

BIC Initial Thoughts on the WBG Citizen Engagement (CE) Concept Note

April 2014

We welcome the World Bank Group's (WBG) move towards engaging citizens in its operations. In the spirit of wanting to see true engagement by citizens with WBG towards the achievement of its twin goals of reducing absolute poverty and boosting shared prosperity, we would like to offer the following comments and recommendations on the proposed Citizen Engagement Concept Note.

- **Linking CE to improved development results:** Given the paper's discussion of CE being important for development results, in operations where the link between CE and improved development results is not clear (for example in DPLs), would you deem it unnecessary to engage citizens despite the Bank's recognition that citizens are the ultimate beneficiary/client? **We call for CE to be mainstreamed in all operations and lending instruments regardless of whether the link between CE and development results is explicit or not.**
- **Para 11.** Bank's commitment to **increase beneficiary feedback to 100 percent:** what does this mean? What would be considered satisfactory beneficiary feedback? Will one beneficiary feedback for a project be considered "beneficiary feedback"? **We call for the Bank to set unambiguous criteria and methodology to establish that beneficiary feedback is fully considered and addressed in the revised design documents and updated implementation plans.**
- **Para 11& Para 16.** The definitions in Para 11 don't include **affected communities**. Some citizens might not benefit from a project, but might be deeply impacted by it. The feedback should also include affected communities. Affected communities are also ignored in Para 16. **Affected communities should be recognized and included in the strategy.**
- **Para 16.** It refers to **consultations starting at the project preparation**, when the decisions about the project and its location have been already made, and not early on in the process, during the concept phase when decisions are made about the type of projects and their locations. **Citizens should be engaged early on in the concept phase to have their voices heard and considered properly.**
- **Para 17.** The Bank recognized "**third-party monitoring**" (TPM) as one of the existing instruments for CE. However, the in few experiences that we know about, the Bank contracted foreign consultancy firms to do the TPM which is like contracting a firm to do

an evaluation and is not really a form of citizen engagement. Moreover the Bank didn't release the TOR of these contracts or the reports done by those firms. **For TPM to be an effective CE tool, the ToR and the implementation plan should require the actual participation and further verification of duly elected citizen representatives (beneficiaries and impacted).**

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- **Para. 19. b.** We welcome the commitment to “**develop intermediate outcome and outcome indicators** that can be used in results frameworks (e.g., in CPFs and PADs) as well as for reporting on progress in implementing citizen engagement in ISRs and ICRs. **We would like to see the Bank making a commitment on process and timeline for developing and implementing these indicators bank-wide.**

- **Para 19. d.** One of the sources mentioned for potential **financing resources** is foundations. We know that the Bank's Global Partnership for Social Accountability (GPSA) is currently funded by foundations. **Will the funding available for GPSA be considered part of the pot for CE? Or will this be separate funding?**

- **Para 20. Table 1.** Systemic Country Diagnostic (SCD) and Country Partnership Framework (CPF) are identified as potential entry points for CE. Those two new policies/directives are still being developed but CE elements are still only just recommended or mentioned as best practices. **The Bank should mandate CE in those new policies.**

- **Para 20. Table 1. Projects.** The Bank identifies some **safeguards as entry points for CE**. We know that the Bank is currently reviewing its safeguards and that a new safeguard on Stakeholder Engagement will be introduced. **What type of coordination exists between this new CE strategy and the new proposed safeguard for engagement?**

- **Para 25.** The Bank recognizes the importance and interest of CE to external stakeholders and for this the **Bank commits to developing the strategy in coordination with all relevant stakeholders including CSOs, gov., and private sector.**

- **The Bank has only consulted so far with stakeholders in developed countries where the Bank is not operating.**
- In previous consultation sessions in DC the Bank's team mentioned that **there will be “dialogues” in some developing countries.** However we haven't yet seen any information about those “dialogues”.
- On the other hand in this same concept note, in **Annex 2, the Bank differentiates between “consultation” and “dialogue”** where the latter is less structured and

the convener is not as committed to “active listening” as it is the case with consultations.

- The Bank also opened **consultations online but it is still only available in English which is not a good practice for CE.**

We think that the Bank should show that it really believes in the principles of CE included in this concept note and conduct serious consultations in the countries where CE should be practiced.

- **Para. 25.** The Bank “is forming an **advisory council** including representatives of the above mentioned stakeholder groups to accompany the development and implementation of the strategy”. **Since the Bank itself recognizes that the context in each country is different, we propose that a national advisory group should be formed in each country where the Bank has programs to guide the implementation in the specific country context. The idea is not new and it is already implemented by the IDB in some countries where those national groups also assist with upstream inputs at the CAS level.**