



IDS WORKING PAPER

Volume **2019** No **525**

How Does the World Bank Build Citizen Engagement Commitments into Project Design? Results from Pilot Assessments in Mozambique, Myanmar, Nigeria, and Pakistan

Rachel Nadelman, Ha Le and Anjali Sah

April 2019

Produced as part of:



Action for Empowerment and Accountability (A4EA) is an international research programme which explores how social and political action can contribute to empowerment and accountability in fragile, conflict, and violent settings, with a particular focus on Egypt, Mozambique, Myanmar, Nigeria, and Pakistan.

Led by the Institute of Development Studies, A4EA is being implemented by a consortium which includes: the Accountability Research Center, the Collective for Social Science Research, the Institute of Development and Economic Alternatives, Itad, Oxfam GB, and the Partnership for African Social and Governance Research. It is funded with UK aid from the UK Government. The views expressed in this publication do not necessarily reflect the official policies of our funder.



How Does the World Bank Build Citizen Engagement Commitments into Project Design? Results from Pilot Assessments in Mozambique, Myanmar, Nigeria, and Pakistan

Rachel Nadelman, Ha Le and Anjali Sah

IDS Working Paper 525

© Institute of Development Studies 2019

ISSN: 2040-0209 ISBN: 978-1-78118-542-1

A catalogue record for this publication is available from the British Library.



This is an Open Access paper distributed under the terms of the Creative Commons Attribution 4.0 International licence (CC BY), which permits unrestricted use, distribution, and reproduction in any medium, provided the original authors and source are credited and any modifications or adaptations are indicated.

<http://creativecommons.org/licenses/by/4.0/legalcode>

Available from:

Communications and Engagement Unit, Institute of Development Studies, Brighton BN1 9RE, UK

Tel: +44 (0) 1273 915637

Web: www.ids.ac.uk/publications

IDS is a charitable company limited by guarantee and registered in England

Charity Registration Number 306371

Charitable Company Number 877338

How Does the World Bank Build Citizen Engagement Commitments into Project Design? Results from Pilot Assessments in Mozambique, Myanmar, Nigeria, and Pakistan

Rachel Nadelman, Ha Le and Anjali Sah

Summary

How and to what degree is the World Bank putting its new institutional citizen engagement (CE) commitments into practice? This question guides an independent assessment that the Accountability Research Center (ARC) at American University has undertaken as part of the Institute of Development Studies (IDS)-led Action for Empowerment and Accountability (A4EA) research programme's investigation into how external actors can best support local processes of and conditions for empowerment and accountability. This report investigates the World Bank's incorporation of CE into project design, the critical early stage of donor engagement. To accomplish this, ARC reviewed the World Bank's fiscal year 2015–17 investment project portfolios for four A4EA priority countries, Mozambique, Myanmar, Nigeria, and Pakistan, which covers 57 projects that range from US\$19 million to US\$600 million. The analysis determines whether projects commit to seeking a strategic approach to CE, which involves combining multiple tactics so that the whole could be greater than the sum of the parts. This assessment of CE commitments is intended to help to inform possible national, civil society organisation strategies to monitor whether and how these commitments are actually implemented in practice.

Keywords: accountability, citizen engagement, feedback, monitoring, public disclosure, World Bank.

Rachel Nadelman is a Scholar-in-Residence and Research Fellow at the Accountability Research Center at American University. She has worked in international development for 15 years with a range of organisations including the World Bank, the German Development Agency (GIZ), American Jewish World Service, and the Institute of Development Studies. She has specialised in social development, primarily on issues related to social inclusion, women's social and economic empowerment, and the intersection of environment and sustainable development. Rachel has a BA from Brown University, an MA in International Affairs from The New School and a PhD in International Relations from the School of International Service at American University.

Ha Le is a researcher at the Accountability Research Center at American University. She has hands-on experience in anti-corruption, transparency and journalism with in-depth understanding of governance issues in Vietnam. Previously she worked in Vietnam with Transparency International's National Contact and supported the implementation of the Provincial Governance and Public Administration Performance Index, managed by UNDP Vietnam. Her work and research also focus on water governance in Southeast Asia. Ha has a background in international finance and earned her master's degree in International and Intercultural Communication, with a concentration on Development and Environmental Policy, from American University.

Anjali Sah is a researcher at the Accountability Research Center at American University, focusing on citizen engagement, civic participation, social accountability and transparency in World Bank-financed operations. She holds a master's degree in International Development from American University, with a concentration on Social Development and Development Management. Additionally, her professional experience in India spans more than a decade in the fields of gender, socioeconomic and community development, managing socially responsible businesses and thereafter as a social entrepreneur providing rural livelihoods to women and marginalised artisan groups.

Contents

	Summary, keywords and author notes	3
	Acknowledgements and acronyms	6
	Executive summary	8
1	Introduction	10
1.1	Overview	10
1.2	Citizen engagement and World Bank operations: present and past	13
1.3	Antecedents to the World Bank's 2014 CE strategy	14
1.4	The World Bank's 2014 strategic framework for mainstreaming citizen engagement	16
1.5	Assessing citizen engagement in World Bank projects: scope and methodology	20
1.5.1	Data collection: application of the assessment tool	21
1.5.2	Quantitative analysis: establishing a citizen engagement density scale	22
1.5.3	Qualitative analysis: the quality of commitments, based on depth and detail	23
2	World Bank commitments to citizen engagement in investment projects: Mozambique, Myanmar, Nigeria, and Pakistan (FY15–17)	24
2.1	Overall citizen engagement results	24
2.1.1	The density of CE commitments in Mozambique, Myanmar, Nigeria, and Pakistan	24
2.1.2	Overall results by CE area	28
2.1.3	Social safeguards and CE findings	29
2.2	In-depth analysis: World Bank prioritised CE areas	31
2.2.1	Commitments to citizen/beneficiary collaboration in decision-making and collecting feedback from citizens	31
2.2.2	Commitments to involving citizens in project monitoring	35
2.2.3	Commitments to implementing GRMs	37
2.2.4	Commitments to monitoring CE results in project results frameworks	40
2.3	In-depth analysis: commitments to creating an enabling environment for CE	42
2.3.1	Measures for proactive social inclusion in citizen engagement efforts	43
2.3.2	Third-party monitoring commitments	45
2.3.3	Proactive (public) information disclosure	48
3	The findings and their implications	54
3.1	Synthesis of technical findings	55
3.2	The World Bank's CE agenda: implications for empowerment and accountability?	57
	Annexe: Citizen engagement overview tables	60
	References	68

Boxes

Box 1.1	IEG main findings on citizen engagement	20
Box 2.1	Results framework indicators (RFIs) designed to capture data about project-specific GRMs	40
Box 2.2	Public disclosure of CE activities and results as mitigating measures for potential conflict	52
Box 2.3	Lessons learned from monitoring how CE commitments are carried out in Myanmar	54

Figures

Figure 1.1	Categories of CE in World Bank projects	17
Figure 1.2	Indicators of an enabling environment (EE) for CE	21
Figure 2.1	CE commitment density scale – combined results for Mozambique, Myanmar, Nigeria, and Pakistan FY15–17 (57 projects)	25
Figure 2.2	CE commitment density scale – four country comparison	26
Figure 2.3	Total commitments to World Bank prioritised CE areas across the four countries (57 total projects)	28
Figure 2.4	Total commitments to mechanisms for an enabling environment for CE, across the four countries	29
Figure 2.5	Project-level application of social safeguards (FY15–17) across all four countries	30
Figure 2.6	Collaboration in decision-making	32
Figure 2.7	Commitments to collecting citizen feedback, by country	33
Figure 2.8	Citizen monitoring commitment results, FY15–17 across the four countries	35
Figure 2.9	Commitments to implementing GRMs, by country	37
Figure 2.10	Comparison of GRM commitments and GRM disclosure commitments	38
Figure 2.11	Monitoring indicators for CE, by country	41
Figure 2.12	Monitoring indicators for CE, by area	42
Figure 2.13	Proactive social inclusion commitments, by country	43
Figure 2.14	Proactive social inclusion commitments, by population group	44
Figure 2.15	Categories of third-party monitoring commitments, overall (57 projects)	46
Figure 2.16	Categories of third-party monitoring commitments, by country	47
Figure 2.17	Proactive information disclosure mechanisms, by country	49
Figure 2.18	Overall distribution of proactive disclosure mechanisms	49
Figure 2.19	Overlapping project commitments to third-party monitoring for CE and public disclosure, four country total	52

Tables

Table 1.1	Citizen engagement (CE) density scale	22
Table 2.1	CE overview by project, Myanmar portfolio FY15–17 (in descending order)	27
Table 2.2	Collaborative decision-making in two projects, Mozambique and Myanmar	33
Table 2.3	Citizen feedback collection and reporting in example projects, Mozambique and Nigeria, FY15–17	34
Table 2.4	Examples of CE monitoring across three Mozambique projects	36
Table 2.5	Commitments to publicly disclosing GRM data beyond limited RFI monitoring indicators	39
Table 2.6	Project commitments to CE activity third-party monitoring, by country	48
Table 2.7	Examples of commitments to in-person project information disclosure	51
Table 2.8	Examples of project commitments to proactive information disclosure without specific mechanisms	51
Table 2.9	Project commitments to third-party monitoring and public disclosure of results	53

Acknowledgements

The authors would like to especially acknowledge Jonathan Fox (ARC) and Colin Anderson (IDS) for their thoughtful peer review and timely feedback, and Jenny Edwards for her guidance and support throughout the research and writing process. Ian Evans, Rabia Uddin, Julia Fischer-Mackey and Michela Del Mastro provided key contributions to the four-country desk review and Wunna Htun led the fieldwork on project implementation in Myanmar.

Any errors are the authors' sole responsibility.

Acronyms

A4EA	Action for Empowerment and Accountability
AF	Additional Financing
ARC	Accountability Research Center
BIC	Bank Information Center
CBO	community-based organisation
CDD	Community Driven Development
CE	citizen engagement
CSO	civil society organisation
DFID	Department for International Development
DLI	Disbursement Linked Indicator
E&A	empowerment and accountability
ECA	Europe/Central Asia
EE	enabling environment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESSA	Environmental and Social Systems Assessment
ESSD	Environmentally and Socially Sustainable Development
ESW	economic and sector work
FCVAS	fragile, conflict and violence affected settings
FY	fiscal year
GAC	Governance and Anti-Corruption
GPSA	Global Partnership for Social Accountability
GRM	grievance redress mechanism
GRS	grievance redress services
IBRD	International Bank for Reconstruction and Development
ICSID	International Centre for Settlement of Investment Disputes
ICT	information and communication technologies
IDA	International Development Association
IDS	Institute of Development Studies
IDP	internally displaced people
IFC	International Finance Corporation
IEG	Independent Evaluation Group
IPF	investment project financing
ISDS	Integrated Safeguards Data Sheets
ISR	Implementation Status and Results Report
IVA	Independent Verification Agent
M&E	monitoring and evaluation
MIGA	Multilateral Investment Guarantee Agency
NCDDP	National Community Driven Development Project
NGO	non-governmental organisation

OM	operational manual
OVG	other vulnerable groups
PAD	Project Appraisal Document
PID	Project Information Document
PDO	project development objective
P4R	Program for Results
PIU	Project Implementation Unit
PMU	Project Management Unit
RAP	Resettlement Action Plan
RAS	reimbursable advisory services
RFI	results framework indicators
RPF	Resettlement Policy Framework
SMU	Special Management Unit
TA	technical assistance
WBG	World Bank Group

Executive summary

In 2013, then World Bank president Jim Yong Kim publicly promised that the institution would improve its engagement with citizens by incorporating feedback into 100 per cent of its projects with 'identifiable beneficiaries'. The goal took formal shape as the 2014 'Strategic Framework for Mainstreaming Citizen Engagement' (CE Strategy) that 'incorporates citizen engagement, including beneficiary feedback, specifically in its treatment of inclusion, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results' (Manroth *et al.* 2014: 1).

How and to what degree is the World Bank putting its new institutional citizen engagement (CE) commitments into practice? This question guides an independent assessment that the Accountability Research Center (ARC) at American University is undertaking as part of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) research programme's investigation into how external actors can best support local processes of and conditions for empowerment and accountability. This report investigates the World Bank's incorporation of CE into project design, the critical early stage of donor engagement. To accomplish this, ARC reviewed the World Bank's fiscal year (FY) 2015–17 investment project portfolios for four A4EA priority countries, **Mozambique, Myanmar, Nigeria, and Pakistan**, which altogether covers 57 projects that range from US\$19 million to US\$600 million. The research has produced four independent, in-depth reports that encapsulate each country's unique findings, including a within-country comparative analyses among projects. This kind of in-depth analysis of CE in project design is necessary but not sufficient to assess whether and how the World Bank and government partners actually implement CE commitments. Such an assessment of project commitments is intended to help to inform possible national, civil society organisation (CSO) strategies to monitor whether and how these commitments are actually implemented in practice.

This research on the World Bank is one component of A4EA's broader investigation into how external actors, particularly large donors, are supporting empowerment and accountability in fragile, conflict and violence affected settings (FCVAS). This focus on the World Bank is timely. On the one hand, with its institutional clout and the proportion of development assistance it administers, the World Bank is in a unique position to encourage state actors in FCVAS to protect and foster the contribution of citizen voice to development effectiveness. With the CE strategy, the institution has laid out much needed guidance on how large-scale development projects can encourage arenas for citizen action as well as state response capacity, which in FCVAS is most likely to be lacking. On the other hand, across all settings, the World Bank primarily funds government-led, 'induced' participation in project-created spaces and rarely finances initiatives that specifically target public accountability and empowerment. The CE strategy acknowledges the kinds of risks, such as 'elite capture', that induced participatory efforts face yet it remains unclear how the World Bank is actually addressing these risks in both project design and implementation. The potential contribution of such a strategy on citizen engagement, the risks of the World Bank's induced approach to CE, including elite capture, and the unique implications of both for FCVAS, underscores the relevance of this independent assessment.

In this context, ARC has developed and piloted an assessment tool that examines whether and how the World Bank commits to citizen engagement in project design. The tool covers seven priority citizen engagement areas identified in the CE strategy. These include:

- Consultation during project preparation
- Collaborative decision-making during project implementation
- Citizen feedback opportunities throughout the project lifecycle

- Citizen involvement in project monitoring
- Grievance redress mechanisms
- Capacity building for citizen engagement
- Improved CE monitoring and results reporting.

The approach then expands the scope beyond CE project mechanisms to three additional measures that ARC hypothesises could potentially facilitate an enabling environment for CE. These include:

- **Measures for proactive social inclusion** (i.e. related to gender, disability, ethnicity, age, migrant status, etc.) in citizen engagement efforts
- **Third-party monitoring** for project results and citizen feedback findings – which could inform CE if accompanied by
- **Proactive public information disclosure** of project results and findings from citizen engagement efforts and the project progress.

The goal of the overall analysis is to determine whether projects commit to seeking a strategic approach to CE, which involves combining multiple tactics so that the whole could be greater than the sum of the parts. This assessment builds from the 2018 study of CE by the World Bank's own Independent Evaluation Group (IEG), distinguishing between projects that apply the CE framework with a minimalist, 'tick box' approach ('thin' in the language of IEG), and projects that commit to pursuing multiple CE approaches (what IEG calls 'thick'). This A4EA assessment uses the IEG's thin/thick differentiation, applying an original 'Citizen Engagement Density Scale' that ranks the varied 'thickness' of project commitments to citizen engagement across five categories (robust, comprehensive, intermediate, weak and low).

The key overarching findings from the four country review include:

- The ARC CE Density Scale classifies the 57 total projects assessed as: robust (47 per cent or 25 projects), comprehensive (10 per cent or 7 projects), intermediate (27 per cent or 15 projects), weak (11 per cent or 7 projects), and low (6 per cent or 3 projects). Among the four countries, Nigerian and Mozambican projects showcase substantially higher thickness results than those in Pakistan and Myanmar.
- The most common project design commitment is to incorporate a project-specific grievance redress mechanism (GRM) (91 per cent), while citizen involvement in monitoring is promised in the fewest projects (52 per cent).
- There is a substantial discrepancy between the CE mechanisms that projects commit to in design and what they commit to measure and report on. Of the 91 per cent of projects that pledge to carry out project specific GRMs, only 22 per cent include a monitoring indicator dedicated to measuring GRM processes and/or results.
- A high 90 per cent of projects across the four countries commit to adopting measures for proactive social inclusion in citizen engagement processes. The overwhelming majority cover gender inclusion, however, with very few addressing the proactive engagement of other socially excluded groups.
- Commitment to proactive information disclosure of both project and citizen engagement results is limited, with only slightly more than half (30 of the 57 assessed projects) reporting this commitment. Myanmar projects have the lowest commitment level, at 37 per cent. Commitments to proactive disclosure are rarely linked with third-party monitoring, meaning few projects declare an intention to share findings from external monitors with the public.
- There is a greater emphasis on 'reporting up' to World Bank management rather than 'reporting out' to the public at large, even when projects commit to third-party

monitoring and implementing mechanisms for collecting citizen feedback and grievance redress.

- Few projects provide specifics on *how* they plan to carry out citizen engagement. Therefore ‘thickness’, in terms of the quantity of committed activities, rarely translates to ‘thickness’ in terms of specificity of the plans themselves.
- It is rare for projects to specify dedicated funding for citizen engagement in project design, increasing the likelihood that CE will be an unfunded mandate during implementation, competing with other priorities.
- Each country portfolio includes at least one project that models both high density of CE commitments as well as high specificity in CE plans and measures to create an enabling environment. These potentially ‘model’ projects demonstrate that the World Bank is capable of more systematically planning for and reporting on citizen engagement.

The above findings relate only to the ways in which the World Bank has (or has not) committed to incorporating citizen engagement mechanisms and activities in project design in Mozambique, Myanmar, Nigeria, and Pakistan. The question of how those commitments are ultimately implemented (or not) in practice is critical, and for future work.

1 Introduction

1.1 Overview

‘We must become a better listener,’ the World Bank’s then-president Jim Kim acknowledged during his keynote speech at the World Bank/IMF’s 2013 annual meetings. He continued: ‘Last year we had beneficiary feedback on 34 per cent of our projects. We promise that for our projects with clear beneficiaries, we will get feedback – from every single one of them, 100 per cent’ (Kim 2013). By announcing this to an audience of high-level government officials, President Kim committed the World Bank to improving how it engages with the people affected by its projects and to developing measurements of these achievements.

In 2014, World Bank management translated Kim’s public promise into a set of corporate requirements for citizen engagement in investment project financing (IPF) operations. IPFs are the World Bank’s leading lending instrument and are used for long-term operations (i.e. periods of five to ten years) across all sectors, but primarily concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The new CE requirements oblige IPF projects with ‘identifiable beneficiaries’ and approved between 1 July 2014 and 30 June 2017 to: (1) incorporate a least one citizen engagement (CE) mechanism, (2) integrate at least one indicator to monitor CE, and (3) report on the CE indicator by the third year of project implementation (World Bank 2018a).

To provide operational guidance for meeting the new institutional CE mandate and to more systematically incorporate citizen engagement into operations, the World Bank then produced a ‘Strategic Framework for Mainstreaming Citizen Engagement’ (abbreviated in this report as ‘CE strategy’). As laid out in the CE strategy, the World Bank envisions citizen engagement as:

The ***two-way interaction between citizens and governments*** or the private sector within the scope of [World Bank] interventions – policy dialogue, programs, projects, and advisory services and analytics – that gives citizens a stake in decision-making with the objective of improving the intermediate and final development outcomes of the intervention.

(Manroth *et al.* 2014: 8)

This definition establishes World Bank-fostered CE as *reciprocal* and *bounded*. It is *reciprocal* because it requires government to respond to citizen demands and not simply extract their input for consideration. Yet it is *bounded* because it applies only to government-citizen interactions encompassed by World Bank interventions and therefore stops short of considering the implications for broader citizen-state relations and accountability.

How and to what degree is the World Bank fulfilling the goals of its CE strategy and actually embedding mechanisms for citizen engagement in project design? In 2017, the Accountability Research Center (ARC) at American University, member of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) research programme launched an investigation of World Bank's fulfilment of its citizen engagement agenda. This research comprises one component of A4EA's broader investigation into if and how external actors, particularly large donors, are supporting empowerment and accountability in FCVAS. A4EA chose to focus this line of inquiry on the World Bank because, even as civic space around the world is restricted, the World Bank has the potential to support government counterparts to protect and foster the contribution of citizen voice to development effectiveness.

The investigation encompasses a two-track monitoring and advocacy approach:

- The first track aims to independently monitor *whether and how* the World Bank is integrating CE into project design. It relies on a desk review of publicly available documents to identify how individual projects commit to incorporating engagement with citizens throughout the project lifecycle. Evidence from this track is the basis for this Working Paper.
- The second track focuses on implementation, using findings on project commitments to CE to launch partner-led action research. It aims to monitor *how* citizen engagement commitments are *actually* being carried out in specific World Bank projects and requires extensive field research informed by local knowledge. Lessons from pilot field research in Myanmar for this track are included in this paper.

To guide the independent monitoring process, ARC developed an assessment tool to identify the nature of the World Bank's commitments to citizen engagement as incorporated into project design. ARC's assessment tool uses the official project documents made public on through World Bank's online operations portal to identify whether and how projects commit to:

- **Citizen engagement mechanisms throughout the project lifecycle:** i.e. public meetings, satisfaction surveys, and participatory monitoring.
- **Mechanisms that could facilitate an enabling environment for CE:** i.e. third-party monitoring, procedures for social inclusion, plans for proactive information disclosure.

By examining project commitments to specific CE activities, along with mechanisms that potentially strengthen the enabling environment for CE, ARC's analysis seeks to answer two overarching questions: to what degree do World Bank projects demonstrate a commitment to minimum standards for informed citizen engagement? To what degree do projects go beyond a minimalist 'tick the box' approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments?

To pilot the assessment tool, ARC undertook a desk review of all publicly available programme documents for the investment project financing (IFP) portfolios (FY15–17) in four A4EA priority countries: Mozambique, Myanmar, Nigeria, and Pakistan, jointly selected with the A4EA funder, UK Department for International Development (DFID). These four country

portfolios include a total of 57 projects, with loans that range from US\$19 million to US\$600 million. The research has produced four independent, in-depth reports that encapsulate each country's unique findings, including a within-country comparative analysis. These country portfolio reviews are available as detailed stand-alone reports for use by national and local CSOs, researchers and policymakers (see Ha *et al.* 2019; Nadelman, Ha and Sah 2019; Nadelman *et al.* 2019; Sah and Nadelman 2019). To pilot field research on how CE commitments are carried out in practice, ARC and its in-country partner the Bank Information Center (BIC) conducted 12 months' fieldwork in Myanmar on three projects at the most advanced stages of implementation.

This A4EA research recognises that the World Bank, in contrast to other large-scale donors, rarely finances initiatives designed to target public accountability and empowerment. Instead the institution takes a more indirect approach to E&A by funding government-led participation in 'invited' spaces (Mansuri and Rao 2013: xi) created within projects whose main objectives are typically not empowerment related. The World Bank's approach to civic engagement has been described in the literature as *induced participation* because it results from government and donor organised and/or funded efforts to which citizens are invited to participate and may be bureaucratically managed (Mansuri and Rao 2013: xi, 1).¹ As explained in its CE strategy, the World Bank's approach to CE 'entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results' (Manroth *et al.* 2014: 1). The implication is that if, in addition to achieving the main objectives, the project also leads to longer-term empowerment and/or accountability outcomes, it is a positive, but auxiliary, benefit.

Although induced participation continues to dominate the World Bank's approach to CE, the institution has also published extensive research that documents the shortcomings, including widespread patterns of 'elite capture' of induced participatory efforts (Mansuri and Rao 2013). Indeed, the CE strategy openly acknowledges the literature documenting these risks (Manroth *et al.* 2014: 95; Haque 2008; Gugerty and Kremer 2008). However, in the World Bank's current efforts to mainstream CE in operations, it remains unclear whether or how actual projects address this key risk in design or implementation.

How might the World Bank's project-specific CE approaches, centred on invited opportunities for participation, relate to the broader challenge of addressing the growing wave of restrictions on civic space, particular in FCVAS? The World Bank's CE strategy discusses both the potential risks and contributions of citizen engagement initiatives in FCVAS, acknowledging that:

In such contexts, engaging with citizens is not without risk, as it can contribute to further fragility or conflict and can entail greater personal risk for those engaged. At the same time, opportunities for CE can be explored in settings where there is precedent for state-citizen interaction, local government structures exist, or there are local customary institutions and other intermediaries that have the government's trust and the capability to mobilize citizens.
(Manroth *et al.* 2014: 15)

The risk that such citizen engagement processes in FCVAS face, including but not limited to putting those that participate in peril and elite capture, highlight the relevance of this kind of independent assessment of whether and how meaningful spaces for citizen engagement are actually created in practice.

1 Induced participation is differentiated from organic participation which can be spontaneous, or when organised it is done so 'by civic groups outside government, sometimes in opposition to it' (Mansuri and Rao 2013: xi).

Beyond the inherent possibilities and risks already discussed, what are the implications of the World Bank's CE agenda, if any, for empowering citizens to engage their governments beyond the boundaries of World Bank-funded operations? Furthermore, what might this mean, if anything, for increasing governments' accountability to citizens? Will such spaces for engagement necessarily be limited to projects for which they are created, or might there be positive spillovers? To answer these questions, one needs to first determine what kinds of spaces these projects actually create in practice. That process is likely to be uneven and contested, and this study focuses on the first step: *What do World Bank projects commit to doing?*

Within this context and line of enquiry, this report synthesises the findings from the independent CE assessments of Mozambique, Myanmar, Nigeria, and Pakistan (FY15–17). This section provides background and context. It builds from the overview and provides the reader with a dual-purpose primer on the basics of World Bank's project-based lending and the evolution of the institution's engagement with citizens and civil society related to in-country operations. It also details the 2014 World Bank CE strategy and describes ARC's methodology, explaining the investigative process and its contribution. Section 2 presents a cross-country comparison of the four country portfolio trends, highlighting notable country and project-specific findings. Section 3 provides a synthesis of the lessons derived from the individual country trends and cross-country patterns. Finally, Section 4 concludes with a critical discussion of what these World Bank project-based findings can tell advocates, proponents and scholars of citizen empowerment and accountability about how the World Bank's approach to fostering citizen engagement contributes (or does not contribute) to E&A outcomes and processes in FCVAS.

1.2 Citizen engagement and World Bank operations: present and past

The 2014 CE Strategy claims that,

under the right circumstances, CE can contribute to achieving development outcomes in support of the goals the WBG [World Bank Group] aims to support through all of the operations it funds: eradicating extreme poverty and boosting shared prosperity in a sustainable manner.

(Manroth *et al.* 2014: 1)

The WBG encompasses five distinct international organisations. These include:

- **The International Bank for Reconstruction and Development (IBRD)** and **the International Development Association (IDA)**, which work primarily with governments,
- **The International Finance Corporation (IFC)** and **the Multilateral Investment Guarantee Agency (MIGA)**, which support private sector investment,
- **The International Centre for Settlement of Investment Disputes (ICSID)**, which adjudicates investment disputes that arise between international private sector companies and governments.

Headquartered in Washington DC, in 2017 the five branches of the WBG provided close to US\$59 billion in loans, grants, equity investments, and guarantees to both partner governments and the private sector in developing and transition countries (World Bank 2017a: 1).

This CE investigation focuses on the two government-serving WBG branches, IBRD and IDA, which together are most commonly known collectively under the umbrella moniker the 'World Bank'. This oftentimes confusing title of World Bank for just two of the five entities that comprise the WBG results because 'the IBRD and IDA constitute the World Bank proper,

while the ICSID, IFC and MIGA are ‘affiliates’ that ‘are closely associated with the World Bank’ (Bebbington *et al.* 2006: 10). Owned and managed by its 189 country members, IBRD/IDA (henceforth referred to as the ‘the World Bank’) provided 71 per cent of the WBG’s 2017 global financial assistance (US\$42.1 billion of the total US\$59 billion provided (World Bank 2017: 4)). The primary vehicles through which the World Bank provides financial assistance are autonomous projects, also called operations.²

Officially recipient governments have authority over World Bank financed projects. However, the actual lines of authority are not always clear to those outside the institution. Contributing to the lack of clarity is the World Bank’s common reliance on Project Implementation Units (PIUs) to manage operations rather than turning over management to directly to government agencies and their civil service staff. Instead, PIUs, also known as ‘autonomous units’, ‘enclave projects’, ‘Project Management Units (PMUs)’ and ‘Special Management Units (SMUs)’ are specifically created and staffed for a given project with a lifespan that only continues for the duration of the project. World Bank teams justify the reliance on PIUs because they ‘fill in the technical skills gap in the administration of development assistance programs in the Bank’s borrower countries’ and/or replace ‘regular civil service staff... fully employed with existing responsibilities or... unable to take on the additional tasks involved with major Bank projects’ (World Bank 2005: 1–2). While some PIUs can be semi-integrated into sector ministries, the commonly used stand-alone PIU exists outside the structure of government ministries/agencies. As a result, standalone PIUs often recreate the functions and capabilities of the ministry a project has been designed to serve (World Bank 2005: 6). This begs the question, is the project management more accountable to the World Bank team that created it than to the client country that agreed to the project?

World Bank management has ‘long recommended that stand-alone project implementation units (PIUs) be mainstreamed into existing ministry structures, because they are inconsistent with the Bank’s mission of capacity development and institutional strengthening in developing countries’ (World Bank 2005: 1). Yet a substantial number of projects have continued to rely on PIUs, even in countries with well-established and high-functioning institutions, because ‘external and internal incentives work toward organizational arrangements that favour the short-term goal of safeguarding project fiduciary and performance objectives’ (World Bank 2005: 2–3). Regardless of the kind of entity that manages a World Bank-financed project, it is responsible for all aspects of project implementation, including carrying out commitments to citizen engagement.

1.3 Antecedents to the World Bank’s 2014 CE strategy

The 2014 CE Strategy is the outcome of more than 45 years of evolving approaches to engagement between the World Bank, civil society, and project affected peoples in participant countries. A list of key actions, publications and events is listed chronologically below (for more in-depth discussion see Fox and Brown 1998; Davis 2004; World Bank 2005; Bebbington *et al.* 2006; World Bank 2007; Weaver 2008; Manroth *et al.* 2014; World Bank 2018c).

- **Publication of *The Use of Anthropology in Project Operations* (1973).** This report, written by Glynn Cochrane and Raymond Naronha, based on a review of World Bank problem projects from 1968 to 1972, was one of the very first published by the Bank to identify cultural issues on development and the social impacts of land acquisition and resettlement.

2 The World Bank’s development assistance falls into two broad categories: financing and services. Financing encompasses the following financial instruments: investment project financing, development policy financing, program-for-results, trust funds and grants, private sector options, customised options and risk management and multiphase programmatic approaches. Services include: technical assistance (TA), reimbursable advisory services (RAS), economic and sector work (ESW), business advice, and donor aid coordination (see World Bank 2018d).

- **Passage of the first social safeguard policies (1980, 1982).** A watershed moment began in the early 1980s with the establishment of a set of mandatory safeguarding policies to mitigate harm caused by World Bank projects. Primarily focused on environmental issues, the policies also included two 'social' safeguards. The first, adopted in 1980, set protections and compensation standards for people affected by project-caused involuntary resettlement and the second, adopted in 1982, mandated protections for indigenous peoples.
- **Publication of *Putting People First: Sociological Variables in Rural Development* (1985).** This volume, edited by the World Bank's first non-economist social scientist staff member, sociologist Michael Cernea, was the first World Bank publication concerned with the roles of people and local associations in development projects intended to challenge the 'economic reductionism' in the institution's theory of development (Bebbington *et al.* 2006: 15).
- **Formation of environmental divisions across the World Bank (1987).** In response to international criticism of social and environmental impacts of large-scale World Bank funded infrastructure projects, in the late 1980s the World Bank created new environmental divisions within its departments. Under the environmental umbrella, these new divisions evolved to also incorporate social expertise revolving around mitigating the negative effects of projects on people. To staff these new divisions, hiring of non-economist social scientists increased. Although scattered throughout the Bank, they began to link up informally with the creation of a 'Sociology Group'.
- **Establishment of the Participatory Development Learning Group (1990)** convened to develop approaches and practices for participation in World Bank operations. This led to experimentation with community participation in Bank projects and, in 1994, a high-profile conference on participation that brought together Bank and non-Bank actors.
- **Production of *The Resettlement Review* and subsequent establishment of the Division of Social Policy and Resettlement (1993).** For the first time the World Bank reviewed its project experience with resettlement and the resulting, highly disseminated report was highly critical because of evidence that resettlement caused by World Bank operations had exacerbated or created poverty, in many cases because projects were not in fact following established policies.
- **Establishment of the World Bank's Inspection Panel for IBRD/IDA projects (established 1993, operationalised 1994),** an independent accountability mechanism to which people who believe they have been adversely affected by Bank-financed operations can bring their concerns. The panel determines whether Bank projects have complied with policies and procedures. The World Bank Inspection Panel, as the first independent entity created to promote accountability within an international financial institution, set a precedent that other multilateral and regional financial institutions have since followed.
- **Publication of *The Participation Sourcebook* (1996),** the World Bank's first official how-to publication for incorporating participatory approaches into projects. It is important to note that recognition of such approaches and institutional funding provided to publications to disseminate the approach did not mean they became standard Bank practice.
- **The recognition of a social development 'professional family' (1996) and subsequent formation of a Social Development Network and department (1997).** As part of an institution-wide reorganisation of technical and operational staff, the World Bank created the Social Development Network within the Vice-Presidency for Environmentally and Socially Sustainable Development (ESSD). This led to both the creation of social development units across the Bank's regions and a Social Development Board composed of regional representatives. From its inception, the Social Development Network produced 'how-to' notes on different ways to integrate

- social development and the operationalisation of engagement with project affected people. These social development guidance notes continue to be produced today.
- **The development of guidelines for consultation with civil society.** The NGO/Civil Society Unit under the guidance of social development specialist William Reuben issued *Guidelines for Consultation with Civil Society* in 1999, and produced an expanded sourcebook in 2002. This document provides practical guidance on structuring dialogue between governments and civil society and setting realistic expectations about what can be achieved.
 - **Launch of new non-economic driven strategic approaches: Social Development Strategy (2005) and Governance and Anti-Corruption Strategy (GAC) (2007).** These two World Bank operational strategies prioritised social accountability and demand-side governance. Updated in 2012, the GAC Strategy accentuated the importance of governance and anticorruption in the World Bank's efforts to reduce poverty and promote growth, putting greater emphasis on the roles of transparency and openness.
 - **Establishment of the Global Partnership for Social Accountability (GPSA) (2012).** Developed to complement traditional World Bank assistance, the GPSA provides direct, sustained support to civil society organisations from countries that opt into the initiative. A central goal for the GPSA is to build capacity for CSOs to engage in social accountability initiatives.

The 2014 CE strategy is an outgrowth of this progress at the World Bank. Nevertheless, it is considered new and different from earlier participation, safeguard and social accountability efforts, because it represents the first formalised framework with institution-wide reach that provides comprehensive guidance for engaging citizens from a project's inception to its completion

1.4 The World Bank's 2014 strategic framework for mainstreaming citizen engagement

As explained in the introduction to the IEG's 2018 investigation on CE:

The 2014 strategic framework aimed to provide a more coherent approach to incorporating citizen engagement across Bank Group operations. The framework builds on lessons from Bank Group-financed operations across regions and sectors and underscores the importance of country context, government ownership, and clear objectives for citizen engagement.
(World Bank 2018c: ix)

The CE strategy outlines several key categories of citizen engagement:³

3 The CE strategy describes categories of citizen engagement mechanisms as follows: consultations; GRMs; collecting, recording, and reporting on inputs received from citizens; collaboration in decision-making; citizen-led monitoring, evaluation, or oversight; empowering citizens with resources and authority over their use; and citizen capacity building for engagement (Manroth 2014: 31). The ARC assessment includes all CE strategy categories except 'empowering citizens without resources and authority over their use' for several key reasons. First, as described in the strategy, the only kinds of World Bank projects that are in the position to implement mechanisms in this category are those designed to be community driven development and therefore does not pertain to the majority of World Bank operations. By creating a CE category that only projects using a CDD approach can fulfil, the strategy privileges this particular development model and creates a high level category into which, by definition, no other types of projects could reach. Furthermore, this framing takes for granted that the kinds of participatory mechanisms that comprise CDD approaches will lead to empowerment among those participating in the project. Although this study does not discount the benefit of CDD approaches and the embedded participatory opportunities it creates, it does not accept the underlying premise that by their implementation empowerment is achieved (see Mansuri and Rao 2013). Therefore, the ARC assessment did not use this category, understanding that participatory mechanisms that are part of the design of CDD operations will be captured in the other categories.

Figure 1.1 Categories of CE in World Bank projects



Source: Authors' own.

1. **Consultation.** Formally, the term 'consultation' in the context of World Bank projects, captures engagement with citizens in the design or project preparation stage before an operation has been approved by the World Bank Board. The World Bank describes the objectives for citizen consultations as receiving input about the design and implementation arrangements of a development programme or project, in order to contribute to improved results and sustainability. Distinct from dialogue, the World Bank defines consultation as 'a more structured exchange in which the convener commits to "active listening" and to carefully consider the comments, ideas, and recommendations received... Common consultation methods include public hearings or meetings, focus group discussions, household surveys and interviews, electronic consultations, and advisory/expert groups.' They can also include 'more informal structures at the local level, such as village councils and women's groups' (Manroth *et al.* 2014: 42).
2. **Collaborative decision-making.** This process goes beyond consultation and integrates citizens directly into decision-making processes. The goal is to make decisions more responsive to citizens' needs and improve the sustainability of programme and project outcomes through increased citizen ownership. Mechanisms for collaboration include 'citizen/user membership in decision-making bodies, integrity pacts, participatory planning and budgeting, and citizens' juries' (Manroth *et al.* 2014: 43).
3. **Collecting, recording, and reporting on inputs from citizens.** This refers to citizen feedback collected periodically during and after implementation on different dimensions of provided services, including but not limited to effectiveness, inclusiveness, quality, delivery time, transaction costs, targeting, resource utilisation or engagement processes. Some tools used in projects to capture citizen inputs include 'satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback' (Manroth *et al.* 2014: 44).
4. **Complaint and grievance redress mechanisms (GRMs).** These are complaint systems through which project affected peoples can raise concerns, queries or clarifications related to implementation and through which complaints and grievances are addressed. For the purpose of this analysis, we have focused on project specific GRMs which are intended to be designed to be context specific and not the more

generic grievance redress services (GRS) offered via the World Bank's operations online portal (Manroth *et al.* 2014: 45).

5. **Citizen monitoring, evaluation and oversight.** Citizen monitoring goes beyond citizen feedback processes and directly involves citizens in monitoring service delivery, revenues, budget execution, procurement, contract awards, and reform policies. The philosophy behind such intensive citizen involvement is that it can increase transparency, improve efficiency of service delivery and budget execution and reduce opportunities for corruption. Some commonly used mechanisms for citizen-led monitoring include 'public expenditure tracking surveys, social audits, or citizen report cards' (Manroth *et al.* 2014: 47).
6. **Capacity building for citizen engagement.** This capacity building is specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or Community Driven Development (CDD) projects).⁴ This is considered particularly necessary for World Bank-supported operations where CE approaches are introduced for the first time and include a focus on building government capacity for sustainability of engagement processes, beyond the life of a project (Manroth *et al.* 2014: 50).
7. **Improved monitoring and results reporting.** The CE strategy states that a key objective of the framework is to develop a better understanding of and monitoring of CE outcomes in World Bank-supported operations (Manroth *et al.* 2014: 54–55). The strategy emphasises that projects would benefit from incorporating dedicated CE indicators into monitoring systems, especially within their results framework.⁵ Furthermore, the strategy suggests incorporating third-party monitoring to ensure independent, accurate reporting.

The CE strategy's status as a 'strategy' rather than a 'policy' means that it is not mandatory. The CE strategy recognises this limitation, acknowledging that 'the large majority of CE mechanisms in projects to date are motivated by safeguard requirements' (Manroth *et al.* 2014: 106).⁶ When fulfilling social safeguard requirements, consultations during project preparation and GRMs become mandatory. Therefore, social safeguards have been viewed as an important and logical entry-point for CE activities which can then lead to additional opportunities to integrate and expand citizen engagement measures beyond the limited requirements set by the strategy. Furthermore, the CE strategy identifies additional context-specific opportunities for scaling up CE.

4 CDD is defined at the World Bank as 'an approach that gives control over planning decisions and investment resources for local development projects to community groups' (World Bank 2018b).

5 Results framework is the overarching term used by the World Bank to describe the context in which results are internally measured and monitored. In practice, it includes only a small number of indicators that together are intended to explain how the project development objective (PDO) is to be achieved. What is significant is that the indicators included in a project's results framework must: (1) explain how the data collected will be used over the course of project implementation and, (2) be publicly disclosed. Therefore, if the results framework includes an indicator on CE, the project must disclose information publicly, at least about this particular area. However, the process by which these results are considered to meet this requirement is through bi-annual Implementation Status and Results Reports (ISRs). These short documents which typically include basic numerical reporting and minimal accounting of process or explanatory detail, are made available only via the project pages of the World Bank's website.

6 In October 2018 (FY19) the World Bank enacted a new Environment and Social Framework (ESF) to manage operational risks for IPF. This replaces the World Bank's prior environment and social policies (referred to as safeguards) and according to the World Bank: 'makes important advances in areas such as transparency, non-discrimination, public participation, and accountability — including expanded roles for grievance mechanisms. It brings the World Bank's environmental and social protections into closer harmony with those of other development institutions' (World Bank 2019). The ESF includes ten environment and social standards, with ESS 10 providing guidelines for stakeholder engagement and information disclosure. The previous safeguards system remains in place for projects developed before 1 October 2018, with the new ESF applying thereafter. At the time of publication, the process for incorporating ESS 10 into CE strategy implementation is still ongoing. See: www.worldbank.org/en/projects-operations/environmental-and-social-framework.

As explained in the overview, the CE strategy provides operational guidance to accompany the World Bank's 2014 corporate commitment that 100 per cent of IPFs with clearly identified beneficiaries incorporate citizen engagement in new projects by FY2018. The corporate commitment specifies that IPFs must meet three benchmarks. These are:

- A. Incorporating **a minimum of one mechanism** designed to engage beneficiaries in the specific context of the project;
- B. Integrating **a minimum of one indicator** to monitor a particular aspect of citizen engagement during project implementation;
- C. Reporting on the **beneficiary feedback indicator** by the third year of implementation, which for IPFs is typically between one-third and half way through.

Furthermore, to be considered an acceptable CE indicator, a project indicator must meet one of the following criteria:

- Clearly capture citizen feedback and in so doing report whether there is a tangible response to close the feedback loop; or
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation and oversight.

It is essential to recognise that **the accompanying corporate commitment is what now makes citizen engagement compulsory for IPF**. This commitment moves the strategy in a mandatory direction. Yet, there are concerns that project compliance with these minimal requirements, and the limited application to only one kind of lending instrument, will not ultimately lead to the World Bank's meaningful operationalisation of citizen engagement.

The minimal requirements, under which projects are obligated only to incorporate one CE mechanism and indicator, allows for a 'tick box' approach to compliance. This risks World Bank project monitoring falling short of capturing the extent to which projects are actually fulfilling the guidance laid out in the strategy. Furthermore, the fact that projects are not responsible for reporting on results until implementation year three, significantly limits the prospects that any citizen feedback will meaningfully inform implementation decisions.

Two World Bank entities have undertaken evaluations of Bank progress in incorporating CE into project design – The Social Development Practice in the Europe/Central Asia (ECA) region and the IEG. The former created a *Citizen Engagement Quality Index* to measure the quality of citizen engagement activity in all board approved IPFs in the ECA region. The results have not been published, but representatives of the ECA team have shared an overview of findings in presentations with civil society (Plummer 2018).

More prominently, in 2017–18 the IEG undertook a corporate evaluation of the early implementation of the CE agenda. The evaluation's purpose is to inform the Bank's Board of Executive Directors and management 'on the effectiveness of mainstreaming citizen engagement to support development processes and outcomes.' IEG chose to focus on the CE agenda in order to provide 'a timely contribution to any review and update of the corporate citizen engagement goals, targets, and approaches on completion of the 2018 corporate citizen engagement commitment' (World Bank 2018c: x). See Box 1.1 below for the main findings highlighted in the 2018 IEG report about meeting the corporate targets and the quality of CE.

Box 1.1 IEG main findings on citizen engagement

Meeting the target

- The commitment to mainstreaming citizen engagement and tracking progress in the corporate scorecard mobilised senior management and received buy-in from staff.
- Engagement mechanisms not tied to safeguards are now more prevalent, denoting a move toward a more proactive approach.
- Although the World Bank Group leverages its new country engagement model to consult with a wider range of stakeholders, it is **not using the full range of entry points to involve citizens** in strategic decision making and policy dialogue.
- **Monitoring of citizen engagement remains weak** beyond tracking progress on corporate targets: indicators rarely track results of all mechanisms used nor are designed to capture whether the feedback loop with citizens is closed (World Bank 2018c: 11–12).

Enhancing the quality of citizen engagement

- The World Bank Group has rightfully made the quality of citizen engagement a cornerstone of its mainstreaming commitment. The evaluation focused on four quality principles highlighted by the strategic framework: results orientation, continuity and feedback loop, social inclusion, and capacity enhancement.
- Although closing the **feedback loop** with citizens is an intrinsic part of the Bank Group's engagement, it is **neither mainstreamed nor tracked**.
- **Inclusion of women and marginalised groups is not systematically scrutinised**.
- Numerous examples of high-quality mechanisms appear in the World Bank's portfolio as well as some encouraging trends: projects that use **multiple engagement mechanisms and pay attention to social inclusion are on the rise**.
- However, **thin engagement remains the most prevalent** and **essential capacity building for engagement is limited**. There is significant scope for pursuing opportunities for deeper engagement when the context allows.
- The **insufficient attention paid to quality principles** points to a trade-off between meeting the mostly quantitative corporate targets and ensuring quality of engagement (World Bank 2018c: 26–27).

1.5 Assessing citizen engagement in World Bank projects: scope and methodology

ARC's CE assessment focuses on ten key areas of investigation. The initial seven are derived from the priority citizen engagement areas detailed in the 2014 CE strategy (explained above). ARC developed the final three based on their potential to create an enabling environment for citizen engagement. These additional areas include:

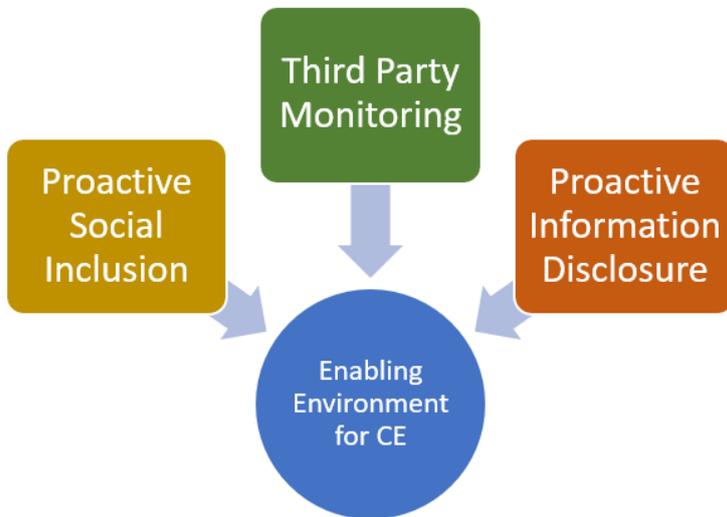
- Measures for proactive social inclusion (i.e. related to gender, disability, ethnicity, age, migrant status, etc.) in citizen engagement efforts;
- Third-party monitoring and verification for project results and citizen feedback findings. The World Bank defines third-party monitoring as:

Monitoring by parties that are external to the project or program's direct beneficiary chain or management structure to assess whether intended outputs, outcomes, and impacts have been achieved by the project. TPM is mainly used to provide an independent perspective on project or government performance. It can be conducted by CSOs, thinktanks, academic institutions, media, or private firms.

These organizations generally have greater skills for monitoring than community representatives.
(Van Wicklin and Gurkan 2013: 2)

- Proactive disclosure of the results from citizen engagement efforts and the project progress and results beyond the World Bank’s minimal requirements.

Figure 1.2 Indicators of an enabling environment (EE) for CE



Source: Authors' own.

In order to foster a supportive environment for citizens to actively and meaningfully engage in the project lifecycle, it is essential that they are included and informed. The World Bank CE strategy recognises these ideas in a discussion of ‘good practice principles’ for citizen engagement. According to the strategy, for citizen engagement to be considered meaningful, best practice requires that projects provide ‘disclosure and timely access’ of ‘objective information and documentation’ as well as ‘due consideration of representativeness and inclusion of women and disadvantaged or vulnerable groups’ (Manroth *et al.* 2014: 42). The ARC approach is predicated on the understanding that no single indicator among these three is considered adequate on its own to support and encourage community participation.

By examining project commitments across these ten areas, the analysis seeks to answer two overarching questions:

1. To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE?
2. To what degree do projects go beyond a ‘tick box’ approach and demonstrate that there is both depth and specificity in individual CE commitments, and a potential for synergy across the range of CE commitments.

1.5.1 Data collection: application of the assessment tool

ARC’s assessment tool relies on publicly available World Bank project documents that lay out plans, strategies and commitments that have been approved by the Bank’s Board. The principal documents used in the analysis include (where available): the Project Appraisal Document (PAD), the Project Information Document (PID), the Integrated Safeguards Data Sheets (ISDS), the Environmental and Social Management Framework (ESMF) and related social safeguard documents (Resettlement and Indigenous People’s Frameworks) where applicable. The World Bank requires that all the above-mentioned documents be publicly disclosed via the World Bank’s online operations portal.

In principle, this assessment would also include operational manuals (OMs), which all projects develop after receiving World Bank board approval to describe and codify their implementation plan. For government–society engagement, the OM translates World Bank project commitments into specific actions, processes and benchmarks in each national context. This ‘translation’ is also key for CSOs and citizens who want to observe or monitor how a project is functioning. However, the World Bank does not have an institutional mandate that OMs must be disclosed and therefore they are typically not publicly available. This means, in practice, that public access to the primary operational document that most concretely details a project’s implementation plans for meeting the approved objectives is left to the client government’s discretion. When government agencies do not proactively disclose their specific decision-making processes, project rules and performance benchmarks, it has major implications for informed citizen engagement for accountability.

This project assessment process is never automated and there is a strict policy of secondary or peer review to avoid subjective decision-making about the depth and detail of individual CE commitments. Once the data is collected from the publicly available World Bank documents, it is subjected to a quantitative and qualitative analysis. The processes for each are explained in the sections below.

1.5.2 Quantitative analysis: establishing a citizen engagement density scale

To answer the question of ‘whether’ World Bank projects are operationalising institutional commitments to CE, ARC developed and piloted a ‘Citizen Engagement Density Scale’ that considers the seven World Bank priority citizen engagement (CE) and three enabling environment (EE) indicators discussed above. The density scale builds from the literature (Fox 2015) and IEG (2018) findings that:

‘Thick’ approaches – those combining multiple tools to enable collective action and public sector responsiveness – are more promising than ‘thin’ approaches – those that are not matched with vertical integration of independent monitoring and oversight or do not include support to increase government’s capacity to respond.
(World Bank 2018: xiii)

A thick approach to CE commitments combines a project’s inclusion of the various CE activities laid out in the World Bank’s strategy with mechanisms or practices that could create an enabling environment to further advance citizen action. The creation of an enabling environment is facilitated through the proactive social inclusion of marginalised groups in consultation processes, and the inclusion of independent/external monitoring with public disclosure of results. While the thick versus thin distinction may be intuitive and subjective, this desk review attempts to capture greater nuance by classifying the range of density of commitments according to five different categories: robust, comprehensive, intermediate, weak, and low. Table 1.1 depicts the combined CE and EE numerical criteria for each level.

Table 1.1 Citizen engagement (CE) density scale

Robust		Comprehensive		Intermediate		Weak		Low	
CE	EE	CE	EE	CE	EE	CE	EE	CE	EE
7	2-3	7	0-1	6	0	4	0-1	2	0-1
6	3	6	1-2	5	0-2	3	0-2	1	0-2
		5	3	4	2-3	2	2-3	0	0-3
				3	3	1	3		
Key	CE = citizen engagement areas Maximum = 7				EE = enabling environment indicators Maximum = 3				

Source: Authors’ own.

A project's rating on the CE density scale depends on a combination of its CE and EE commitments. The final tally, however, is not based on a simple total of commitments within the ten possible CE and EE options. Rather, it results from a weighted combination of two complementary approaches to enabling citizen action. In other words, a project's thickness is based on counting the number of tools for citizen action (from 0 to 7) that a project describes and then determining if and how they have matched with efforts that contribute to an enabling environment for CE. ARC's CE density scale therefore reports on how mechanisms for social inclusion, external monitoring and public disclosure can potentially reinforce the officially recognised modalities for creating enabling environments for citizen engagement and accountability.

Although the number of CE commitments is the first step to determining the thickness of a project's approach to citizen engagement, the final determining factor is what the project contributes to the enabling environment. For example, Table 1.1 shows that a project that includes commitments in all seven Bank prioritised CE areas could fall into one of two categories: robust or comprehensive. Seven commitments guarantee a rank in one of the top two categories. However, these seven CE commitments, if not matched with at least two of the enabling environment indicators, is not sufficient for a project to qualify as having a robust approach to CE. To be considered at the robust level, the project must also include commitments to at least two of the EE indicators.

1.5.3 Qualitative analysis: the quality of commitments, based on depth and detail

To answer the question of *how* the World Bank is operationalising its commitments to citizen engagement in ways that could foster accountability and empowerment, the assessment then investigates the content of the commitments. First, it considers the detail and depth with which CE mechanisms and processes are explained, in terms of how they will both handle and incorporate stakeholders' inputs so that they shape project decisions and implementation. Examples of questions that guide the process of determining CE mechanisms' detail and depth include:

1. **Collaborative decision-making:** For projects that commit to collaborative decision-making, do projects specify the mechanisms and/or activities through which this would be carried out during implementation?
2. **Collecting feedback:** For projects that commit to collecting citizen feedback, do descriptions of the planned mechanisms explain how feedback solicited and collected will be integrated to inform project implementation (closing the feedback loop)?
3. **Grievance redress mechanism (GRM)**
 - a. For projects that commit to establishing a GRM, who will manage it (the same unit charged with managing the project that potentially could be a subject of the complaints)? Will it be under the authority of or subject to oversight by a third-party organisation to avoid conflicts of interest?
 - b. What GRM data will be disclosed? Will disclosure involve numbers of complaints received and resolved? Will data released cover the nature of the grievances and their resolutions?

Second, the assessment considers the detail and depth with which the project commits to fostering an enabling environment for CE. The hypothesis guiding this approach is that the less precise a CE commitment is at the project design stage, the easier it becomes for project authorities to impose their own interpretations. The risk therefore is that without sufficient specificity, CE plans can be diluted into a 'tick box' exercise during implementation. For example, the assessment asks:

1. **Social inclusion:** For projects that commit to proactive inclusion, are details provided on the approaches that will be undertaken to include groups that have experienced

social marginalisation and exclusion in citizen engagement activities? What groups are specifically identified and what are the mechanisms for reaching and incorporating them?

2. **Public disclosure:** For projects that commit to public disclosure, are specific mechanisms for the disclosure detailed? Does the project commit to frequency of public dissemination activities or explain exactly what will be shared?
3. **Funding for CE:** Has the project allocated funds to support citizen engagement commitments?

Using this two-tiered approach to quantitative and qualitative analysis, ARC then determines the degree to which a World Bank project's commitments to engaging citizens throughout its lifecycle add up to a strategic approach which, if implemented, could tangibly contribute to enabling empowered and empowering citizen action and/or accountable institutional responses.

2 World Bank commitments to citizen engagement in investment projects: Mozambique, Myanmar, Nigeria, and Pakistan (FY15–17)

This section of the report presents the results of the individual country portfolio analyses for Mozambique, Myanmar, Nigeria, and Pakistan.⁷ The discussion highlights the overall CE trends in project design, examining these four pilot cases together and compared to one another. First, the analysis will explore the country-level results, depicting the density of CE commitments by country and CE area. Second, the analysis will delve more deeply into the findings related to a selection of World Bank prioritised CE areas and each of the three ARC identified mechanisms that can contribute to an enabling environment for CE.

2.1 Overall citizen engagement results

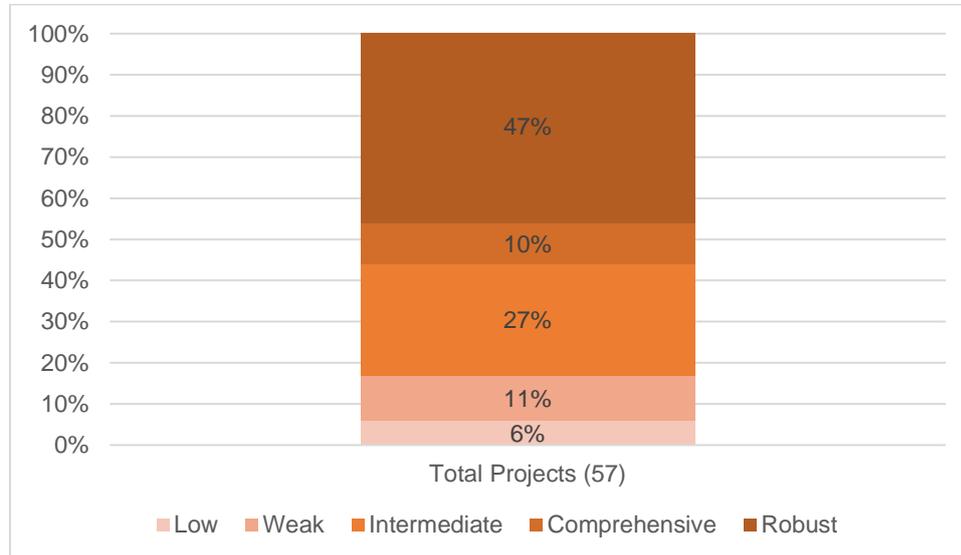
2.1.1 *The density of CE commitments in Mozambique, Myanmar, Nigeria, and Pakistan*

As described in the introduction, thick approaches to CE commitments combine a project's inclusion of the various CE activities laid out in the Bank's strategy with mechanisms or practices that potentially contribute to an enabling environment for CE. ARC's original CE density scale establishes parameters for understanding the variations of thickness and thinness in project CE commitments (see Table 1.1). The density is determined based on the existence of commitments, not an interpretation of the quality/lack of quality of the commitment. As discussed in more depth in section 1.5.2, the determination of where a project ranks is based on a balance between planned CE mechanisms and contributions towards an enabling environment for CE and is not simply based on an absolute total of CE + EE commitments. The CE density scale classifies the range of CE commitments into

⁷ This assessment focuses on IPFs, the focus of the World Bank's CE corporate mandate, but it includes one program-for-results (P4R) operation. P4Rs differs from IPFs because in principal financing is dedicated to a client country's own development programme rather than an autonomous World Bank project (i.e. IPFs provide 'funds for specific expenditures' while P4Rs provide 'funds for specific expenditure programs' (World Bank 2012: 3). Furthermore, P4R fund disbursement depends upon the achievement of agreed interim results (DLIs – a financing mechanism an increasing number of IPFs now use) and are not subject to social safeguard policies, but instead must undertake an Environmental and Social Systems Assessment (ESSA) (World Bank 2012: 23). Although the World Bank is not monitoring P4R operations as part of the corporate mandate, these operations are still of considerable concern to the public in borrowing countries. Since the World Bank has steadily increased its use of P4R financing since creating the instrument in 2012 it is important to also understand the opportunities (and/or obstacles) to CE that exist in P4R based operations and where relevant ARC includes P4R operations in the analysis.

five categories. From highest to lowest they are: robust, comprehensive, intermediate, weak and low. Figure 2.1 shows the combined results for Mozambique, Myanmar, Nigeria, and Pakistan.

Figure 2.1 CE commitment density scale – combined results for Mozambique, Myanmar, Nigeria, and Pakistan FY15–17 (57 projects)



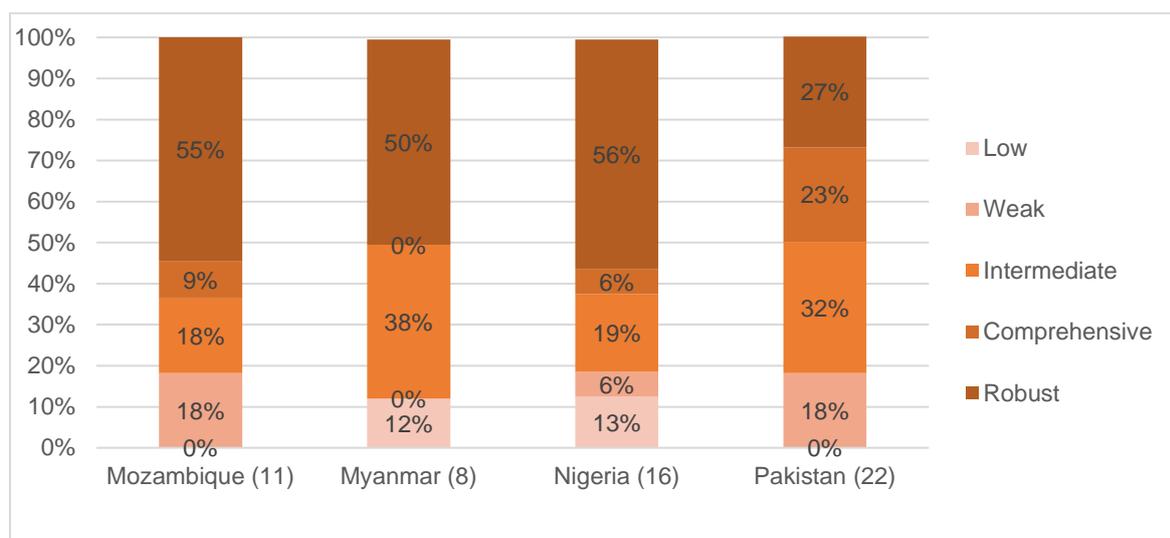
Source: Authors' own.

Fifty-seven per cent of Mozambique, Myanmar, Nigeria, and Pakistan projects (40 out of 57) rank in the top two categories of the CE density scale, meaning that a slim majority of projects use a range of mechanisms at multiple points throughout their lifecycle and thereby demonstrate a thick commitment to comprehensive community engagement. The breakdown of the rankings are: robust (47 per cent or 25 projects), comprehensive (10 per cent or 7 projects), intermediate (27 per cent or 15 projects), weak (11 per cent or 7 projects), and low (6 per cent or 3 projects). These results show that these 57 projects from four countries are distributed across the five levels of the scale, but that a plurality (47 per cent) occupy the top category. This plurality becomes a majority – albeit narrow – when the robust and comprehensive categories are combined. Projects in the comprehensive category do not meet all of the possible benchmarks, but meet at least seven of the ten. To qualify for the second highest category, projects with only five out of the seven possible CE mechanisms must have all three enabling environment commitments.

There are 43 per cent of the projects in the lowest three categories, meaning that a sizeable minority have thin commitments to citizen engagement. Just over a quarter of the projects fall into the middle category, 'intermediate'. These projects give some attention to citizen engagement, including in most cases to fostering an enabling environment, but fewer aspects have been addressed. Finally, just under a fifth of the projects (ten) rank as weak or low. This is a minority of projects, but still a substantial percentage that have no more than four total CE commitments and could have no enabling environment commitments.

To better understand this distribution, it is important to see how each country portfolio ranks on the CE Density Scale. Figure 2.2 shows how the countries compare to one another.

Figure 2.2 CE commitment density scale – four country comparison



Source: Authors' own.

Given the minimal mandates the World Bank has imposed on projects – a single CE mechanism and CE indicator, the results of the CE density scale for these four portfolios can be interpreted as positive. At the country level, at least 50 per cent of projects in all four countries are ranked in the top two categories. In Mozambique, Myanmar and Nigeria, at least 50 per cent of projects are ranked at the highest level. Pakistan is an outlier among these four countries, falling below the other three with just over a quarter (27 per cent) of total projects meeting the robust criteria, which explains why the robust ranking average for all four countries is below 50 per cent. Yet Pakistan meets the 50 per cent mark when including 'comprehensive'. Adding the comprehensive level then encompasses almost two-thirds of the Mozambique and Nigeria portfolios.

However, as many as a half (Myanmar and Pakistan) and at least a third (Mozambique and Nigeria) of projects across all four portfolios are ranked as intermediate or lower. In all four countries there is a notable number of projects that are missing CE and enabling environment commitments.

On balance, the CE density scale results provide a positive more than a negative picture of how this sample of World Bank projects have committed to incorporating CE into project design. However, all four country portfolios show room for improvement. Mozambique stands out in a positive way because not only does it have more than 50 per cent in the top category, none of its projects fall into the bottom category.

Table 2.1 shows how each of the projects in the FY15–17 Myanmar portfolio commit to the range of CE and EE areas. To see these details for Mozambique, Nigeria, and Pakistan refer to the Annexe.

Table 2.1 CE overview by project, Myanmar portfolio FY15–17 (in descending order)

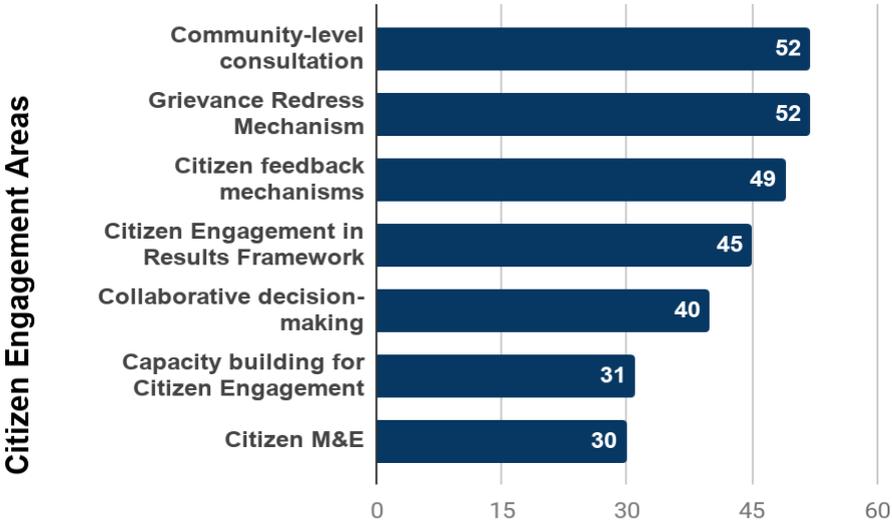
Myanmar projects (FY15–17)	Commitment amount US\$	Social safeguards applied?	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen M&E	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive inclusion	Third-party M&E	Proactive disclosure		
National Community Driven Development FY15	400	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Essential Health Services Access FY15	100	IP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Agricultural Development Support FY15	100	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Flood and Landslide Emergency Recovery FY17	200	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
National Electrification FY16	400	IP+IR	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	5	2
Ayeyarwady Integrated River Basin Management FY15	100	IP+IR	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	No	5	1
Southeast Asia Disaster Risk Management FY17	130	IR	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	No	5	1
Financial Sector Development FY17	100	None	No	No	No	No	No	No	Yes	No	No	No	1	0
Total commitments		7	7	7	7	5	7	4	7	7	5	3		

Source: Authors' own.

2.1.2 Overall results by CE area

Figures 2.3 and 2.4 showcase each of the CE areas, showing how many of the projects in the portfolio include each CE mechanism/activity from the greatest to the fewest. Figure 2.3 focuses on the seven CE areas prioritised in the World Bank’s CE strategy while Figure 2.4 highlights the ARC-identified indicators that potentially can foster an enabling environment for CE. As with the CE density scale ranking, the portfolio level analysis reports only on the *existence* of commitments and not their *quality*. The exploration by CE and enabling environment areas demonstrates the range of commitment incorporation. A discussion on the depth of said commitments will follow in the next section.

Figure 2.3 Total commitments to World Bank prioritised CE areas across the four countries (57 total projects)



Source: Authors’ own.

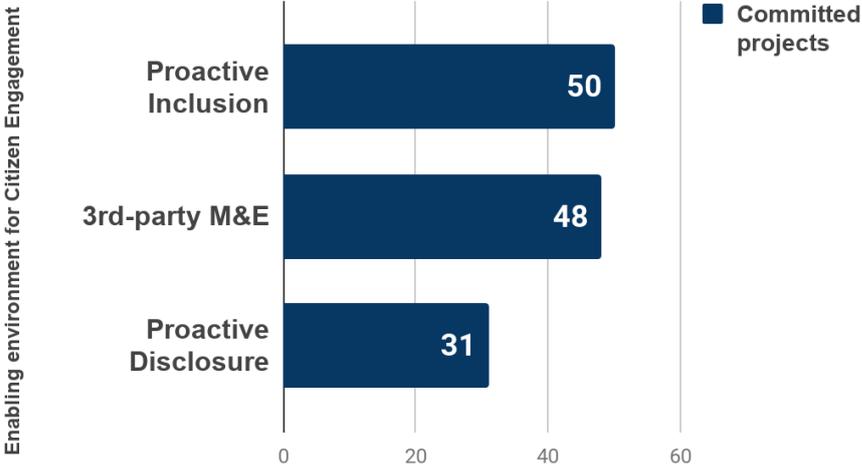
Eighty per cent of projects (45 out of 57) commit to at least four of the CE areas prioritised by the World Bank. The top areas include: community-level consultation during design, grievance redress mechanisms, citizen feedback during implementation, and citizen engagement monitoring indicators in projects’ result frameworks. As explained in the introduction, community consultation in design differs from the other areas because it represents what projects report as already having accomplished versus commitments to what should take place during implementation.

At the portfolio level, projects display the most commitments (91 per cent) to community consultation during design and establishing a project specific GRM. These findings align with IEG, which also found citizen consultation during design and project-level GRMs as having the highest number of commitments across the sample evaluated (World Bank 2018: 14) Seventy per cent of the projects (40 of 57) commit to going beyond seeking input from citizens and involving them in some aspect of project decision-making. Capacity building for CE and citizen M&E are the categories with the fewest commitments, both with about only 50 per cent of assessed projects committing to them (31 and 30 out of 57 respectively).

Twenty-three per cent of projects do not fulfil the World Bank’s minimum corporate requirement to include at least one CE activity and at least one CE indicator in project design. Seven projects (12 per cent) do not include any citizen engagement activities at all, whilst 12 projects (20 per cent) do not adopt any indicators to monitor aspects of citizen engagement during their lifecycle.

Having explored the comparative trends across the four countries for the World Bank CE priority areas, the analyses now moves on to the three indicators identified by ARC as potentially facilitating an enabling environment for CE. Figure 2.4 presents these commitments.

Figure 2.4 Total commitments to mechanisms for an enabling environment for CE, across the four countries



Source: Authors' own.

The results show that substantially more projects commit to facilitating social inclusion and hiring third-party monitors than to public information disclosure. Across all four countries, 87 per cent of the assessed projects (50 of the 57) committed to at least one activity designed to increase the inclusion of different types of stakeholders and beneficiaries in CE activities. This broad indicator only tracks if a project includes at least one mechanism for social inclusion and does not account for which groups are covered or how they will be included. Therefore, for this indicator in particular, an analysis of the content of the commitment is essential to discern the extent to which a project is engaging societal groups that are commonly excluded from participation.

Third-party monitoring commitments come second after proactive social inclusion while proactive information disclosure is last. Eighty-seven per cent of projects (48 out of 57) document plans to arrange for third-party agencies to be involved in various aspects of project monitoring, evaluation and oversight. This means that for a large majority of projects there will be an external entity responsible for monitoring an aspect of project operations.

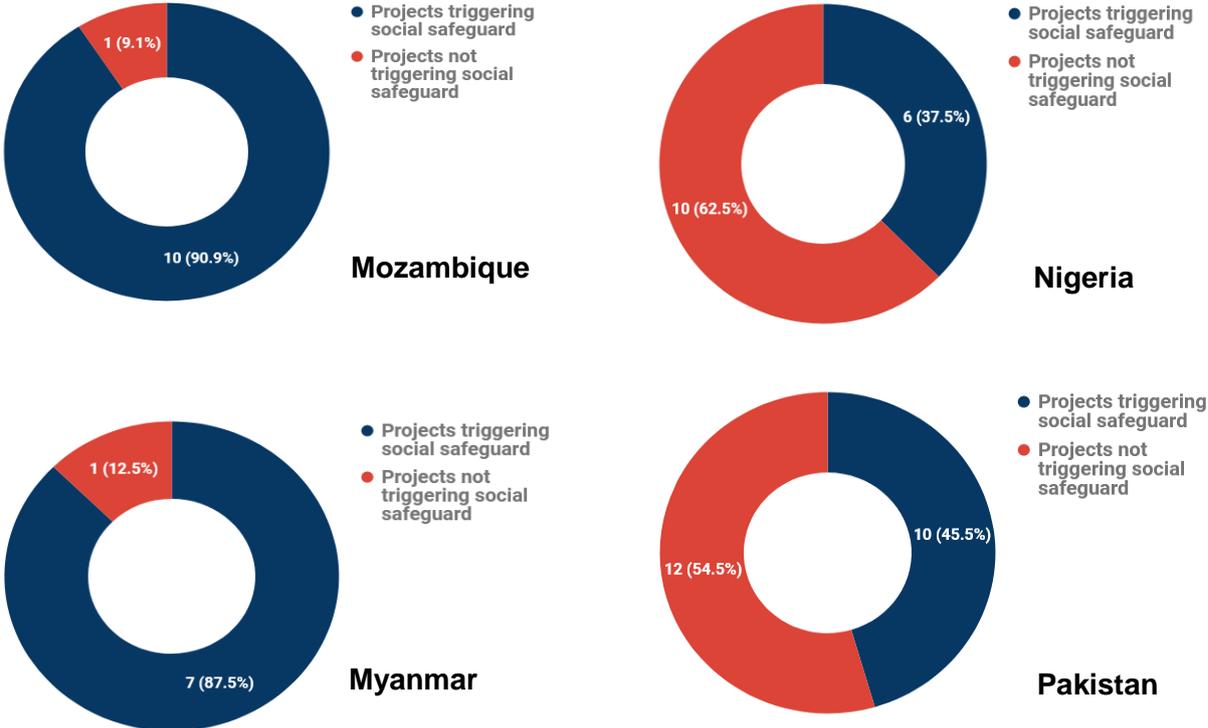
In contrast to the project commitments to social inclusion and external monitoring, only slightly above 50 per cent (31 out of 57) projects documented intentions to proactively disclose information. Therefore, almost a half of the projects lack commitments to sharing project information beyond the minimum World Bank mandates.

2.1.3 Social safeguards and CE findings

As explained in the introduction above, when World Bank projects trigger social safeguard policies relating to indigenous peoples (Operational Policy OP/Bank Procedure (BP) 4.10) and/or involuntary resettlement (OP/BP 4.12), they are required to include two kinds of CE mechanisms: consultations during project design and GRMs that should be operational

during project implementation.⁸ Furthermore, social safeguard policy requires that the community-based consultation proceedings be documented and disclosed via publications in both English and any official national languages (which are then shared in live presentations to audiences of invited stakeholders). Given the disclosure requirements, the published documentation of these safeguard required consultations was included among the project documents reviewed for this analysis. Therefore, it is relevant to track the overlap between projects with these two kinds of CE commitments and those that have triggered one or both of the social safeguards. Figure 2.5 below depicts the number of projects in each country portfolio that applied social safeguards.

Figure 2.5 Project-level application of social safeguards (FY15–17) across all four countries



Source: Authors' own.

8 Social safeguard policy requirements go beyond these two kinds of citizen engagement mechanisms. For example, resettlement policy requires compensation and the consideration of alternative investments that would minimise displacement.

Across the four countries, 29 of the 57 projects (51 per cent) apply at least one of the World Bank's social safeguard policies.⁹ When these social safeguard results are cross-referenced with the CE results for citizen consultation during design and/or GRMs (91 per cent), the share of projects with commitments to these two CE areas goes significantly beyond those required by the safeguards. This finding at first glance could be a positive indication that projects are aiming for more than minimal compliance.

The World Bank's social safeguard mandates pre-dated the CE strategy and President Kim's increased attention to these issues. In principle they are seen as strengthening incentives for implementing certain CE activities in projects applying social safeguards. However, as noted in the World Bank's 2014 CE strategy, the triggering of social safeguards in practice mean that these 'required' CE activities are carried out well or in full, or reported on as expected (World Bank 2014: 133–34). Therefore, it remains critical to investigate what the CE commitments actually include, even while recognising the additional mandate that the application of social safeguards is assumed to add.

2.2 In-depth analysis: World Bank prioritised CE areas

In the following section the discussion moves beyond the identification of the range of CE commitments and analyses the content as expressed in programme design documents. The discussion will proceed according to select World Bank CE priority areas, including citizen collaboration in decision-making, citizen feedback collection, citizen monitoring, GRMs and CE indicators. The discussion continues with a focus on the three ARC identified indicators of an enabling environment for CE, proactive social inclusion, third-party monitoring and proactive information disclosure. Where relevant, the discussion draws on particular projects from the four countries that have committed to undertaking activities in those respective areas.

2.2.1 Commitments to citizen/beneficiary collaboration in decision-making and collecting feedback from citizens

The CE strategy delineates three distinct categories of CE, *consultation during preparation, collaboration in decision making during implementation, and citizen feedback collection* which guides how the CE areas are considered in the assessment. This discussion will focus on two of these categories, collaboration in decision-making and citizen feedback collection. Collaboration in decision-making is intended to go beyond consultations that seek out input to processes that integrate citizens directly into decision-making. The CE strategy explains that this process seeks to 'make decisions more responsive to citizens' needs and improve the sustainability of program and project outcomes through increased ownership by citizens' (Manroth 2014: 43–144).

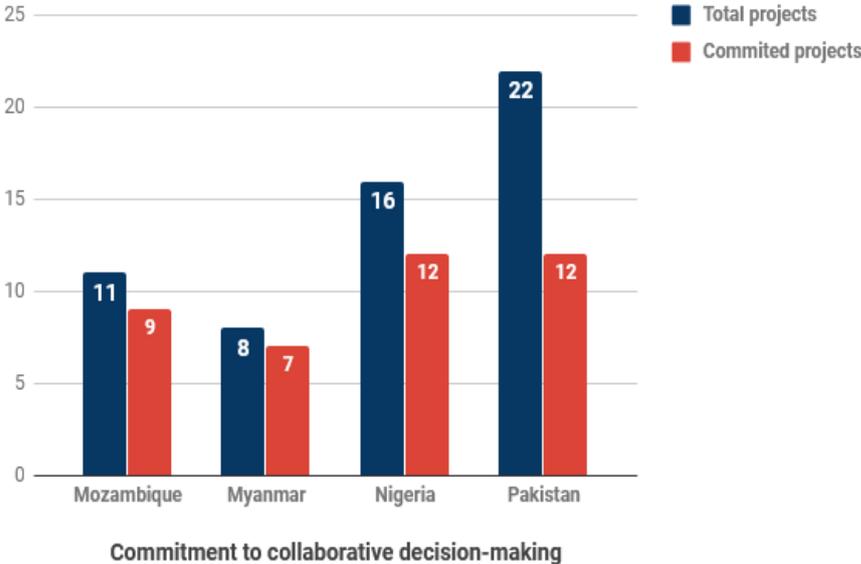
Collection of citizen feedback, or what the CE strategy categorises as collecting, recording, and reporting on inputs from citizens, pertains to the periodic solicitation of feedback from project affected peoples during project implementation on a vast range of issues important to project success. According to the CE strategy these include, 'effectiveness, inclusiveness, quality, delivery time, transaction costs, and targeting, as well as on resource utilization or engagement processes' (Manroth 2014: 43–44).

⁹ It is important to note that of the four countries studied, only Myanmar applies the indigenous peoples safeguard and does so for projects that affect (or are determined likely to affect) the country's legally categorised ethnic minorities. The legal systems in Mozambique, Nigeria and Pakistan do not recognise the existence of indigenous peoples; therefore, under the World Bank's safeguard framework that applies to projects during the period studied, only the classification of possible involuntary resettlement could potentially be applied in these three countries. In Myanmar, several of the projects assessed applied both social safeguards. This does not mean that projects are guaranteed to be involuntarily resettling people, but that there is a potential chance that this could occur. For more information on the World Bank's safeguard policy on involuntary resettlement, see <http://go.worldbank.org/TRLT2MQSX0>.

This review found that these categories do not consistently represent the terminology that project teams use in programme documents to describe CE commitments. Often projects employ the term ‘consultation’ when describing both consultative meetings that have the purpose of gathering input for project teams to make the final decisions versus participatory exercises that allow citizens to be involved in decision-making themselves. Therefore, the context in the programme documents was key to determining the kind of citizen engagement activity the project committed to carrying out.

Given the potential overlap between collaborative decision-making and feedback collection, the two areas will be presented with their findings and then examined together. Figure 2.6 displays the collaboration in decision-making results for FY15–17 in the four countries.

Figure 2.6 Collaboration in decision-making



Source: Authors’ own.

The four country portfolios show a strong commitment to collaborative decision-making, with 40 out of 57 projects (70 per cent) committing to this. The in-country comparison indicates that, in terms of percentage of project portfolio, Mozambique and Myanmar demonstrate greater commitments than Nigeria and Pakistan to directly involving citizens in decision-making. In Mozambique and Myanmar, an overwhelming majority of projects within each country committed to creating such decision-making opportunities for at least some beneficiaries (81 per cent and 87.5 per cent respectively). Nigeria, at 75 per cent has a lower percentage commitment than Myanmar and Mozambique, but this still represents a majority of its 16 projects. Pakistan has the same number of projects (12) as Nigeria that commit to offering community members some decision-making opportunities, but its portfolio is 30 per cent larger.

Commitments to stakeholder involvement in decision-making processes vary by the nature of projects and by countries. Many projects indicate that they plan to engage with and include a wide range of project affected peoples, from individual beneficiaries to representatives of community-based organisations, in project decisions. For example, in the Cities and Climate Change project for Climate Resilience of Mozambique (2015), street vendors whose businesses may be affected by project plans for climate mitigation are identified for direct involvement in decision-making. However, a majority of projects document planned mechanisms for collaboration without clarifying the issues upon which the communities will

decide, where the community engagement will take place, and when the co-planning will happen during a project cycle. Table 2.2 juxtaposes projects from Mozambique and Myanmar.

Table 2.2 Collaborative decision-making in two projects, Mozambique and Myanmar

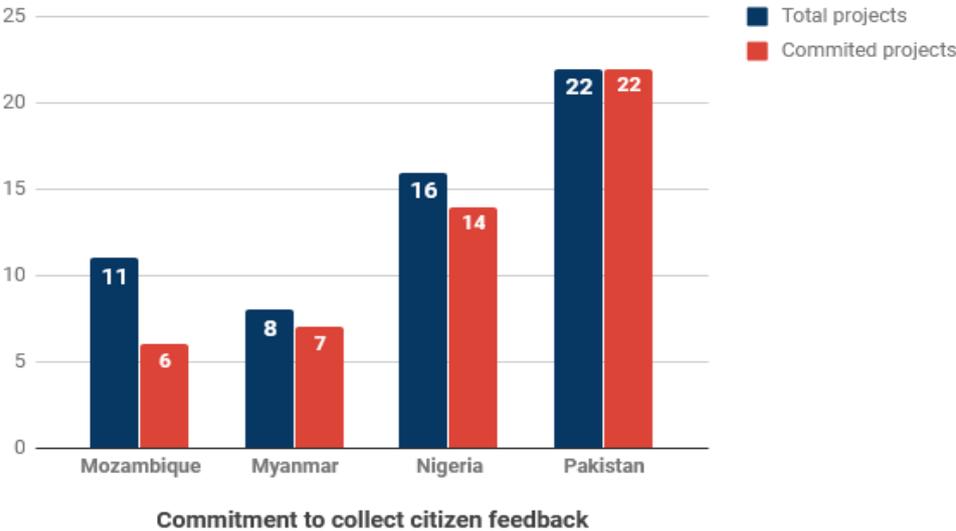
Mozambique <i>Agriculture and Natural Resources Landscape project (FY16)</i>	Myanmar <i>Flood and Landslide Emergency Recovery project (FY17)</i>
<p>Commitment: Community-based organisations to create land-use plans to feed into relevant district and provincial level spatial planning activities.</p> <p>Mechanism:</p> <ul style="list-style-type: none"> Participatory planning. 	<p>Possible mechanisms (to be decided during implementation):</p> <ul style="list-style-type: none"> Community meetings (to inform design, construction, maintenance); Focus group discussions; Participatory planning exercises; Awareness building about project with communities.

Source: Authors' own.

These two examples from Mozambique and Myanmar, the two countries with the highest percentage of commitments on collaborative decision-making by portfolio, show the discrepancies that can exist in the details provided for a commitment under this category. In Mozambique, the Agriculture and Natural Resources Landscape project provides specifics about the content of the intended collaboration, outlining that land-use plans will be created by community-based organisations at district and provincial levels. Information about the mechanisms for carrying out these plans are more limited, however, explained only as taking place via participatory planning. Meanwhile, the Flood and Landslide Emergency Recovery project in Myanmar showcases a more comprehensive list of potential mechanisms to give community members opportunities to direct and determine project activities. However the project does not specify the subject matters that communities could decide upon or the stages at which community decision-making would take place.

Figure 2.7 depicts commitments to collecting citizen feedback during implementation across the four assessed countries.

Figure 2.7 Commitments to collecting citizen feedback, by country



Source: Authors' own.

All four country portfolios exhibit a high level of commitment to incorporating citizen feedback mechanisms throughout project implementation, with 85 per cent of all assessed projects (49 out of 57) committing to this CE indicator. At the highest level is Pakistan, the largest portfolio, with all of its 22 projects documenting citizen feedback commitments. At the lowest, lies Mozambique, with only 6 of its 11 projects having this commitment.

Qualitative analysis shows that, within this category, projects commit to collecting citizen feedback both periodically and on an ongoing basis using a wide range of tools. Periodic feedback collection, which depends on the project initiating the opportunity, is the most common kind of commitment. The most frequently cited mechanisms include: satisfaction/opinion surveys, citizen report cards, focus groups, and public meetings. However, a majority of projects do not provide details about the frequency of opportunities for citizen feedback. The Pakistan portfolio includes two exceptions to this: the Balochistan Integrated Water Resources Management and Development (2016) commits to implementing a satisfaction survey every two years, while the Tarbela 4th Extension Hydropower 2017 AF commits to carrying out an annual beneficiary feedback survey.

A quarter of all analysed projects (13 out of 49) committed to ICT-based feedback opportunities. The Nigeria portfolio stands out by offering the highest number of ICT based feedback opportunities in seven projects, via plans for virtual platforms, email, phones, and social media. Pakistan follows with five projects listing web-based platforms and cell phones as some of the tools to collect community feedback. Myanmar promoted the use of ICT-based tools without giving specifics, while there was no mention of these mechanisms in Mozambique.

Despite the fact that projects clearly state commitments to collecting citizen feedback during implementation, there is both a wide variation in how they document the types of feedback they plan to collect, the mechanisms to be used, and the level of detail explaining how the commitments will be executed. The table below features two projects, one from the Mozambique and the other from Nigeria to demonstrate the differences in detail and specificity project documents offer on the kinds of commitments, their goals, and the mechanisms to be used.

Table 2.3 Citizen feedback collection and reporting in example projects, Mozambique and Nigeria, FY15–17

Mozambique <i>Water Services and Institutional Support II project (FY16)</i>	Nigeria <i>Mineral Sector Support for Economic Diversification project (FY17)</i>
<p>Commitment:</p> <ul style="list-style-type: none"> ● To assessing implementation, service quality, satisfaction with new water connections, and household perceptions/valuation of the new water service, which focuses on the degree of engagement and feedback from service users; ● To implementing ‘Citizen Voice’ tools in project cities (which will be measured in results framework). <p>Mechanisms:</p> <ul style="list-style-type: none"> ● Collecting qualitative data from households ● Beneficiary score-cards ● Survey in the results framework. 	<p>Commitment:</p> <ul style="list-style-type: none"> ● To on-going stakeholder and public consultation. <p>Mechanisms:</p> <ul style="list-style-type: none"> ● Meetings ● Radio programmes ● Requests for written comments ● Questionnaires ● Interviews ● Focus groups.

Source: Authors’ own.

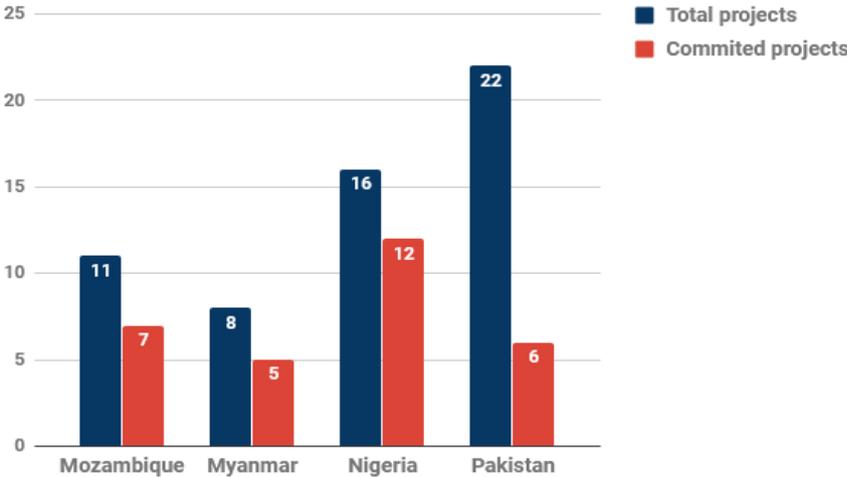
The Water Services and Institutional Support II project in Mozambique showcases the most detailed and nuanced commitments to citizen feedback collection across all 57 projects analysed. The project documents extremely specific goals for collecting citizen feedback, going beyond user satisfaction with service provision (the focus of the project) and including perceptions of implementation process and households’ overall value of the service for their lives. The list of mechanisms for collecting feedback is brief (only three mechanisms documented), yet they appear to be tailored to meet each of the specified goals. This information provides the basis for project observers to track if and how the commitment is being carried out.

In contrast, the highlighted project in Nigeria, Mineral Sector Support for Economic Diversification, includes a comprehensive list of six different mechanisms for gathering beneficiary opinions, ranging from written feedback opportunities to public meetings. Yet the project’s extremely generic commitment to ‘on-going stakeholder and public consultation’, makes it unclear as to how this range of mechanisms would be used solicit feedback and inform implementation progress. These two examples demonstrate how ticking the check box for this category of CE might not guarantee that the commitment is adequate to gather feedback from communities in a way that can meaningfully contribute to the project.

2.2.2 Commitments to involving citizens in project monitoring

According to the CE strategy, involving citizens in project monitoring ‘can increase transparency, improve efficiency of service delivery or budget execution, and reduce opportunities for corruption’ (Manroth *et al.* 2014: 47). Participation in project monitoring in areas such as service delivery, revenue intake, budget execution, procurement, contract awards, and the roll out of reform policies can leverages citizens’ roles so they contribute beyond mere feedback provision. The role provides citizens with both an independent verification role and allows a sub-set of the project affected population access to the big picture of project performance and service provision, as well as providing beneficiary reactions to the implemented programmes. Figure 2.8 displays the results for the four countries assessed.

Figure 2.8 Citizen monitoring commitment results, FY15–17 across the four countries



Source: Authors’ own.

Citizen monitoring represents the CE area with fewest commitments at project level across the four assessed countries, only 30 of the 57 projects (53 per cent) report a commitment to including at least one form of citizen oversight. Nigeria shows the highest percentage (75 per cent) with this commitment, while Pakistan, despite having the biggest portfolio, has only 30 per cent of projects committed to this CE area.

The definition as well as the roles of who will monitor the implementation of activities that will benefit direct beneficiaries or have some kind of impact on indirect beneficiaries is still unclear. There is variation in the articulation of the type of community-based stakeholders projects commit to involving. At one end, approximately one-third (9 out of 30) explicitly state the intention to give CSOs, CBOs and NGOs responsibility for an aspect of project oversight. It is not made clear, however, if these organisations would encompass affected community members, which means the role of citizens as monitors is still questionable. At the other end, one-third (ten) provide no details about the type of community-based stakeholders that would be offered the opportunity to participate in monitoring project implementation.

‘Participatory M&E’ is a common way that projects express their intentions to give citizens a role in monitoring activities. What mechanisms will be used to facilitate this participation, remains ambiguous. A number of the assessed projects across the four countries report similar plans or mechanisms of adopting assessments and evaluations to engage citizens in oversight. Some projects list more detailed initiatives such as a national forest forum (Forest Investment project FY17 in Mozambique) or using an ICT-based tool (Water Services and Institutional Support II in Mozambique), although not detailing the kind of tool.

To provide a comparative example from one of the country portfolios, Table 2.4 illustrates the extent to which several Mozambique projects commit to citizen monitoring. No single project mentions all aspects of the commitment from what to monitor, to who will monitor, what the roles are, and how to monitor. Thus, there is still a big gap between beneficiary-led monitoring and monitoring initiatives led by project implementers, in which beneficiaries collaborate.

Table 2.4 Examples of CE monitoring across three Mozambique projects

Social Protection project – AF (FY17)	Water Services and Institutional Support II (FY16)	Forest Investment project (FY17)
<p>Commitment: Participatory monitoring during programme implementation.</p> <p>Who: Community leaders.</p> <p>Mechanisms: Unspecified.</p>	<p>Commitment: Local quality-of-service and financial regulatory mechanisms to enforce and monitor local regulation; local regulatory commissions called CORALs (<i>Comissoes Reguladoras Locais</i>).</p> <p>Also commits to decentralising ‘some aspects’ of regulatory oversight to customers.</p> <p>Who: Unspecified.</p> <p>Mechanisms: CORALs; local ICT instruments.</p>	<p>Commitment: Promotes citizen engagement in a National Forest Forum and regular and participatory evaluation of the forest sector.</p> <p>Who: Unspecified.</p> <p>Mechanisms: a National Forest Forum; participatory evaluations.</p>

Source: Authors’ own.

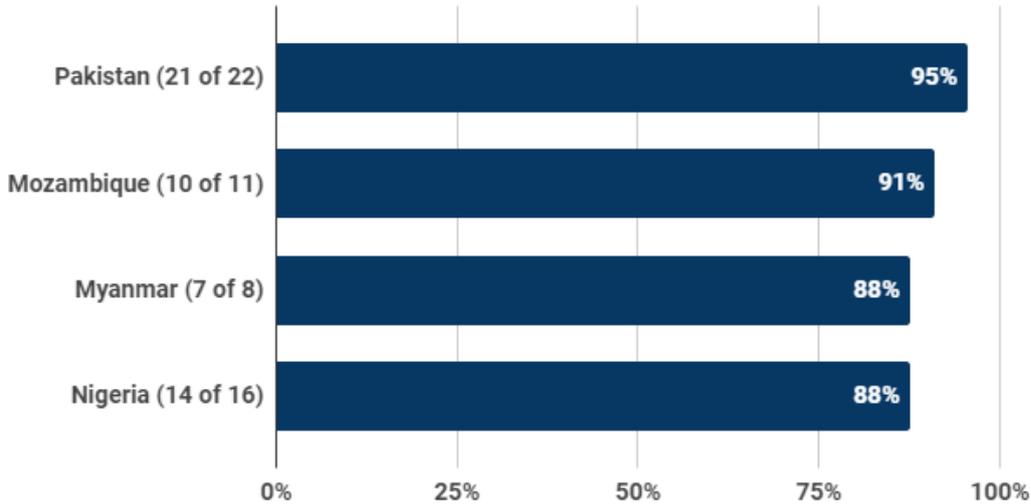
In terms of the monitoring responsibilities that citizens would have, only 40 per cent (12 out of 30 projects) outlined clearly the kind of activities or components to be monitored. Where stated, they include involving citizens in monitoring regulatory compliance, budget and contract awards, service delivery, construction, and project performance and progress. The remaining 60 per cent only document plans for participatory M&E, but without specifying how it will take place and what responsibilities citizen monitors might have.

2.2.3 Commitments to implementing GRMs

As specified in the introduction (see section 1.3), this analysis differentiates project-specific GRMs, which are intended to be contextually relevant to the project in design and functionality, from the institutional-level Grievance Redress Service (GRS), administered by World Bank management. In principle, project-specific GRMs serve a dual purpose. On the one hand, they are meant to act as a complaint handling mechanism through which project affected peoples can raise concerns, queries or clarifications related to project implementation. On the other hand, they should provide the channels through which reported complaints and grievances are addressed and resolved. The CE strategy recognises that in many projects, GRMs are not operationalised. In fact, the strategy cites findings from the World Bank’s 2014 GRM review which found that, ‘of projects that commit to creating GRMs in design, 40 per cent do not end up creating one in practice’ (Manroth *et al.* 2014: 45). To address these operational concerns, the CE strategy lays out GRM best practices that include: ‘providing multiple channels for soliciting complaints; registering complaints in a log; publishing timely and service standards for acknowledgement, response, and resolution; and ensuring transparency about the grievance procedure as well as options for mediation and appeal’ (Manroth *et al.* 2014: 46).

As discussed in section 3.1.3, World Bank IFPs that apply either of the two social safeguard policies (for indigenous peoples and/or involuntary resettlement) are mandated to incorporate GRMs into project implementation. However, a GRM only narrowly developed for social safeguards compliance will not necessarily be available to the entirety of populations considered to be beneficiaries or affected. These regulations will be considered in the forthcoming analysis of findings. Figure 2.9 depicts the documented commitments to implementing project-specific GRMs across the four countries.

Figure 2.9 Commitments to implementing GRMs, by country



Source: Authors’ own.

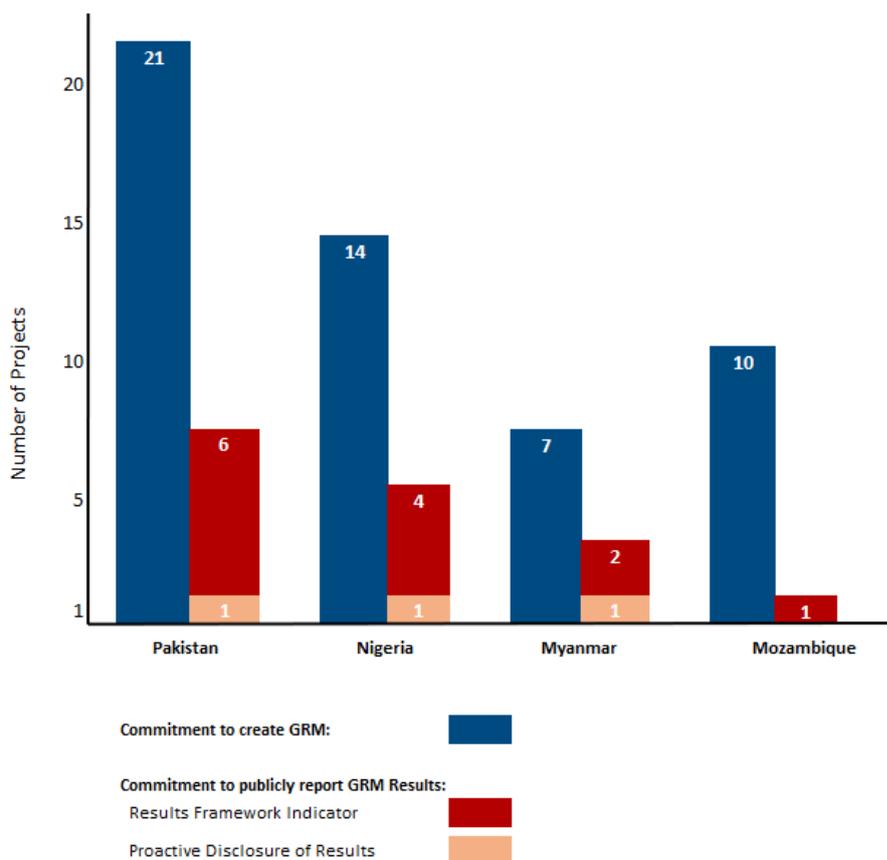
A large majority of the projects (91 per cent or 52 projects) committed to creating project-specific GRMs. Pakistan topped this commitment at 95 per cent (21 out of 22 projects), followed by Mozambique at 91 per cent (10 out of 11 projects), then both Myanmar and Nigeria at 88 per cent (7 out of 8 projects in Myanmar and 14 out of 16 projects in Nigeria). Within these 52 projects, 33 (10 in Pakistan, 10 in Mozambique, 7 in Myanmar and 6 in Nigeria) involved (or potentially involved) social safeguards for involuntary resettlement and/or indigenous peoples. It is important to highlight this, given the IFP policies that require projects applying social safeguards to incorporate project-specific GRMs. The remaining

19 projects did not trigger social safeguards, but proactively committed to creating a project-specific mechanism through which project affected peoples could submit complaints and expect redress.

Findings from the assessment show that most of the projects that commit to GRMs, plan for the same authorities implementing the project to manage the GRM processes and results. When GRMs are overseen by the same authorities that manage the project, citizen complaints are likely to be received by those individuals/organisations that could be responsible for the problems or concerns. This does not necessarily suggest that complaints will not be pursued responsibly or that the results are questionable. Nevertheless, the lack of separation between project management and GRM management may potentially dissuade people from using the mechanisms and can reduce trust in the reported results even when they are publicly disclosed. These findings are therefore significant because they raise a conflict of interest concern for those tasked with managing GRMs.

Given the lack of independent monitoring of GRM operations and how often planned GRMs are not fully carried out, the assessment tracked the frequency with which projects committed to disclosing their GRM results. The proactive disclosure of GRM data increases the possibilities for communities to hold projects accountable for this commitment. Figure 2.10 shows the distribution of the commitments to create a project-specific GRM correlated with commitments to disclose the GRM results.

Figure 2.10 Comparison of GRM commitments and GRM disclosure commitments



Source: Authors' own.

While commitments to incorporating GRMs are very high across all four countries, the commitments to making GRM results available to the public are extremely low. Of the 52 projects that include a GRM commitment, only 16 document an intention to share results with the public. Less than half of Nigeria’s projects (five) commit to publicly reporting on aspects of their GRM: through the use of results framework indicators (RFIs) in four projects, and voluntary disclosure in the other. In Myanmar only three projects (38 per cent) commit to disclosing GRM related information: two projects using RFIs and one project through voluntary disclosure. In Pakistan roughly a third (seven) commit to disclosing GRM results: six through RFIs, and one – National Immunization Support – through voluntary disclosure. Only one project in Mozambique – Social Protection AF uses RFI to publicly report on its GRM related activities.

Table 2.5 shows the only three projects committed to voluntarily disclosing their GRM data outside of their results framework.

Table 2.5 Commitments to publicly disclosing GRM data beyond limited RFI monitoring indicators

Myanmar <i>National Community Driven Development Project (FY15)</i>	Nigeria <i>Multi-Sectoral Crisis Recovery Project for NE Nigeria (FY17)</i>	Pakistan <i>National Immunization Support (FY16)</i>
Commitment in operational manual (which is publicly available) to produce reports on GRM results and publicly disseminate them.	Commitment to public disclosure of Biannual report of all complaints received via GRM and actions taken.	Commitment in Environment Assessment to sharing some GRM results but mechanism not specified.

Source: Authors’ own.

These findings show a significant discrepancy between project commitments adopting GRMs and publicising any information about the mechanism. Disclosing GRM results – whether through the World Bank’s RFI structure or other means – enables the public and project beneficiaries to understand the difficulties faced by the project and how the challenges are resolved. For instance, in Mozambique, 10 of the 11 projects commit to creating a GRM, but only the Social Protection project AF will disclose GRM information related to complaints received and/or resolved. This raises questions about how accountable complaint handling processes will actually be and if and/or how citizens would be informed in a timely and appropriate manner about problems that arise. Thus, across the majority of projects, it will be extremely difficult to track whether the high commitment numbers to GRM translate into actual opportunities for citizen engagement (i.e. if projects in fact operate functioning and accessible complaint redress systems), if actions are taken to resolve the complaints, and if these actions actually resolve them.

Box 2.1 Results framework indicators (RFIs) designed to capture data about project-specific GRMs

Of the 52 projects across the four countries that commit to implementing a project-specific GRM, 13 created RFIs to track results. The aspects of the GRM covered in these indicators fall into four main categories:

1. **Timelines** refers to complaints attended to within the specified timeframe. For example, percentage of grievances attended to per time stipulated in the operational manual (OM). Sometimes, the timespan is listed – 60 days in the case of the FATA temporarily displaced persons emergency recovery project in Pakistan – but most often the RFI just says ‘timeliness of response’ without defining timelines, or that ‘timeliness’ will be spelled out in the OM which is not available to the public. Most RFIs for GRM are related to timelines.
2. **Beneficiary satisfaction** reports on the level of satisfaction of respondents with the GRM – on issues of transparency, timelines, and actual resolution. For example the RFI for the National social safety nets project AF in Nigeria measures the percentage of complains satisfactorily addressed within three months of the initial complaint being recorded.
3. **Number or percentage of addressed/resolved complaints (or percentage increase)**. The resolution of complaints is tracked in absolute numbers or percentages with a targeted goal which spans 75–95 per cent. For example, the Southeast Asia disaster risk management project in Myanmar RFI tracks the percentage of registered grievances addressed (the target being 85 per cent).
4. **The number of GRMs set up** relates to complaint mechanisms launched at project sites. Only one project in Mozambique – the Social Protection Project AF – records the percentage of districts with a GRM (along with the number of complaints handled in a timely manner).

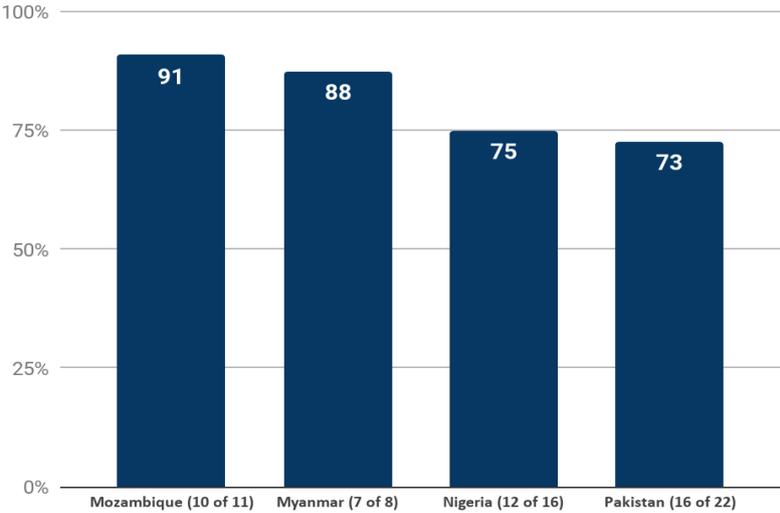
Source: Authors' own.

2.2.4 Commitments to monitoring CE results in project results frameworks

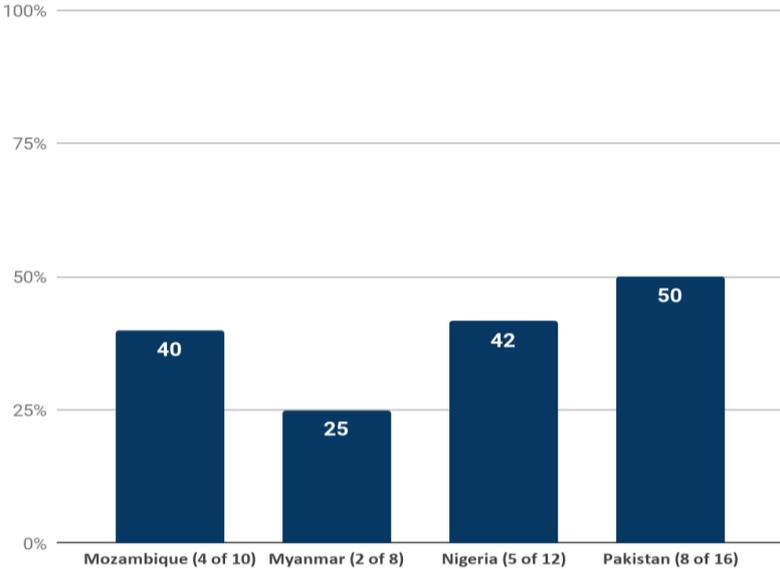
The CE strategy emphasises the importance of creating dedicated monitoring indicators that will measure CE activity progress and performance, and the corporate commitment for citizen engagement requires projects to do this for at least one CE mechanism. The interim and final outcomes measured by RFIs must be reported on to management and made public via the World Bank's online operations portal. This means that CE indicators offer one of the few instances in which information about CE in World Bank projects is required to be disclosed. Therefore, this section discusses the following: are projects meeting this minimum corporate requirement? If so, what CE areas do projects commit to monitoring in their results frameworks? Do projects go beyond the minimum requirement to evaluate CE across more than a single area?

Figure 2.11 Monitoring indicators for CE, by country

Projects including at least 1 CE indicator in Result Framework



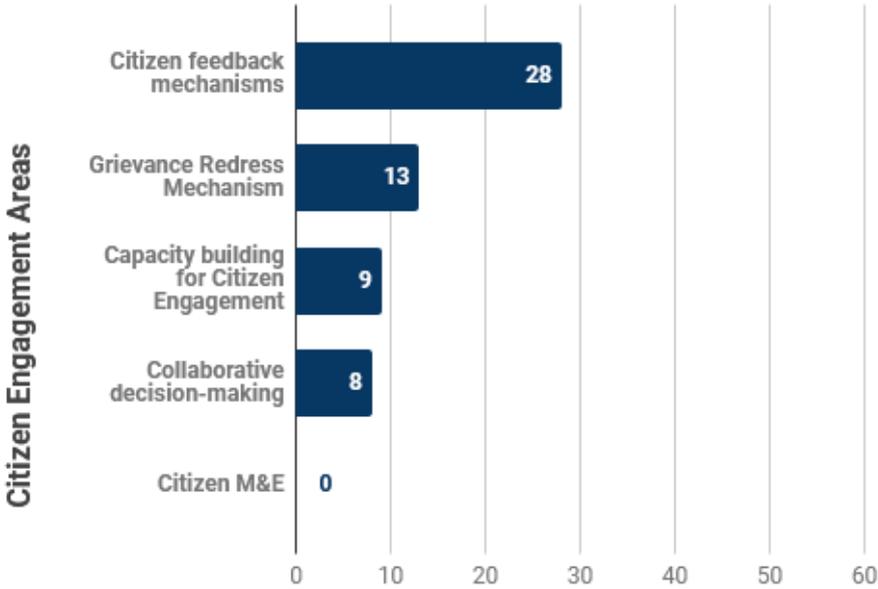
Projects including 2 or more CE indicators



Source: Authors' own.

Over two-thirds of the assessed projects (45 out of 57) meet the minimum corporate requirement by the World Bank to include at least one RFI to measure the extent of citizen engagement. Myanmar and Mozambique have the highest percentages, with all projects except for one in each portfolio meeting the minimum requirement. However, when investigating commitments to two or more CE indicators, Myanmar has the lowest percentage among the four countries. In Pakistan, only 73 per cent (16 out of 22) of projects pledge to incorporating at least one CE RFI, however of those projects half demonstrated commitments to including at least two CE RFIs.

Figure 2.12 Monitoring indicators for CE, by area



Source: Authors' own.

Collecting citizen feedback is the CE area projects most frequently select to monitor and disclose through their results frameworks, with more than 62 per cent of committed projects (28 out of 45) developing a CE indicator to measure progress in this area. Only 30 per cent and 18 per cent, respectively, of the committed projects have indicators measuring progress on GRMs and collaborative decision making. For GRMs, this percentage can be considered relatively low given that there are 33 projects across the four country portfolios that triggered social safeguards and 52 that commit to carrying out a GRM.

Since the results framework is the primary way that projects disclose information about their CE activities and results, this low figure raises questions about how projects triggering social safeguards, and therefore required to implement GRMs, will actually be held accountable for complying with this policy. This finding aligns with the 2018 IEG investigation, which found a significant discrepancy between how commonly projects committed to adopting GRMS and yet how infrequently projects committed to measuring and reporting on the results (World Bank 2018c: xii). It is notable that no projects chose to adopt internal monitoring indicators to track the progress of citizen involvement in project monitoring, although 30 projects committed to this kind of CE activity.

2.3 In-depth analysis: commitments to creating an enabling environment for CE

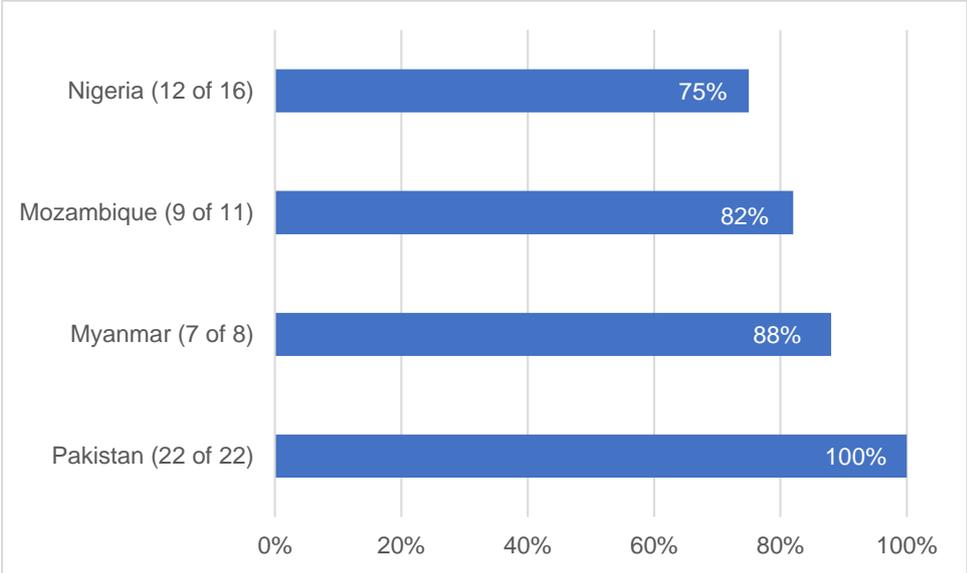
This research is based on ARC’s hypothesis that a project’s inclusion of CE activities is not sufficient to guarantee meaningful engagement and therefore an ‘enabling environment’ is needed to facilitate and shape such engagement. Although individual projects do not have the power or influence to shape the general context in which they are implemented, they can take actions that potentially favourably or unfavourably contribute to an enabling environment. Therefore, the overall opportunity for CE is not only determined by the existence of discrete mechanisms and activities for citizens to provide input, make decisions, be involved in monitoring, etc., but also by the way in which these activities are carried out. Although not guaranteed, projects have the potential to influence these enabling circumstances in at least three ways: (1) by fostering social inclusion; (2) by promoting accountability through incorporating independent monitoring mechanisms; and (3) by promoting transparency through disclosure of project information. The discussion below covers the assessment of findings across these three areas.

2.3.1 Measures for proactive social inclusion in citizen engagement efforts

Groups that have experienced social marginalisation and exclusion could be omitted from participatory processes unless there are proactive measures to enable or seek their engagement. Such potentially vulnerable groups include women, children and youth, people with disabilities, the elderly, ethnic and religious minorities, and migrants, among others. Therefore, the analysis investigates whether a project includes measures in its design that are intended to facilitate the participation of vulnerable groups (as is contextually relevant) in planned CE processes and to what extent.

Out of the assessed projects, 50 or 88 per cent commit at least once in their project documents to proactively taking measures to ensure that citizen engagement efforts and activities are inclusive. Pakistan leads with all projects committing to proactive social inclusion, followed by Myanmar (88 per cent), Mozambique (82 per cent) and finally Nigeria (75 per cent). Figure 2.13 depicts the percentage of proactive social inclusion commitments across the four country portfolios.

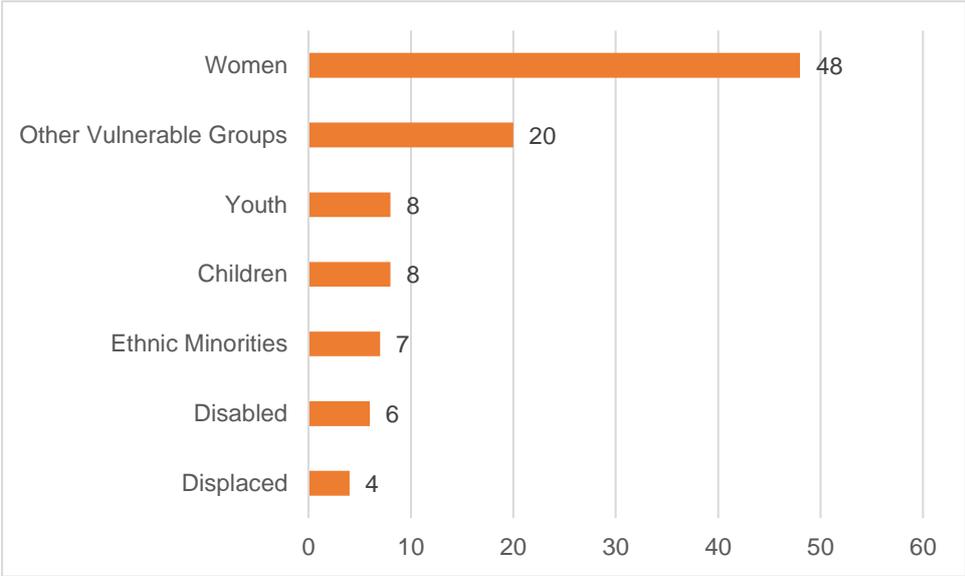
Figure 2.13 Proactive social inclusion commitments, by country



Source: Authors' own.

Across all four countries, project commitments to proactive social inclusion prioritise engaging women and far less frequently document commitments to including other socially excluded groups. Not only is the number of commitments to gender inclusion higher, but these commitments also show greater depth and specificity. Figure 2.14 depicts the large gaps between the commitments to women's inclusion *vis-à-vis* the inclusion of other population categories and the analysis that follows, highlights the main findings.

Figure 2.14 Proactive social inclusion commitments, by population group



Source: Authors' own.

Women (gender) take precedence in proactive social inclusion commitments. An overwhelming majority (84 per cent or 48 projects) document commitments to secure 'gender inclusion' in their project design commonly demonstrated by instituting quotas or minimum percentages for women's participation in CE activities. Examples include: minimum number of women members in community-based decision-making bodies, participants in CE capacity building workshops, or respondents to satisfaction surveys. Some projects also facilitate women's inclusion by committing to offer women-only and women-led face to face consultation opportunities.

A composite category that World Bank projects often refer to as '**other vulnerable groups**' (OVG) is the next most commonly addressed group (35 per cent or 20 projects) for proactive social inclusion. The definition of OVG varies according to projects and sometimes it is used independently as a stand-alone category. This analysis uses the OVG categorisation to broadly encompass the poor, elderly, socially or economically excluded populations, landless, water groups, farmers, AIDS patients and the chronically ill. Only a third of the projects commit to including some or all sub-groups in the OVG category and lay out generic mechanisms outlining their inclusion that range from consultations to capacity building.

In some cases, albeit far less frequently, projects go beyond the overarching OVG category to pledge commitments to specific marginalised groups as described below:

Youth inclusion is addressed in 8 projects from Nigeria and Mozambique (none in Pakistan or Myanmar). Mozambique includes commitments to including youth in CE efforts in almost half of its projects (5 out of 11) while Nigeria does in just 3 of its 16 projects. Mozambique projects also document specific mechanisms for including youth.

Commitments to including **children** are also in eight of the projects. Children, however, are rarely a stand-alone category and are mentioned along with women (mothers) as being recipients of project incentives, or targeted service delivery especially in projects pertaining to maternal or child health, for example the National Immunization Support and Enhanced Nutrition projects in Pakistan and the Polio project in Nigeria. Projects relating to education in Nigeria and Mozambique also address children (students). Myanmar does not document any commitments to proactively including children.

Only Myanmar consistently commits to including **ethnic minorities** and their representative organisations in citizen engagement processes in six of its eight projects. The World Bank's policy in Myanmar of applying the indigenous people's safeguard to projects affecting one or more of the country's ethnic minority groups is the reason for this. Apart from Myanmar, only one project in Pakistan (Enhanced Nutrition for Mothers and Children), documents the inclusion of **religious and ethnic minorities**, but without any specific mechanisms. Mozambique and Nigeria, both of which have minority ethnicities within their population, do not have a single project that commits to their inclusion.

People with disabilities is another category of socially excluded population that finds a mention in only 11 per cent or six projects. Pakistan is the only country with three projects that document inclusion measures for people with disabilities. Project mechanisms include supporting universal access to public spaces (Karachi Neighborhood Improvement project) and expanding proactive access to this population in emergencies (FATA Displaced Persons Emergency Recovery project and the Disaster and Climate Resilience Improvement project). Additionally, only one project in each of the other three countries has pledged a commitment to people with disabilities without listing specific mechanisms.

Lastly, **displaced people, IDPs or migrants** were found to be included in the fewest project commitments (7 per cent or 4 projects). Only Nigeria has two projects that commit to proactively including these groups in their CE efforts, while Myanmar and Pakistan include them in one project each. As in case of most other marginalised groups, project documents simply name this group without detailing plans for their specific inclusion in activities.

The main finding from this four-country analysis of commitments to proactive social inclusion reveals that the vast majority of projects (84 per cent) only incorporate mechanisms into project design facilitating women's inclusion. In contrast, few projects commit to fostering the inclusion of often socially excluded or neglected groups like the disabled, displaced, poor, the elderly and youth. Furthermore are expressed in vague language, palling in comparison to the comprehensiveness of commitments to women's inclusion. This shows that a single indicator measuring proactive inclusion may not be sufficient to interpret a project's enabling environment for CE.

2.3.2 Third-party monitoring commitments

The World Bank defines third-party monitoring as, 'monitoring by parties that are external to the project or program's direct beneficiary chain or management structure' (Van Wicklin and Gurkan 2013: 2). It recommends that projects incorporate third-party monitoring in order 'to provide an independent perspective on project or government performance' (Van Wicklin and Gurkan 2013: 2). Third-party monitoring in this case does not refer to external monitoring undertaken separately from the project, for example by watchdog organisations. Instead this refers to monitoring handled by entities outside of the project management structure, although likely funded by the project. It is because of the anticipated independence of these external monitoring entities, even when they are hired by the project, that the incorporation of third-party monitoring can potentially contribute to an enabling environment for citizen engagement.

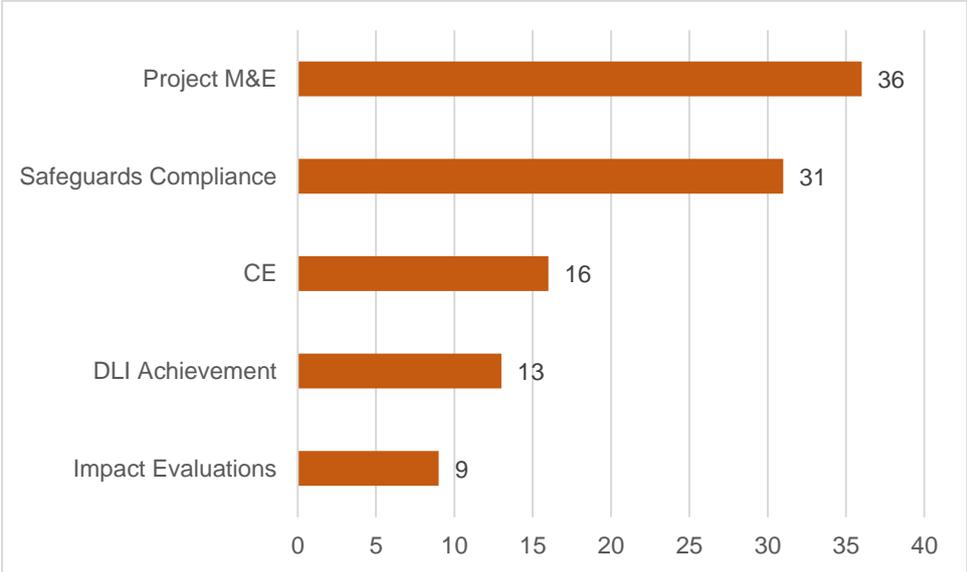
The ARC assessment tool identifies first whether a project commits to incorporating a third-party monitoring entity (professional or community-based). If so, the assessment then ascertains the purpose for which the project plans to engage the entity (i.e. monitoring safeguard compliance, impact evaluation, collection of citizen feedback, etc.) and whether there is a documented intention to share findings with the public. These three steps are collectively considered to determine the potential contribution of third-party monitoring to an enabling environment.

The assessment revealed that projects commit to third-party monitoring for a range of activities and mechanisms. While some projects include commitment to third-party monitoring in just one area, many include multiple commitments across several areas during the project life cycle. The five broad categories of third-party monitoring include:

1. **Social Safeguard compliance** for projects that have been determined to involve or have the potential to involve resettlement and/or indigenous peoples.
2. **Project M&E** of general project processes, results and outcomes to accompany the project monitoring taken by PMUs.
3. **Disbursement Linked Indicators (DLIs)** are project indicators whose achievement triggers the release of a new tranche of funds to continue project implementation. These are used by projects to incentivise the achievement of key programme milestones and improve performance. Because funding provision is linked directly with goal achievement, the World Bank requires that these indicators be monitored by external entities. Therefore, projects that incorporate DLIs rather than traditional project indicators are required to contract third-party monitoring.
4. **CE activity monitoring** involves project supported or recruited external monitoring of the CE project activities and mechanisms designed to provide affected peoples with opportunities to provide feedback, make decisions, submit complaints (i.e. management of a project-level GRM by an entity separate from the PMU or the client government).
5. **Impact Evaluation** determines if the changes in outcomes can be attributed to the project.

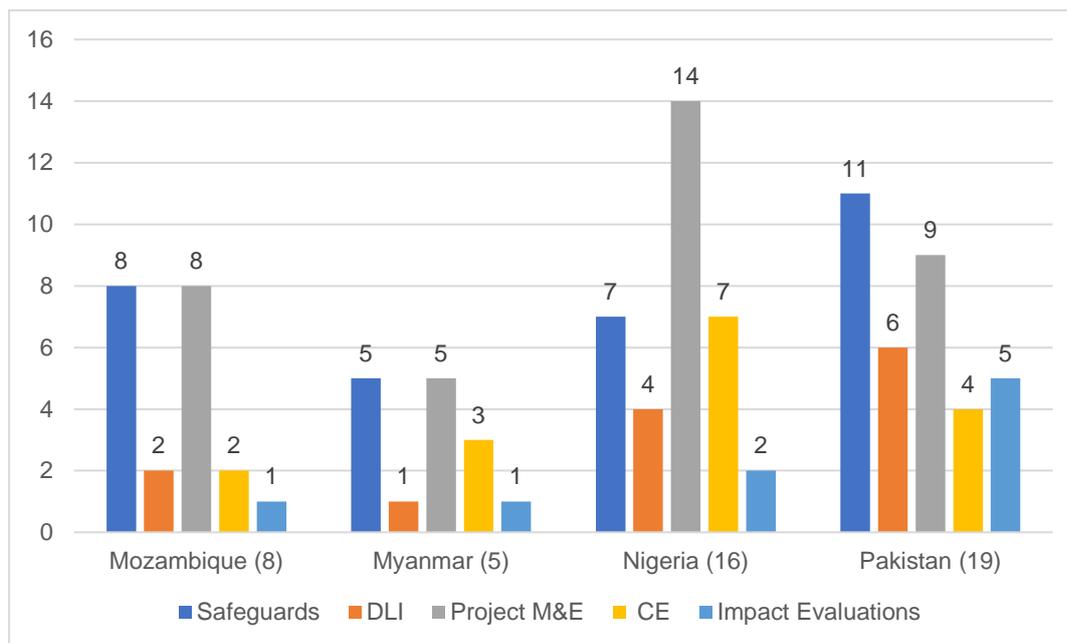
The classification of these commitments overall and separated by country is illustrated in Figures 2.15 and 2.16, respectively.

Figure 2.15 Categories of third-party monitoring commitments, overall (57 projects)



Source: Authors' own.

Figure 2.16 Categories of third-party monitoring commitments, by country



Source: Authors' own.

Nigeria leads with a commitment to one or more categories of third-party monitoring in all of its 16 projects. Pakistan comes a close second with an 86 per cent commitment in its 19 projects. Mozambique and Myanmar follow with eight (73 per cent) and five (63 per cent) respectively.

Within the five categories of third-party monitoring, commitments are found to be the highest for general project monitoring and evaluation (36 projects), followed by safeguards compliance (31 projects). Given the World Bank mandate that requires projects with DLIs to use external monitoring, it fits expectations that all 13 projects that incorporate DLIs include third-party monitoring to meet this requirement.

When a project involves a third party to monitor and evaluate its CE activities, it adds an additional layer of transparency and accountability which may not be found in other projects. Yet, the analysis found that third-party monitoring of CE activities does not appear to be a priority, with only 28 per cent or 16 projects making a commitment to monitoring certain aspects of their CE efforts. Seven projects in Nigeria make the highest CE monitoring commitments, followed by four projects Pakistan, then three projects in Myanmar, and lastly two in Mozambique. A large majority of third-party monitoring involves some form of gauging satisfaction through beneficiary assessments, or monitoring quality and effectiveness of service delivery. Table 2.6 highlights some of these project commitments.

Table 2.6 Project commitments to CE activity third-party monitoring, by country

Nigeria <i>National Social Safety Nets project AF FY16</i>	Pakistan <i>Punjab Skills Development project FY15</i>	Myanmar <i>Essential Health Services Access project FY15</i>	Mozambique <i>Water Services and Institutional Support II FY16</i>
<p>Commitment: Independent third-party monitors (i.e. CSOs and specialised private firms) will collect feedback from beneficiaries on project performance (e.g transfers, quality of services, responsiveness to beneficiary challenges) and conduct spot checks.</p> <p>Who: CSOs and specialised private firms.</p> <p>What: Feedback collection on project performance; spot checks.</p>	<p>Commitment: Specific third-party independent monitoring activities will be carried out to verify employer satisfaction surveys, third-party validations of enrolment and pass-out data, and employment tracer studies and regular monitoring of training providers.</p> <p>Who: Independent firm.</p> <p>What: Verification of employer satisfaction surveys, enrolment and pass-out data and employment tracer studies; monitoring of training providers.</p>	<p>Commitment: Ministry of Health will contract an international firm to carry out an independent sample-based survey of filled checklists by the township and State teams to verify the results. Independent assessor may review all the township reports and visit randomly selected townships and health facilities at village level.</p> <p>Who: International firm contracted by Ministry of Health (MOH).</p> <p>What: Verify results through sample-based survey of filled checklists; review reports; visit select health facilities.</p>	<p>Commitment: Independent Verification Agency will track indicators of service quality and socio-economic characteristics and carry out beneficiary surveys as part of the poverty-focused activities.</p> <p>Who: Independent Verification Agency (IVA).</p> <p>What: Tracking indicators of service quality; conducting beneficiary surveys.</p>

Source: Authors' own.

It is worth noting that neither CE monitoring nor impact evaluations (to which nine projects commit), are mandatory requirements by the World Bank or project teams unlike monitoring of safeguards and DLIs. It is the onus of project teams to involve independent monitoring of CE activities and entails going above the minimum monitoring requirements stipulated by the World Bank. The next section on proactive information disclosure will discuss those projects that link third-party monitoring and disclosure commitments.

2.3.3 Proactive (public) information disclosure

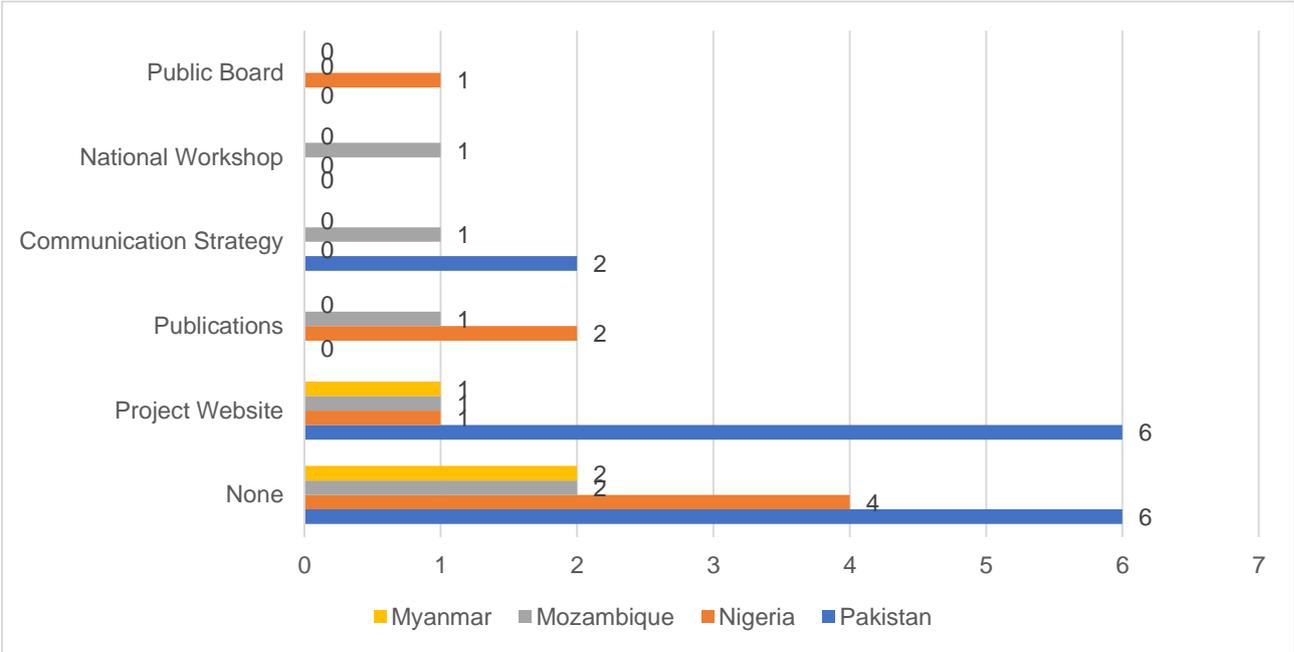
Proactive information disclosure goes beyond efforts to make the public aware of a project's existence and its intended impacts and refers to the public release of information about a range of issues including: project progress, outputs, monitoring and learning results, and outcomes. Recognising that the World Bank has minimal disclosure requirements for social safeguards and RFIs (as discussed earlier in this section), this indicator therefore measures whether and how a project commits to proactively releasing project results to the public, including from citizen engagement efforts, beyond the mandated minimum. As a result, this indicator seeks to determine if a project commits to 'reporting out' its progress and results to the public rather than only 'reporting up' to World Bank officials and if so, how. This is a crucial aspect of the enabling environment for CE because the capacity of project affected peoples to shape a project increases when they are accurately and appropriately informed about its progress.

Slightly more than half (31 of 57) of the assessed projects commit to proactive disclosure of progress and results. Of the three enabling environment areas, proactive information disclosure has the fewest project commitments. Comparing the four countries, Pakistan has

the highest proportion of projects (64 per cent) committing to proactively reporting to the public about progress and results. Mozambique has this commitment in 55 per cent of its projects, followed by Nigeria with 50 per cent, and then Myanmar at 38 per cent.

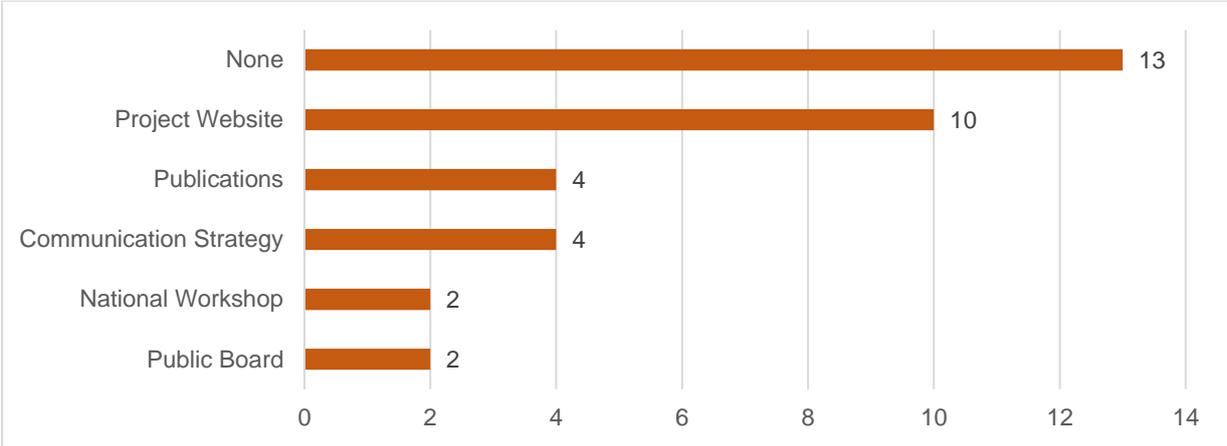
Figure 2.17 demonstrates the mechanisms for proactive information disclosure adopted in each of the four countries and Figure 2.18 presents the total distribution of these mechanisms across the 57 projects.

Figure 2.17 Proactive information disclosure mechanisms, by country



Source: Authors' own.

Figure 2.18 Overall distribution of proactive disclosure mechanisms



Source: Authors' own.

Websites or web portals are the most frequently cited mechanism for public information disclosure (9 out of the 31 projects with a public disclosure commitment). Six Pakistan projects commit to information disclosure using websites to widely disseminate key project information, third-party evaluations, citizen monitoring reports on service delivery, status of evaluations, and complaints and actions taken. In Myanmar both the National community

driven development project and the Agricultural development support project commit to having a dedicated section on project webpages to display project data such as supervision monitoring reports and the results of participatory monitoring and evaluation (M&E). The Myanmar National Community Driven Development Project (NCDDP) makes use of the World Bank's online operations portal to share pertinent project information, including project's OM which is periodically updated to reflect project revisions based on learning from implementation. In the publicly available OM, the NCDDP documents all of the key project documents that will be disclosed, including but not limited to the findings of the financial, technical and social audits, and procurement documents. The project's website, www.cdd.drdmyanmar.org, is the key place for disclosing project-related documents. In addition, documents are made publicly available in the participating communities, as feasible. Documents that should be disclosed and posted locally on notice boards are specified in the OM.

The Water Services and Institutional Support II Project in Mozambique commits to using a web-based IBNET database to ensure transparency and accountability of collected survey information and to report impact evaluation results. In Nigeria, the Kaduna State Economic Transformation Program for-Results Project also commits to using its website for its public-private partnership disclosure framework, project and budget information and audit results.

The next two most commonly cited mechanisms for proactive information disclosure are publications and what projects term as 'communication strategies' (or plans). Of the 31 projects with a public disclosure commitment, four indicate the use of publications to disseminate information to the public. For example, in Mozambique, the Higher Education Science and Technology Project AF commits to disseminating the results of externally-led evaluations through live seminars and published summaries of the proceedings. The National Social Safety Nets project in Nigeria commits to an independent firm or CSO implementing and publishing an annual results and resources scorecard, and the Partnership for Education project in Nigeria pledges to disseminate publications and reviews related to education service delivery quality and project performance.

Four projects commit to using a communication strategy for sharing project related information with the public. In Pakistan, the Sindh Barrages Improvement project commits to disseminating information on citizen engagement, feedback and safeguard related action plans via this strategy. Similarly, the Disaster and Climate Resilience Improvement project in Pakistan reports on developing a communications strategy to address the requirement for public consultation, participation and to inform the population about the availability of mechanisms such as a GRM. The Conservation Areas for Biodiversity and Development project in Mozambique also commits to developing a communication plan that includes ongoing communication channels to facilitate presentation of feedback and participatory monitoring. However, none of these projects specify the ways in which these communication strategies would reach the public.

Three projects, one in Nigeria, one in Mozambique, and one in Myanmar commit to using real-time, in-person methods for disclosing project progress and results information to the public. In Nigeria, the Community and Social Development project AF2 commits to sharing project results by displaying them in a dedicated community space. In Mozambique and Myanmar, the Education Sector Support project AF and the National Community Driven Development project – AF commit to disseminating project results at sub-national and national workshops. Furthermore, the Education Sector Support project AF in Mozambique documented the planned period of time when the workshop would take place, lending specificity to its commitment that goes beyond other projects. Table 2.7 provides additional details.

Table 2.7 Examples of commitments to in-person project information disclosure

Nigeria <i>Community and Social Development project AF2 (FY16)</i>	Mozambique <i>Education Sector Support project AF (FY17)</i>	Myanmar <i>National Community Driven Development project – AF (FY15)</i>
Commitment: To disclose social accountability, public disclosure and complaints handling arrangements and project activities at an open space on a public board in the community.	Commitment: To disclose and disseminate the results of the impact evaluation in a national workshop in April 2019 at the close of the project.	Commitment: To organise multi-stakeholder reviews (MSR) in each project township and subsequently at the union level, with all results then summarised and disseminated widely.
What is being disclosed: Complaints mechanisms, project activities.	What is being disclosed: Impact evaluation results.	What is being disclosed: Results of sub-national and national multi-stakeholder reviews.
How (mechanism): Public board in an open community space.	How (mechanism): National workshop.	How (mechanism): Sub-national and national meetings, public boards in community spaces.

Source: Authors' own.

Finally, almost half of the projects (13 out of 31) that commit to proactive public information disclosure do not specify the mechanisms they would use. These include six projects in Pakistan, four in Nigeria, one in Myanmar and two in Mozambique. Table 2.8 shows four example projects, one from each country portfolio that do not specify how they will operationalise public information disclosure.

Table 2.8 Examples of project commitments to proactive information disclosure without specific mechanisms

Pakistan <i>National Immunization Support (FY16)</i>	Nigeria <i>Program to Support Saving One Million Lives (FY15)</i>	Myanmar <i>Essential Health Services Access Project (FY15)</i>	Mozambique <i>Social Protection Project AF (FY17)</i>
Commitment: Improving Expanded Program on Immunization (EPI) functionality to enable regular dissemination of results to public and media.	Commitment: Conducting surveys, verifying and disseminating the results of a standardised M&E survey.	Commitment: The Ministry of Health (MOH) will disseminate township health plans to township stakeholders and communities.	Commitment: Information on programme outcomes drawn from a multiyear third-party impact evaluation has been disseminated publicly.
What is being Disclosed: Project results.	What is being Disclosed: M&E survey results.	What is being Disclosed: Township health plans.	What is being Disclosed: Third-party impact evaluation.
How (Mechanism): None.	How (Mechanism): None.	How (Mechanism): None.	How (Mechanism): None.

Source: Authors' own.

Box 2.2 Public disclosure of CE activities and results as mitigating measures for potential conflict

The **Multi-Sectoral Crisis Recovery Project (MSCRP) for North Eastern Nigeria (FY17)** showcases citizen engagement activities (including GRM and two-way dialogue) in concert with plans for ‘full and frequent’ dissemination of results as one of the ways the project will mitigate conflicts that could arise due to project activities.

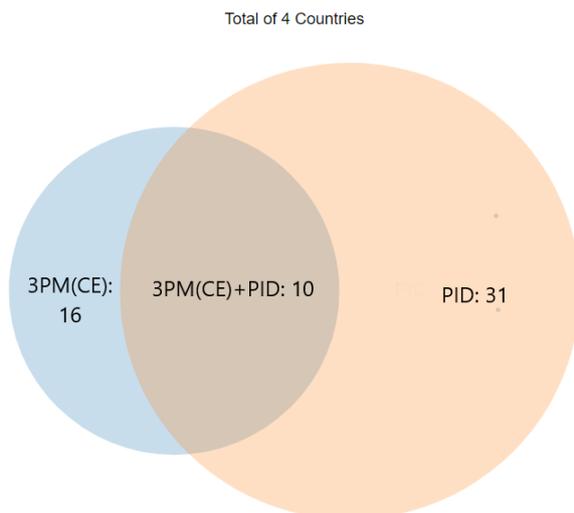
Project activities	Potential and associated impacts	Mitigation measures
Direct or indirect impacts on conditions in the North East.	Social unrest, potential conflict with local communities, disruption of work, and risks to personnel because of the history of conflict.	Maintain effective two-way dialogue through transparency and disclosure, full and frequent information to the public and concerned NGOs, and establish arrangement for community liaison and for handling complaints and grievances.

See: World Bank (2017b: 88).

Given the importance of public access to accurate and timely project implementation information for fostering a conducive environment for CE, the ARC investigation examined whether and how projects planned to disclose information about the World Bank prioritised CE activities or other enabling environment indicators. Significant for each of these areas, public disclosure has particular value for results collected by entities external to, and potentially independent from, project management. ARC’s guiding hypothesis is that in projects where third-party monitoring results are made public, this helps to advance a conducive or enabling environment by encouraging public accountability and transparency in project operations. As a result, these two areas are complementary and mutually reinforcing in creating an enabling environment for citizen engagement.

This research therefore further delves into the intersection of third-party monitoring of CE activities and proactive disclosure commitments within projects across the four country portfolios and Figure 2.19 depicts the relationship between the two.

Figure 2.19 Overlapping project commitments to third-party monitoring for CE and public disclosure, four country total



Source: Authors’ own.

Within the small minority of 16 projects across the four countries that commit to third-party monitoring of citizen engagement activities, ten also include commitments to proactive disclosure. However, an exploration of the content of project commitments revealed that this overlap of enabling environment commitments did not necessarily mean that the results of third-party monitoring would be included in the information disclosed to the public. Among these ten projects only five specified that they would disclose results from third-party monitoring. These five projects include one each from Pakistan, Myanmar and Mozambique and two projects from Nigeria. Table 2.9 provides details about what these projects commit to monitoring and sharing publicly.

Table 2.9 Project commitments to third-party monitoring and public disclosure of results

Project title	Commitments to third-party monitoring (CE)	Commitments to proactive information disclosure
Punjab Skills Development project (FY15) – Pakistan	Specific third-party independent monitoring activities will be carried out to verify employer satisfaction surveys, third-party validations of enrolment and pass-out data, employment tracer studies, monitoring of training providers.	The project website will be used to widely disseminate information, and third-party evaluations to public and interested stakeholders.
National Community Driven Development project (FY15) – Myanmar	Independent third party will act as a check on social accountability mechanisms and CE specifically relating to participation, role of women and OVGs in project decision-making, implementation and effectiveness of GRM.	Lessons learned from independent third-party monitoring will be shared with a broad set of stakeholders, including Department for Rural Development, the World Bank and civil society observers.
Social Protection project AF (FY17) – Mozambique	Verification of the beneficiaries' participation by third party, impact evaluation including on issues related to CE.	Information on programme outcomes from a multi-year third-party impact evaluation has been disseminated publicly.
National Social Safety Nets project (FY16) – Nigeria	Independent third-party monitors (i.e. CSOs and specialised private firms) will collect feedback from beneficiaries on project performance (e.g. transfers, quality of services and responsiveness to beneficiary challenges) and conduct spot checks.	Commitment to publishing 'annual results and resources scorecard', which will be produced by a third-party organisation.
Nigeria Youth Employment and Social Support AF (FY16)	Third party to collect feedback from communities and beneficiaries on their experiences.	Third-party monitors will disclose annual results of resources scorecard.

This analysis points to several key take-aways. Of the three enabling environment indicators studied, proactive information disclosure represents the area with the fewest commitments. Twenty-six projects across the four countries (45 per cent) make no commitments to proactively disclosing information about project progress, monitoring results or outcomes. Across the 31 projects that do commit to public information disclosure, most commonly say they will do so by using project websites, followed by publications and communication strategies. Yet, even among those projects that include this commitment, their project documents reveal few specifics about exactly what the public should expect to find out and how often the information will be made available. Furthermore, in most projects the information disclosed to the public will neither come from external monitors nor will be related to citizen engagement findings and results. Therefore, even among those projects that include commitments to 'reporting out' progress and/or results to the public, the ambiguity of

these commitments means that it remains unclear how robust or meaningful the limited information that reaches the public will ultimately be on operations whose implementation directly affects them.

Box 2.3 Lessons learned from monitoring how CE commitments are carried out in Myanmar

ARC's pilot implementation research in Myanmar was conducted over the course of a year (September 2017–September 2018). The fieldwork focused on three projects: The Ayeyarwady Integrated River Basin Management Project (FY15), Essential Health Services Access (FY15), and the National Community Driven Development Project (NCDDP) (FY15). The empirical findings are still being analysed, but preliminarily suggest the following five lessons for independent monitoring of government programmes funded by the World Bank.

1. The public release of the project OM matters for accountability and empowerment. This is not just an administrative document, but serves as the blue print for how the project will be translated into action on the ground.
2. When GRMs are actually being carried out they may not only be used to convey complaints. Project affected peoples are taking the opportunity to submit general feedback, including praise and gratitude. While this expanded function for GRMs has benefits because it can represent the opening of new avenues for government–citizen communication, it also can mean that actual grievances are not adequately addressed or are overlooked entirely.
3. The civic space that project CE efforts are opening is relatively ephemeral. It may disappear when projects end. Yet, when a space opens that had not previously existed this small amount of freedom of association is a possible step towards collective action.
4. CE in many cases continues to be an unfunded mandate. This negatively affects both how commitments are carried out and how community members can participate in CE opportunities when offered.
5. Citizens do not view all projects equally. From a citizen perspective, there can be a significant difference between projects that are national programmes which receive World Bank funding versus stand-alone projects that appear to only exist because of World Bank financing. The differences in perception have implications for monitoring that are not yet fully understood.

3 The findings and their implications

What does this assessment reveal about the degree to which the World Bank is (or is not) embedding opportunities for citizen engagement in its project design? What are the implications of these findings, if any, for citizens in FCVAS, in terms of their possible empowerment, and for government accountability to their citizens? Section 3.1 answers the first question, presenting the assessment's main technical findings and discussing what the results from these four countries reveal about how the World Bank is building the new institutional CE commitments into project design. Section 3.2 addresses the second question, using the country-specific findings to critically appraise how the World Bank's approach to CE appears to be (or not to be) contributing to E&A in FCVAS.

3.1 Synthesis of technical findings

The in-depth analysis of CE in FY15–17 World Bank projects in Mozambique, Myanmar, Nigeria, and Pakistan that has been laid out in the sections above leads to the following key findings:

The ARC CE density scale reveals that a narrow majority of the projects commits to ‘thick’ approaches to citizen engagement while a sizeable minority commits to thin approaches. As explained in the 2018 IEG evaluation: “Thick” approaches — those combining multiple tools to enable collective action and public sector responsiveness — are more promising than “thin” approaches — those that are not matched with vertical integration of independent monitoring and oversight or do not include support to increase government’s capacity to respond’ (World Bank 2018c: xiii). Fifty-seven per cent of the 57 projects (32) incorporated a wide range of CE and enabling environment mechanisms into project design, therefore demonstrating thick approaches to CE. These 32 projects were spread among the two top categories of the CE density scale: robust (47 per cent or 25 projects) and comprehensive (16 per cent or 7 projects). In contrast, the assessment found that the other 43 per cent only commit to using a limited number of CE activities that will not necessarily be matched with mechanisms to foster an enabling environment for CE. These ranked on the CE density scale as: intermediate (27 per cent or 14 projects), weak (11 per cent or 6 projects), and low (6 per cent or 3 projects).

At the country-level, Nigeria and Mozambique showcase substantially higher CE density results than Pakistan and Myanmar. The application of the ARC CE density scale showed that in Nigeria and Mozambique, at least 65 per cent of each country’s projects rank in the top two categories (with slightly above 50 per cent in the ‘robust’ category). Furthermore, in Mozambique no projects are classified as low. In Pakistan, the largest country portfolio, only 23 per cent of total projects achieved a robust category ranking, the same percentage of projects that occupy the bottom two categories, weak and low.

Of the four countries studied, the Nigeria portfolio most consistently committed to CE throughout project life cycles, with 75 per cent committing to include at least six of the seven World Bank prioritised CE activities and at least two of the three ARC identified indicators. Furthermore, the portfolio demonstrated increased adoption of the CE agenda over time, given that the projects with the weakest CE commitments were approved in FY15, the first year of the CE strategy’s application. The consistency of thick approaches to CE throughout the Nigeria portfolio and increased uptake of the CE agenda over time, potentially indicates that there was country-level leadership prioritising systematic incorporation of CE into project design.

Citizen consultation during project preparation and GRMs (both 91 per cent) are the CE areas to which projects most commonly commit while citizen involvement in project monitoring has the fewest commitments (50 per cent). Both sets of findings align with the 2018 IEG evaluation results (World Bank 2018c). Commitments to gathering citizen feedback during implementation is the second most common CE mechanism that projects incorporate (85 per cent). While capacity building for CE is ahead of citizen monitoring; only slightly above 50 per cent of projects across the four countries commit to undertaking activities intended to build capacity building for community members or government that would strengthen citizen engagement.

There is a significant gap between the CE mechanisms most commonly incorporated into project design and those which projects commit to measuring. Although 91 per cent of projects commit to carrying out a GRM, only 23 per cent of those commit to reporting on the results. This aligns with the IEG evaluation which reported that GRMs were the most common mechanisms included in project design but the least measured. The least measured

area in this four country sample, however, was citizen involvement in M&E which had no CE indicators across any of the 57 projects studied.

Despite the fact that 85 per cent of projects explicitly make commitments to collecting citizen feedback during implementation, few projects state how that data would be used, if at all. Furthermore, there is extreme variation in how projects document the types of feedback to be collected, the mechanisms to be used, and the level of detail explaining how the commitments will be executed. Even though citizen feedback collection is the area that will be most frequently reported on across the four countries (28 projects), the kinds of indicators used (i.e. percentage of beneficiaries satisfied with the service provided) do not show how the results could potentially be used to improve implementation. Country examples demonstrate how ticking the check box for this category of CE might not guarantee that the commitment is either adequate to gather feedback from communities in a way that could meaningfully contribute to the project or that the feedback would be used to inform implementation choices

Project commitment across all four countries to adopting measures for proactive social inclusion in citizen engagement processes is extremely high (90 per cent). These commitments focus almost entirely on women and infrequently on other socially excluded groups. The findings show that considering proactive social inclusion broadly as an indicator of an enabling environment for CE is too ambiguous. A deeper exploration shows that an overwhelming number of projects commit *only* to gender-related inclusion measures, which, while extremely important, mean that there is minimal attention to ensuring that other socially excluded groups (e.g. the disabled, youth, internally displaced, and ethnic minorities) will have a voice in project-facilitated engagement.

Proactive information disclosure has significantly fewer commitments than proactive social inclusion and third-party monitoring. Even among those projects that include this commitment, few specify what information will be proactively disclosed, and how often. In most projects that do commit to proactive information disclosure, the data will neither come from external monitors nor will cover citizen engagement-related findings and results. Therefore, even among those projects that include commitments to sharing progress and/or results with the public, there is ambiguity over how robust or meaningful the limited public information will be.

There is a much greater emphasis on 'reporting up' to World Bank management rather than 'reporting out' to the public. This bias is demonstrated most clearly by the discrepancy between project commitments to third-party monitoring and proactive information disclosure. While 87 per cent of projects commit to using external monitoring at least once during project implementation to gather data that will be reported to the World Bank (and potentially government counterparts), only 54 per cent of projects commit to proactively sharing any project information with the public. Furthermore, only a small portion of proactive disclosure commitments relate to data produced by third-party monitors. Therefore, while the third-party monitoring results demonstrate that the World Bank prioritises investment in externally produced data about project performance for internal monitoring and evaluation, the proactive information disclosure results show that it does not recognise the importance of public access to this information.

Few projects, including those that document CE commitments across all areas, provide specifics on how they plan to carry out the engagement. Therefore the 'thickness' found in terms of *numbers* of CE commitments mostly does not translate to 'thickness' in terms of their specificity. Project examples from across the four countries assessed demonstrate how 'ticking the box' for a CE activity does not guarantee that the commitment will be fulfilled in a way that meaningfully contributes to the project. Furthermore, although a majority of projects commit to reporting on an aspect of CE, investigating the content of project monitoring

indicators on CE shows that the limited information captured (e.g. GRM: percentage of complaints addressed but without data on the number of complaints received or their nature and their resolution) is not sufficient to inform the public about the nature and impact of citizen involvement.

Each country portfolio includes at least one project whose design models both a high density of CE commitments as well as a high specificity in CE plans and measures to create an enabling environment for citizen action. These include: Mozambique: the Conservation Areas for Biodiversity and Development project and Additional Financing for Social Protection project; Myanmar: the National Community Driven Development project; Nigeria: the Kaduna State Economic Transformation Program-for-Results project and Multi-Sectoral Crisis Recovery project for North Eastern Nigeria; and Pakistan: the Immunization and Support project. Although this conclusion is based only on CE integration into design and not evidence from actual implementation, these projects still show that the World Bank is capable of more systematically planning for and committing to reporting on citizen engagement.

3.2 The World Bank's CE agenda: implications for empowerment and accountability?

What does this research and its findings tell advocates, practitioners and scholars about how the World Bank's model of project-induced citizen action can contribute to empowerment and accountability outcomes and processes in FCVAS? The answer to this 'so what?' question depends on three broader questions:

1. Do World Bank projects, which are co-designed with governments, make policy commitments that – if implemented – would change the institutional environment that shapes power relations between governments and the governed?

This question – the main focus of this study – is necessary but not sufficient to answer the next question.

2. To what degree are those policy commitments actually implemented in practice?

Answering this question would involve a much larger-scale study, with extensive field research to document continuity and change in patterns of state-society interaction in dozens of project areas of influence. Instead, this study carried out pilot field research on project implementation in Myanmar, which sheds light on how relevant – and ambitious – such a research agenda would be. *This independent review of policy commitments therefore is intended to serve as an input to inform such important future research.*

3. Even if World Bank project commitments to opening civic space are serious, and even if those commitments are actually implemented in practice – the question remains - would they have spillover effects? Would they survive beyond the involvement of the external donor?

The broader development literature on external donor-funded projects raises questions about whether and how they have multiplier effects – positive or negative – beyond those projects' area of influence and timeframe. This primarily desk review-based study addresses just the first link in this much longer causal chain.

In this context and within these parameters, this research on CE in World Bank project design in select FCV countries offers several relevant insights about the potential achievement of E&A:

- There is a wide spectrum of how World Bank projects document their intentions for opening spaces and opportunities for citizen engagement, and more projects commit to using thick approaches that include a variety of mechanisms than those that rely on thin approaches. While this is promising, documented commitments to thick approaches are not a guarantee that they will be carried out in practice. However, the likelihood and the opportunity for meaningful CE that could lead to empowerment and accountability outcomes increases substantially when plans are more deeply embedded in design.
- At the same time, the general way that so many projects describe their CE plans, even those projects with a high number of commitments, creates concerns about whether and how they will provide meaningful opportunities for input and engagement or if they will be perfunctory and ‘tick box’. If the latter, they are unlikely to reach E&A goals.
- The significant discrepancies between commitments to implementing CE mechanisms and publicly disclosing results is a threat to achieving accountability outcomes. This is exemplified with best project commitments to GRMs and third-party monitoring, which are two key mechanisms through which projects can increase their accountability to the public.
 - All but six of the assessed projects committed to creating a GRM during implementation and only nine projects lacked any commitments to third-party monitoring. Yet the vast majority of these projects have no commitments to disclosing the results. Even those projects that do commit to some kind of reporting, most commonly through monitoring indicators, frame the information to be gathered and reported extremely narrowly.
 - In regard to GRMs, this means that those directly or indirectly affected by these World Bank projects are unlikely to ever have access to information about the kinds of complaints submitted, or if or how they are being resolved. Regarding third-party monitoring, even if external monitors do maintain independence from project implementers and their monitoring results reflect this, without transparent access to these results, they lose their value as accountability tools for the public.
- The lack of documented plans to integrate other socially excluded groups raises the concern that even if a project achieves E&A outcomes, they will be exclusionary and will not reach populations that have the most significant need.
- In contrast to the well documented commitments to creating space for citizen voice, there is little to nothing documented about how the results of CE activities will feed back into and inform project. The CE Strategy emphasises the feedback loop component of citizen engagement, but the vast majority of projects assessed do not document how they plan to close the loop. This leaves significant questions about how the World Bank’s induced citizen action will actually make contributions to development outcomes overall, and E&A outcomes in particular.
- Finally, because of the project-specific nature of the documented CE mechanisms, these findings shed light primarily on how the World Bank is realising its institutional CE agenda and little on how the state commits to engaging its citizens beyond what a finite World Bank project requires.

Research on design means that the findings are by nature speculative and cannot guarantee what will or will not take place in practice. The guiding assumption in this work is that specificity in commitments means that they will be more likely to be carried out as described. However, this is not guaranteed to happen. In the same vein, where the research identified significant gaps in CE in project design this should be seen as a warning, but not be taken as a predictor of whether citizen engagement objectives will or will not be met.

Therefore, this product is not an end in and of itself, but it is a significant input that helps make possible the eventual answering of the overarching A4EA questions. Carrying out an ambitious plan that alters the way business has long been done should be expected to be uneven and challenging. Mapping of commitments to CE therefore reveals a landscape of

potentially contested terrain and with this knowledge advocates can be prepared. The next critical step then, is to use this design-based mapping, this analysing of CE commitments, as a driver of advocacy efforts to promote CE and as the basis of an investigation into how CE is being carried out in practice.

There is real potential for the World Bank's new CE agenda to make an impact in FCVAS. The narrow civic spaces created by World Bank funded projects in these settings could be potentially significant. Even with the noted limitations, invited or induced spaces for citizen engagement can potentially be broadened when social actors take advantage of openings from above to exercise associational autonomy (Fox 2004). In fact, if all of the projects that qualified as robust on the CE density scale across these four FCV countries accomplished even 75 per cent of the citizen engagement efforts integrated in their design, this would have a significant impact on the enabling environment for empowerment and accountability. Furthermore, the World Bank's current approach to governance reform potentially can make the CE strategy more effective if it bolsters enabling environments for citizen voice by, for example, funding ombudsman agencies, audit bureaus, public information agencies, independent judicial systems, and human rights commissions.

If the World Bank moves beyond policy pronouncements and uses its institutional clout with partner governments to leverage the citizen engagement it induces within its projects, the institution, in principle, could move towards opening new civic spaces as well as strengthening existing civic space. This study on project design cannot definitively determine whether or not the World Bank is accomplishing this. However, these findings that cover three years and four countries help to make it possible to answer this critical question, laying the ground work for the next initiative that would investigate how these World Bank operations are realising their documented commitments in practice.

Annexe: Citizen engagement overview tables

Myanmar projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguards	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive inclusion	Third-party monitoring	Proactive disclosure		
National Community Driven Development (FY15)	400	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Essential Health Services Access (FY15)	100	IP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Agricultural Development Support (FY15)	100	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Flood and Landslide Emergency Recovery (FY17)	200	IP+IR	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
National Electrification (FY16)	400	IP+IR	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	5	2
Ayeyarwady Integrated River Basin Management (FY15)	100	IP+IR	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	No	5	1
Southeast Asia Disaster Risk Management (FY17)	130	IR	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	No	5	1
Financial Sector Development (FY17)	100	None	No	No	No	No	No	No	Yes	No	No	No	1	0
Total commitments		7	7	7	7	5	7	4	7	7	5	3		

Mozambique projects (FY15–17)	Commitment amount US\$ (Millions)	Social safeguards	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators	
			Community consultations reported	Collaborative decision-making	Citizen feedback	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive inclusion	Third-party monitoring	Proactive disclosure			
Conservation Areas for Biodiversity and Development Project (FY15)	40	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3	
Social Protection Project AF (FY17)	10	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3	
Forest Investment Project (FY17)	15	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	2	
Agriculture and Natural Resources Landscape (FY16)	40	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2	
AF to Education Sector Support Project (FY17)	59	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	6	3	
Water Services and Institutional Support II (FY16)	90	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	6	3	
AF to Education Sector Support Project (FY16)	50	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	6	2	
Emergency Resilient Recovery Project (FY16)	40	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	Yes	No	5	1

AF Emergency Resilient Recovery Project (FY17)	20	Yes	Yes	Yes	No	No	Yes	Yes	Yes	No	No	No	5	0
Higher Education Science and Technology Project AF (FY15)	45	No	Yes	No	Yes	No	No	No	Yes	Yes	No	Yes	3	2
The Cities and Climate Change Project/Pilot Program for Climate Resilience of Mozambique (FY15)	15.75	Yes	Yes	Yes	No	No	Yes	No	No	Yes	No	No	3	1
Total commitments		10	11	9	6	7	10	9	10	9	8	6		

Nigeria projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguards	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Community consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive social inclusion	Third-party monitoring	Proactive information disclosure		
Kaduna State Economic Transformation Program-for-Results (FY17)	350	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria (FY17)	200	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
State Education Program Investment AF (FY16)	100	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
Third National Fadama Development Project AF 2 (FY16)	50	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	7	2
Mineral Sector Support for Economic Diversification (FY17)	150	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
National Social Safety Nets AF (FY16)	500	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Community and Social Development AF 2 (FY16)	75	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Partnership for Education (FY15)	100	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Youth Employment and Social Support AF (FY16)	100	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3

Nigeria projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguards	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Community consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive social inclusion	Third-party monitoring	Proactive information disclosure		
Agro-Processing, Productivity Enhancement Livelihood Improvement Support (FY17)	200	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	6	2
Better Education Service Delivery for All (FY17)	611	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	No	5	2
State Health Investment Project AF (FY16)	125	No	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes	No	5	1
Development Finance (FY15)	500	No	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes	No	4	2
Program to Support Saving One Million Lives (FY15)	500	No	No	No	Yes	No	Yes	Yes	No	No	Yes	Yes	3	2
AF Polio Eradication Support (FY16)	125	No	Yes	No	No	Yes	No	No	No	No	Yes	No	2	1
Polio Eradication Support AF (FY15)	200	No	Yes	No	No	No	No	No	No	Yes	Yes	No	1	2
Total commitments		6	14	12	14	12	14	7	12	12	16	8		

Pakistan projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguard	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive social inclusion	Third-party monitoring	Proactive information disclosure		
National Immunization Support (FY16)	144	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Sindh Public Sector Management Reform (FY15)	50	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Sindh Water Sector Improvement Phase 1 AF (FY15)	138	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
Balochistan Integrated Water Resources Management and Development (FY16)	200	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	6	3
Third Punjab Education Sector (FY16)	300	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	6	3
National Social Protection Program for Results (FY17)	100	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	6	3
Sindh Irrigated Agriculture Productivity Enhancement (FY15)	187	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	6	2
Sindh Agricultural Growth (FY15)	76	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	6	2
Karachi Neighborhood Improvement (FY17)	86	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	6	2
Enhanced Nutrition for Mothers and Children (FY15)	36	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	5	3

Pakistan projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguard	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive social inclusion	Third-party monitoring	Proactive information disclosure		
FATA Temporarily Displaced Persons Emergency Recovery (FY16)	75	No	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	5	3
Tarbela 4th Extension Hydropower AF (FY17)	390	No	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	5	2
Punjab Tourism for Economic Growth (FY17)	50	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	5	2
Sindh Barrages Improvement (FY15)	50	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	Yes	4	3
Disaster and Climate Resilience Improvement (FY15)	125	Yes	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes	Yes	4	3
Sindh Resilience FY16	100	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	Yes	4	3
Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas AF (FY17)	19	No	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	No	4	2
Governance and Policy Program Balochistan (FY16)	19	No	No	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	4	2
Sindh Enhancing Response to Reduce Stunting (FY17)	62	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	No	No	4	1
Punjab Skills Development (FY15)	50	No	Yes	No	Yes	No	Yes	No	No	Yes	Yes	Yes	3	3

Pakistan projects (FY15–17)	Commitment amount US\$ (millions)	Social safeguard	World Bank CE Strategy priority areas							Indicators of enabling environment for CE			Total World Bank CE commitments	Total enabling environment indicators	
			Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results framework indicator(s) for CE	Proactive social inclusion	Third-party monitoring	Proactive information disclosure			
GPE Balochistan Education Project (FY15)	34	No	Yes	No	Yes	No	No	No	No	No	Yes	Yes	Yes	2	3
Pakistan Financial Inclusion and Infrastructure (FY17)	137	No	No	No	Yes	No	Yes	No	No	No	Yes	No	Yes	2	2
Total commitments		10	20	12	22	6	21	11	16	22	19	14			

References

- Bebbington, A.; Woolcock, M.; Guggenheim, S. and Olson, E. (2006) *The Search for Empowerment: Social Capital as Idea and Practice at The World Bank*, Hartford: Kumarian
- Davis, G. (2004) *A History of the Social Development Network in The World Bank, 1973–2003*, Social Protection Discussion Paper Series 56, Washington DC: World Bank, <http://documents.worldbank.org/curated/en/806361468779696310/A-history-of-the-social-development-network-in-The-World-Bank-1973-2002> (accessed 3 April 2019)
- Fox, J. (2015) 'Social Accountability: What Does the Evidence Really Say?', *World Development* 72: 346–61
- Fox, J. (2004) 'Empowerment and Institutional Change: Mapping "Virtuous Circles" of State-Society Interaction', in R. Alsop (ed.), *Power, Rights and Poverty: Concepts and Connections*, Washington DC: World Bank/Department for International Development
- Fox, J. and Brown, L.D. (eds) (1998) *The Struggle for Accountability: The World Bank, NGOs and Grassroots Movements*, Cambridge MA: MIT Press
- Gugerty, M.K. and Kremer, M. (2008) 'Outside Funding and the Dynamics of Participation in Community Associations', *American Journal of Political Science* 52.3: 585–602
- Haque, M.S. (2008) 'Decentering the State for Local Accountability through Representation: Social Divides as a Barrier in South Asia', *Public Administration Quarterly* 32.1: 33–58
- Kim, J. (2013) 'One Group, Two Goals: Our Future Path', Keynote speech presented at the World Bank Group Annual Meetings Plenary, 11 October, Washington DC, www.worldbank.org/en/news/speech/2013/10/11/world-bank-group-president-jim-yong-kim-speech-annual-meetings-plenary (accessed 27 June 2018)
- Le, H.; Nadelman, R.; Sah, A. and Evans, I. (2019) *World Bank Operationalization of Citizen Engagement in Project Design: A Pilot Assessment of the Mozambique Portfolio FY15–17*, Washington DC: Accountability Research Center
- Manroth, A. et al. (2014) *Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations: Engaging with Citizens for Improved Results*, Washington DC: World Bank Group, <http://documents.worldbank.org/curated/en/266371468124780089/Strategic-framework-for-mainstreaming-citizen-engagement-in-World-Bank-Group-operations-engaging-with-citizens-for-improved-results> (accessed 27 June 2018)
- Mansuri, G. and Rao, V. (2013) *Localizing Development: Does Participation Work?* Policy Research Report, Washington DC: World Bank
- Nadelman, R.; Le, H. and Sah, A. (2019) *World Bank Operationalization of Citizen Engagement in Project Design: A Pilot Assessment of the Nigeria Portfolio FY15–17*, Washington DC: Accountability Research Center
- Nadelman, R.; Htun, W.; Le, H. and Sah, A. (2019) *World Bank Operationalization of Citizen Engagement in Project Design and Implementation: A Pilot Assessment in Myanmar*, Washington DC: Accountability Research Center
- Plummer, J. (2018) 'ECA Citizen Engagement Quality Index', presentation to the July Meeting of World Bank-CSO Working Group, 13 June 2018, Washington DC

- Sah, A. and Nadelman, R. (2019) *World Bank Operationalization of Citizen Engagement in Project Design: A Pilot Assessment of the Pakistan Portfolio*, Washington DC: Accountability Research Center
- Van Wicklin III, W.A. and Gurkan, A. (2013) *How-to Notes: Participatory and Third Party Monitoring in World Bank Projects - What Can Non-State Actors Do?*, Governance and Anti-Corruption (GAC) in Projects: Dealing with Governance and Corruption Risks in Project Lending, Washington DC: World Bank, <http://documents.worldbank.org/curated/en/863281468337280255/How-to-notes-participatory-and-third-party-monitoring-in-World-Bank-projects-what-can-non-state-actors-do> (accessed 15 November 2018)
- Weaver, C. (2008) *Hypocrisy Trap: The World Bank and the Poverty of Reform*, Princeton NJ: Princeton University Press
- World Bank (2019) *Environment and Social Framework*, www.worldbank.org/en/projects-operations/environmental-and-social-framework (accessed 31 January 2019)
- World Bank (2018a) *Citizen Engagement*, www.worldbank.org/en/about/what-we-do/brief/citizen-engagement (accessed 27 June 2018)
- World Bank (2018b) *Community-Driven Development Overview*, www.worldbank.org/en/topic/communitydrivendevelopment#2 (accessed 17 September 2018)
- World Bank (2018c) *Engaging Citizens for Better Development*, Independent Evaluation Group, Washington DC: World Bank, https://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/Engaging_Citizens_for_Better_Development_Results_Full_Report.pdf (accessed 27 June 2018)
- World Bank (2018d) *Products and Services*, www.worldbank.org/en/projects-operations/products-and-services (accessed 10 September 2018)
- World Bank (2017a) *Annual Report 2017: World Bank Lending (Fiscal 2017)*, Washington DC: World Bank, <http://pubdocs.worldbank.org/en/982201506096253267/AR17-World-Bank-Lending.pdf> (accessed 15 December 2018)
- World Bank (2017b) *Nigeria Multi-Sectoral Crisis Recovery Project*, Washington DC: World Bank Group (Project Appraisal Document/PAD), <http://documents.worldbank.org/curated/en/720891490278540329/Nigeria-Multi-Sectoral-Crisis-Recovery-Project> (accessed 27 November 2018)
- World Bank (2012) *Program-for-Results Financing Overview*, Washington DC: World Bank Group, <http://pubdocs.worldbank.org/en/654421478722080104/PforR-Overview-Presentation-OPCS.pdf> (accessed 31 January 2019)
- World Bank (2007) *Strengthening World Bank Group Engagement on Governance and Anticorruption*, Washington DC: World Bank, <http://siteresources.worldbank.org/PUBLICSECTORANDGOVERNANCE/Resources/GACStrategyPaper.pdf> (accessed 15 November 2018)
- World Bank (2005) *Empowering People by Transforming Institutions: Social Development in World Bank Operations*, Washington DC: World Bank, <http://siteresources.worldbank.org/EXTSOCIALDEVELOPMENT/Resources/244362-1164181732580/SDStrategy-Full.pdf> (accessed 15 November 2018)