefits.
- By assisting in the collection of beneficiaries' feedback and using it to improve the programme



14. Ibid
15. Ibid

Figure 1: Utility of Different Social Accountability Mechanism for Solving Different Issues



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

3. Grievance Redress Mechanism (GRM)

States usually enforce social protection programmes in unidirectional way: programme enforcement flows from state to citizen. Despite top-down enforcement of cash transfer programmes, 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 enshrined in international instruments.¹⁶

The ILO Recommendation 202 (Article 7), stipulates that the GRM should be built-in in social protection programmes and the GRMs should be “impartial, transparent, effective, simple, rapid, accessible and 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 programmes 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 complainants.”¹⁷

One influential report highlights 4 key dimensions of an effective GRM.¹⁸ These include

1. Information: citizens are aware of how to complain and whom to complain; and they are willing to do so. Moreover, they understand social protection as a right.
2. Interface and Citizen-Action: Appropriate, accessible and multiple mechanisms exist to receive complaints. Complaints are registered and recorded
3. State Response: Complaints are addressed and provided feedback. Complaints are referred to, and investigated within agreed timelines. Progress is tracked and follow up action taken to address any delays
4. Supporting systems and civic mobilisation: Systems are in place to handle complaints with sufficient and trained staff supported by community and other institutions



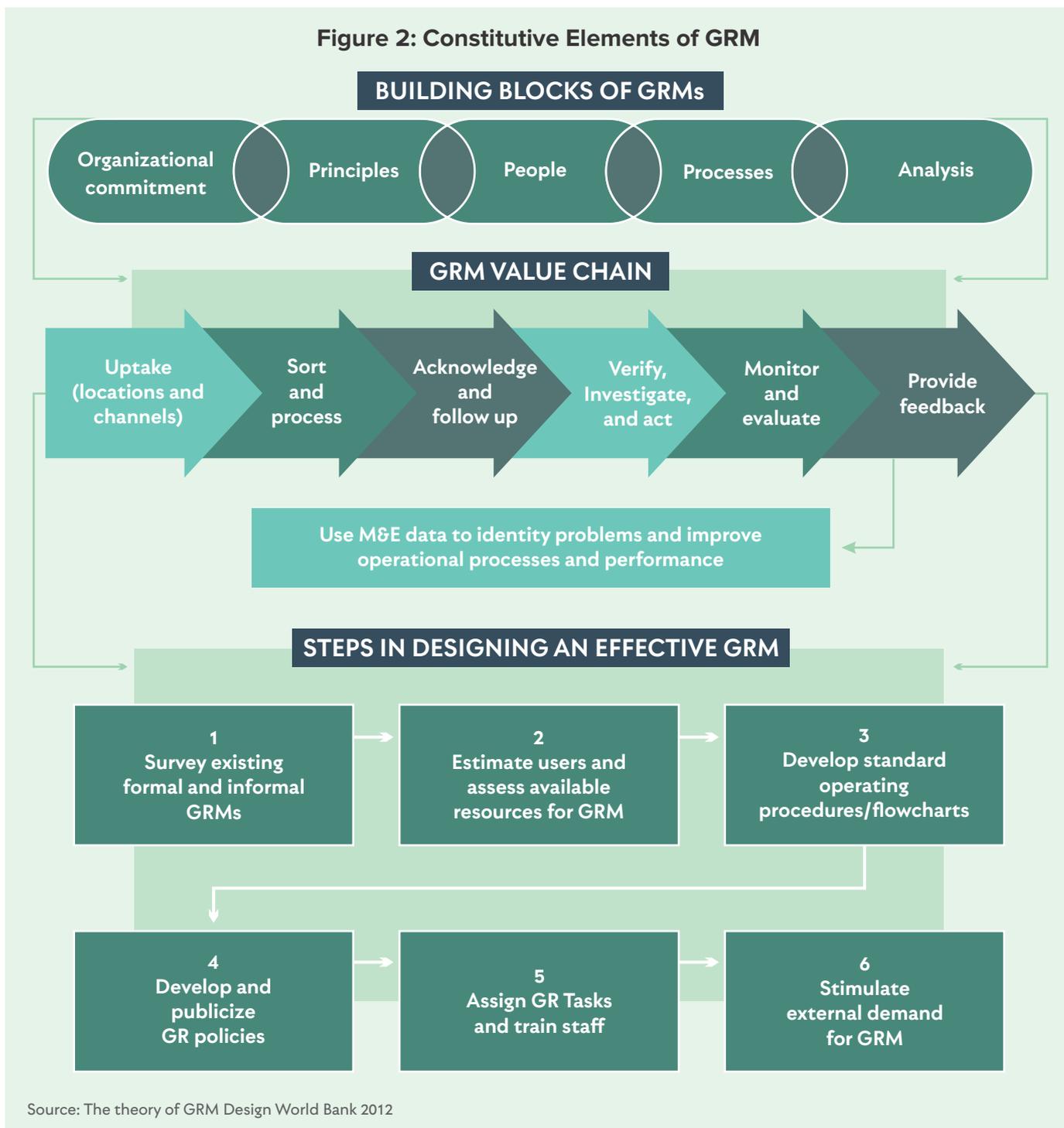
The GRM enables beneficiaries to file in complaints and appeals regarding any aspects of the cash transfer programme from payments to inclusion and exclusion criteria. Complaints are mandated to be entertained and official response given in a time-limited frame. The GRMs are very useful where complaints regarding application or misapplication of simple rules and guidelines are concerned. Most Latin American countries, where cash transfer programmes were pioneered, have introduced GRM to a scale where they have become the default social accountability mechanism for social protection. The GRM’s constitutive elements are illustrated in the following Figure 2.

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

17. Ibid

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

Figure 2: Constitutive Elements of GRM



Following four main types of complaints and appeals procedures have been identified in literature:¹⁹

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 through various types of courts.²⁰

International literature has documented many best practices respecting the operation of the GRM. One such practice suggests that an effective GRM and appeals pro-

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

20. Ibid

cess 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 rejected complaints to an independent authority.²¹

International good practices also put stress on the necessity of allowing multiple channels of complaints offering citizen free and accessible avenues. The pros and cons associated with different channels of complaints is illustrated in the table 1 below.

Table 1: Main Types of Programme Grievance Channels

| 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 (not 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

Global experiences have also highlighted that programme design matters significantly when it comes to exercising citizens' right to lodge complaints. More crucially, human rights experts emphasize the centrality of appeals mechanisms in relation to the targeting of beneficiaries where many eligible poor households find themselves excluded from the programme.²² In case of Kenya's

cash transfer programme, complaints "flooded the systems but remained largely unresolved". These cases also demonstrate that positive results are not automatic as they 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 system.²³

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

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

23. Ibid

4. Global Good Practices

Box 1: Brazil

Bolsa Familia, the conditional cash transfer programme, was started in 2003. The accountability mechanisms used by the Bolsa Familia Programme include hotlines (toll-free call numbers), controls through the Public Audit Network, and Social Control Committees or Councils. The last are enshrined in legislation and are operating in every municipality. Civil society, members of the community and government constitute the membership of these committees. The complaints if unaddressed at municipal level are escalated to the Ministry of Social Development. One review of the programme found citizen- and community-driven mechanisms for ongoing monitoring and accountability as weak while acknowl-

edging that top-down accountability processes, such as random audits have worked.

Bolsa Familia 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 Familia 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.

Source: Rohwerder, B, 2014 Civil Society Organisation Supporting Accountability in Cash Transfer programme UK

Box 2: Philippines

In the Philippines, the Pantawid Pamilyang Pilipino conditional cash transfer (P4) programme was launched in 2007. The P4's GRM has two key objectives: to provide a mechanism to facilitate grievances and complaints related to project implementation. The GRM has the following underlying principles:

- Simplicity and accessibility. The GRM procedures for filing grievances and seeking redress are simple and easy to understand
- Transparency. The GRM is publicised to a broad audience from barangay/village to the national level.
- Empowering and participatory. Communities, project implementers, and the media are encouraged to share feedback and file grievances.
- Timeliness. Guidelines include timelines that ensure grievances are handled in a timely manner.
- Right of appeal. Channels for appeal are available if complainants are not satisfied with the way com-

plaints were handled.

- Confidentiality. The confidentiality of complainants is maintained throughout the process unless otherwise requested.
- Pro-community. The GRM aims to involve the community in grievance resolution system

The GRM involves civil society organisations in advisory/grievance committees at the provincial and city/municipal levels. The P4 uses a publicly accessible database to enter and track complaints, which are received via text message, websites, Facebook, Twitter, telephone hotline, email, letter and drop boxes. In 2010, 80 per cent of complaints were related to payments. The programme requires routine spot checks by senior officials and independent parties to determine the quality and effectiveness of grievance redress. The programme's grievance redress measures have resulted in retroactive payments to households and de-listing of beneficiaries that were found illegible.

Source: Rohwerder, B, 2014 Civil Society Organisation Supporting Accountability in Cash Transfer programme UK

5. GRM in BISP 2008–2018

In Pakistan, since the roll out of the Benazir Income Support Programme in 2008, a complaint handling mechanism has been in place. The GRM at BISP 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. The 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.²⁴ 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 floods showed functioning grievance handling systems in place. The evaluation recommended improved communication strategy, developed and coordinated standard practices across various nodes of redressal systems, beefed up and trained human resources and enhanced ownership of the programme by local district administration as the key steps going forward.²⁵

One recent report based on spot check of the grievance system suggested the following improved remedial actions to make the GRM more effective:²⁶

- Designing the system to cater to the needs of women;
- Expanding the scope of the grievances heard;
- Enhanced allocation of staff to the GRM work;
- Making the BISP website more user friendly;
- Improving the efficiency of helplines.

Despite BISP Cash Transfer System adopting some of the best practices, the GRM is a work in progress and evolving.

5.1 GRM and BISP since 2018

With the expansion of the BISP's programme, and the graduation of underserving 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 complaints.²⁷ Many new channels of grievance recording have been opened up to encourage and facilitate greater uptake of the GRM. The complaints reaching the complaint management cell come through a range of channels such as citizens portal, twitter accounts, phone calls, call centre and the prime minister portal and the registration desks set up for the second wave of the just concluded National Socio-economic Survey. In addition, the complaints will also be received through the Citizen Portal and the Ombudsman office. Beneficiaries can also move judicial courts and the office of the Ombudsman as independent channels. The complaint management service has been advertised through media and other social media outlets. However, the number of unresolved complaints remains high. The required period of 30 days in which grievance need to resolved does often get stretched to 60 days.²⁸ Given profusion of various programmes under the BISP umbrella and the increase in the volume of complaints as a result of new channels for lodging complaints, developing a standardised and uniform grievance redressal practice across various departments and stakeholders poses a big challenge.



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

25. Global Review of Grievance Mechanism, 2014, World Bank Group, Washington

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

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

28. Federal Ombudsman Orders to Resolve All Ehsaas Program Complaints in 60 Days, 2020. <https://propakistani.pk/2020/09/14/federal-ombudsman-orders-to-resolve-all-ehsaas-program-complaints-in-60-days/> (accessed on 14 April, 2022)

6. Key Recommendations Going Forward

6.1 Designing more gender-reponsive GRM

Since the BISP is targeted at women beneficiaries, the GRM should be designed with the needs of women at the very heart of its design. Greater involvement of beneficiaries in the GRM design will help improve its design and implementation in participatory direction. Recruitment of more female staff in the GRM workforce and call centres would go a long way in making the complaint systems more women friendly and enhance its ownership by women. More importantly, further research should be undertaken to assess barriers to making the GRM more women friendly.

6.2 Allocating increased staff

The BISP programme at tehsil level is thinly spread to deal with the growing burden of complaints and inquiries. Therefore, staff specifically dedicated to the GRM should be beefed up to expedite disposal of growing number of grievances and complaints due to expansion of the BISP programme. Dedicated and increased staffing at local level will make the GRM more effective and efficient.



6.3 Training of the BISP staff and other stakeholders

The BISP staff involved in the GRM needs to be trained on the GRM processes and how to deal speedily with the complaints in a coordinated manner. These trainings should be supplemented with periodic refreshers as part of continuing professional development of the staff.

6.4 Improving communication strategy and public information campaigns

Communication strategy and public information campaign on the complaint handling system are crucial to enhance its uptake. A sustained public information campaign also ensures that the public fully understands the programme and are thoroughly familiar with the process of using available grievance channels and seeking redress. All channels of communication such as social media, print and broadcast media and theatre should be optimised to publicise the complaint handling and resolution system.

6.5 Developing standard practices and procedures across the programme

Developing standard practices to forge common understanding of the GRM and making it more interconnected, uniform and smooth in its operation is key to its optimal functioning. Devising and implementing standardised practices and response for the most common complaints will go a long way in making the programme smooth, accountable and transparent.

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