

Grievance Redress Mechanisms in the Public Sector

A Literature Review

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Summary

Grievance redress mechanisms (GRMs) in the public sector are institutionalized processes designed to enable people to complain about and seek redress for services they rightfully should have received. This paper reviews evidence on GRMs from around the world, focusing on mechanisms attached to public services and programs in the Global South, where they are relatively new and emerging fast. GRMs matter in particular in the Global South because they are increasingly widespread and found in multilateral aid programs, across national governments, within specific programs and services, as well as in the private sector. GRMs are expected to improve public service efficiency, effectiveness, and fairness by giving people a systematic means of seeking redress for governance failures, and they have strong potential to improve accountability to the most excluded and marginalized people, who tend to find it most difficult to make claims on their state.

The literature on GRMs in frontline public services has emerged and grown fast in the past 20 years, in part with moves toward more open, transparent, and responsive governments. While these mechanisms have superficially similar institutional features across different contexts, the evidence suggests that governmental motivations for introducing GRMs vary. In some cases, they are mandated through law or policy and appear to be more ornamental than they are functional. In others, governments adopt GRMs because they are committed to improving public service delivery and believe their efforts will be helped by having citizen-complaint data and systems for addressing complaints. The varying motivations for establishing GRMs influence how the mechanisms are designed, implemented, and evaluated; future research should account for the political and administrative goals with which GRMs are adopted when attempting to assess their performance and contribution.

A small but growing body of studies illustrate how public-sector GRMs bring or have the potential to bring about tangible gains in governance and service delivery. Studies show that well-designed and implemented GRMs have helped ensure programs and policies minimize harms on affected people, tackle harmful practices early on, and avoid lengthy delays or cancellations due to legal or other challenges. Evidence from India shows that GRMs can help detect and even deter frontline corruption, particularly if local authorities have the power to act. From the water sector, there are several strong examples of GRMs being used to improve service delivery, including the MajiVoice system in Kenya, which integrates highly accessible and multiple means of complaining with proactive transparency about complaints and resolution rates. Cases also show that citizen trust and participation can be increased through GRMs, but that facilitating complaints without adequate and transparent processes of resolution may actually lead to citizens becoming frustrated or losing trust. The evidence also indicates that marginalized and vulnerable groups can benefit from GRMs, but that fear of reprisal is a realistic concern for many. Organizational support for such groups to access and use GRMs can be critically important in empowering them to make effective claims on state actors. However, GRMs may also have unexpected side-effects, for instance they can increase staff workloads without corresponding resources or authority to act, or raise citizens' expectations that cannot be met by the mechanism.

Nevertheless, the literature is new, uneven across geography and sectors, and does not conclusively answer how GRMs affect: 1) service delivery outcomes, and 2) citizen-state relations. These were the two outcomes of focus of this review. Most literature on GRMs is descriptive or focused on their internal efficiency and effectiveness rather than on how they affect service delivery, citizen-state relations, or governmental responsiveness and accountability. There is more attention to the successful registration of complaints than on their resolution, and studies take either a managerial perspective or a citizens-rights orientation, which means that few capture the synergies between state actors and citizens that GRMs are

expected to create. Where GRM outcomes for service delivery are analyzed, the focus is on direct remediation rather than on possible policy feedback loops from proactive transparency about aggregated complaints and resolution data.

The review concludes with a simple framework for understanding the key elements of successful GRMs, as identified through the review process. These are:

- **Citizen capacity to complain**: Citizens need to know their rights and what to expect from public programs. They should have organizational support to help them access and use complaint mechanisms. A GRM should also consider citizens' expectations of a time-bound response without fear of reprisal.
- State capacity to respond: State actors need the independence, authority, and resources, to register, track, and resolve complaints and enforce their resolution. State actors must be able to redirect or escalate complaints when they cannot handle them themselves, and they must be committed to maintaining anonymity of complainants.
- **Proactive transparency:** GRMs are unlikely to be effective at registering and resolving complaints unless they are proactively transparent about the nature and number of complaints and the rate of resolution. Where complaints are dealt with in secrecy, there are few external pressures on government actors to resolve them. Proactive transparency is particularly crucial if GRMs are to achieve positive policy feedback, as it can highlight widespread or systematic problems and serious service delivery failures within the sector or program.

The review concludes with key research questions to improve our understanding of how GRMs work and could be better designed and implemented.

i. Introduction: Why Grievance Redress Mechanisms Matter

What are grievance redress mechanisms (GRMs)?

Grievance redress mechanisms (GRMs) are institutionalized processes designed to enable people to complain about and seek redress for services they rightfully should have received. This literature review focuses on GRMs in the public sector and for public services, although GRMs are also designed and implemented by aid agencies on behalf of governments and exist in the private sector. This review draws on evidence from private sector GRMs where relevant. "Institutionalized processes" mean that the collection of complaints and redress actions are recognized by governments, however, these actions need not be undertaken solely by public institutions. By "enabling people to complain about and seek redress," we recognize that while governmental authorization distinguishes a GRM from everyday grumbling or civic activism, merely permitting complaints is not enough—complaints need resolution. A meaningful process of seeking redress requires that government actors are oriented and equipped to gather, process, and act on complaints, and that civic and community action from outside government can be key to enabling citizens to register and track their complaints through the system. How people understand the "services they should rightfully have received" depends on laws, policies, and program rules, and also on past experiences with and expectations of public services.

This definition of GRMs is derived from a review of the literature on public-sector GRMs, which finds that effective mechanisms for grievance redress are not only a matter of technical design and information flow, but also of empowerment: GRMs are effective when citizens are empowered to make specific claims on public agents, and those agents are in turn empowered to respond appropriately. There are examples of multipurpose GRMs, but most are designed to address specific services and their standard of provision (Varun Gauri 2013). Vitally, a GRM is more than a space for airing grievances, nor is the information intended solely for service-providers to improve their performance; a GRM makes public services more accountable because it involves both a "voice" (in making complaints) and "teeth" (in resolving them) (Fox 2015; Pfeil and Agarwal 2021b). While citizens' collective action has led to the institutionalization of some community-based grievance systems as in India (Agrawal and Nair 2018), GRMs are more commonly bureaucratic in their origin and in treating citizens. They are:

top-down creations of very structured and controlled bottom-up mechanisms, to address information asymmetries in managing public administration and delivering public services [that frame] users as individuals rather than as collective actors (Grandvoinnet, Aslam, and Raha 2015, 24).

This paper focuses on systems for handling citizen complaints about public services in developing countries. Mechanisms for complaint and resolution are not exclusive to national programs, developing country governments, nor to public services. Nonetheless, it is worth focusing on GRMs in developing countries. They are an increasingly common feature of international aid programs to strengthen citizen engagement (Brown et al. 2014; Pfeil and Agarwal 2021b). The assumption among development practitioners is that GRMs can improve the delivery of public services to impoverished or marginalized people, and may therefore be of great importance in developing countries. Despite this, there has been little analysis of their nature or impacts in the Global South.

GRMs are important beyond a development perspective as well. They feature in multistakeholder initiatives (MSI Integrity 2016), as well as in the international business practice (ICJ 2019), handling grievances about the

adverse impacts of their operations in line with the United Nations' Guiding Principles on Business and Human Rights.¹ GRMs can operate at multiple levels. UNICEF notes that international best practice features a three tiered system, with frontline service-providers dealing with immediate problems and face-to-face complaints, an administrative level of complaints-handling to engage with local government, and a final tier of "an independent authority to act as a destination of last resort, such as a Human Rights Commission, an Ombudsman or the justice system" (UNICEF 2015, 90) (see also Ringold 2011 for an alternative take on the three-tiers of grievance redress).

Though this review focuses on evidence from developing countries, many of the findings can be generalized to other contexts. In many low- and middle-income countries with high levels of poverty, most marginalized citizens see governments as the ultimate guarantor of delivering basic public services such as clean water, sanitation, functional schools, and well-staffed public health facilities. Many of these countries receive international aid (from developed countries) to help deliver effective public services. Establishing effective and inclusive GRMs is a major test for developing countries with their generally weaker state capacity and less empowered citizens; therefore, it's likely that lessons learned from the Global South will easily apply to the less challenging contexts of richer countries. Designing and implementing effective GRMs will remain relevant across different contexts, wherever citizens continue to demand better public services and are willing to use for use for complaints (sometimes at great personal risk).

There are overall lessons for governments, donors, and civil society in creating strong GRMs. These are: to invest in skill- and capacity-building of public-sector agencies; prioritize proactive transparency; ensure equality in access and use of complaint systems; support civil society in co-designing effective GRMs, and support civil society's verification that complaints are addressed. Though the examples and elements for effective GRMs discussed in this paper could be useful for governments, they are not a panacea for successful GRMs and will no doubt need to be adapted to the social, political, and institutional context of each country.

Institutionalized systems through which people can complain and seek redress for substandard public services arrived on the governance and development scene with new public management approaches in the 1990s. This shift away from traditional command-and-control governance introduced a new view of citizens as consumers. Feedback was encouraged as a way of improving government performance in the same way that businesses respond to customers to keep them satisfied (Brewer 2007; van Teeffelen and Baud 2011; Caseley 2006). GRMs are also recommended as part of strategies for realizing human rights, e.g., in relation to child rights (Kilkelly and Liefaard 2019), human rights abuses by the police (Goldsmith and Lewis 2000), rights to social protection (Sepúlveda 2018), and in relation to human rights abuses in the extractive industries (MSI Integrity 2016). The evidence in this paper also suggests that governments have a range of motivations for adopting GRMs, including legal mandates, and that the reasons for their adoption likely shape how they are designed, resourced, implemented, and evaluated.

Why GRMs matter

An understanding of GRMs matters because they: i) are increasingly widespread and notable features of international development; ii) are seen as having significant potential to improve the quality of public investment and service delivery; and iii) have the potential to improve accountability to excluded and marginalized groups. This review focuses on understanding how GRMs contribute to the following outcomes: the quality of public service delivery (in any sector that had evidence), and the relationship between citizens and public authorities.

See https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/.

GRMS ARE INCREASINGLY WIDESPREAD

At least on paper, there are more GRMs absorbing policymaker attention, administrative energy, and public resources in the Global South than at any time in the past. Among World Bank investment lending operations, GRMs were included in 28% of projects in 2008, and in 50% by 2011 (Brown et al. 2014). This rose to 67% in 2014–2016 and was 69% as of September 2020 (World Bank 2021). Since 1997, GRMs have been required whenever safeguards on indigenous peoples or involuntary resettlement were triggered. However, as of 2018, the World Bank's new Environmental and Social Framework requires all investment project financing to "propose and implement GMs under the Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure" (World Bank 2021, 3). Other multilateral and bilateral aid agencies have also established and promoted the use of GRMs in their aid and lending programs (DFAT, n.d.; ADB 2018). The past two decades have seen a range of efforts to improve national grievance redress systems through legal and independent ombudsmen institutions and program-level mechanisms (Randolph and Edjeta 2011; SSPS 2020; Chen 2016; Gazdar and Zuberi 2014; Varun Gauri and Brinks 2008; Aiyar and Walton 2015).

GRMS ARE VIEWED AS IMPROVING DEVELOPMENT EFFICIENCY, EFFECTIVENESS, AND FAIRNESS

Governments and aid agencies claim GRMs can improve governance overall, as feedback and the incentives to respond are expected to build more transparent and accountable public services (Post and Agarwal 2012b). For the World Bank, the rationale for GRMs "builds on the business case established for GMs in the private sector where, it is recognized, they significantly reduce financial, construction, operational, reputational, and corporate risks" (Pfeil and Agarwal 2021b, 1). Project GRMs can a) provide fast solutions to individual problems with projects; b) be an early warning system of impending problems; c) improve public awareness of the project; d) help prevent corruption; e) suggest project improvements; f) assess internal organization; g) increase project stakeholders' involvement; and h) improve targeting (Pfeil and Agarwal 2021b). The Australian Department of Foreign Affairs and Trade (DFAT) emphasizes the reduced risks to project investments from functioning GRMs, pointing out that if complaints are credibly and accessibly handled, it will increase the chances of achieving project goals, and minimize the risks of controversies, legal action, and delays (DFAT, n.d., 1).

Governments appear to make similar calculations about the costs and benefits of GRMs, seeing them as ways of accessing citizen opinion, improving projects, curbing corruption, and improving performance (SSPS 2020; Randolph and Edjeta 2011; Jenkins and Manor 2017; Aiyar and Walton 2015). In China, extensive public complaint systems reflect the fact that the government knows that "citizen feedback helps sustain authoritarian rule" (Göbel and Li 2021, 40) by addressing sources of discontent with public authorities and engaging citizens in monitoring lower-level officials (see also Dimitrov 2014 on the use of complaint systems in communist Bulgaria). One study explained the "universal positive association between a country's educational level and the quality of its government" with reference to citizens' complaints:

educated citizens complain more and ... these complaints lead to better conduct by officials fearful of being punished, which in turn leads to greater accountability and a higher quality government. One attractive feature of this mechanism is that it is entirely decentralized and does not rely on any particular institution, such as democracy (Botero, Ponce, and Shleifer 2013, 989).

GRMS CAN IMPROVE ACCOUNTABILITY TO EXCLUDED AND MARGINALIZED GROUPS

Complaints are an aspect of citizenship, and achieving redress is an aspect of public accountability. In 2011, when India's transparency and accountability activists advocated for a national grievance redress legislation,

it reflected an "important analytical step in India's accountability movement in its shift from transparency to enforcement" (Aiyar and Walton 2015, 270). This analytical shift can be traced to ongoing civil society efforts to embed downward accountability strategies such as jan sunwai or public hearings, statutory social audits (Aiyar and Walton 2015; Vij 2013), and a subnational Right to Hearing law from the state of Rajasthan (Agrawal and Nair 2018) into state practice. Civil society in India (as in other countries) has a longstanding demand for a citizen's right to be heard, especially the powerless and marginalized who are most dependent on the state for their well-being. Systems for gathering complaints, particularly in the public sector, enable citizens' voices. When they're combined with functioning and resourced systems to assess, monitor, and follow up on the resolution of complaints, GRMs can have the "teeth" necessary for accountability (Fox 2015). However, GRMs are paradoxical, because:

To complain is an act of citizenship....Through these institutionalized acts, citizens call on the authority of the state at the same time that they challenge the state in light of perceived rights violations or deficiencies in service provision (Kruks-Wisner 2021, 3).

GRMs also have the potential to make governance more equitable and inclusive. They can shift power to the powerless by authorizing their claims to be heard and have their problems tackled (UNDESA 2021; Barca 2016; Kotagiri and Morel 2018; Pfeil and Agarwal 2021a; van Teeffelen and Baud 2011).

ii. Overview of the literature

Research interest in GRMs is rising

In the last 20 years, there has been an emergence of grievance redress mechanisms (GRMs) as a distinct concept with a common label in public policies and programs in the Global South. This emergence seems to reflect a combination of new public management approaches to governance and service delivery, and the "accountability turn" in international development after the publication of the *World Development Report 2003/4*. Figure 1 shows the increased use of the term "grievance redress mechanism" in published literature (both academic and grey) over the last two decades. Google Scholar recovered no publications using that specific term in 2000, but almost 700 pieces using that term by 2020, with the number rising fairly steadily for 20 years.

The published literature features a northern bias, focused on GRMs in the private sector as well as in public health, welfare, or other social policies and programs. Transnational or multilateral GRMs, including international legal mechanisms for human rights-related complaints, are also discussed, chiefly in institutional (rather than scholarly) publications. Other literature examines the broader politics of claims-making, situating GRMs within the formal structures and informal politics involved in realizing citizens' rights.² The literature covers GRMs found in countries of different political regime types (pluralist electoral democracies such as India and the Philippines and strong authoritarian regimes such as China and Vietnam); weak states and strong; and those with or without substantial dependence on international aid. From this overview we can conclude that GRMs as defined above have emerged as an important institutional and international response to making public services work in the past 20 years.

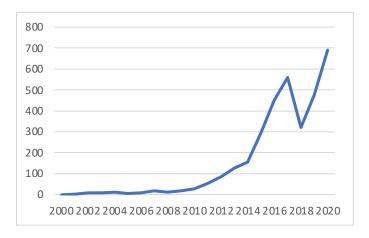


Figure 1: Articles recovered in Google Scholar keyword search for "grievance redress mechanism"

The existing scholarship describes basic principles, designs, staffing, costs, demand (by civil society or citizens) and supply (by government, courts, and ombudsman) of GRMs (Varun Gauri 2013; Randolph and Edjeta 2011; Rao 2014). It also describes proposed GRMs (UNDP 2017; MSI Integrity 2016; Sepúlveda 2018; Rohwerder and Rao 2015; Post and Agarwal 2012a; 2012b). GRMs are categorized into three common types: a) within government or administrative GRMs; b) independent redress institutions such as ombudsman; and c) legal redress through courts (Babajanian 2015; Varun Gauri 2013; Brown et al. 2014; Rao 2014; Ringold 2011; Kruks-

² See Kruks-Wisner (2018 and 2021), which situate GRMs within a broader understanding of how people forge their citizenship through negotiations with frontline state actors, and explores how the interaction of informal power relations, organized citizen groups, and formal governmental structures shape people's capacities to make effective claims on their state.

Wisner 2018; Allsop and Jones 2008; Warwick and Ortolano 2007; Bassett et al. 2012). Most studies observe there is an overlap between these three types of GRMs in some countries. Countries with more developed legal systems may rely more heavily on courts for redress, and countries with an active civil society may make greater use of independent third-parties for redress. An effective redress system, according to Gauri (2013), links the supply-side (or capacity of public authorities to respond) with the demand-side (or capacity of citizens to complain). A pilot study from one district in Bangladesh tested the hypothesis that both demand and supply factors matter in the effectiveness of GRMs. It found that increasing citizens' capacity to register complaints as well as public authorities' capacity to respond led to an increased rate of grievance submission and redress (SSPS 2020).

The literature on GRMs provides evidence of:

- how different mechanisms have successfully engaged people to provide feedback through raising awareness, overcoming fear or apathy, and making it easy to register complaints through accessible locations, language, and platforms;
- successful local resolution of issues that GRM managers have the capacity to address, either on their own or through links to decisionmakers with more power in the system;
- local anticorruption impacts, including through the prospect of greater scrutiny and deterrence; and
- improved service delivery, including rapid and transparent grievance redressal.

GRMs are often discussed as part of broader discussions on program outcomes, but without specific assessment of GRMs' impact. There is no evidence that multilateral institutions, who promote GRMs, have invested in developing an outcome-oriented business case for GRMS. This is in part because GRMs are required under organizational policies, regardless of their impacts on policy or program outcomes. Establishing GRMs is the responsibility of the client country, and thus depends on their commitment and proactiveness in putting them in place and ensuring they survive and function. For these reasons, the contribution of GRMs to program or policy success is unevenly understood. Some specific questions and gaps that the nascent GRM literature give rise to include the following:

- The focus of most literature that addresses GRMs directly is on formal grievance-handling mechanisms. Informal institutions and local power relations that are likely to shape how effectively citizens can complain are frequently ignored.
- While there is ample analysis of the process of registering grievances, there is less emphasis on their resolution, and less still on whether or how policy feedback loops are activated by successful implementation of GRMs.
- Much literature on GRMs is descriptive rather than analytical, and the studies lack a consistent conceptual framework for assessing the operation or impacts of GRMs.
- Research tends to take either a managerial perspective or a citizens-rights orientation. What it finds tends to focus on what is relevant for either managers, administrators, and designers of policies and programs, or for citizens and civic actors and movements. GRMs are important precisely because they are at the interface of citizens and the frontline state. Analysis of how well they work needs to integrate both perspectives.
- Research tends to focus on improving consequences in response to service failures, rather than
 addressing the causes of service failures. Studies that examine how GRMs help address the causes of
 service failure show that it is possible to activate the policy feedback loop through a GRM that proactively
 discloses complaint and resolution patterns.

The literature on India provides the strongest conceptual insights and analysis, but even this body of literature does not specifically or consistently demonstrate empirical impacts in terms of services delivered, problems resolved, or program or policy corrections. Overall, we find that GRMs tend to be common but understudied institutional practices; the scholarship is more focused on design than implementation and there is limited research on the role of civil society in assisting citizens seeking resolution or redressal.

iii. Methodology

This review is of English language literature on grievance redress mechanisms. Although this includes evidence from many countries, there is likely to be additional evidence in Spanish, Portuguese, Chinese, and other languages that we were unable to review. The search strategy for evidence on GRMs involved:

- Identification of search terms and strings: we used combinations of "grievance+redress+mechanisms," "grievance+mechanisms," "complaint+systems," and related terms (e.g., "social protection," "citizenship," and "governance");
- Google, Google Scholar, and manual searches for material citing prominent articles and reports on GRMs;
- Manual searches of organizations' websites (e.g., World Bank); and
- Follow-up searches on specific programs, service sectors, and authors.

The focus of this literature review was on mechanisms related to public services in the Global South. This included GRMs for aid-financed programs that are run by governments. A total of 181 documents were finally selected for closer reading on the basis that they contained substantial discussions of GRMs, and/or described instances in public services in the Global South.

It should be noted that different terms are used for GRMs in different institutions and sectors. Parts of the UN system also use the term grievance mechanisms (GM), while the Green Climate Fund has established a community of practice around the concept of grievance redress and accountability mechanisms (GRAM).³

Similar but not identical to GRMs are "customer complaints," "complaints systems," "customer feedback," and "consumer protection" systems. Some literature on GRMs uses this language (in particular "complaints" and "feedback"), but these terms chiefly refer to private companies' customer relations. Note, there is some overlap with GRMs regarding mobile money services used to transfer government payments.⁴

The literature search and review sought to be comprehensive, and to include all available analysis of GRMs and related institutions relevant to public-sector services in developing countries. It did not focus on specific outcome variables.

³ See Green Climate Fund, "Resources" (accessed 28 Sep. 2021), <u>https://irm.greenclimate.fund/resources/other</u>.

⁴ See, Innovations for Poverty Action, "Consumer Protection Practitioner's Forum | Complaints Data as a Tool for Consumer Protection: Lessons from Uganda" (25 Nov. 2020), <u>https://www.poverty-action.org/event/consumer-protection-practitioners-forum-complaints-data-tool-consumer-protection-lessons</u>.

iv. Findings

Despite the growing visibility and spread of GRMs in international development, authors have been commenting for a decade on the limited evidence on how such systems work on the ground (Varun Gauri 2013; Kruks-Wisner 2018; Ringold 2011). Scholars note the gaps in the literature (Bhattacharjee and Mysoor 2016; Ringold 2011), how little attention is paid to GRMs in social protection programming evaluations (Ayliffe, Schjødt, and Aslam 2017); and find little consolidated knowledge on outcomes and effectiveness of different GRMs (Mirzoev and Kane 2018; Babajanian 2015; Ringold 2011).

Most of the detailed accounts of formal complaints mechanisms were in India (Seth, Gupta, and Johri 2021; Kruks-Wisner 2018; Robinson 2014; van Teeffelen and Baud 2011; Marathe et al. 2016; Agrawal and Nair 2018; Vij 2013; Kruks-Wisner 2021; Aiyar and Walton 2015). Case studies were also found from China (Warwick and Ortolano 2007; Chen 2016; Meligrana, Li, and Zhang 2011; Göbel and Li 2021; Mol 2009), the Philippines (World Bank 2014), Indonesia (Siregar et al. 2017; Mahendra, Pratiwi, and Prawesti 2014), Bulgaria (Dimitrov 2014), Pakistan (Gazdar and Zuberi 2014), Ethiopia (Randolph and Edjeta 2011), and Kenya (Feruglio and Misoi 2017). India is the country with the most documented instances of GRMs, with a number of studies examining national and subnational GRMs for social protection (Seth 2020; Robinson 2014; Vij 2013; Kruks-Wisner 2018; Aiyar and Walton 2015), policing (Kruks-Wisner 2021), education (Bhattacharjee and Mysoor 2016), and public services (van Teeffelen and Baud 2011; Chakraborty, Ahmad, and Seth 2017; Marathe et al. 2016; Caseley 2006).

The scholarship on GRMs is focused on mechanisms hosted by either an externally funded project (i.e. involving financial assistance from donors or multilateral and bilateral agencies)⁵ or the service providers themselves. There are few detailed descriptions of project- or program-level GRMs in operation. Several guidance notes, toolkits, and proposals describe international organizations' normative and aspirational intent for GRMs, but these contain few concrete examples of how the mechanisms work on the ground (Sepúlveda 2018; UNDP 2017; MSI Integrity 2016; Dennis and Stewart 2004). According to one World Bank evaluation, there is better support for GRMs in the "design process than in implementation process" and many GRMs "exist on paper but not in practice" (Brown et al. 2014, 16). In their review of citizen engagement in the World Bank, the Independent Evaluation Group (IEG) found that stakeholder consultation processes and GRMs were the most widely-used tools of citizen engagement with World Bank projects (IEG 2018), but that some 81% of projects had no dedicated indicator to track project outcomes.

GRMs' contribution to the development process

One way in which GRMs improve value for money is by enabling free scrutiny and monitoring of projects by citizens. This 'best quality' monitoring (Ranganathan 2008) tends to be more accurate than 3rd party monitoring (May, Oswald, and Smidt 2009) and could help provide innovative public service solutions (Simmons and Brennan 2017).

For example, GRMs are useful in roadway construction given that the roads displace people and habitats, requiring resettlement and compensation. The GRM in a World Bank-supported road project in Kazakhstan registered only a few hundred complaints, but proved "very effective at picking up many of the indirect impacts of the road on both the local communities and the more than 35,000 people indirectly employed by the project," highlighting problems of low salaries, sexual harassment, and improper land acquisition (Brown

⁵ The World Bank has published several key studies on GRMs. An earlier body of literature established the case for GRMs and documented design and implementation processes (Ringold 2011; Bassett et al. 2012; Varun Gauri 2013; Brown et al. 2014; Post and Agarwal 2012b). Since October 2018, GRMs have been required in all World Bank programs, and recent studies have examined the contextual and institutional factors shaping their implementation, including surveys of managers tasked with ensuring the operation of GRMs in country-lending programs (Pfeil and Agarwal 2021a; 2021b).

et al. 2014, 32). Similarly, a study of an ADB-supported road project in Vietnam found that GRMs made it possible to resolve a large number of grievances that could otherwise have meant livelihood and asset losses by the people facing resettlement. The GRMs registered and resolved hundreds of complaints about access to cultivable land, property damage during road-building, and unfair compensation arrangements, with the formal institutions of the GRM being supported by mass unions and other local organizations (ADB 2018). The resolution of these complaints both enabled the project to continue without undue hindrance, and ensured that even citizens affected by resettlement were appropriately compensated and supported through the process, minimizing the disruption they would otherwise have experienced from the development process. A landmark highway project in Sri Lanka experienced protests that delayed the project for five years. Lessons from this experience helped introduce a range of best practices in Sri Lankan government practice regarding public participation and engagement in project design and implementation, including the use of GRMs to ensure proper compensation (Perera, Gamaathige, and Weerackody 2016).

GRMs tend to be designed to respond to complaints about a specific range of mandated activities, and do not address all possible grievances in relation to programs. A common complaint in social protection programs is about exclusion from targeted schemes, and several GRMs faced excessive workloads of complaints regarding exclusion (UNICEF 2015; Gazdar and Zuberi 2014; Shelley 2015). Barca reviewed both public-sector and aid agency-managed GRMs in Indonesia's social programs. They found GRMs "cannot compensate for poorly designed or implemented programmes...eligibility criteria should be simple and there should be adequate financing to ensure all eligible target group in each province/district can be included" (Barca 2016, 6). Where the registering of complaints was followed up by redressing actions that were tracked, there were clear and strong gains. For instance, the government-run GRM for the Philippines' flagship Pantawid Pamilyang social assistance program registered half a million complaints, many of them about exclusion. The resolution of these complaints led to the retroactive payment of USD 71 million to households who had their eligibility confirmed (World Bank 2014).

GRMs and corruption

CITIZEN PARTICIPATION IN DETECTING CORRUPTION

While social audits are not the same as grievance redress mechanisms or forums (see Gauri 2012), in practice, some become de facto spaces for gathering complaints. In India, the success of civil-society led social audits in improving services led to their institutionalization by the government. Evidence indicates that state-supported social audits, a practice that provides a collective forum for the expression of complaints, in India's National Rural Employment Guarantee Act (NREGA) has helped detect corruption (Aiyar and Mehta 2015; Aakella and Kidambi 2007; Afridi and Iversen 2014). Through collective complaints platforms, it was uncovered that in the state of Andhra Pradesh, around 5% of all muster rolls (workers' details) were falsified, and several development officers and office staff were removed for corruption (Aakella and Kidambi 2007).

However, a study of the impacts of repeated social audits, also in relation to the NREGA in Andhra Pradesh, found that while these practices were highly effective in detecting corruption, there was no sign that they actually deterred it (Afridi and Iversen 2014). Nevertheless, there is considerable consensus among social auditors in India that the audits have reduced wage-related theft, as NREGA workers are able to complain when their wages are not paid (Aiyar and Mehta 2015). Evidence from Telangana found a high redressal rate for certain types of complaints that could be resolved by local auditors and did not need escalation to higher levels for resolution; this prevented recurring grievances (mostly related to workers' wages), which can get stuck without resolution after social audits (Pande and Dubbudu 2017). This evidence suggests that factors such as state responsiveness—action or inaction by governments or project managers and external actors—to grievances are critical to deterring corruption, and cannot be assumed from the existence of complaints systems or mandates to resolve complaints that exist on paper.

ADDRESSING THE RISKS TO INDIVIDUAL COMPLAINANTS

Formal GRMs might not be the preferred pathway to fight corruption because of the high personal risk to complainants. Bangladeshi civil servants noted that the people tasked with receiving complaints regarding public appointment processes were themselves corrupt, and raising questions could worsen the situation (Alom 2021). Evidence suggests that citizens are particularly vulnerable to reprisals when their requests for information threaten to expose corrupt individuals or organizations. The risk of reprisal against individual complainants is why the state-convened NREGA social audits were designed to provide avenues for collective complaints from NREGA workers. Social audits as a collective complaint forum contrast sharply with the political view that beneficiaries are passive, isolated, individual welfare recipients. This view often underlies cash transfer schemes as well. NREGA aimed squarely at enhancing workers' political awareness, confidence, skills, and connections—in short, their political capacity (Jenkins and Manor 2017, 11–12).

Further, retail corruption – citizens' experiences of bribe-demands— was tackled with the use of right to information law—an information access law and not a formal GRM. Many citizens with pending public service requests such as a new electricity connection, passport issuance or renewal, or obtaining a government subsidy used the right-to-information law to successfully secure public services (Webb 2010). However, grand-scale corruption is less likely to find resolution regardless of whether citizens use informal channels like information requests or formal GRMs like online forms or physical complaint boxes. GRMs may help government agencies identify governance weaknesses with frontline implementation, but they are less likely to prevent corruption.

GRMs and public service delivery

Evidence suggests that many GRMs in public services exist on paper only, or as nominal efforts to allow complaints through the provision of a complaints box or hotline number. These tend to lack systems for tracking complaints or their resolution. Without a strict timeframe or third-party follow up, grievances are easily ignored, or users may find alternative means of registering their complaints, either from higher or other public authorities, or through informal collective action.

However, there is evidence of GRMs working to provide resolution and improve service provision. The MajiVoice system for handling complaints about services in water utilities and contracted water service providers in Kenya found that its integrated system of some online but predominantly face-to-face or phone-based complaint registration was highly effective. Complaint numbers increased tenfold once it was established (Belcher et al. 2016). Complaints were transparently addressed, and access to information about resolution rates saw the pace of redress improve. Most users were satisfied with the responses received, and more felt the experience of complaining had been worthwhile. This GRM is actively monitored by the Water Services Regulatory Board, which is empowered to take legal action against failures to meet agreed service standards (Belcher et al. 2016).⁶ The MajiVoice case demonstrates the value of an integrated and proactively transparent system.

May et al. (2009) observe that the GRM for Asian Development Bank's Earthquake and Tsunami Emergency Support Project in Indonesia was able to identify problems early and provide resolution, largely due to highlevel commitment from the project's senior management, dedicated staff, and funding. High-level support meant lower-level staff could not ignore complaints; only a few complaints were elevated to higher levels.

In India, an urban municipal water provider in a southern state reformed its GRM (Caseley 2006). One of the reforms was an online (internally networked) system that monitored staff performance based on citizen complaints. Since the system was established, citizens who used the new service perceived significant

⁶ See WASREB, "About WASREB" (accessed 29 Oct. 2021), <u>https://wasreb.go.ke/about-wasreb/</u>.

changes in staff behavior and the majority of complaints were addressed within a shorter timeframe (four days) as opposed to the previous practice of not being addressed at all. Despite the improvements, complaints continue to rise, which Caseley attributes to a combination of "greater awareness among citizens, consistency in referrals made by section staff, and, most importantly, satisfaction among citizens, resulting in repeat engagement with complaints services" (Caseley 2006, 535).

GRMs and citizen trust and participation

GRMs have the potential to improve citizen trust and participation but can also raise expectations they cannot meet, particularly when those in charge of accepting grievances have no power to redress them. For instance, government-run citizen complaint windows in Mexico's conditional cash transfer program Progresa (later Oportunidades), provided a degree of answerability to program participants. Before the complaint windows, the program was accountable upward to officials but not downward to participants. Program managers of these windows were wary of making complaints public and used discretion in assessing patterns of complaints. The program addressed a felt need, evident from data on growing number of complaints. However, these complaint windows mainly only contributed to simple program implementation issues, and could rarely address all citizens' complaints. In addition, once a grievance was transferred to another department, the commitment to anonymity was lost, thereby increasing the risk of reprisals (Fox 2007).

Despite growing interest and widespread adoption of internet-based GRMs, digital solutions tend to be unidirectional and opaque—information is taken from citizens, not given back; complainants are unable to determine whether their complaint is universal or not. For example, van Teeffelen and Baud (2011) point to a "democratic deficit" in relation to implementing new public management strategies such as an electronic GRM, because not all citizens can enjoy their rights to complain equally. They find that Indian middle-class citizens are better empowered to obtain greater accountability from local government because of their better access to and capacity to use digital platforms handling complaint redress (see also Caseley 2006):

Neither middle-class citizens nor poorer citizens are able to enforce accountability in these areas [of public services] on their own, but have to work with advocacy processes and intermediaries over a longer period of time. Therefore, if new public management approaches want to improve the effectiveness of government for all citizens existing, inequalities and dependencies have to be taken into account (van Teeffelen and Baud 2011, 182).

Gazdar and Zuberi (2014) note that beneficiaries of the Benazir Income Support Programme in Pakistan who were able to file grievances needed further assistance in understanding the redress processes. The study notes that educated and well-connected people, and in some instances, NGO staff, played a mediating role.

Even with legislative guarantees for grievance redress, one Indian study shows there are numerous practical limitations that can limit GRMs success. These include conflict of interest between implementing and executing agencies; a lack of clarity on how to deal with complaints that involve multiple actors (e.g., schools, teacher, parents); a lack of clarity among complainants on who to approach; and a lack of specific remedies for different violations (Bhattacharjee et al. 2016; 2014). Two common themes among the key GRM studies from India are that digital solutions mistakenly assume equality among those who will use them, and to enforce redressal of complaints, citizens need additional spaces (van Teeffelen and Baud 2011). In India, citizens engage in "level hopping" (Kruks-Wisner 2021); "going up the ladder" (van Teeffelen and Baud 2011) or "level jumping" (Robinson 2014) to engage the state and draw attention to their grievances. Sabhikhi observed that India's national grievance redress legislation requires the state to facilitate grievance redress, allowing citizens to approach officers with powers to summon lower-level officials and hear out a complainant, thus increasing the chance of redress (2012). Though as Robinson (2014) observes, officials can also engage in level jumping or higher-level

officials can "jump down" (with on site visits or inspections) to solicit complaints. However, where there is no strong commitment from the top to resolve and address complaints, GRMs can be little more than ornamental.

According to a global review of social accountability literature, most social protection programs include some type of mechanism for receiving and addressing complaints, at least on paper (Ayliffe et al. 2017). However, many of these are not functional (Barca 2016). Ayliffe et al. (2017) also find that many of the public-sector GRMs in social protection vary widely in terms of how well they document and follow up on complaints. For example, we can look at the Pantawid Pamiliyan Filipino Program ("4Ps") in the Philippines and the Benazir Income Support Programme (BISP) in Pakistan. Registration and categorization of complaints has enabled the number and type received to be tracked (World Bank 2014; Rao 2014). However, according to one independent review of 4Ps, there is no evidence on whether the program helped prevent corruption. G-Watch's recent report on governmental social assistance for COVID-19 that included 4Ps, shows that government hotlines and grievance redress systems were hardly used (Aceron, Bueno, and Maglanque 2021). Elsewhere, basic information on the number and type of complaints is unavailable, such as in Ethiopia (Randolph and Edjeta 2011) and Indonesia (Barca 2016). Nigeria's Child Grant Programme uses a telephone-based interface for their GRM that has several limitations, as local community norms are against complaining about programs that bring benefits, fear of reprisal, and a lack of knowledge about how to complain (Sharp et al. 2016).

Ayliffe et al. (2017) draw on Aiyar and Walton's (2015) classification of "thin" versus "thick" accountability activities. Ayliffe et al. observe that GRMs in social protection programs work better in "thin" accountability activities such as registration and enrollment than in "thick" activities such as exclusion and targeting.⁷ Often GRMs can expose a policy gap (e.g., inadequate selection criteria for targeted assistance programs) but the grievance that led to the exposure can remain unaddressed and, in some cases, lower expectations and trust. Thus, as we noted earlier, GRMs are only as effective as the power granted to those in charge of handling complaints. For example, despite legal backing for Nigeria's Public Complaints Commission, the lack of power hinders how effectively it responds to complaints (Aina 2012).

GRMs and excluded and marginalized groups

GRMS HELP MARGINALIZED CITIZENS BENEFIT FROM THE PUBLIC SERVICES THEY NEED MOST

In theory, GRMs should be accessible to those on the margins of society. Yet, despite their popularity and high demand, complaint mechanisms can be inaccessible, particularly for marginalized populations. Whether GRMs are hosted by projects or service providers, GRMs cannot be effective unless they are reached and used by all affected citizens. For example, in the Philippines, 4Ps targets the poorest of the population. The Department of Social Welfare and Development reports an increasing utilization of 4Ps' GRMs from 2009 to 2017 with a resolution rate of 91% in 2017. This is a good example of a program-level GRM benefiting the poorest, specifically 4Ps beneficiaries. However, G-Watch's 2019 survey notes that what constitutes a "resolution" raises questions about whether complaints actually improve beneficiaries' conditions (Aceron, Bueno, and Maglanque 2021).

The Indonesian government's national complaint handling system (LAPOR) is easy to use, and some argue that as a digital platform, it helps citizens report on government performance by bypassing the bureaucratic process (Mahendra, Pratiwi, and Prawesti 2014). But access problems are common. LAPOR is used primarily by men (aged 31–45) with college degrees and who work in private sector. Such gendered effects on GRM access are also noted in Ethiopia. Female beneficiaries of social protection programs reported knowing of opportunities to raise their concerns but chose not to do so due to fear or because they did not want to bother the service

⁷ See also Dadap-Cantal et al. (2021) for a critical assessment of the Philippines' Pantawid social assistance program.

providers (Vinci and Roelen 2018, 20). By contrast, however, beneficiaries of the Benazir Income Support Program in Pakistan claimed that being able to visit public offices to register their complaints about the program was itself an empowering experience for women who had previously had no reason to engage with public officials (Gazdar and Zuberi 2014).

TECHNOLOGICAL SOLUTIONS MAY NOT WORK FOR THE MOST MARGINALIZED

Citizens living in remote areas may be unable to use GRMs, particularly if access is through digital platforms. But even where digital connectivity is high, people may not have the knowledge or confidence to complain. In one Indonesian province, Bojonegero, with high levels of internet connectivity (60.8%), awareness about the complaint system was low and residents used the local government-run radio show to make complaints (Siregar et al. 2017). Thus, even in areas with high internet rates, advanced technology is no guarantee GRMs will be widely used. Awareness and trust building are important for reaching populations who feel they have been treated unfairly.⁸ Digital solutions for grievance redress often ignore the crucial role of intermediaries or independent convenors that could help facilitate access by marginalized groups (Seth, Gupta, and Johri 2021; Feruglio and Misoi 2017).

GRMS PROVIDE INFORMATION NECESSARY FOR 'ADAPTIVE MANAGEMENT'

As part of the 'adaptive management' (or management informed by learning and feedback) of Egypt's Takaful and Karama unconditional cash transfers program, government-run GRMs were used to aggregate and analyze complaints of exclusion by people with disabilities. The GRMs were a source of information that helped program staff focus on key implementation bottlenecks, in this case the incorrect recording of disabilities affecting eligibility for the program. Of more than 270,000 complaints between 2018 and 2020, almost 100,000 complainants had their assessments revised so that they became eligible for the cash transfers (Pfeil and Agarwal 2021b, 12). Similarly, a flood emergency cash transfer project in Pakistan found that out of half a million eligibility appeals, almost 140,000 were upheld and people received the cash transfers (Brown et al. 2014, 36).

Unintended/undesired consequences of grievance redress mechanisms

FRONTLINE WORKER MORALE

A critical point to consider is that effective grievance redress mechanisms require an outlay of human resources, data management capacities, and authority to respond that do not appear to be adequately anticipated in all cases. A common complaint from those tasked with administering GRMs is that this leads to excess workloads, usually by generating a large volume of complaints that are not actionable by the GRM authority. For instance, social protection GRMs frequently receive a large number of complaints about exclusion from programs. These often relate to the fact that social protection services are mostly targeted, and demand outstrips supply. Some complainants may be eligible but have not been chosen because there are not enough places on the list; others may be ineligible but believe they deserve the benefit (Gazdar and Zuberi 2014; Vinci and Roelen 2018; Barca 2016). Other GRMs report receiving the wrong kind of complaints, because citizens do not know what they can complain about, or lack alternative channels for their complaint (Grossman, Platas, and Rodden 2018). Handling a high volume of complaints that are irrelevant or irresoluble can be demoralizing for frontline staff and may also detract from their other mandated tasks.

⁸ Peixoto and Sifry (2017) note that in spite of the wide array of internet-based tools available for global citizens to express themselves vis-à-vis their government, the desired impact on citizen engagement is lacking.

Frontline service provider morale is an important aspect of GRMs. There is a tendency in the literature to portray public service employees in low- and middle-income countries as self-interested or profit-maximizing (Davis 2004). The introduction of new public management strategies should strive to strengthen positive perceptions of frontline staff jobs. Otherwise, unsatisfied frontline workers might sabotage new reforms. For example, one study of South Asian water and sanitation agencies found that face-to-face interactions between service provider staff and customers ("social intermediation") is one strategy that could contribute to a new sense of purpose in their positions, helping to reorient their practices. The lack of a human factor in follow up for grievances is also noted as a limitation of Indonesia's national complaint handling system, LAPOR (Mahendra, Pratiwi, and Prawesti 2014). A literature review of citizen monitoring initiatives—including social audits and GRMs—and corruption also concludes that if the initiatives provide contact between citizens and service providers, and enable citizens to monitor government performance, the potential benefits of the initiatives are likely to be higher (Molina et al. 2016).

FEAR OF REPRISALS

Complaining may be an important aspect of improving citizen-state relations. But it can be risky and outright dangerous. When designing and promoting a GRM it is necessary that governments and project managers bear in mind the undesired or unintended consequences. The act of complaining, especially by marginalized populations, is an extremely powerful activity that mobilizes anti-accountability forces who fear a loss of social status or power; these forces organize to block or suppress grievances.

Even with some safeguards in place, complainants might be in danger. In India, the national Ministry of Personnel, Public Grievances and Pensions is dedicated to grievance redress. (Though in practice, it's hard for citizens to register complaints and grievances through the ministry). Additionally, there is an array of national and subnational internet-based complaint systems and some in-person complaint forums. However, there are serious attacks on right to information (RTI) users (deaths, assaults, and harassment), totaling 450 as of July 2020, with 87 reported deaths.⁹ Those killed are ordinary citizens seeking information under India's RTI law on public interest issues. Many of them filed RTI requests inquiring into a prior complaint or grievance related to mining, corruption, irregularities in rural schools, fund utilization for village drainage systems, civic projects, illegal electricity connections, and land (Pande 2015). In other instances, political elites threaten frontline social auditors for assisting workers to receive welfare benefits under India's national work program (Pande and Dubbudu 2017). As Kruks-Wisner (2018) notes, in India, GRMs are also not just about problem-solving but a product of citizens' exposure to-and hence knowledge of, expectations of, and linkages to-the state. Though claims-making often fails, Kruks-Wisner (2021) notes that GRMs are a way of strengthening the relationship between citizen and state and provides a critical channel for marginalized groups to be heard. But complaining is paradoxical and can at times—due to local government constraints—deepen grievances and lead to citizen-withdrawal (Kruks-Wisner 2021). In this sense, complaining can be risky, particularly for marginalized populations; for many populations, oppression is so significant that a GRM cannot overcome that fear.

In Ethiopia, female beneficiaries of two social protection programs told researchers they do not engage in activities or discussion or raise issues because of fear of repercussions (Vinci and Roelen 2018). Similarly, in Pakistan, beneficiaries of the Benazir Income Support Programme did not pursue cases as a result of serious dissatisfaction with some offices or they were hesitant because they feared their beneficiary status might be revoked (Gazdar and Zuberi 2014).

⁹ See Commonwealth Human Rights Initiative, Hall of Shame: Mapping Attacks on RTI Users (accessed 27 Sep. 2021). <u>http://attacksonrtiusers.org/</u>.

Finally, governments and project managers should bear in mind the effects of complaints on employees, frontline staff, health professionals against whom complaints are made. While complaining is an important activity that can improve service delivery, more research is needed on the relationship between individual encounters and complaints and institutional responses to complaint systems (Gill et al. 2019).

Conclusions

This review found that a growing number of governments and government agencies recognize the potential value of GRMs. New and expanded mechanisms for gathering and responding to citizen feedback are found in all regions, in developing and advanced economies, and in democratic political systems as well as in more authoritarian settings. This growth in the numbers and spread of GRMs has not, however, been matched by strong supporting evidence of what they mean for the services delivered, relationships between citizens and states, or for the capacity or accountability of governments. Some analysis of the private sector and development investment projects builds a business case for GRMs, assessing their contribution in terms of avoiding delays through legal or civic action, stopping harmful practices, building community trust in businesses or public institutions, or reducing corruption. But a business case has not been essential to the adoption of GRMs, and no such justification was found for government-led GRMs, many of which were established in response to international standards, multilateral lending policies, or national policy frameworks or laws.

The present review suggests that how GRMs are designed and implemented very likely reflects the motivations for their adoption and implementation. GRMs' design and implementation also reflect the state's and citizens' capacity to use the mechanisms to complain or respond, and the existing institutions, including service standards, that mediate citizens' relationships with their state. One reason there is no conclusive answer to "what do GRMs achieve?" is because they are established and implemented with a range of differing motivations; their successes and failures must be judged against what they are designed to do. For instance, in India, the move to rights-based welfare architecture was part of a state transformation by giving citizens new rights and spaces in which to claim them, so that citizens' capacities for collective complaints are an important feature of the system (Aiyar and Walton 2015, 260). By contrast, the Shanghai Environmental Citizen Complaint System "enhances government legitimacy by showing citizens that the government is focused on responding to the concerns of its citizens," but does so to substitute for weak official monitoring of local environmental standards, and for the lack of space for citizens to challenge local environmental policies (Warwick and Ortolano 2007, 238).

The literature is mostly silent on the reasons governments adopt and implement GRMs, but the following motivations can be inferred:

- laws or policy require such a mechanism;
- political leadership reforms to build a more open government;
- to improve the internal efficiency and effectiveness of government programs through greater oversight of final outcome;
- to enable more systematic surveillance of citizens' grievances;
- to enhance governmental legitimacy by being seen to respond to citizens' concerns; and
- to protect and promote citizens' rights.

Activating synergies: a framework for understanding how GRMs work

The varying importance of these motivations helps explain the design and implementation of different GRMs, and shapes their technology choices, efforts at transparency and increased uptake, resourcing and authorizing of government actors, and involving organized civic groups. However, a key conclusion from this review is that GRMs can contribute to better and more effective public programs not through empowering either citizens or state actors, but by creating synergies between citizens and the state that contribute to better public services. Lessons from the successful MajiVoice system in Kenya included that its success was owed to the synergies it created as:

[A]n integrated solution that increases accountability pressure from below by facilitating submission and tracking of complaints by customers, reinforming monitoring from above by giving the regulator better data access, and by equipping public utilities with a modern complaint management tool to react productively to these pressures by processing customer issues more efficiently (Belcher et al. 2016, 186).

This section outlines a simple framework for understanding how GRMs work that centers the dynamics of complaint and resolution, based on the conclusions drawn from this review. This framework identifies three main elements that enable complaint, facilitate resolution, and improve policy and performance (see Figure 1):

- i. Citizen capacity to complain: The capacity to complain includes knowledge of (or access to such knowledge) about citizens' rights, including specific programs and policies. There must be organizations or groups to help citizens understand their rights or register complaints and citizens must be able to actually access and use the mechanisms to register their complaints. There should be no fear of reprisal or benefit exclusion for complaints. GRMs need to be designed to provide an appropriate and diverse channel to receive claims such as complaint boxes, public forums, documentation of citizen complaints, interactive voice recording, anonymized or confidential processes, and face-to-face systems. Designers and implementors of GRMs increasingly recognize the challenges facing equity and inclusion in systems for receiving feedback, or of enabling citizens to complain should they need to (Pfeil and Agarwal 2021a). This involves attention to the power dynamics that mean marginalized and vulnerable groups may lack the knowhow or physical access to register complaints or may fear reprisal for doing so. Almost all cases of GRMs pay attention to whether citizens have the capacity to complain, with a strong focus on disseminating information about the mechanism to affected communities, and some analysis of the material and social obstacles people face in trying to complain. Online platforms can be efficient means of registering and tracking complaints, but reliance on these may exacerbate the digital divide (see Belcher et al. 2016). Unequal power relations between government actors and citizens may mean that women, marginalized, and low-income groups are less likely to complain individually, and more likely to benefit from civic or organizational support in registering and following up on complaints.
- **ii. State capacity to respond:** State actors need the independence, authority, and resources, to register, track, and resolve complaints, and enforce their resolution. Some GRMs were described as being on paper only, because no personnel or resources were allocated to the task (Shelley 2015). State actors tasked with GRM management need the resources to enforce resolution decisions in a time-bound way, and to redirect complaints that they cannot handle to other levels of grievance redress. If state actors are unable to respond or to demonstrate progress on resolution, citizens may lose trust, and be less likely to complain in future. However, a lack of response might not always suggest apathy, particularly if state actors do not track complaints and are unaware of recurring grievances. Overall, GRM studies focused less on the capacities of state actors to respond, or on their independence, authority, or resources

to enforce resolutions, than they did on citizen capacity to complain. Thus, they failed to unearth the dynamics that generate reactive responses or policy feedback.

- **iii. Proactive transparency:** GRMs are unlikely to be effective at registering and resolving complaints unless they are proactively transparent about the nature and number of complaints and the rate of resolution. Where complaints are dealt with in secrecy, there are few external pressures on government actors to resolve them. Proactive transparency is particularly crucial if GRMs are to achieve positive policy feedback, as it can highlight widespread or systematic problems and serious service delivery failures within the sector or program. Active efforts to monitor the progress of complaint resolution can enable citizens' concerns to feed directly back into high-level policy thinking, and may increase citizens' trust in government. Proactively disclosing patterns of complaints could identify hotspots and prompt other state actors to take action.
 - Some mechanisms concentrate on enabling citizens to complain, often through the use of technology such as SMS or web-based platforms. This information can be used for government monitoring of its own programs, and so has value in its own right. Program information extracted from user complaints may enable a degree of responsiveness with respect to actionable problems. However, unless efforts are also made to empower and incentivize state actors to respond in proactively transparent ways, these operate mainly as unidirectional information-extraction exercises. Citizens can get frustrated by a lack of response to their specific complaint, and may stop registering their grievances through formal channels unless they can see tangible changes (Aceron, Bueno, and Maglanque 2021).
 - Other mechanisms are designed to both increase citizen capacities to complain and state capacities to resolve their complaints. However, the review found that program-based GRMs can be internally effective yet still lack the proactive transparency needed to activate the policy feedback loop. Proactive public disclosure of the performance of GRMs can mean that data on grievances and their resolution are treated as feedback on policy, offering guidance on how to improve policy or delivery design (Pfeil and Agarwal 2021b). Proactive transparency should also include data about grievances that are not resolved because they do not fall within the precise remit of the GRM. Several cases noted that GRMs that successfully enabled citizens to complain often received a large number of ineligible complaints. Rather than feeding into a debate about the program, these are often discarded as irrelevant (Grossman, Platas, and Rodden 2018). A common example is grievance systems attached to social protection programs, where complaints frequently relate to exclusion or ineligibility for targeted benefit schemes (Barca 2016; Gazdar and Zuberi 2014; Ayliffe, Schjødt, and Aslam 2017; Dadap-Cantal, Fischer, and Ramos 2021; UNDESA 2021; Vinci and Roelen 2018). Analysis of ineligible grievances is important for integrating citizen complaints into the policy process. This implies also that GRM managers are empowered to redirect complaints to appropriate levels of grievance redress. Proactive transparency about GRM performance is necessary for governments to move from reactive to preventive policy measures.

Future research agenda

Research into how GRMs work and what changes they bring to public services and the relationship between citizens and states is in its infancy. Several studies included in this review recognize that the lack of evidence on what GRMs actually do constitutes an important research gap. The findings of our review would agree that GRMs merit further research because they have the potential to challenge power relations and bring about systemic change, and governments are increasingly recognizing their potential value. Key issues for further research include the following:

- The motivations for implementing GRMs: What are governments hoping to achieve when they establish GRMs?
- Internal effectiveness of GRMs: How and under what conditions do GRMs successfully register and resolve complaints? What are the technical and design features of such systems?
- Synergies between citizen capacity to complain and state capacity to redress: How and under what conditions have GRMs provided policy feedback that improved service design or delivery by informing action higher up the policy chain?
- What role does organized civil society play in co-designing and activating GRMs?
- What is the role of GRMs in implementing pro-poor, inclusive public services?

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