How Do World Bank Staff Perceive the Institutional Environment for Building Citizen Engagement into Projects?

Rachel Nadelman

HAS CONTROL

DELEGATED AUTHORITY

COLLABORATES

ADVISES

CONSULTED

INFORMED

NONE

EMPOWERED PARTICIPATION

INSTRUMENTAL PARTICIPATION

NON-PARTICIPATION

ACCOUNTABILITY RESEARCH CENTER
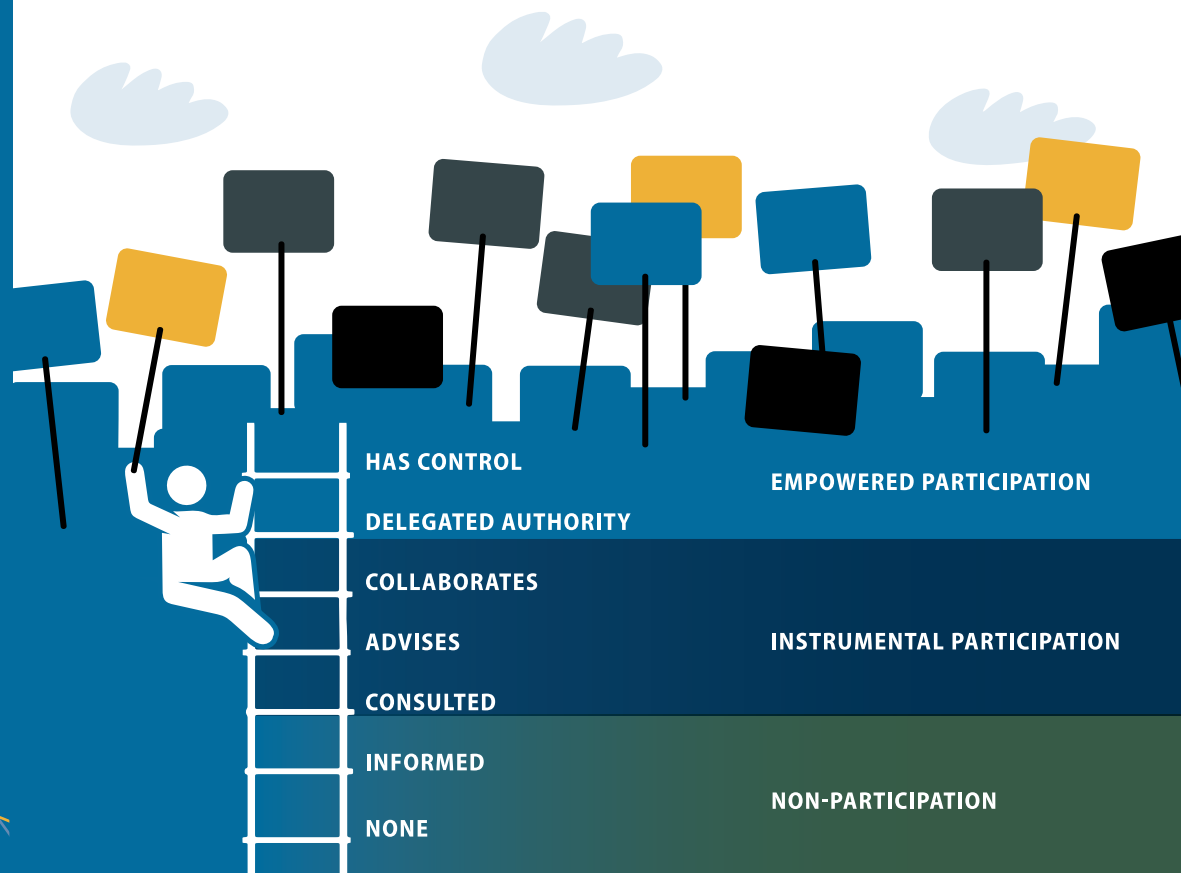
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About the Author

Rachel Nadelman joined the Accountability Research Center (ARC) in 2017 as a Scholar-in-Residence and Research Fellow after more than a decade in the international development field. She has worked as both practitioner and researcher in multi- and bi-lateral institutions, grassroots organizations, small foundations and university-based research centers, enabling her to approach the field from a range of vantage points. Her roles have included social development specialist for the World Bank, organizer with the grassroots women's network the Huairou Commission, curriculum designer and instructor for government capacity building with the German Development Agency (GIZ) and the Center for Latin America and Latino Studies (CLALS) at American University, and principal investigator and writer for the Institute of Development Studies (IDS). She has led field research across the world and credits this for shaping her as an analyst and scholar. Particularly transformative opportunities have involved: investigating the phenomenon of fabricas recuperadas (Argentina); documenting community-based social protection initiatives for street children (Kinshasha, Democratic Republic of Congo); assessing women's needs and priorities for post-earthquake recovery (Haiti); Uncovering the origins of the world's first gold mining ban (El Salvador); and testing whether and how the World Bank implements its commitments to citizen engagement (Myanmar). 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.
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Acknowledgements

Acronyms

ARC	Accountability Research Center
CE	Citizen Engagement
CMU	Country Management Unit
CPF	Country Partnership Framework
EAP	East Asia and Pacific
ECA	Europe and Central Asia
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FY	Fiscal Year
GP	Global Practice
GGP	Governance Global Practice
GRM	Grievance Redress Mechanism
GSURR	Social Urban Rural and Resilience Global Practice
IEG	Independent Evaluation Group
IPF	Investment Policy Financing
LAC	Latin America and the Caribbean
MENA	Middle East and North Africa
OPCS	Operations Policy and Country Services
P4R	Project for Results
PIU	Project Implementation Unit
SAR	South Asia Region
SEP	Stakeholder Engagement Plans
SSI	Social Sustainability and Inclusion
TTL	Task Team Leader
TOR	Terms of Reference
VPU	Vice Presidency Unit

Executive Summary

How do World Bank staff perceive institutional opportunities and bottlenecks for undertaking citizen engagement (CE) as part of projects? The Accountability Research Center (ARC) at American University sought to answer this question by going beyond formal institutional directives and asking the staff themselves. ARC interviewed 30 World Bank staff involved with stakeholder and civic engagement in different capacities. Respondents represented the World Bank's six administrative regions and a range of Global Practices, as well as operational, analytic, advisory, and managerial roles. The Open Society Foundations funded this independent research, which took place in consultation with senior World Bank management, without their direct involvement in the research or writing.

During the February–August 2019 research period, the World Bank initiated an internal restructuring process which included changes to the leadership of the citizen engagement agenda. This report offers important insights that continue to be relevant for the Bank's crucial CE work, particularly for its Citizen Engagement and Social Accountability Global Solutions Group in the new Social Sustainability and Inclusion Global Practice. The findings can also contribute to the efforts of public interest groups interested in strengthening the World Bank's work in this area.

The main findings resulting from this qualitative survey of World Bank staff perceptions include:

• Staff overwhelmingly credited the World Bank's mainstreaming commitments for having increased the prominence of CE across the institution and expanding its visibility in projects. However, most viewed incentives as geared toward meeting minimum standards rather than achieving maximal impact;

• The primary internal promotors of the CE agenda, Regional and Global Practice Focal Points, are hampered by significant time and financial constraints. The institutional emphasis on compliance with minimum project design standards has meant that most do not know if or how the design commitments are carried out in practice;

• Staff consistently cited a lack of reliable, dedicated funding for CE monitoring and follow-up support for why advancements in design would not translate into improved CE in practice;

• Staff perceived that those World Bank regions and sectors that pursued CE most ambitiously and consistently were those whose management actively sought visibility for the agenda and proactively advocated for and secured dedicated funding;

• There is limited strategic coordination between the Bank's CE agenda and its new Environmental and Social Framework (ESF), which establishes standards for stakeholder engagement and information disclosure. Unlike the CE agenda, the ESF introduces policy reforms supported by strict guidelines, dedicated staff, and uniquely robust monitoring and enforcement apparatus. More consistent attention to finding synergy would allow the CE program to leverage the ESF's strengths while bolstering the unique aspects of CE that the ESF does not cover.

I. Introduction

What are the institutional incentives and dis-incentives for World Bank staff to pursue citizen engagement (CE) in projects? The Accountability Research Center (ARC) at American University sought to answer this question by investigating the perceptions and experiences of World Bank staff responsible for promoting, prioritizing, and carrying out stakeholder and civic engagement in operations. The Open Society Foundations funded this independent research, which took place in consultation with senior World Bank management without their direct involvement in the research process or the writing of this report.

Since 2014, the World Bank has instituted a series of high-profile actions with the stated goal of strengthening citizen voice and participation in projects. These notably include:

• Instituting a "citizen engagement mainstreaming commitment" that established minimum benchmarks for CE in investment project financing (IPF) (2014)[1];

• Developing and promoting a Strategic Framework for Mainstreaming Citizen Engagement (known as CE Strategic Framework) to provide overarching guidance for how large-scale development projects can cultivate community response capacity and be more receptive to their inputs (2014), and;

• After a decade in development, launching the Environmental and Social Framework[2] (ESF), the Bank's overhaul of its prior Environment and Social Safeguards policies in place since the early 1980s. The ESF introduces a range of social policy reforms for IPFs, including requiring stakeholder engagement plans (SEPs, part of Environmental and Social Standard/ESS 10), that are supported by strict guidelines, dedicated staff, and a level of internal institutional enforcement not applicable to the CE agenda (October 2018).

In broad strokes, the World Bank carries out and monitors its stakeholder and civic engagement operational work through complementary, but distinct channels:

• A CE-specific program, elaborated in the CE Strategic Framework, that fits within a broader social development and good governance agenda; and

• The ESF (previously social and environmental safeguards policies).

ARC initially used the Bank's self-defined parameters for its CE program to guide the research. However, as the research progressed it became clear that it would be necessary to also consider the range of mechanisms for stakeholder engagement contained within the ESF as well as the more limited options that had been included under the prior social safeguard umbrella.[3]

Between February and August 2019,[4] ARC Research Fellow, Rachel Nadelman, undertook interviews with World Bank staff involved in different capacities with stakeholder and civic engagement. Respondents represented the World Bank's six administrative regions and a range of Global Practices (GP), as well as operational, analytic, advisory, and managerial roles.[5] To encourage respondents to speak freely the author promised anonymity. Sources, therefore, have been coded and the text excludes further identifying information.[6]

The findings are organized in two sections: (i) institutional structure and resources for CE and (ii) experiences and lessons learned carrying out the CE agenda. The report has been prepared with two audiences in mind. First, CE champions within the Bank who are interested in seeing the efforts through the eyes of their colleagues as captured by an independent, external observer. Second, development bank-watching civil society organizations familiar with the World Bank's commitments to stakeholder and civic engagement but who may lack a full understanding of the systems and processes underpinning this work.

Over the period of ARC's research, the World Bank announced plans for "a structural re-alignment" that began on July 1, 2019, the start of Fiscal Year 2020 (FY20). This included changes to the lines of authority in different areas of the Bank, including over the CE agenda and the ESF.[7] Since the research took place before and during the transition to the new structure, the investigation focused primarily on staff perceptions and experiences with CE prior to the re-alignment. The findings presented offer important insights that continue to be relevant for this crucial work within the new oversight and management arrangements. Ongoing discussions with CE staff suggest that this restructuring process does not affect the applicability of the research's main findings.

II. Institutional Structure and Resources Underpinning the CE Agenda

One can easily access the World Bank's pledges to support CE. Yet for civil society on the outside looking in, it is challenging to discern who are the most important institutional actors involved and how the processes are meant to operate. This information is not readily accessible or easy to navigate without the assistance of World Bank insiders. Therefore, this section presents the CE agenda in terms of the lines of authority, oversight, responsibility, and funding, as portrayed by the staff interviewed.

When considered together, respondents' accounts paint a comprehensive picture of the World Bank's internal structure for promoting and tracking CE prior to the FY20 restructuring. Two units co-led the CE agenda: The Governance and Inclusive Institutions unit in the Governance Global Practice (GGP) and the Social Development Unit of the Social, Urban, Rural and Resilience Global Practice (GSURR).[8] Under this co-management, responsibility for advancing and monitoring the CE mainstreaming sat with a three-person body called the Citizen Engagement Secretariat (known as CE Secretariat) and 30 Citizen Engagement Focal Points (known as CE Focal Points). The CE Focal Points represented either one of the Bank's six administrative regions (called Regional CE Focal Points) or one of its many specialized sectors (i.e., education, water, transportation, called Global Practice (GP) CE Focal Points).[9] The Secretariat member and Focal Point functions were designed to be bounded, explained one respondent who had been centrally involved in the CE agenda's development. Staff at the Bank wear many hats, the respondent explained and roles like these are not "an entire job" in and of themselves. For example, one Secretariat member simultaneously served as a CE Focal Point while also a task team leader (TTL) for several projects.

The CE Secretariat functioned as a coordinating, advisory group with an eye on the big picture of CE at the World Bank. Respondents described the Secretariat's responsibilities as: facilitating the work of CE Focal Points; conducting overall institutional data collection on compliance with the three CE mainstreaming requirements; providing capacity building and advisory services; contributing to the institutional dialogue on CE mainstreaming; and distributing a modest funding envelope that management earmarked for CE per fiscal year. According to some interviewees, when the CE Secretariat first formed, it took on a proactive facilitation role, which built a feeling of community among the appointed CE Focal Points. Respondents reported that over subsequent years the Secretariat continued to convene periodic meetings, although their frequency decreased. GP CE Focal Points, who had less day-to-day contact with issues related to citizen engagement, reported that the cross-sector/regional CE meetings were extremely helpful for making connections and sharing best CE practices and resources. In contrast, among the Regional CE Focal Points, there was a sense that the Secretariat's role had become more reactive over time, increasingly focused on responding to management's demands rather than proactively supporting CE Focal Point efforts and learning.

The CE Focal Point function was created "to stimulate the [CE] agenda" rather than "have a central role in how it is carried out," according to a director-level respondent. Appointed by regional or sectoral management, CE Focal Points concentrated on a targeted portfolio of projects. Social development specialists from GSURR held all of the Regional CE Focal Point appointments while staff with sector-specific expertise served as GP CE Focal Points. As reported by Secretariat members and confirmed by the CE Focal Point Terms of Reference (TOR), the role had intentionally been designed to be narrow in its scope and to prioritize ensuring compliance with the mainstreaming commitments.[10] One respondent described CE Focal Points as the "first filter" for the project design review process. Second to their compliance responsibilities, CE Focal Points often also served as a CE knowledge resource for staff in their respective regions or sectors. This most commonly included gathering and sharing best practices

and other guidance, advising project teams on an as-needed basis, and providing backstop support (for example, finding consultants with the requisite skills when needed).

One CE Secretariat member commented that the Focal Point role had "grown informally" over the years and now provided a "ticket to doing more if you want, if you can make the space." Yet several respondents disputed that characterization, explaining that "making the space" to go beyond compliance and "do more" depended entirely on management decisions and allocations. "When CE Focal Points go beyond monitoring for compliance and offer guidance and technical assistance, it is because they have their leadership's buy-in," explained one Regional Focal Point. "Doing more depends on how much the VPU [Vice Presidency Unit] or senior managers are convinced." These substantial differences among the regions meant, according to another Regional Focal Point, that, "comparing CE work programs in one region versus another is like comparing apples to oranges." Those with more substantial management support and the associated financial backing could use the role's TOR as a starting point to launch more ambitious activities and responsibilities (see highlight box on the Europe/Central Asia (ECA) CE program). Without that, Focal Points lacked the means and capacity to go beyond the basics.

Respondents explained that during the CE agenda's early years the Secretariat had provided Regional CE Focal Points (all from Social Development) with a CE-specific budget distinct from the funding their management allocated budget for CE-specific work. On average they had received $30,000 per fiscal year, which guaranteed that their time would be covered to review project design documents and, if possible, to provide guidance and support for task teams. In contrast, the CE Secretariat did not historically allocate funds to the GP Focal Points who therefore needed to rely on their management for funding. In general, sector-focused Focal Points faced more significant time and resource limitations than their regional CE Focal Point counterparts.

Respondents reported that CE funds had been reallocated in FY19, with the largest slice ($500,000) allotted to GGP for analytical work and management reviews (i.e., documenting CE knowledge, learning, and progress). This FY19 re-allocation did not represent an increase in management-provided funds for CE, but instead, a shift from GSURR to GGP and drastically decreased the CE funding for the Regional CE Focal Points to $5,000 annually.[11] One respondent commented that "GGP did a better job pitching itself and got the biggest chunk of money…this is very much how the Bank works."

The limited CE resources sharply contrasted with the sizeable budgets made available to support social safeguards/ESF implementation, for which management allocates a large envelope. The logic for capping the dedicated CE funding mirrored the logic underlying CE support roles. CE actors were meant to respond to operational demand, not instigate it, the theory being that real demand would generate the necessary finances.

III. Staff Perceptions of the CE Agenda's Progress and Impact

World Bank staff were not monolithic in their perceptions of the institutional environment for stakeholder and civic engagement. Yet, there were several consistent themes that repeated across the discussions. When presented together, these perspectives painted a clear picture of the gaps that existed between commitment and practice.

Staff overwhelmingly credited the Bank-wide CE mainstreaming commitments[12] with having increased CE's prominence within the Bank and expanding its visibility in projects. However, most viewed incentives as geared toward meeting minimum standards at the design stage rather than achieving maximal impact.

"Right now, we are absolutely better than the status quo five years ago," shared one TTL. "Before, it never would have happened that managers were thinking about CE at the institutional level." The World Bank's internal CE tracking provides evidence for this TTL's assertion. From the launch of CE mainstreaming in FY14 through FY19, the number of IPFs meeting the minimum required threshold for CE in project design increased from 60% to 99%.[13] Another TTL shared that when starting at the Bank almost two decades earlier, CE was not consistently part of "the development discourse" across the Bank and credited the "corporate check mark for making TTLs pay attention."

This "corporate check mark" also invited attention from sectoral and regional leadership. For example, when the East Asia/Pacific region (EAP) scored the lowest among all regions on CE inclusion in design for the FY15-17 period, EAP leadership felt pressure to remedy this. The region then allocated $40,000 to investigate why the results were among the lowest at the Bank and what would be required to improve. Therefore, the existence of the institutional-level CE tracking, which flagged EAP's poor performance relative to other regions,

compelled management to pay attention to CE where previously it had been mostly overlooked.

While noting compliance pressures, most respondents emphasized a range of other factors that had improved the enabling environment for CE at the Bank. According to a one GP CE Focal Point, "having the strategic framework changed the conversation [in the Bank] and created entry points to start conversations with clients, including some of the more challenging ones." Other interviewees echoed this, adding that it was not just the existence of the strategic framework, but the increase of capacity building opportunities and ongoing advisory support that accompanied it. Once required to include CE in projects more systematically, and with some new resources available, many TTLs were not just "interested in ticking the box" and therefore sought support from CE experts on "how to do it well." One GP CE Focal Point shared, "I have seen the transition happening in a lot of places. More people are doing CE – and for those that didn't think about it before the new requirements, people are more open to including it."

One TTL shared the view that CE advancements went beyond IPFs, the only World Bank financial instruments formally subject to the CE mainstreaming mandate, citing personal experience as an example. At the time of the interview, the respondent was serving as TTL for a large Project-for-Results (P4R) program that included an independent sub-component dedicated to CE. The TTL shared having a personal commitment to integrating CE activities, no matter what instrument the government and the Bank agreed to use. Yet, previously there had not been this level of both Bank and government support for a project sub-component with CE-focused objectives and a substantial budget allotted specifically to carry out these plans.

A member of the Independent Evaluation Group (IEG) team that evaluated the Bank's CE program[14] posited that the tracked "corporate CE indicator is the stick" that prods Bank teams to consistently include CE in

accordance with the minimum standards. For example, task teams could be subject to time-consuming administrative delays when reviewers determine CE plans and indicators to be inadequate and require that they be redone. The respondent cautioned that such highly resourced institutional tracking carries with it both a "danger and a curse" even if it notably increases the desired activity. The "danger" is that monitoring according to a binary (Yes/No) reduces CE tracking to a check-the-box exercise, rendering the results "uninformative." This then brings on the "curse" because the significant institutional resources invested have gone to collecting data that is "potentially not meaningful" and therefore will not advance achievement of the intended goals. Or in the words of one TTL, "when closing the ticket is the measure, it is a recipe for mediocrity."

When IPFs reach the third year of implementation, they trigger the final CE monitoring commitment, reporting on CE indicator(s). All the TTLs interviewed shared that having to report on this progress, both to management and in status reports that would be made public, incentivized attention to the CE mechanism being monitored.[15] Yet when asked about what the monitoring results revealed, respondents often responded negatively. One GP CE Focal Point called the CE indicators "a blunt instrument" that could not capture insightful information about how CE takes place. The same TTL cited above who had touted the improved environment for pursuing CE in non-IPF projects also admitted that the corporate mandate could be "about CYA [cover your ass] rather than innovation." According to another TTL, for the CE agenda to go beyond tick-the-box and make an impact at the country-level, it depended on variable factors, such as "what the project is about, how government perceives the engagement, what systems are already in place, etc."

Several among the TTL respondents admitted that they tried to be strategic when creating a CE indicator. 'Strategic' in this case typically meant keeping the indicator simple and choosing a more readily achievable focus rather than one that would be considered ambitious. One TTL based in-country shared, "I try to go for indicators that won't bite back later." He explained:

"You want always to put indicators that are easy to attain for you that hopefully won't be flagged by anyone else. You under promise and over deliver. This is the logic of indicators in general, not just limited to CE. You don't want your indicators to get you in trouble. You want it to play to a certain information asymmetry – people think it is difficult to achieve but you know it is easy, so when you achieve more it appears even better."

These admissions did not mean that the TTLs were trying to skirt their CE obligations. Among the sample of TTLs interviewed, all claimed to have included CE plans far beyond the requirements. Yet several acknowledged past circumstances in which they had not subjected their most ambitious CE plans to formal monitoring so that they could test new approaches without being penalized for imperfect results.

CE lacks consistent, dedicated funding for implementation and monitoring, preventing advancements in project design from translating into improved citizen engagement in practice.

"Without a budget, CE is an unfunded mandate," stated one CE Focal Point. "If a CPF [Country Partnership Framework] doesn't have defined objectives related to CE that can be linked to a [project's] budget projects will have no money available [for CE]." As a result, respondents reported that it would be common for project teams to document CE design plans that met the mainstreaming requirement without having considered with the client what the actual implementation costs would be or if the project budget had accounted for such activities. This kind of disconnect between plans and actual costs had practical implications, including that the responsible government agency or project unit would potentially not be able to execute CE commitments to the degree envisioned, if at all.

According to a majority of respondents, attaining funding for CE had been an extremely challenging endeavor, in large part because of little to no flexibility in project budget allocations. Therefore, TTLs most commonly had to find supplementary funds to execute CE commitments, which added labor and time to an already extremely demanding job. Where management did not provide CE funding, and with the range of pressures and demands on TTLs, there was little incentive for individual TTLs to seek resources for CE. One TTL shared,

> "CE has a cost. It is a cost that is too high for the Bank's structure. And it is not a part-time job. How do you create a space for dialogue in which you are both the convenor, the guy who pays for it, guy who writes the minutes, also the one [responsible for] the project?"

Both Regional and GP CE Focal Points cited World Bank-executed Trust Funds as one of the few supplementary financial resources available for CE, acknowledging that they were not equivalently available across regions and sectors. Trust Funds proved to be particularly crucial because they often were not tied to an individual project and therefore allowed for CE efforts with potentially wider, longer-lasting impact. For example, in Tunisia, the Bank mobilized funds from a coalition of donors to carry out a national-level satisfaction survey that offered beneficiary feedback valuable for a range of projects and provided input into upcoming project creation. A GP Focal Point credited ready access to Trust Funds for enabling ongoing CE work, explaining that when one has consistent access to these resources it "allows for more dedicated attention to CE." Yet the TTL explained that not "all sectors have access" to supplementary Trust Fund resources and that the experience of having reliable access was not typical.

Those Focal Points without access to Trust Funds to supplement scarce project-based resources for CE depended on what the CE Secretariat provided. Yet at its peak, the Secretariat-provided support only covered up to three weeks of Focal Point staff time, almost all of which was used to monitor that CE in design complied with the mainstreaming requirements. Some Focal Points briefly believed that following the 2018 IEG CE evaluation and recommendations that there would be a sizeable increase in funding from management, recounted one Regional CE Focal Point. As a result, they began to conceive of a "2.0 strategy for CE that would go beyond compliance to how to do it, building on the [IEG evaluation]." When management did not respond with increased funding the 2.0 strategy never materialized.

When asked about the minimal CE-specific resources, one Secretariat respondent reiterated that the CE agenda had been purposefully designed as demand-driven, meaning it could not be left to the corporate CE Secretariat and its immediate management to provide the bulk of the funds. Instead, the business needs of a region would need to determine the level of CE, negotiated as part of an agreement with practice managers. In other words, if there were demand, resources would follow.

One respondent recounted that that management had begun conveying the message that there would be a reduction in Trust Funds to supplement project resources. Those Focal Points who relied on these funds worried that this would further limit the quality and depth of their CE work. One Focal Point rhetorically asked and answered: Will the Bank fill the void created by lost Trust Funds by contributing more of its own resources? If not, the only option for CE resources would be allotments from country directors based on decisions driven by clients.

The primary internal promotors of the CE agenda, Regional and Global Practice Focal Points, were hampered by significant time and financial constraints. The institutional emphasis on compliance with minimum project design standards meant that most did not know if/how the design commitments were carried out in practice.

"The focus of my role, given the time constraints, is getting [CE] requirements covered," explained one Regional CE Focal Point. "If there is additional time, then I can pursue thick engagement." The majority of CE Focal Point respondents acknowledged that they usually did not know if or how the CE commitments they verified

in the design stage were actually implemented. Most were quick to clarify that this was not because they lacked interest or commitment, but instead, they were limited by financial and time constraints. One Regional CE Focal Point lamented, "I don't have the bandwidth to get deeply into each and every project [in my region]." As shared by a GP CE Focal Point, "I wear too many hats — so it is about stretching to get this done. This isn't the only thing that stretches me — I believe in it, so I am willing and committed to doing it." Some admitted that they most often knew of how projects had pursued CE in implementation because they served as members of operational task teams (i.e., as social or sectoral specialists or in some cases the TTL) or because a project team chose to reach out to share information/ seek guidance.

Even with these limitations, in general, Regional Focal Points were more knowledgeable about project-specific CE than their GP counterparts. Several GP Focal Points reported they had minimal to no contact with projects after the design stage unless they personally took the initiative to ask. As one respondent clarified, Regional Focal Points had a formal role in validating project CE compliance in each IPF while GP focal points did not. The responsibilities, therefore, centered on supporting teams so that their projects adequately fulfilled the criteria for at least one CE mechanism and one CE indicator in project design. In fact, some whom ARC contacted because they were named as a GP Focal Point on the list provided by the CE Secretariat, expressed surprised that they had the designation, and others never responded to meeting requests. Several felt they had been tapped for this position because they had been responsible for related activities like gender, climate change, and overall quality assurance.

Whether and how a project will carry out CE ultimately depends on the commitment and interest of the TTL and the associated country management unit (CMU), according to several CE Focal Points. One Regional Focal Point shared four reasons why TTLs did not follow through with CE as planned. First, TTLs often did not know CE fundamentals, such as what is needed to foster meaningful consultation or what personnel would be needed, and therefore could not adequately advise or supervise the government agency implementing the project or project implementation units (PIU). In cases where CE activities were carried as planned, many TTLs do not know how one uses the findings to inform

upcoming stages of project implementation meaning that, ultimately, any engagement would likely not have an impact.

Second, the Focal Point explained that TTLs cannot always access personnel with the right skill set. For example, a project might be assigned a safeguard specialist (and the requisite resources to carry out safeguards responsibilities), but the narrow safeguard mandate and knowledge may preclude this specialist from carrying out other broader CE activities. Since only safeguards (and now the ESF) have guaranteed accompanied funding, then, "if the safeguards person doesn't do it, then who will?" Third, the limited readily available funding for non-safeguards related to CE and the lack of knowledge among TTLs of where to find supplementary sources. Finally, connected to each of the prior three reasons, this Focal Point explained that given the complicated nature of Bank projects and all the range of demands they must manage, TTLs do not have the capacity to ambitiously pursue CE beyond the minimum requirements. The interviews with TTLs provided support for the Regional Focal Point's reasoning. One TTL shared, "TTLs are not resistant to the [CE] idea as long as there is guidance, as long as there is someone to support. They know there is a corporate mandate and will look for advice. If they can find the right person who can guide and support them through the process, then TTLs can get creative."

Where there had been measurable CE progress with a project, CE Focal Points and members of the CE Secretariat credited technical assistance. Such assistance ranged from CE trainings, advising on scaling up CE efforts, fostering champions, and organizing learning exchanges. At the same time, respondents shared even when projects followed through with the planned CE activities, it was likely that they would fall short of expectations for inclusive participation. One GP CE Focal Point, who had also served for years as TTL, shared a range of experiences with gender inclusion. The Focal Point recounted times when consultations committed to equally involving men and women but instead, men composed the majority of participants and in some cases, there were no women present at all. Even when women would come to participate, their husbands, brothers, or other male family or community

members accompanied them, potentially limiting their comfort to speak openly.

Likewise, another TTL shared that far too often CE activities would not be adequately accessible to people with disabilities. For projects that proactively considered disability needs in design, including low-cost investments that would benefit all users, during implementation the available time and/or resources were inadequate to ensure that those with disabilities were represented. Respondents argued that these are the cases in which both guidance from CE specialists and TTL training is extremely important. Even if project documents reference marginalized/excluded groups, the mention does not automatically translate into operational plans that project teams know how to carry out.

The bottom-line message was therefore the following: With more resources available for CE, Focal Points and task teams would be able to spend more time monitoring and reporting on CE implementation. In the circumstances where only minimal time and resources were allocated, staff had little choice but to focus on the institutionally prioritized CE responsibilities, such as ensuring CE inclusion in project documents.

Those regions and sectors that pursued CE most ambitiously and consistently were those whose management had actively sought to give the agenda greater visibility and who invested in high-level advocacy to secure dedicated funding.

"When senior management isn't convinced, that is when the focus is only on the corporate mandate," explained one Regional Focal Point. Doing more, the Focal Point explained, required "solid backing from upper management to put forward a compelling message to regional leadership." The majority of Focal Points interviewed shared similar sentiments. One posited that "when CE Focal Points go beyond monitoring for compliance and offer guidance and technical assistance, it is because

they have their leadership's buy-in. Doing more depends on how much the VPU or senior managers are convinced." The TTLs interviewed were of a similar mindset. One emphatically stated that CE "won't work without management on board." While another acknowledged, "it would be difficult to go farther [on CE] than the CMU or government are willing to go." Yet, just having management backing was not always enough. An essential component, argued another CE Focal Point, had been regional "management who fought for visibility at the highest levels [of institutional management], who were pro-active in fund-raising, and who sought to obtain funds from Regional VPU/CMU budgets."

Neither regions nor sectors had standardized processes for monitoring, supervising, or funding CE, explained a CE Secretariat member, leading to significant differences in the practices among them. According to respondents, the ECA region most consistently allotted financial and human resources for CE (See highlight box below for details). EAP occupied the other end of the spectrum, with funding for CE dedicated primarily to corporate commitment compliance, which left limited time and resource allocation to advise teams beyond those that proactively would reach out. Respondents considered the South Asia Region (SAR), Africa, Latin America and the Caribbean (LAC), and Middle East/North Africa (MENA) to fall in the middle of the spectrum. During the research period, the Africa VPU was far larger than any other region[16] and therefore had two co-CE Focal Points. Yet, even then, the volume of projects in the portfolio was too large for two regional-level CE Focal Points to manage. Therefore, the Africa CE Focal Points launched a process to appoint and train CE leads at the CMU level who would bring more country-specific knowledge to a smaller number of projects. In SAR, management committed to developing region-wide guidance identifying linkages between CE with the ESF.

Box 1. The Europe and Central Asia Region: the CE Exception

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Dedicated funding: In ECA the regional VPU and a range of CMUs allocated substantial dedicated funding for CE. This meant that the ECA CE Focal Point, unlike those in other regions, did not depend on any minimum funds provided through the CE Secretariat. This VPU/CMU-allocated funding enabled ECA to sponsor an ambitious CE program that including region-wide capacity building for staff, upstream studies to inform country decision-making, and systematic project monitoring.

CE Roadmaps: Country-specific studies of the enabling environment for CE/civic space used to inform each CPF. This began with European CMUs (excluding European Union countries — i.e., Poland, Croatia) and then extended into Central Asia.

Capacity building: The CE Focal Point led an in-country CE capacity building series for PIUs, training about 100 PIUs throughout the region.

CE Implementation review: The region undertook a detailed implementation review of FY15–17 projects that went far beyond the minimum corporate commitments. This investigated:

- If PIUs incorporated CE into project operational manuals or other guidance documents (such as TORs) that would enable implementation of CE instruments. This focused on trends, not individual project anecdotes.

- Design issues including:

  - CE commitments in main project documents;
  - Budget for CE (i.e., specifically assigned resources, not just general assurance that there would be funding);
  - Plans to operationalize design;
  - Monitoring and reporting, primarily based on mandatory Implementation Status and Results Reports and involving findings from supervision missions where possible.

- o Initially, the review focused most closely on Grievance Redress Mechanisms (GRMs) but after lessons from the early review stages, it expanded to all CE mechanisms.

CE Quality index: Developed to measure the quality of citizen engagement activity in all board approved IPFs in the ECA region based on:

- Project Documents (depth of engagement, categorizing tools, any restrictions);

- The extent to which project moving away from only safeguard instruments (i.e., opening up GRM to all people, not just those that fall into safeguard categories).

By the time of the IEG evaluation's release at the end of 2018, ECA had assessed 300 projects for operationalization of CE in design. The findings about individual projects' CE plans enabled targeted identification of where to lend support.

In MENA, respondents reported that the VPU and some CMU leadership provided explicit backing for CE, evidenced by how the regional strategy featured CE. Having the regional commitment to CE in MENA proved to be particularly important because a large percentage of MENA projects were P4R,[17] one of the Bank's lending instruments that is not subject to the CE corporate requirement. Even though all MENA projects must include CE commitments in design per the regional strategy, the real opportunities for carrying out meaningful CE varied drastically among countries. Respondents cited a range of complex regional dynamics that explains this variation, including the Bank's "real" influence on decision-making in different countries. For example, in low-resource MENA countries, like the West Bank/Gaza and Yemen, the World Bank is "the big game in town," shared one respondent. This gives the Bank leverage to have a say in "how a wide range of project activities, including CE, are designed and carried out." In contrast, for a middle-income MENA country such as Egypt, an extremely important Bank client, the government's severe restrictions on civic space complicate carrying out the CE processes promised in design. Yet implementing agencies still have consistently reported having fulfilled their CE commitments. "What can you do?" asked the respondent rhetorically. "What should you do? Should you give up entirely?"

Respondents emphasized that CE success also depended on buy-in and dedicated funding from GP and operational sector management, repeatedly citing the Water sector as their evidence. "Water is active, why? They have the funding," one GP CE Focal Point asked and answered. "The Water GP is now working a lot on CE and inclusion [because] they have the leadership and…a lot of money." According to another CE Focal Point, "the corporate commitment helps to get people's attention. But in Water, these activities were there before…with support from management." Several respondents credited reliable access to Trust Funds as well as the leadership of a particular practice manager for deepening the Water sector's enabling environment for CE. This practice manager created a mandate for social inclusion, bringing in funding and new staff who championed participation and trained existing Water staff.

As a result of the Water sector's prior experience and consistent financial support, the two appointed GP Focal Points could utilize the increased institutional attention on CE to take "a more holistic approach." They collaborated to produce advisory materials on CE (shared with ARC as part of the research) and provide advice to TTLs on ways to go beyond minimum compliance requirements in their CE efforts. One of the strategies they touted as most successful involved finding practical entry points and the "nexus[es] between different corporate requirements (i.e., CE, climate change, gender)," which proved possible even when tackling complexities in issues such as water management and energy consumption.

Strategic coordination between the ESF and CE is currently limited, undermining synergy between the agendas that could expand and strengthen opportunities for citizen voice without sacrificing the unique aspects of the CE program.

"If CE is linked to the new ESF there will be growth. Pushing through the ESF is the winning way," posited one Regional CE Focal Point. Another employed similar language, emphasizing that the need for CE to be "pushed more through the ESF," adding that if this does not happen, "CE is a lost battle." An infrastructure TTL approached the issue from a different angle, suggesting that more closely coordinating CE plans with the ESF could help to reduce "consultation fatigue" and reduce the disruption to the lives of the people projects aim to serve.

Respondents highlighted that pursuing CE mainstreaming as part of ESF implementation would enable CE efforts to access World Bank systems and resources otherwise out of reach. The most commonly cited ESF advantages included its rigorous requirements, mandatory upfront client agreement, explicit enforcement mechanisms, and dedicated resources for both design and implementation. Together all of this represented transformation rather than incremental change. As one TTL elaborated,

> *"CE [mainstreaming] just changed what we monitored, not the way we planned projects… It just meant you had to have some indicator, some kind of feedback mechanism, which didn't have an enormous impact [on project preparation]. The ESF is more transformative in terms of how Bank projects interact with society. Now under the ESF, the SEP has had a massive impact on the way we prepare and the way we implement projects."*

Respondents cited ESS 10 on Stakeholder Engagement and Information Disclosure as one of the strongest entry points for CE that had ever existed at the World Bank. Several respondents noted that there were additional opportunities for CE through ESS 1–9, but that the openings through ESS 10 were unprecedented.

In principle, the mandate for an SEP via ESS 10 enabled project teams to develop a roadmap for CE that would be tracked throughout a project's lifecycle and updated based on, on-the-ground circumstances. An OPCS (Operations Policy and Country Services) manager responsible for finalizing and launching the ESF explained, "stakeholder engagement is iterative and ongoing. It doesn't stop with the SEP. Where the rubber hits the road, is in implementation. This is a culture change in how people think, and the SEP is how they will get there." The same Regional CE Focal Point who had described CE mainstreaming in isolation as a losing fight, noted that the SEP "is where we can make the biggest difference." Speaking from a practical perspective, this Focal Point explained that SEPs are prepared as part of the project packages submitted to the World Bank Board for approval and therefore when supervising Bank teams can have the most input. Therefore, "if the Bank gets SEPs right," they will go far beyond the minimum requirements for consultations and GRMs.

However, the Focal Point warned that without serious "backing from above," there was a high risk that SEPs would be limited to just those two aspects and attention to other CE mechanisms would "only have marginal impact."

Like the Regional CE Focal Point quoted above, others who recognized the need for synergy between CE and the ESF also warned that without strategic linkages the opportunities created new risks. These respondents were not against coordination. Rather, they feared that marrying the CE and ESF agendas without carefully considering their differences could sacrifice systems-related, long-term CE goals. An OPCS staff member who had transferred from operational work to support the ESF's development and launch laid out key distinctions between the ESF and CE, describing CE as a "social contract between government and citizens" that is bigger than individual projects, with spillover effects. In comparison, "when you look at ESF and stakeholder engagement, it is about a specific project and specific types of stakeholders. It is about a project process, which is smaller than CE" and can truncate the broader impacts that CE efforts can have.

One Regional CE Focal Point recounted that the CE agenda and the ESF were developed based on two separate historic institutional processes and motivations – in both timing and content – and this had and would continue to interfere with their alignment. This Focal Point predicted that if there is a "tunnel vision" focus on pursuing CE via the ESF, there is the risk of CE "becoming all about service delivery and therefore moving away from systemic opportunities for CE." Another Regional Focal Point cautioned that because ESF requirements only apply at the project level, close linkages between the ESF and CE could limit the kinds of country systems approaches that CE advocates believe are most impactful.

IV. Implications

The findings presented here are not interpretations from critics external to the Bank. Instead, they synthesize perceptions from a robust sample of World Bank staff charged with realizing the CE agenda. These individuals have personally experienced the opportunities and bottlenecks in the current institutional processes and therefore have unique understandings of what works and what does not. By having an independent third party undertake this research with a commitment to anonymizing answers, respondents could securely share their assessments, complaints, ideas, and recommendations. The collected staff insights provide a reality check in five key areas:

1. Management-level attention to CE increased its prominence and visibility, yet the focus on meeting minimum standards rather than achieving maximal impact has limited the overall impact. This will continue to be the case as long as the focus remains on whether the minimums of the mandate are met rather than how it is being carried out and to what effect.

2. There is a lack of consistent, dedicated funding for monitoring CE in implementation, as well as for providing specialized support to teams to strengthen CE implementation when found to be lacking. Yet, staff report that with active management support and advocacy for visibility and budget, they successfully realize more ambitious CE plans. The absence of a consistent source of critical resources accounts for why the touted advancements in project design often do not translate into improved CE in practice.

3. The lead staff for CE, the CE Focal Points, face significant constraints on their time, resources, and authority. Those in regions and sectors that elect to advance CE can be more ambitious, but for the majority who must operate within significant constraints, the focus remains on meeting the minimums. This significantly restricts the agenda's potential overall impact.

4. Staff interpret that the institutional emphasis on CE mainstreaming has not shifted the status quo in terms of how different sectors and regions invest in CE. They perceive that those who historically had prioritized consultation and participation continue to demonstrate the most progress.

5. The Bank is foregoing a unique opportunity by not fostering synergy between the CE agenda and the ESF. Strategic coordination would allow the lower-profile CE program to leverage the ESF's extensive monitoring and enforcement mechanisms while bolstering the unique aspects of CE that the ESF does not cover.

In conclusion, this analysis of staff perceptions finds that the variation in how different regions and sectors prioritize and invest in this reform agenda limits the potential for implementation of CE commitments in projects. The identified obstacles hinder the CE agenda from reaching its potential, notwithstanding if they exist by design or they have arisen inadvertently. As the Bank shifts internally, seeking to find the right structures to best respond to the development needs of clients, it is the hope that these findings can inform current and future institutional thinking and plans for citizen engagement.

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Endnotes

1   The commitment requires that projects approved beginning in FY 2015 include at least one CE mechanism in project design plans, construct at least one indicator to measure CE progress, and report on that indicator by the third year of implementation. See https://www.worldbank.org/en/about/what-we-do/brief/citizen-engagement.

2   In October 2018 (FY19), the World Bank enacted the ESF to manage operational risks for IPFs. This replaced 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, nondiscrimination, 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 environmental and social standards, with ESS 10 providing guidelines for stakeholder engagement and information disclosure. The previous safeguards system remained in place for projects developed before October 2018 with the ESF applying thereafter. At the time of publication, the process for integrating the ESF with CE is still ongoing. See: https://www.worldbank.org/en/projects-operations/environmental-and-social-framework.

3   As part of the ESF, the Bank instituted ESS 10, which requires IPFs to undertake SEPs and institute Grievance Redress Mechanisms (GRMs). Previously, this had been good practice, encouraged as part of project's environmental and social impact assessments, but not required unless a project triggered application of one of Bank's two social safeguard policies on Indigenous Peoples (O.P. 4.10) and Involuntary Resettlement (O.P. 4.12). SEPs, therefore, were not a new instrument for the Bank. Rather, the standardization of the SEP instrument and the mandate that it be utilized for IPFs represents the innovation.

4   In 2020 the author followed up with many of the 2019 interviewees and interviewed three additional stakeholders to fill in remaining gaps from the initial research. The report was completed in December 2020.

5   The 30 World Bank staff respondents included: Management from The Governance Global Practice (GGP), the Social Development Unit of the Social Development, Urban, Rural and Resilience Global Practice (GSURR) and from Operations Policy and Country Services (OPCS); staff with advisory responsibilities, such as Citizen engagement Focal Points from across the Global Practices, themes and regions, developers, trainers for the social aspects of the ESF from GSURR and OPCS, as well as members of the CE Secretariat; and operational staff, including task team leaders and team members (with a focus on social development and safeguards specialists).

6   See Saunders et al. 2015.

7   When the Bank re-organized at the start of FY20 (July 2020), the Social Development unit within GSURR transitioned into an independent Global Practice that had sole authority over the CE agenda. In 2020 the Social Development GP rebranded, taking the name Social Sustainability and Inclusion (SSI). SSI now solely manages the CE agenda as one part of the broader Social Development portfolio, which also includes a parallel track that manages the social aspects of the ESF.

8   The management structure for the CE agenda described here pertains to the research period (February-August 2019). When the CE agenda first launched, GSURR managed the Secretariat independently with GGP joining in a co-leadership capacity several years later.

9   See: World Bank 2019.

10   See: World Bank 2015.

11   It is important to note that following the organizational re-alignment that began in FY20, the onus for providing CE-specific funding for Regional CE Focal Points moved from the Social Development GP at headquarters (now called SSI) to the respective management for each of the six regions. Therefore, the social development specialists who served as CE Focal Points could no longer count on a having a minimum amount of CE-earmarked funds.

12   The CE mainstreaming commitment requires that projects incorporate at least one CE mechanism and one CE indicator into project design and report results from the CE indicator by the third year of implementation.

13   World Bank. "Citizen Engagement." https://www.worldbank.org/en/about/what-we-do/brief/citizen-engagement (Accessed December 5, 2020).

14   See: World Bank. 2018.

15   ARC could only access TTLs for interviews who had some degree of personal commitment to CE, which may explain their willingness to participate in the interviews.

16   As of July 2020 (FY21), Africa has been divided into two VPUs, Western and Central Africa and Eastern and Southern Africa. See: https://www.worldbank.org/en/news/press-release/2020/07/01/world-bank-realigns-africa-region-into-two-vice-presidencies-for-greater-focus-on-country-progress.

17   P4Rs differ from IPFs because, in principle, financing is dedicated to a client country's own development program rather than an autonomous World Bank project (i.e., IFPs provide funding for specific expenditures while P4Rs provide funding for specific expenditure programs). Furthermore, P4R fund disbursement depends upon the achievement of agreed upon interim results (Disbursement Linked Indicators or DLIs) and are not subject to social safeguard policies, but instead must undertake an Environmental and Social Systems Assessment. See: World Bank. 2012.

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