

Introduction

Social and Environmental (S&E) safeguards and accompanying accountability mechanisms have been introduced in the early 1990s following the World Bank's establishment of the Inspection Panel (IP) for the International Bank for Reconstruction and Development (IBRD) and the International Development Agency (IDA) (Inspection Panel). Since then, the World Bank's Compliance Advisor Ombudsman (CAO) – an accountability mechanism for the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA) as well as many Development Finance Institutions' (DFI) grievance redress mechanisms have been established.

Despite the decades of existence of the redress mechanisms, the United Nation (UN) has started to introduce the tool in some of its agencies starting from 2015 only. The decision, however, has not been connected to the social or environmental footprints those UN agencies have had on their affected communities, as it has been the case with the World Bank's Inspection Panel. The decision has been connected with some of those agencies' donor funds' decision to require their partner organizations to have social and environmental safeguards, including accountability mechanisms, in order to qualify for the funds' financial support.

As those redress mechanisms at some of the UN agencies have been introduced fairly recently, there are no studies conducted on the social and environmental standards they are based on, i.e. their policy basis as well as their structure, operations and effectiveness. Given the pressure UN is under now both politically and financially, it is crucial for the UN to develop effective social and environmental accountability mechanisms. Given the urgency of restructuring the UN, current research outcomes will be valuable in providing policy recommendations to specific UN agencies on areas of improving their social and environmental accountability mechanisms.

The current research aims at answering the following research questions: What are the criteria of effectiveness of a social and environmental accountability mechanism? Do the UN agencies' social and environmental accountability mechanisms meet the established effectiveness criteria? If no, how can they be improved?

The first research question will be answered by conducting a desk research and analyzing the existing primary data on the criteria of effectiveness of social and environmental accountability mechanisms. The second research question will be answered through a combination of content analysis of the identified UN agencies' social and environmental accountability mechanisms, and field research involving interviews with experts.

A Synthesis of Effectiveness Criteria

There are multiple criteria and best practices discussed in official documents of international organizations and literature. Below is a compilation of the most commonly discussed principles and best practices of the redress mechanisms based on the analysis and review of the World Bank and Development Finance Institutions. The criteria are presented in alphabetical order.

1. Accessibility and Outreach:

The accountability mechanism has the responsibility to make efforts to provide information on the redress mechanism to the affected communities. The redress mechanism has the responsibility to be accessible to the affected communities. The websites of the mechanisms should be visible and available in multiple languages.

2. Both internal and external accountability as well as leverage:
Ensuring both compliance to the institution's standards and procedures through investigations of alleged failures to comply as well as solution and remedy to the affected communities through dispute resolution and other forms of remedy.
3. Considering and addressing the power imbalances between the complainants and other stakeholders:
Studies have found that the level of political and/or financial leverage of an entity that is a part of a dispute resolution can influence the problem-solving process. Given the fact that in the majority of cases the complainants are representatives of underdeveloped communities, there is an issue of power imbalance, which should be considered a risk and addressed.
4. Equity:
The complainants should be given the same opportunities when it comes to commenting on the reports as well as should receive the reports at the same time as entity the mechanism reports to. Creating a mechanism of appeals allowing the complainants to proceed with it if they are unsatisfied with the results of the process is suggested as a best practice.
5. Independence and impartiality:
The mechanism should not report to the management of the institution and the management should not provide technical assistance or funding to the mechanism.
6. Legitimacy:
It has been recommended to include outside stakeholders, for instance, civil society representatives in the compliance review or dispute resolution processes.
7. Advisory and monitoring functions:
The above mandates are defined as the ability to recommend solutions and advise on the existing problems as well as the ability to follow up with the entities who implement the suggested recommendations
8. Retaliation:
It is recommended to create guidelines on how to protect complainants from reprisals should such instances occur as well as guidelines on how to conduct prior risk analysis to determine the possibility of retaliation.
9. Skilled staff and financial resources:
This criterion stresses the importance of availability of the needed funding and staff for effective and successful functioning of the redress mechanisms as well as availability of a certain level of staff professionalism.
10. Transparency:
Making sure the reports and other documentation created by the redress mechanism and the management are available to the public in timely manner. Clear approaches to generating or using evidence to inform actions and determinations. Publication of complete information of the cases online and a tracking mechanism of all the cases. It would be beneficial to have a publicly available management tracking system that records the responses of the management to the recommendations of the redress mechanisms and how the lessons learned would be applied in future project development and implementation. It is considered beneficial if the civil society organizations have access to comment and review the procedural guidelines of the redress mechanisms. The authors propose to invite the complainants to the board

meetings devoted to their cases, and it is also suggested to livestream the board meetings.

Expert Interview Analysis

The Methodology

For the purposes of identifying the best practices and challenges in the field of social and environmental accountability mechanisms, twenty experts from thirteen organizations who have or have had experience in the field were interviewed.

Those were: A chief technical advisor from UNIDO; two compliance officers and an analyst from UNDP Social and Environmental Compliance Unit (SECU); an operations officer from World Bank Inspection Panel; an Associate Professor of Law and an expert in social and environmental accountability from American University; a Principal Compliance and Mediation Officer at African Development Bank; a Social Development Specialist at World Bank; a Technical Specialist of Safeguards and Grievance Mechanisms at UNDP and UN-REDD Programme; a Senior Evaluation Officer at the Independent Evaluation Office of the Global Environment Facility; an Expert at the Independent Compliance Mechanism of the Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.' (FMO); an Independent Expert of the Project Complaint Mechanism at the European Bank for Reconstruction and Development (EBRD); a Social and Environmental Standards Policy Specialist at UNDP; a Policy Associate at Accountability Counsel; a Regional Climate and Environmental Specialist at the International Fund for Agricultural Development (IFAD); a Safeguards Advisor at the Policy and Programme Division of UNEP; an Environmental Specialist at the World Bank, a senior level expert at the Office of Accountability at the Overseas Private Investment Corporation (OPIC); a Case Officer and a Communication Officer at the Independent Consultation and Investigation Mechanism (MCI) of Inter-American Development Bank (IDB).

Based on the expert interview analysis, common patterns as well as contradictions occurred when discussing certain criteria of effectiveness of the grievance mechanisms. Those patterns and differences in opinions as well as suggestions on how to overcome some of the challenges are presented below.

Accessibility, Awareness and Outreach

Accessibility, awareness and outreach came up as the most important factors contributing to the success and effectiveness of a grievance mechanism. The interviews' analysis revealed that there are multiple levels of awareness and outreach: the first level is informing the communities that the project is implemented (or funded) by the institution; the second level is to ensure the affected communities know that the institution implementing or funding the project has a social and environmental grievance mechanism; the third level is

ensuring that within the institution itself, including the project management, there is information and awareness about the mechanism.

These levels of awareness are directly linked to how outreach is conducted. There is direct outreach – outreach to the affected communities or to representatives of affected communities, like CSOs or government institutions – to inform them about the mechanism. There is also outreach to the country offices of the institution or to the project management, which can be called indirect outreach and outreach to different entities at the institution informing about the mechanism, which can be called internal outreach.

There is another issue closely associated with awareness and outreach – accessibility. The issue of accessibility does not necessarily come after the above-mentioned levels; it can come up at any time and even after there is full awareness at all levels. Accessibility is connected to the development level of the communities, whether the communities are affected by conflict and the level of resources available to the population. All these are factors that need to be taken into consideration when designing outreach strategies and raising awareness. That is why the issue of accessibility came up in conjunction with the issues of awareness and outreach during the discussions with the experts and that is how the analysis will be structured as well.

Working with the Communities

A Principal Compliance and Mediation Officer at the African Development Bank talked about the importance of the awareness among communities saying that “for the affected parties to accept the mechanism, the presumption is that the communities know the mechanism exists and they can file the complaint, which is normally not the case. In the case of the Independent Mechanism of the ADB, in short, we call it IRM, we have a problem that is, the people affected by the project do not know that the mechanism exists and some of them don’t even know that it’s the bank.”

An independent expert from EBRD’s Project Complaint Mechanism talked about the information policies as well as social and environmental policies of EBRD, mentioning that they are “designed and intended to address accessibility issue and enhance accessibility on all the levels.” The expert mentioned, however, that “it doesn’t mean it always works [...] There is a recurring issue in the projects that I have seen [...] about informing potentially affected people and communities that there is an institution such as EBRD and that there are other institutions involved in the project, and the next step after that is that along with that comes some form of an accountability mechanism.”

An expert from UNDP SECU also stressed how important it is to ensure that the first level of awareness is there: “If communities don’t know a given project has something to do with your institution, it doesn’t matter if you have an accountability mechanism.”

When discussing the challenges on the way of conducting outreach to the communities directly and raising awareness, many experts mentioned the importance of trust in the affected communities towards the redress mechanisms. “The truth is”, mentioned a compliance officer at UNDP’s SECU, “the mechanisms that have been the most used and from my perspective most successful have been the mechanisms that the communities trust the most.” The expert

continued, “and the communities can tell when the mechanism is structured to help them and when it is not. So, practically speaking, I think how the mechanisms are perceived by the communities as legitimately trying to help them or not is critically important.” The expert brought the example of Meg Taylor, the former vice-president of the Compliance Advisor Ombudsman at IFC. Meg Taylor is a national of Papua New Guinea and, according to the expert, and “had credibility with local communities.” The expert stressed the importance of the mechanisms being perceived as legitimately trying to help the communities, and an effort to inform the communities that the mechanism exists is a sign that the mechanism cares enough to make an effort and raise awareness. This can increase trust in the communities and increase the likelihood of complaints submissions.

The expert from ADB also stressed the importance of trust and that it is crucial to work on that “even before the project implementation.” He suggested that “if a financial institution has a grievance mechanism, a place where affected people can raise their concerns or make complaints, some of the affected people may see that as just superficial in the sense that the clients of the banks and the institutions know that they are supposed to have those mechanisms but the affected people are quite skeptical that the input is really going to be meaningfully considered.”

Besides the discussions on the levels of raising awareness, implementing outreach plans, challenges, other than trust were raised during the conversations with the experts accompanied, in some cases, with solutions and best practices on how to overcome those challenges.

In general, the experts that talked about the most important effectiveness criteria and that were specifically asked about raising awareness among the communities and the accessibility of the mechanism, mentioned that those were the most important and largely discussed issues among their institutions. The expert from OPIC’s Office of Accountability shared the feedback of the environmental groups; they expressed an opinion that OPIC’s Office of Accountability does not have cases not because it is doing a great job but because it is not known, hence making the issue of awareness and outreach a crucial one.

Among the most common issues related to the community outreach were the small staff, scarcity of resources in some and absence of country presence in other UN agencies. In terms of accessibility, the level of development in the affected communities was considered a factor influencing the communities’ ability to access the mechanisms. A Social Development Specialist from the World Bank mentioned two issues that did not come up in the conversations with other experts. One was the existence of conflict in a community influencing the level of access to the grievance mechanisms. The other issue was connected to gender. “When you look at many of these violent or fragile contexts”, the expert mentioned, “there is a lot of violence against women, and you have the cultural limitations and maybe taboos like gender-based violence. We need to find new mechanisms to be able to help women to report these incidents and what happens at the project-level and macro-level. This is still what we are struggling with.”

The experts suggested multiple tools and solutions to increase awareness and access among the communities. One of the most discussed way of raising awareness was through the Independent Accountability Mechanism Network (IAMNet). The IAMNet members participate in the social outreach conference and meet with Civil Society organizations. Some of the member

also organize and hold joint outreach missions. Regional workshops in the communities as well as working with local and international civil society organizations were also often mentioned as useful tools in raising awareness. The most commonly expressed opinion about CSOs can be summarized in the quote by one of the experts at UNDP SECU: “I don’t think these mechanisms could function without civil society.” However, there were differences in opinions on how helpful CSOs can be. A World Bank Social Development Specialist talked extensively on the issue of working with CSOs:

“I found that working with associations can be a double-edged sword sometimes. They know the communities better than anyone because they are the members of the communities, [...] but we found that sometimes these associations do not represent the interests of the communities. You have what, I think, are commonly known as business making associations. They will know that there is some economic gain from representing or doing a certain type of work, it is very important to make sure you are looking at the political context as well. I’ll take the example of this area I was working in. There was this association I was working with, which was from one of the dominant groups and, obviously, the issues that would come up from this dominant group were handled or managed in a way that they would get compensation, they would get their money faster, they would get higher rates for things they said they lost because of the project and the minorities would complain and say that the association does not represent them, it is very interesting and important to look at the cultural fabric of the area which you work in; these associations are extremely useful but they can also do more damage than good.”

A case officer from IDB MICI also mentioned about the importance of NGOs but noted that one has to be aware of the reality that some NGOs are biased.

Newsletters, social media presence and website visibility were also mentioned as effective tools to increase awareness in the affected communities. Many experts stressed the importance of having visible websites and connected it not only to the ability of raising awareness and as an outreach tool, but also as a best practice for better accessibility. All of the experts from UNDP SECU mentioned how having the SECU website link in the front page of UNDP main website has helped in terms of providing better access to the affected communities. “We do have a complaint from Bosnia”, one of the experts told, “[...] the reason we have that complaint is that we really pushed to have a link to our mechanism to the very front of the UNDP website. If you have a problem with UNDP and you type UNDP.org and you are frustrated, you go to the website and go to the very bottom of the webpage it says submit a social or environmental complaint. It’s right there on that page.”

The expert from ADB mentioned that in the case of ADB, not having a separate website was not only an awareness and accessibility issue but also an issue of trust. The expert understood that not having a website combined with the fact that the ADB accountability mechanism is housed within the premises of the Bank can raise concerns among the communities on the credibility of the mechanism.

The importance of having a user-friendly website was also stressed by a communication expert at IDB’s MICI. The expert shared the plans of the IDB accountability mechanism to improve the website by analyzing it as well as sending surveys to CSOs for feedback.

In terms of accessibility, the majority of experts talked about the importance of having low threshold for the complainants to file a case. An expert from UNDP SECU talked about the importance of not having many requirements for the complainants:

“the idea was [...] to create as big a window as possible for people to come and complain. It is very tempting to create a narrow window. Of course, in that process, we receive all kinds of complaints in UNDP, some of them are fascinating in terms of what people aren't happy about, [...] that's why it's good to have the hotline so people can contact us in any way, on Facebook, email, call. As long as they give us a way to reach them, we can start a conversation. Then it gets narrowed down because we take complaints that are related to social and environmental standards.”

In the case of IDB accountability mechanism as well, the expert from the institution's office of accountability also acknowledged that the narrow window the mechanism has for accepting the cases is a disadvantage. The definitions of a narrow or a wide window varied, but not having very detailed requirements for the complainants when filing the form as well as providing as many ways to communicate the complaint as possible (phone, email, mail, Facebook, text messages etc.) were considered to increase the accessibility of the mechanism. Availability of the information in multiple languages was also mentioned by experts as a tool to decrease the accessibility barrier for the affected communities.

Working with the Country Offices and Project Management

When discussing what in the scope of current research is called the third level of raising awareness and conducting outreach, i.e. the indirect outreach to communities through the country offices and project management, multiple concerns were raised and solutions suggested.

The issue of raising awareness in country offices and on the project management level can be said to be a difficult one both for the institutions with presence in the countries where the projects are run and for the institutions without country presence.

Two of the experts from UNDP SECU talked about the levels of awareness on the UNDP S&E accountability mechanism. One of the experts shared an experience from a trip to Bosnia:

“We just had a visit to Bosnia, meeting with a lot of staff, the first questions are who are you? What are you doing? We read about you but we don't know what that means in practical terms. They are worried that we are there. We hear that every time so far. I'm sure that with time, as it was with the Inspection Panel and CAO, the staff will become more aware because there will be complaints and the word gets out.”

Another expert from UNDP also agreed that “awareness is a huge problem, because UNDP has 160 or 170 country offices and SECU is a small team in New York, and emails get sent out from BPPS, and people get emails from headquarters all the time about new policies and new standards and new quality assurance processes. And there is a lot of turnover in the country offices, and staff is moving around and have different roles. Awareness of SECU within

the organization and the awareness even of the social and environmental standards of UNDP and the level of knowledge and expertise about the standards and about applying standards and the screening procedure is variable ranging from very informed to completely unaware of and that's a huge hurdle that a small team like SECU needs to overcome.”

In case of UNEP, the problem is not the abundance of country offices and lack of resources to communicate with them and raise awareness about the mechanism. The interviewed expert told that “UNEP is different from UNDP or World Bank in a sense that we don't have country presence. We are very small and have headquarters in Nairobi, regional offices and exceptional cases of country offices. Our visibility at the ground level is not very clear.”

Besides raising the issue of awareness in the country offices and among project management, one of the topics discussed by the experts were the incentives of the project management and country offices to work with the mechanisms in raising awareness and helping with outreach. As an expert from EBRD observed, “different stakeholders have different stakes. [...] It is important to remember that different participants in the development process have different reasons and they may or may not want to increase usage of the accountability mechanisms.”

As a result of the interview analysis, a pattern occurred in regards to the incentives in the DFIs and UN agencies. The experts from both types of institutions acknowledged that it is an issue to incentivize the project management and, in some cases, the staff may feel threatened by the mechanism and have conflict of interest in raising awareness among the communities. However, experts from the World Bank and DFIs thought the issue of the project management incentives to be more acute than the experts from the UN agencies. Experts from both types of institutions agreed that in the case of the Bank and DFIs there is a need to “move money and the need to cut corners”, as an expert put it. Whereas in the case of the UN agencies, experts agreed that with exceptions, the management seemed to be cooperative and less concerned about the faith of their jobs. As an expert from UNDP mentioned: “no one's likely to lose their job at UNDP unless the mistake is so huge, and there's no huge incentive like in the World Bank to move money.”

Multiple best practices have also been shared by the experts during the interviews. In order to make sure the country offices and/or project management cooperates with the mechanisms in disseminating information about the availability of the mechanism, the following practice was the most applied and recommended: the majority of the experts mentioned the requirement to include information about the grievance mechanisms in the project documents.

Other tools included assigning focal points in country offices, i.e. special staff members responsible for being contact points for the mechanisms in the country offices, a link of the website in the project documents, engaging the project management in raising awareness during the consultation and screening processes of the project development as well as monitoring the management efforts to inform the communities about the mechanism.

A tool was mentioned by the OPIC expert, and it is unique as no other expert had suggested and no other mechanism has or has implemented it. OPIC's Office of Accountability has set up a process during which if a project is classified as A, OPIC has to write to the client

and notify them that they have to inform the community about the office of accountability. The way the client informs is the client's decision, but the client is given thirty days to report back to OPIC on how the outreach was done. If it was not done or was done unsatisfactory, the Office of Accountability sends a staff member to investigate. According to the interviewed expert, since a year ago when the process was established, ten cases were classified A, and all of them complied with the requirement. This can be an indicator of a best practice that works in making sure the projects cooperate in raising awareness about the redress mechanisms. This practice also relates to the mandates of an institution, which will be discussed in the following section.

The Mandates

Based on the analysis of the expert interviews, the following functions or mandates of the accountability mechanisms were identified: Compliance Review; Dispute Resolution; Advisory and; Monitoring or a Follow-up function.

Although all experts acknowledged the value of the dispute resolution function, several experts mentioned that dispute resolution cannot be applied to every case. An expert from the Accountability Counsel mentioned that the dispute resolution process is not appropriate in every circumstance. One of the experts from UNDP shared that view and stressed that mediation is a separate skill and in some instances the cases can stretch for “10 years and mediate forever and the parties fundamentally don't want to agree.”

This mention of dispute resolution not applying to every case does not disrupt the consensus among the experts that mediation is an important function. The expert from FMO talked about the reasons why dispute resolution can specifically be an important tool mentioning that compliance reviews correct the problems in the organization but do not directly address the problem and solve it; dispute resolution can be effective in that regard. An important aspect of the dispute resolution process was mentioned by one of the experts at UNDP: “We wanted to create a bottom-up system and have the country offices play a role. A lot of people criticize CAO for helicoptering and bringing in people from headquarters. We wanted to push the responsibility downwards and recognize the criticism.”

The experts from the World Bank also agreed to the importance of the dispute resolution function. Although the World Bank Inspection Panel does not have the function, the expert acknowledged the importance of the function anyway and explained its absence by historical reasons. Inspection Panel was the first social and environmental accountability mechanism and the expert from the Inspection Panel explained the difficulty to introduce the function due to the fact that it is the Board's decision.

The expert from the Inspection Panel also talked about the process that has been recently introduced in IP – the quick response procedure that allows to provide solutions to urgent issues with an action plan without having to register the case formally and to allow the case run its course. The expert from EBRD also talked about the function of rapid response, mentioning that it can be an important function as some cases take eighteen months to run their course and by then there can be fatigue among the parties and “may be too late by the time it gets resolved.”

Social and Environmental Accountability Mechanisms at the United Nations

The advisory and monitoring functions of the mechanisms were also discussed. Those two mandates do not appear in all the mechanisms and involve a certain level of challenge, and the mechanisms approach those functions with reservations.

The expert from FMO mentioned that the follow-up function can be sensitive because it usually occurs if the management has not implemented the recommendations. One of the experts from UNDP thought that having the monitoring function is extremely important and that “without the monitoring phase [...] there is much less accountability because there is no follow-up and no one to ask whether the recommendations endorsed by the administrator have actually been done.” The experts also spoke about how the monitoring function gives the power to the affected communities: “the fact that monitoring report is made public allows the complainants and the communities to apply pressure to the organization and use whatever tools are at their disposal. Because there is transparency and the transparency as to the result of the monitoring report will give communities that information to determine whether the recommendations have or have not been implemented and that’s an incredibly powerful tool for the communities to use if necessary.”

Advisory function has also been considered important for the purposes of identifying and solving institutional issues that recur frequently, and, in the case of UNDP SECU, because the mechanism cannot investigate cases that have started before 2015, and the advisory function allows to conduct an advisory review to identify possible issues. A concern was raised, however, by one of the UNDP experts, that when conducted proactively, advisory functions can be controversial because they can be conceived as “creating business”. Therefore, according to the expert, there is a fine line when it comes to proactive advisory reviews.

Common Concerns: Retaliation, Skilled Staff and Resources

The issue of retaliation has come up as one of the concerns that is widely discussed among the practitioners in the field. Some of the experts mentioned that the issue of retaliation has been discussed in the IAMNet meeting, and a working group has been informed to work on the issue. Why retaliation is a challenge for the accountability mechanisms can be summarized in the explanation given by one of the UNDP experts:

“It’s a huge issue in the world of accountability mechanisms and it is a pressing issue and one of the problems is that these accountability mechanisms are asking public, the communities to file a complaint and expose themselves as whistleblowers. But then the mechanisms don’t have any control or influence over the folks that might be threatening retaliation over the complainants. In traditional whistleblower protection policies it’s internal to the organization, so the idea is that if a person x at UNDP whistle blows against person y and person y or person z who is allied with person y, both of whom are within the same organization threaten person x, there is all sorts of power and leverage that the person has over person y and z, they are part of the organization, they have contracts with the organization so there are whistleblower protection policies that can be effectively implemented to protect that whistleblower. With SECU, our complainants are necessarily outside of the organization and those who might threaten the complainants are most likely, not always but most likely, also outside of the organization, they are going to be someone who has no connection to UNDP, they are going to be someone who is not necessarily under any control of the UN system. So how do you set up a retaliation

framework that effectively protects whistleblowers when you have none of the leverage over the threatening people that traditional whistleblower policies have? So, that's the struggle."

There have also been suggestions on what the mechanisms can do to address the issue of retaliation:

"So, for example a good whistleblower protection policy for a mechanism might say we are going as careful as possible, we are going to assess the risks we are going to be discreet when setting up meetings, we will respect and maintain confidentiality as much as possible or entirely and if the threats become grave enough we will refer the complainant to the relevant authority we will assist if possible and help them to create the connection between the complainant and the relevant authorities, maybe national police or human rights bodies or whatever is right. Basically, we will try our best but we don't have any leverage over the threatening people. So, what's really important is that mechanisms have public policies where complainants can read it and see what can and cannot be done and then they will be in the best position to determine whether those risks are manageable and whether they can proceed with the complaints, and that's really important. The mechanisms are handicapped when protecting complainants because of the necessary truth that they are external to the organization. That being said, there is a lot that can be done to codify and formalize what can and cannot be done to protect them and, most importantly, as far as I am concerned, to properly set those expectation of what can and cannot be done to protect whistleblowers."

The importance of explaining the risks to the complainants in advance was mentioned by several other experts. The interviewee from World Bank's Inspection Panel shared IP's practice of background check/analysis to assess the potential retaliation risks and protecting people and entities through encryption software.

When talking about retaliation, the expert from American University mentioned about the reasons World Bank Group Inspection Panel and CAO have retaliation guidelines. The expert connected the fact to the assassination of Berta Cáceres, a human rights and environmental activist from Honduras (Watts). Berta Cáceres organized campaigns that prompted the withdrawal of IFC from "one of Central America's biggest hydropower projects, a cascade of four dams in the Gualcarque river basin, including the Agua Zarca dam" (Watts). According to the expert, the big public outcry and the attention drawn to the assassination by the media were among the reasons the retaliation guidelines were created. But as one of the experts at UNDP mentioned, the fact that an institution has not experienced a retaliation issue does not mean it won't. And there was a consensus among the experts that retaliation risk is a pressing one and should be addressed accordingly.

Another topic that came up during the conversations with the experts was the issue of skilled staff and resources.

All the UN experts who had expertise to talk about social and environmental accountability mentioned that having staff and enough funding was a struggle. From what the expert from UNEP discussed, the scarcity of financial and human resources was evident: "For the time being, we are keeping that (the IOSSR) within the monitoring unit but no one wants to really take extra burden, and I am saying ok if any case arrives I will be part of it and will support. So, in terms of the structure, we don't have a firewall and, in a way, the organization is just giving me all the responsibility related to safeguards. [...] We have structural

challenges, that is there, so I want to be prepared for the first case that may come. But in the absence of the support and the senior managers understanding... I don't want to blame them because we haven't had the experience, unless they have the experience they may not realize the issues related to all of this. I said ok, I was pushing for the proper structure and procedure internally and now my strategy is "ok, let's see when the first case comes", we will use it to educate the organization and use that opportunity to have a proper system and raise all the issues I may have. It's difficult."

From this quote, one can observe that the lack of funding and human resources is also connected to the awareness level and political will of the decision makers at UNEP, but that will be discussed in more detail in the coming section.

There was also a mention of the professional capacities of people who work at the grievance mechanisms. An expert from UNDP hoped that "there is a professional track to people who are recruited into it and how they carry out their work. The reason it needs to be addressed is that the work is distinct from, for instance, a professional evaluator and there is a translation that needs to happen, a change of mindset. It's not the same as being a consultant in an independent project. When it comes from a beneficiary, it creates a different dynamic. Unless people can create this different mindset, they don't quite transition into that. We need to emerge maybe in a law school maybe somewhere else for people to distinguish what it is."

A UN-wide Accountability Mechanism

There was a consensus among the experts that there were little chances that there would be a UN-wide social and environmental redress mechanism. There are already efforts, some of the experts discussed, to reconcile the standards and have a basic level of cooperation guidelines among the mechanisms. There is already a certain level of understanding among UNDP, FAO and UNEP to "decide where the complaint should be referred to and what agency should lead the means of cooperation," according to an expert. There is also a process to harmonize the social and environmental principles among certain UN agencies and create basic standard guidelines which will be discussed more in the following chapter.

However, the aforementioned cooperation was aimed, as revealed by the experts, at creating a basic level of common principles and cooperation guidelines, and having a UN-wide mechanism deemed impossible by the experts. And one of the most important reasons was cited to be the lack of political will or incentives in the UN agencies.

The expert at UNDP told that she was certain "it's just politics that no agency wants to lose control of a mechanism, that might hold it accountable. For example, when we write a report, it goes to the head of UNDP. So, if UNEP used us, would our reports go to UNEP or where would they go? It just becomes political. And part of it is that we have different standards and we have to have common standards."

Another expert from UNDP was more certain that "agencies will never agree to an overarching mechanism. You could have better coordination and potentially have overarching principles for the mechanism and potentially a focal point for the country offices."

Yet another expert from UNDP shared the other experts' opinion that "there are some UN agencies that are highly political." The expert continued saying that he didn't think there "is an appetite, for instance, for the peacekeeping operations to expose themselves to social and environmental, especially social complaints." The expert, however, further stated that "there would be a desire to harmonize and have shared services and safeguards etc. I think, it is going to happen slowly, as everything happens at the UN, and I think the logical thing that would happen is that UNDP aka SECU and SRM and our standards would be adopted by its closest agencies like UNICEF and UN Women and UNEP and UNOPS which are all offshoots of UNDP and closely connected to UNDP and whose development systems are close to UNDP and what can happen is those agencies could adopt UNDP standards and then they could pay SECU and SRM to do their compliance and dispute resolution processes."

Another expert at UNDP who is connected to the efforts of harmonizing the social and environmental principles and mechanisms stated that they are only talking about minimum standards, and each agency will develop its own mechanism. They are not talking about establishing a unifying accountability mechanism.

The expert from UNEP considered having a common language in the principles and harmonizing up to 50-60% an achievement in terms of cooperation, if accomplished. "We are happy the way it is going," the expert concluded.

The expert from IDB also thought that UN agencies are politicized more than DFIs, and the expert from the American University connected the absence of interest in the redress mechanisms with the fact that UN agencies social and environmental footprint has not been as big as World Bank's and it never caught the attention of the international community. The expert also expressed an opinion that UN should have a UN-wide accountability mechanism, at least on

The UN Agencies with Redress Mechanisms

The Methodology

In order to identify agencies that have social and environmental redress mechanisms, the author of the current research has a) identified and researched funds that require their implementing agencies to have social and environmental accountability mechanisms in order to identify whether they financed any UN agencies. The researched funds were the Green Climate Fund (GCF), Global Environment Facility (GEF), The Forest Carbon Partnership Facility (FCPF) and REDD+; b) identified and researched UN programmes and funds, specialized agencies and other entities that funded or implemented development projects largely defined. As a result, the following twenty entities have been identified for further research: UNEP, UNCDF, UNCCD, UN Women, UNDP, UNISDR, UNFPA, UNICEF, UNOPS, UNIDO, FAO, WHO, ECE, UNHCR, IAEA, ILO, IFAD, IMO, WFP; c) conducted keyword based internet and academic database research.

Based on the aforementioned research, eight agencies were identified to have grievance mechanisms at different level of development. Those were: United Nations Convention to Combat Desertification (UNCCD), The Impact Investment Fund for Land Degradation Neutrality; The United Nations Office for Disaster Risk Reduction (UNISDR); United Nations Environment

Programme (UNEP); United Nations Industrial Development Organization (UNIDO); Food and Agriculture Organization of the United Nations (FAO); United Nations World Food Program (WFP) and the The International Fund for Agricultural Development (IFAD).

Analysis of the UN Agencies

Based on the analysis of the World Bank, DFIs and GEF social and environmental principles as well as best practices and problem areas identified during the expert interviews, the analysis of UN agencies will focus on the following areas: accessibility and outreach, independence and transparency, mandates or the scope of the mechanisms' work as well as retaliation guidelines. Each of the criteria will be defined, again, based on the operationalization and suggestions found in the Bank, DFI and GEF documents, literature review and expert interviews analysis. The table in Annex 1 shows the description of each of the mechanisms based on the selected criteria.

Accessibility and Outreach

Submissions of Complaints: UNISDR, UNEP, FAO and IFAD accept submissions through email, mail or fax. Only UNDP and WFP's BFM allow complaint submissions through a phone call. Of all the mechanisms, only UNDP's SECU and SRM mention that submissions through email, post and phone call can be done in any language (web forms can be filed in English, French and Spanish). No other mechanism has any explicit indication that complaints can be submitted in a language other than English.

Cases: Of all eight mechanisms, UNDP's SECU and SRM (five and three respectively) and WFP BFM (twenty) had cases. For the rest of the mechanisms, no information on registered cases, if any, was available based on the search of the mechanisms' publicly available documents and websites. Of all the mechanisms, only UNDP and UNEP had publicly available web registries. For other mechanisms, either no information was available on the matter or the availability of the registry mentioned on the website or the official documentation was not possible to confirm.

What should be included in the complaints: UNDP, UNEP, UNIDO and FAO had similar content when it came to requirements on what should be included in the complaints. Identity, contact information, location, information on the project and description of the issue were common in all the above-mentioned mechanisms. UNDP and UNEP also asked the complainants whether they would prefer confidentiality.

Websites and Social Media: The only mechanisms that did not have websites were those at LDN Fund, UNISDR and WFP. UNDP's SECU was the only mechanism with Social Media Presence; it had a Facebook page. UNDP's SECU and SRM were the only mechanisms with a direct link on UNDP's homepage.

Independence and Transparency

Except the LDN Fund and WFP whose reporting structure could not be identified, all the other agencies' mechanisms were independent from management. It is, however, worth noting that only UNDP's SECU and SRM have their own units and staff responsible to exceptionally

Social and Environmental Accountability Mechanisms at the United Nations

carry out the mechanisms' mandate. All the other mechanisms' mandates are carried out by entities that have been established before the creation of the mechanisms and have responsibilities other than to carry out the mandate of the mechanism.

As no cases have been registered in the majority of the mechanisms, it is difficult to judge about transparency in the identified mechanisms. It is, however, worth noting that only UNDP, UNEP, FAO and IFAD's mechanisms have a publicly available list of what documents are going to be produced during and as a result of the investigations.

Recommendations:

Based on the fact that the mechanisms at the UN have been established relatively recently and only one agency has mechanisms that have received and investigated cases as well as the knowledge of the existing lack of political will, lack of internal awareness and devotion to the issue of S&E accountability at the UN as well as scarcity of financial resources revealed as a result of interviews analysis, the UN agencies are recommended:

1. The head of the UN agencies or relevant decision-making bodies should recognize the importance of the social and environmental safeguards and accountability mechanisms, request a review of the mechanisms' policies and operations if no cases have been received during the recent year and allocate sufficient funding for the successful functioning of the mechanisms.

The mechanisms should:

1. Apply and become members of IAM Network to be able to benefit from the annual meetings, exchange of knowledge and best practices as well as shared outreach opportunities.
2. Create an easily accessible and a user-friendly website. Publish the link of the mechanism's website on the homepage of the agency's website homepage.
3. Allow a wide window for the complainants for the submission of the complaint in order to improve accessibility: allow submissions through phone, email, fax, mail and text messages in a language of complainants' choice.
4. For the mechanisms that do not have staff hired to exclusively work on the implementation of the mechanism's mandate, either hire such a person or persons or designate a focal person from the already existing staff members as a contact responsible for the mechanism's operation and outreach activities.
5. Conduct outreach activities both with project communities, local and international NGOs as well as country offices, project management and headquarters through in-person meetings, seminars, dissemination of information materials, newsletters and other applicable means. Consider the level of development of the community and conduct conflict and gender analyses when designing the outreach strategy to successfully raise awareness about the mechanism and increase its accessibility.
6. Include information on the mechanism in the project document, establish a requirement for the project management to inform about the mechanism to the affected communities and other stakeholders during the project consultation phase, establish procedures to be able to monitor and follow up with management's outreach activities. Assign focal points

in country or regional offices and/or other entities representing the agency in locations other than the headquarters.

7. Consider the synthesis of the recommendations presented in chapter 2.

Conclusion

There have been no analyses or studies conducted on the social and environmental accountability mechanisms at the UN. None of the interviewed experts, including those from the UN and those included in the efforts of harmonizing the standards between the existing UN agencies had the list of all the UN agencies with the redress mechanisms; the experts from the World Bank, DFIs, NGOs and academia had no knowledge that any UN agency except UNDP had grievance mechanisms. The fact that the experts working in the same field do not know about the existence of the S&E redress mechanisms at UN agencies as well as the gap between the policies of S&E grievance mechanisms and actual implementation that the study revealed speaks about the urgent need to reform the S&E accountability system at the UN.

Given the important role UN plays in sustaining global peace and eradicating poverty as well as the ongoing accusations about UN's ineffectiveness and lack of accountability, there is a need to recognize the importance of making the existing social and environmental grievance redress mechanisms at the UN agencies fully functional and coordinate the efforts among UN agencies for the sake of clarity, visibility and accessible to the potentially affected communities. To contribute to the aforementioned efforts, the author suggested a list of recommendations directed to the decision-making bodies of the UN agencies with redress mechanisms as well as the mechanisms themselves.