Operationalizing Social Accountability in Policy-Based Lending:

Lessons Learned from Emerging Experience

Annika Silva-Leander
William Reuben
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Background and Methodology

This study is part of a broader effort of the Social Development Department to document good practice and gather lessons learned from experiences with social accountability inside and outside the World Bank. These good practices are collected in the online Social Accountability Sourcebook (www-esd.worldbank.org/sac). The Sourcebook seeks to provide World Bank staff with access to international good practice on social accountability across a variety of sectors and regions, and guidance on how to include social accountability in different types of World Bank operations. This study is part of the Sourcebook section on “Social Accountability in World Bank Operations” and is the working paper version of the chapter on “Social Accountability in Development Policy Lending (DPL)”.

This study provides an overview of how World Bank-financed policy-based loans (PBL)¹ (both structural adjustment loans and DPLs) have supported social accountability approaches in policy reforms and extracts lessons learned from this emerging experience. The study is based on a document review of all policy-based loans approved by the World Bank since 2000 that have some social accountability content, as well as interviews with fourteen key informants. These included task team leaders (TTLs) of some of those DPLs as well as sector leaders, country directors and country managers of sectors, regions or countries that had DPLs with social accountability in their portfolio. The few social accountability practitioners that have worked on DPLs have also been interviewed to gather more specific lessons learned on the challenges and opportunities on design and implementation issues. The study also draws on the experience of the authors that have worked on social accountability components in a number of DPLs in the Latin American and Caribbean region.

Section 2.1 (“Participation in Policy-Based Lending: a Statistical Overview”) provides a statistical overview of how stakeholder participation has been featured in DPLs since the approval of the new DPL policy OP/BP 8.60. Stakeholder participation being a necessary, but not sufficient condition for social accountability, the figures however provide data on how social accountability-related issues have been featured in the content of DPLs to date, across sectors and regions. The analysis was carried out as input for an Operations Policy and Country Services (OPCS) review (“DPL Retrospective”) which sought to assess the implementation of the OP/BP 8.60 from the approval of the new policy in August 2004 until December 31, 2005. The full OPCS study was published in July 2006. The methodology for the participation analysis is described in annex 1.

Section 2.3 (“Examples of Social Accountability Actions Reforms supported by PBL”) provides a typology and examples of the different types of social accountability reforms that can be supported by DPLs. The analysis builds on a review of 224 policy-based loans approved by the World Bank since July 1999. Those considered to have relevant social accountability content (based on the definition of social accountability provided in the conceptual chapter of the Sourcebook²) were selected and documented. The first indicator used to identify social accountability content was whether the prior actions, benchmarks or triggers in the policy matrix made reference to social accountability. The interviews with TTLs and social accountability practitioners eliminated – as much as possible - those reforms and actions that were mentioned in the policy matrix, but not implemented. However, as the interviews did not cover

¹ Generic term used to describe both structural adjustment and development policy loans.  
² The Conceptual Chapter of the Social Accountability Sourcebook defines social accountability as "(i) the broad range of actions and mechanisms (beyond voting) that citizens can use to hold the state to account, as well as, (ii) actions on the part of government, civil society, media and other societal actors that promote or facilitate these efforts".  
³ For operational purposes, social accountability actions in the policy matrix refer to stakeholder participation at the national, regional or local level in the formulation, implementation and monitoring of strategies, plans, policies, programs, budgets, expenditures and services, as well as efforts on the part of governments to facilitate citizen access to information.
all the loans mentioned in this section, the rest of the examples were based solely on the information provided by the Program Documents (PDs).

Section 3 (“Operationalizing Social Accountability in World Bank-Supported Policy-Based Loans: Lessons from Emerging Experience”) is based on information gathered from the fourteen key informant interviews and the experience of the authors.

Finally, one of the purposeful gaps of the study is that it does not assess the lessons learned from the implementation of different sectoral social accountability reforms related as this is covered in the sectoral chapters of the Sourcebook.
Acknowledgements

The report was written by Annika Silva-Leander (SDV) with inputs and guidance from William Reuben (LCSSO). Kristoffer Welsien, Crystal Lopez and Yuki Niimura provided research assistance support for the generation of statistical information and for documenting the interviews. Kirsten Havemann and Sophia Moestrup provided support in extracting the data from Program Documents (PDs) in fiscal years 2000-2004, while Daniela Beckman extracted the data from PDs in fiscal years 2005 and 2006. Warren Van Wicklin and Jeff Thindwa assisted in reviewing and improving the report.

A heartfelt thanks goes to the Country and Sector Directors, Country Managers, TTLs and Social Accountability practitioners that willingly gave their time to share their experience and insights on social accountability in DPLs. These include Douglas Addison (AFTP4), Katherine Bain (LCSPR), Blanche Cotlear (LCSPR), Daniel Cotlear (LCSHD), Evangeline Javier (LCSHD), Phillip Brynnnum Jespersen (AFC10), Alessandro Magnoli (EASPR), Denyse Morin (AFTP4), John Newman (LCCPE), Carolina Sanchez Paramo (LCSPES), Ritva Reinikka (AFC01), Alberto Rodriguez (LCSHE), Roby Senderowitsch (LCSPS) and Agnes Soucat (AFTHD).
## List of Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAA</td>
<td>Analytical and Advisory Activities</td>
</tr>
<tr>
<td>CFCAA</td>
<td>Country Financial Accountability Assessment</td>
</tr>
<tr>
<td>CMU</td>
<td>Country Management Unit</td>
</tr>
<tr>
<td>CPAR</td>
<td>Country Procurement Assessment Report</td>
</tr>
<tr>
<td>CSA</td>
<td>Country Social Assessment</td>
</tr>
<tr>
<td>DPL</td>
<td>Development Policy Loan</td>
</tr>
<tr>
<td>DUF</td>
<td>Unified Directorate of Funds</td>
</tr>
<tr>
<td>IDF</td>
<td>Institutional Development Fund</td>
</tr>
<tr>
<td>IGRs</td>
<td>Institutional and Governance Review</td>
</tr>
<tr>
<td>JSDF</td>
<td>Japan Social Development Fund</td>
</tr>
<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
</tr>
<tr>
<td>OPCS</td>
<td>Operations Policy and Country Services</td>
</tr>
<tr>
<td>PBL</td>
<td>Policy-Based Lending</td>
</tr>
<tr>
<td>PD</td>
<td>Program Document</td>
</tr>
<tr>
<td>PER</td>
<td>Public Expenditure Review</td>
</tr>
<tr>
<td>PSAC</td>
<td>Programmatic Structural Adjustment Credit</td>
</tr>
<tr>
<td>PSAL</td>
<td>Programmatic Structural Adjustment Loan</td>
</tr>
<tr>
<td>PSIA</td>
<td>Poverty and Social Impact Analysis</td>
</tr>
<tr>
<td>PSRL</td>
<td>Public Sector Reform Loan</td>
</tr>
<tr>
<td>SAL</td>
<td>Structural Adjustment Loan</td>
</tr>
<tr>
<td>TFESSD</td>
<td>Trust Fund for Environmentally and Socially Sustainable Development</td>
</tr>
<tr>
<td>TTL</td>
<td>Task Team Leader</td>
</tr>
</tbody>
</table>
Introduction

Accountability is the obligation of power holders to take responsibility for their actions. Social accountability is defined as the articulation of accountability relationships between citizens and the state\(^4\), referring to (i) the broad range of actions and mechanisms (beyond voting) that citizens can use to hold the state to account; and (ii) actions on the part of government, civil society, media, and other societal actors that promote or facilitate these efforts.

There is an increasing recognition both outside and inside of the World Bank that social accountability - or involving citizens and civil society organizations in the formulation, implementation and monitoring of public policies, programs, services and budgets - can contribute to enhanced governance, development effectiveness and citizen empowerment (World Bank 2003 and 2006). Indeed, by providing spaces for citizens to demand greater accountability from the state, to participate in policy-making and to monitor public sector performance and corruption, there is increasing evidence that public policies, programs, services and expenditures can become more responsive and accountable to the poor and that corruption can be deterred and curbed.

The increasing recognition of the role of social accountability in the development agenda has been reflected in an increased number of policy reforms in developing countries featuring social accountability measures, many of which are supported by World Bank-financed policy-based loans (now termed Development Policy Lending)\(^5\).

This study provides an overview of how World Bank-financed policy-based loans have supported social accountability approaches in policy reforms and extracts some of the lessons learned from this emerging experience.

\(^4\) Citizens may also seek accountability from the private sector. This study, however, is focused only on government accountability.

\(^5\) The type of policy-based lending previously called adjustment lending was termed Development Policy Lending with the approval of the new policy OP/BP 8.60 in August 2004.
2. Social Accountability in Policy-Based Lending: The Experience to Date

2.1. Participation in Policy-Based Lending: A Statistical Overview

In 2005 and 2006, a stocktaking of participation in World Bank-supported policy-based lending was carried out. The stocktaking covered 184 policy-based loans approved during fiscal years 2000 to 2004 and 40 DPLs approved after OP/BP 8.60 (August 2004) through December 31, 2005. The review assessed the extent to which policy reforms supported by World Bank-financed policy-based loans had benefited from stakeholder participation in their content reflected as prior actions, triggers or benchmarks in the policy matrix agreed to between the World Bank and the client government.

Although citizen participation is a necessary, but not sufficient condition for social accountability, the research indicates how issues associated with social accountability have evolved in World Bank-supported policy-based lending. The concept of social accountability is narrower than citizen participation (as it refers to the types of demands – i.e. for enhanced accountability - that citizens, when participating, place on the state). However, because no statistical analysis has been done of social accountability in policy-based lending, the chapter draws on the research that exists on participation, a closely related, but not synonymous concept.

The stocktaking showed that a majority of Development Policy Loans (60%) contain some form of participation in their content. The share of policy-based loans that contain references to stakeholder participation in their policy matrix has increased significantly in the last 5 years, from 38 percent of policy-based loans in fiscal year 2000 to 67 percent of DPLs in fiscal year 2005.

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6 This research was carried out by the Participation and Civic Engagement Team of the Social Development Department of the World Bank.
7 A total of 184 policy-based loans were reviewed covering fiscal years 2000 to 2004 in addition to 40 DPLs covering the period from August 2004 to December 31, 2005. Different criteria were used to analyze participation in the period before the OP/BP 8.60 and after. To ensure consistency, the figures on participation patterns by regions and sectors only cover the DPLs approved after the new policy came into effect. The only figure covering the period before the policy (2000-2004) is the FY00 figure, to help give an indication of how participation in DPL has evolved over time.
8 By covering the period both before and after the approval of the OP/BP 8.60, the study included both Structural Adjustment Loans (SALs) and other types of policy-based loans, as well as Development Policy Loans (DPLs).
9 The definition of participation used for the study is the one commonly used in the World Bank: “the process through which stakeholders influence and share control over priority-setting, policy-making, resource allocations and access to public goods and services”. All prior actions, triggers and benchmarks referring to stakeholder participation in the design, formulation, implementation and monitoring of the policies and reforms supported by the DPLs studied were considered.
10 This was calculated based on the proportion of DPLs approved between September 1, 2004 and December 31, 2005 (a total of 40) that contained at least one prior action, trigger or benchmark referring to participation.
11 The World Bank’s fiscal year goes from July 1 to June 30.
Africa is the region with the largest proportion of DPLs with participatory benchmarks, triggers or prior actions\textsuperscript{12} (83 percent - or 33 out of 40 - of DPLs)\textsuperscript{13}. It is followed by East Asia and the Pacific – EAP - (3 out of 5 DPLs) and Latin America and the Caribbean – LCR - (7 out of 15 DPLs) containing participation in their policy matrix. South Asia (SAR) and Eastern Europe and Central Asia (ECA) show the lowest scores with only 1 out 4 DPLs in ECA, 1 out of 3 in SAR, and 0 out of 1 DPL in the Middle East and North Africa (MNA). However, it is difficult to draw definite conclusions as each of these three regions had a very low number of DPLs.

Latin America is the region with the most institutionalized forms of participation supported by DPLs, while the other regions tend to support more short-term participatory measures. In LCR, 55 percent of participatory benchmarks referred to the creation of participatory mechanisms with more institutionalized characteristics, while in AFR and EAP, 65 percent of participatory benchmarks referred to temporary measures set in place without the aim of being maintained over time (see section 2.2.4. for examples).

\textsuperscript{12} Prior actions are policy actions that a country agrees to take before the Board approves a loan and a tranche is released. Triggers are the expected prior actions of the next operation in a programmatic DPL series. Benchmarks are progress markers of implementation of the program which describe the contents and results of the government’s program in areas monitored by the World Bank. They are not legal conditions for disbursement. Good Practice Note on "Designing Development Policy Operations", 2004, p. 12.

\textsuperscript{13} 10 out of the total of 12 approved for the Africa Region between September 1, 2004 and December 31, 2005.
Participatory prior actions, triggers or benchmarks are most common in public sector and social sector reforms. They are less common in infrastructure, financial, banking and private sector reforms.

The type of participation most often promoted by DPL-supported reforms is participation in the formulation of strategies, policies, programs, budgets or services (42 percent of participatory benchmarks\(^{14}\)), followed by participation in monitoring (32 percent). 26 percent of participatory benchmarks refer to stakeholder participation in the implementation of policy reforms.

**Figure 3. Form of Participation Supported by DPLs (by number of participatory benchmarks)**

![Diagram showing the percentage of participation in formulation, implementation, and monitoring: 42% for formulation, 32% for monitoring, and 26% for implementation.]

Africa and East Asia are the only regions which have participation in all policy reform phases (formulation, implementation and monitoring). In Latin America and South Asia, the DPLs do not have any participation in implementation, while ECA only has participation in monitoring.

Some mechanisms of participation – such as consultative mechanisms\(^{15}\) - are more common than others. They feature in 39 percent of all participatory benchmarks\(^{16}\). Participatory management of service delivery in for example health, education, water and sanitation and forestry is also relatively common (26 percent of participatory benchmarks) as is participatory monitoring of service delivery (24 percent). Three participatory benchmarks referred to other oversight mechanisms, while one referred to participatory planning.

\(^{14}\) The calculation was made by counting the number of participatory benchmarks referring to participation in the different categories.

\(^{15}\) As calculated by the most frequently occurring participatory benchmarks.

\(^{16}\) The number of benchmarks referring to consultative mechanisms in proportion to the total number of participatory benchmarks.
2.2. TYPOLGY OF SOCIAL ACCOUNTABILITY REFORMS IN POLICY-BASED LENDING

The stocktaking of policy-based loans supported by the World Bank provided information on the most common types of social accountability-related reforms supported by these loan instruments, the type of participatory mechanisms featured, the sectors in which these reforms are most common, at what administrative level they tend to take place and with what degree of institutionalization.

2.2.1 Types of Social Accountability Reforms

The types of social accountability-related reforms supported through policy-based lending can be reduced to two main categories:

i) Actions aimed at promoting a more enabling environment for citizen participation, by enhancing public sector transparency and accountability and facilitating citizen access to public information; and

ii) Actions aimed at enhancing opportunities for citizen participation in the formulation, implementation and monitoring of strategies, public policies, service provision, budgets and public expenditures.

2.2.2 Social Accountability in Different Sectors

Social accountability reforms can be implemented in a variety of different sectors. The experience of PBLs shows that social accountability measures (both transparency and citizen participation) are most commonly found in public sector reforms (including decentralization, anti-corruption, public expenditure management, procurement reforms and to a lesser extent customs reforms) and social sector reforms (health, education and social protection) and to a lesser extent infrastructure (water and sanitation), and forestry.

While transparency measures are more common in the areas of procurement and public expenditure management (at both the national and regional levels), reforms aimed at facilitating citizen participation in the formulation of policies are found across a broad range of sectors, including public sector reform and anti-corruption efforts, as well as health and education. Participation in monitoring is found in public expenditure management and in public service delivery in health, education, social protection and water and sanitation. Citizen participation in the

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17 While the statistics in section 2.1. were calculated solely based on the indicator of participation, the typology and examples provided in sections 2.2. and 2.3. are based on the definition of social accountability provided in the introduction and therefore also include actions on the part of the government to facilitate citizen participation and public access to information.
management and implementation of programs is commonly found in health, education and forestry management reforms.

Areas where social accountability actions are less common are infrastructure, private sector development and financial sector and banking reform.

2.2.3 Level of Incidence of Social Accountability Reforms
Social accountability reforms supported by the World Bank have aimed at introducing measures of transparency and citizen participation at both the national, regional and local levels. Measures of social accountability at the regional and local levels are often implemented as part of decentralization reform processes.

2.2.4 Level of Institutionalization of Social Accountability reforms
The analysis of social accountability measures supported by World Bank-financed DPLs shows varying degrees of institutionalization, ranging from low, to medium and high.

A low level of institutionalization refers to temporary measures - which may or may not be sustained over time - to enhance citizen access to information and promote citizen participation in public policies. While these actions often run the risk of not being maintained over time, they can contribute to create opportunities for citizens to engage in policy-making and increase public sector awareness of social accountability measures.

A medium level of institutionalization refers to measures aimed at establishing processes, practices and mechanisms of access to information and citizen participation. Sometimes this has been done with the aim of implementing existing legal frameworks and other times the institutionalization of such mechanisms has been done without a supportive legal framework. DPLs are often appropriate mechanisms to support this type of reforms because over the medium-term they can also contribute to structural changes.

A high level of institutionalization refers to actions such as the approval of laws or changes to existing legislative and regulatory frameworks that affect social accountability and citizen participation. Because DPLs support structural reforms, they are particularly suitable instruments to support legislative changes that can contribute to a more enabling environment for structural reforms to succeed.

Table 1. Social Accountability in Policy-Based Lending: by Sectors, Themes, Type of Reforms, Levels of Action and Degree of Institutionalization

<table>
<thead>
<tr>
<th>Sectors and themes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social sector policies: health, education, social protection.</td>
</tr>
<tr>
<td>Public sector reform and governance: anti-corruption, decentralization, public expenditure management, customs reform, public procurement.</td>
</tr>
<tr>
<td>Infrastructure: water and sanitation.</td>
</tr>
<tr>
<td>Forestry.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of reforms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilitating an enabling environment for social accountability: enhancing government transparency and citizen access to information; enabling legal and policy frameworks for civil society organizations.</td>
</tr>
<tr>
<td>Enabling citizen participation in policy-making and budgeting.</td>
</tr>
<tr>
<td>Establishing client power mechanisms that enable citizen participation and voice in the implementation of programs and service provision.</td>
</tr>
<tr>
<td>Enabling citizen participation in the monitoring of policies, programs, services and public expenditures.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Level of action</th>
</tr>
</thead>
<tbody>
<tr>
<td>National</td>
</tr>
<tr>
<td>Regional</td>
</tr>
<tr>
<td>Local</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Degree of institutionalization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low: support to temporary social accountability measures.</td>
</tr>
<tr>
<td>Medium: establishment of social accountability processes, practices and mechanisms.</td>
</tr>
<tr>
<td>High: approval of or changes to legal or regulatory frameworks that affect social accountability and citizen participation.</td>
</tr>
</tbody>
</table>
2.3. EXAMPLES OF SOCIAL ACCOUNTABILITY REFORMS SUPPORTED BY POLICY-BASED LOANS

The review of PBLs showed that these type of operations have supported a broad range of reforms that can contribute to enhance social accountability, by providing the means for citizens to access public information and providing them with opportunities to engage in the formulation, implementation and monitoring of policies, programs, budgets, public expenditures and service provision. The following section provides examples of such reforms.

Table 2. Examples of Social Accountability Reforms Supported by Policy-Based Loans

<table>
<thead>
<tr>
<th>Type of Social Accountability Reforms</th>
<th>Examples of Social Accountability Mechanisms Supported by PBLs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Facilitating an Enabling Environment for Social Accountability</strong></td>
<td></td>
</tr>
<tr>
<td>Transparency and Access to Information: Legal and Regulatory Frameworks for Access to Information.</td>
<td>• Laws of Transparency and Access to Information: Peru PDCSAL I; Peru PSRL III; Uganda PRSC III; Bangladesh DSC III; Timor Leste CSP I; Ghana PRSC IV.</td>
</tr>
<tr>
<td>Transparency and Access to Information: Information Systems and Tools to Facilitate Public Access to Information.</td>
<td>Publication (on the web, newspapers and public bulletin boards) of: • Expenditures of national budget: Peru PSRL I,II, III &amp; IV; Bolivia SSPSAC II; Burkina Faso PRSC I; Chad SAC IV; Ecuador FCCGL II. • Resource transfers to sub-national governments: Uganda PRSC I; Tanzania PRSC III. • Public expenditure tracking surveys or resource transfers to service delivery points: Uganda PRSC II &amp; III; Burkina Faso PRSC II and III; Chad SAC IV; Sierra Leone ERRC II. • Report cards on quality of service delivery: Peru PSRL III; Brazil PHDSRL I. • Procurement documents: Peru PSRL II &amp; III. • Asset declarations: Uganda PRSC II. • Budget Literacy initiatives: Bolivia SSPSAC II; Uganda PRSC I; Timor Leste TSP II.</td>
</tr>
<tr>
<td><strong>Enabling Legal and Policy Frameworks for Civil Society Organizations</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• NGO policy and code of conduct: Uganda PRSC II. • NGO regulatory frameworks: Bangladesh DSC III.</td>
</tr>
<tr>
<td><strong>Citizen Participation in Policy-Making and Budgeting</strong></td>
<td></td>
</tr>
<tr>
<td>Citizen Participation in Policy-Making</td>
<td>• Temporary consultative mechanisms on laws, policies, reforms or issues: Bangladesh DSC III; Timor Leste TSP II; Timor Leste CSP; Brazil HSRL I; Mali SAC III; Congo DRC ERC; Honduras DRC; Vietnam PRSC II; Armenia SAC IV; Ghana PRSC III. • Permanent fora of dialogue between the state and civil society on public policies or planning processes at the national or local level: Bolivia PSAC I; Bolivia SSPSAC I; Peru PSRL I; Lao PDR PRSC I; Ghana ERSOC III.</td>
</tr>
<tr>
<td>Citizen Participation in Budgeting</td>
<td>• Participatory budgeting at municipal level: Peru PSRL; Sierra Leone ERC III. • Multi-sectoral dialogues on the national budget: Ecuador FCGGL II.</td>
</tr>
<tr>
<td><strong>Citizen Participation in the Monitoring of Policies, Programs and Services</strong></td>
<td></td>
</tr>
<tr>
<td>Oversight of policy implementation</td>
<td>• Oversight mechanisms (of poverty reduction strategies, of policy implementation in specific areas): Bolivia PSAC I, II, III &amp; IV.</td>
</tr>
<tr>
<td>Public expenditure monitoring</td>
<td>• Public expenditure monitoring mechanisms at the local level: Bolivia PSAC I; Peru PDCSAL I.</td>
</tr>
<tr>
<td>Monitoring of quality and performance of service delivery</td>
<td>• Citizen report cards of service delivery in health, education, social protection: Peru PSRL III, Brazil PHDSRL I Lao PDR I, Ghana III, Georgia and Rwanda PRSCs. • Consumer grievance systems (Brazil PHDSRL I). User feedback components integrated into conventional M&amp;E systems in the social sectors: Peru PSRL IV; Uruguay SPDPL.</td>
</tr>
<tr>
<td><strong>Citizen Participation in the implementation of policies, programs and services</strong></td>
<td></td>
</tr>
<tr>
<td>User management of services</td>
<td>Health, education, basic infrastructure (water and sanitation) and forest management: Benin PRSC I; Peru PSRL III; Rwanda IRC.</td>
</tr>
</tbody>
</table>
2.3.1 Facilitating an Enabling environment for Social Accountability

2.3.1.1 Transparency and Public Access to Information
Accessing and generating information is critical for civil society actors to be able to effectively participate in policy-making, monitor public sector performance and hold the government to account for its actions. A number of World Bank-supported policy-based loans have supported reforms for increased government transparency and enhanced transparency and public access to information. These reforms include legal frameworks of access to information, establishment of systems and mechanisms to make information accessible to the public, and interventions to disseminate information to citizens.

Legal and Regulatory Frameworks of Access to Information:
Legal and regulatory frameworks for access to information are often an important first step in establishing the right of citizens to obtain public information. Such laws are not a sufficient condition for ensuring citizen access to government information. However, they can help if they are enforced and contain the necessary provisions to make dissemination of information mandatory in all public entities and appropriate sanctions for non-compliance.

Box 1. Examples of Policy-Based Loans that Have Supported Transparency and Access to Information Laws
Several policy-based loans have supported reforms aimed at providing an enabling legal framework for access to public information, mainly by supporting the enactment of Laws of Transparency and Access to Information. This was the case of the Peru Programmatic Decentralization and Competitiveness Structural Adjustment Loan I (PDCSAL I), the Peru Programmatic Social Reform Loan III (PSRL III), the Uganda Poverty Reduction Strategy Credit (PRSC III), the Bangladesh Development Support Credit III (DSC III), the Timor Leste Consolidation Support Program I (CSP I) and the Ghana PRSC IV.

Establishing Information Systems and Tools to Facilitate Public Access to Information
Legislation is an important, but not sufficient step to ensure citizen access to information. Systems, processes, capacities and incentives also need to be in place to ensure that the laws are implemented. Policy-based loans have supported the establishment of a variety of public information mechanisms, mainly in the context of public sector reforms (public expenditure management, anti-corruption and decentralization) and social sector reforms. Examples of information that can be useful for citizens and civil society to be able to effectively monitor government actions include: citizens rights and entitlements (awareness of which is often needed for citizens to start engaging in the public arena); the national budget and public expenditures as well as resource transfers between the national and regional and local levels; quality and performance of public services; asset declarations of public officials and information on public procurement. The internet, newspapers and public bulletin boards are among the tools used to disseminate information.
As an example of transparency and information measures in the area of public expenditure management, the Peru PSRL II, III and IV supported the creation of a government transparency web portal linked to the financial management system, providing up-to-date information (on a monthly basis) on the national budget and public expenditures in all sectors, including defense. One of the benchmarks of the Bolivia Social Sectors Programmatic Structural Adjustment Credit II (SSPSAC II) was the publication of health, education, water and social protection expenditures on the website of the Ministry of Finance. In some cases, adequate financial management systems may not be in place to generate this type of information on a regular basis. Where that is the case, the government may still publish the information on projected and executed public expenditures at the end of the fiscal year, as was the case in the Timor Leste Transition Support Program II (TSP II), the Chad Structural Adjustment Credit (SAC IV), or the Ecuador Fiscal Consolidation and Competitive Growth SAL II (FCCGL II). The government can also make information on HIPC revenues and expenditures available to the public, as was done under the Burkina Faso PRSC I.

In the context of decentralization reforms, resource transfers to sub-national governments can be made public, as was the case of the Uganda and Tanzania PRSCs (I and III respectively), which included benchmarks on the publication of transfers to local governments in the media.

In the context of procurement reforms, governments can take steps to increase transparency around these processes, by publishing bidding notices and documents on the web, or putting in place e-government procurement systems for purchase of goods and services (Peru PSRL II and III).

As part of efforts to reduce corruption, governments can also publish public officials’ asset declarations, as was the case of the Uganda PRSC II, which not only required public officials to declare and publish this information, but also established sanctions in case of non-compliance.

In the context of social service delivery, the publication of resource transfers at delivery points such as schools and health clinics or the results of public expenditure tracking surveys can be useful for citizens to track potential leakages (Uganda PRSC II and III, Burkina Faso PRSC II and III, Chad SAC IV, Sierra Leone Economic Rehabilitation and Recovery Credit II or ERRC II). In social sector reforms, the publication of information on the performance and quality of public services is also critical for citizens to be able to monitor the services delivered to them and can also help create a healthy competition between public agencies. The Peru PSRL III included for example the public dissemination of a citizen report card exercise on the quality and performance of programs in health, education and social protection, and the Brazil Programmatic Human Development Social Reform Loan I (PHDSRL I) included the publishing of public hospital ratings in the media.

Often, however, the mere publication of such information may not be enough to empower citizens to monitor public actions. Converting the information into a jargon more easily understood by lay citizens or translating the information to local languages may be necessary to effectively empower citizens to monitor the state. The Tanzania PRSC III included for example the conversion of results of service delivery surveys into an easily readable and user-friendly format and their publication in the media and the Bolivia SSPSAC II, the publication of pregnant women’s rights charter in indigenous languages. The Uganda PRSC I and Timor Leste TSP II also supported the production and publication of a citizen’s guide to the budget, to explain the budget process to lay citizens.

2.3.1.2 Enabling Legal and Policy Frameworks for Civil Society Organizations

An active and internally accountable civil society is critical for social accountability initiatives to succeed. Although support for more enabling legal and policy frameworks for civil society organizations (CSOs) has not been a primary focus of World Bank-supported policy-based loans, several examples show how this could be done. In the Uganda PRSC II, the policy matrix included the approval of an NGO

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18 Note that this loan was later cancelled on March 15, 2006.
19 This section provides information on measures to enhance transparency and access to information supported by World Bank-financed DPLs. The IMF also encourages greater fiscal transparency of its client countries and has developed a number of manuals and standards to facilitate this. They include "The Code of Good Practices on Fiscal Transparency", "Manual of Fiscal Transparency" and "Guide to Resource Revenue Transparency". The IMF also encourages its member countries to undertake an assessment called "Report on the Observance of Standards and Codes, ROSC" to document the country’s fiscal transparency practices and identify areas in need of reform. For more information on the IMF’s work on fiscal transparency, see www.imf.org/external/np/exr/facts/fiscal.
policy and code of conduct and the Bangladesh DSC III included a review of the NGO regulatory framework.

2.3.2 Citizen Participation in Policy-Making and Budgeting

A key aspect of social accountability is the involvement of citizens and civil society organizations in policy-making. Indeed, involving citizen groups in the formulation and planning of public policies, programs and budgets at national, regional and local levels, can help make these more responsive to citizen needs, more inclusive and more accountable. This can be especially true where governance is weak and formal democratic institutions may lack capacity and adequate representation and accountability mechanisms to formulate policies that are truly responsive to citizen needs. However, even in more consolidated democratic systems, the involvement of citizens in the formulation of public policies and budgets can enrich the policy and budget formulation process, making it more sustainable and more effective by bringing in a broader range of perspectives, calling attention to specific issues and building stakeholder ownership.

The experience to date shows that DPLs can play a key role in supporting reforms to enable citizen participation in policy-making and budgeting at different levels and with different degrees of institutionalization.

2.3.2.1 Citizen Participation in Policy Making

In order to facilitate citizen participation in policy-making, governments often put in place different forms of consultative mechanisms that provide a space for civil society to engage with the state on different issues, including public sector and social sector reform, environment policy, agriculture, housing and poverty reduction strategies.

In the operations analyzed, two different types of consultative mechanisms were found. The most common ones were those formed on a short-term basis to obtain feedback on specific laws and policies or to share the results of studies with non-governmental stakeholders.

Box 3. Examples of Temporary Consultative Mechanisms Supported by Policy-Based Loans

Short-term consultative mechanisms include public consultations on police reform in Bangladesh (DSC III) and Timor Leste (TSP II), the national housing policy in Brazil (Programmatic Sustainable and Equitable Growth Housing Sector Reform Loan I or HSRL I), the cotton sector reform in Mali (SAC III), the Demobilization, Disarmament and Reinsertion Program in Congo DRC (Post-Reunification Economic Recovery Credit or ERC) and Honduras (Debt Relief Development Policy Credit or DRC), the national strategy for environmental protection in Vietnam (PRSC II) or the reform of the Ministry of Revenue in Armenia (SAC IV). In several cases, studies on corruption were also shared with the public through consultations (a study on income and asset register in Timor Leste CSP I and one on anti-corruption agencies in the Ghana PRSC III).

In some cases, spaces of dialogue between civil society and the government were enshrined in legislation, and/or created as more permanent fora of dialogue between the government and non-governmental stakeholders on specific policies at both the national and local levels, thereby ensuring a greater sustainability of these mechanisms over time.
2.3.2 Citizen Participation in Budgeting

Another important area of civic engagement is in budgeting processes, more often at the local than at the national level. Several policy-based loans have supported citizen engagement in budgeting processes at these two levels, and with different degrees of institutionalization.

Box 5. Examples of Participatory Budgeting Mechanisms Supported by Policy-Based Loans

Peru is the only country in the world with a Participatory Budgeting Law. This was supported by the Peru PDCSAL I. Its prior actions included the approval and implementation of the law and its accompanying regulations. The law makes participatory budgeting mandatory for the investment portion of all regional and municipal governments’ annual budgets in the country and is currently being implemented in all regional governments and municipalities in Peru.

The Sierra Leone ERRC III created Community Budget Oversight Committees in all regions to participate in the annual discussion of the budget with ministries and departments and to monitor budget execution in their respective regions.

Finally, the Ecuador FCCGL II supported a dialogue between civil society and the government on the national budget facilitated by a national NGO (the Fiscal Policy Observatory).

2.3.3 Citizen Participation in the Monitoring of Policies, Programs and Services

The involvement of citizens and civil society organizations in the monitoring of state policies, programs, services, actions and expenditures is another key form of social accountability. By opening spaces for civil society to monitor government performance and the conduct of its officials, increased pressure is placed on the public sector to behave and perform in an accountable way, to be more responsive to citizen needs and to use public funds more responsibly. This can contribute to increased development effectiveness, reduce corruption, improve targeting and enhance the impact of public programs.

The support of policy-based loans to participatory monitoring mechanisms has been varied both in terms of the focus of the monitoring (public services and public expenditures), sectors (social sectors, public sector reform and decentralization) and the mechanisms promoted (citizen report
card surveys, Participatory Public Expenditure Tracking Surveys or PETS and grievance mechanisms).

2.3.3.1 Oversight of Policy Implementation

The Bolivia PSAC supported the establishment of a number of mechanisms to ensure civil society oversight of the implementation of Bolivia’s poverty reduction strategy and of its decentralization process.

Box 6. Examples of Oversight Mechanisms Supported by the Bolivia PSAC

To ensure the implementation of the Law on National Dialogue, the policy matrix of the Bolivia PSAC I, II, III and IV also included a number of triggers and benchmarks aimed at further operationalizing the participatory monitoring mechanisms established in the law. At the national level, these included the inclusion of civil society representatives on the Board of the Unified Directorate of Funds (DUF), the government’s main credit agency responsible for the allocation of transfers to municipalities. At the departmental level, the benchmarks included the creation of Project Approval Committees to ensure citizen oversight of the National Compensation Policy, civil society participation in the establishment of a monitoring mechanism for the implementation of the poverty reduction strategy at the prefecture and municipal levels, and monitoring of social control mechanisms an implementation plan for a participatory evaluation of the impact of capacity building programs for municipal and prefectural service delivery.

2.3.3.2 Public Expenditure Monitoring

Policy-based loans have supported the establishment of mechanisms to enable citizen participation in public expenditure monitoring at the local level. In the case of Bolivia and Peru, these were established by law, which has helped ensure their permanence.

In the Bolivia PSAC (I), the approval of the Law on National Dialogue reinforced the role of vigilance committees, local social control mechanisms composed of civil society representatives with the mandate to monitor municipal administrative management and expenditures.

Similarly, the Framework Law of Participatory Budgeting and its accompanying regulation in Peru included the creation of vigilance committees (composed of civil society representatives) at the regional, provincial and district levels, to monitor municipal budget execution (Peru PDCSAL I).

2.3.3.3 Monitoring of Quality and Performance of Service Delivery

Policy-based loans have supported a variety of different mechanisms to strengthen the voice of users and empower them to provide feedback on the services they receive. In most cases, reforms sought to introduce such mechanisms on a pilot basis. The most common mechanisms were citizen report cards and service delivery surveys. They were used most often used for assessing health and education services. Complaints and grievance mechanisms were also used. In a few cases, more institutionalized forms of participatory monitoring of service delivery were also supported, including the establishment of user feedback components of monitoring and evaluation (M&E) systems.
Box 7. Examples of Participatory Service Delivery Monitoring Supported by Policy-Based Loans

The use of citizen report cards to strengthen the voice of users in service delivery in education, health and social protection services were supported by the Brazil PHDSRL I, the Peru PSRL III, the Ecuador Programmatic Human Development Reform Loan II (PHDRL II) and the Lao PDR (I), Ghana (III) and Rwanda (II) PRSCs. Citizen report cards are not only applicable to social service delivery. In Rwanda, they were also used for evaluating the use of driver’s licenses, ID cards and electricity services, while in Tanzania (PRSC III) they were applied to all public services.

The Brazil PHDSRL I established a Consumer Grievance System in the health sector. This included a patient satisfaction survey, the establishment of a toll free hotline for grievances, and a system to respond to complaints received through the surveys and a call center. A database was also created to systematically track and respond to client grievances.

In Latin America, more institutionalized forms of participatory monitoring of service delivery were supported by Bank-financed policy-based loans, moving beyond a one-time piloting exercise which might not be sustained over time. Through the Peru (PSRL IV) and the Uruguay Social Program Development Policy Loan (SPDPL), user feedback on services and participatory monitoring were introduced as integral components of M&E systems for social programs.

2.3.4 Citizen Participation in the Implementation of Policies, Programs and Services

Citizen participation can help enhance accountability in the implementation of policies, programs and services, if accompanied by measures to simultaneously ensure citizen voice in their formulation, planning and monitoring. However, if participatory implementation mechanisms do not also include internal and external accountability mechanisms, these can become as problematic as more traditional public sector mechanisms with weak accountability systems. If the mechanisms only provide a space for civil society to execute programs or services planned by the state without having a voice in their design, planning and management, they will also lack accountability. However, in some country contexts, the governance and policy environment, or existing state and civil society capacities may not allow for more advanced social accountability mechanisms to be put in place. In those cases, citizen participation in the implementation of policies, programs and services without accompanying social accountability mechanisms can provide a first step to increasing civil society participation in the public arena.

In World Bank-supported policy-based loans, the most common form of civil society participation in the implementation of policies, programs and services is user involvement in managing health, education, basic infrastructure services (water and sanitation) or forests. The World Bank has supported this both in countries that do not necessarily have an overall enabling environment for social accountability, as well as in countries where these mechanisms are complemented by a range of other social accountability-enhancing measures.
3. Operationalizing Social Accountability in World Bank-Supported Policy-Based Loans: Lessons from Emerging Experience

This section provides an overview of some of the lessons learned from the emerging experience of supporting the implementation of social accountability reforms through DPLs.

3.1. CONTRIBUTION OF SOCIAL ACCOUNTABILITY TO POLICY REFORMS

Critics may wonder how social accountability matters for policy reforms. The lessons learned from the experience documented in this study demonstrates that social accountability measures can contribute to enhance the accountability and effectiveness of policy reform processes in a number of ways, including:

- **Improving the enabling environment for social accountability** by enhancing the regulatory and policy environment.
- **Institutionalizing social accountability processes** through policy and legal reforms.
- **Enhancing the impact of institutional and structural reforms** by supporting more transparent, accountable and reliable implementation processes and mechanisms.
- **Making policy reforms more sustainable** through the involvement of citizens and their organizations, helping make policy changes less vulnerable to political conjunctures and short-term cycles.
- **Improving governance** by strengthening demand-side mechanisms of accountability, enhancing the capacity of ordinary citizens to access information, voice their needs, and demand accountability between elections.
- **Reducing corruption** by involving citizens in monitoring government performance, tracking public expenditures, demanding and enhancing transparency and exposing leakages and accountability breaches.

DPLs can be particularly effective instruments to support social accountability reforms as they:

- **Support structural reforms** which are essential to help create a more enabling environment for social accountability.
- **Support reforms that have long-term impacts**, making it possible to sequence actions for gradual, but sustained change.
- **Can help protect reform agendas**, especially in the case of programmatic DPLs.
- **Provide opportunities for inter-sectoral collaboration** - both within the government and the World Bank – which is essential for social accountability reforms as they are often cross-cutting.

3.2. THE IMPORTANCE OF COUNTRY CONTEXT

The country context matters for the effective implementation of social accountability reforms. Not all types of social accountability reforms are equally suited for all country contexts. Factors that influence the effective implementation of such reforms include government commitment and civil society capacity. Countries enjoying a stronger governance climate, including well-functioning democratic institutions and a state open to extra-electoral citizen participation are more likely to implement reforms aimed at increasing citizen participation in policy-making and budgeting. However, in contexts with less openness
to such processes, governments may still be interested in implementing measures to enhance government transparency and citizen access to information, which may constitute important first steps in creating a more enabling environment for social accountability.

The country context will also influence the degree of institutionalization of a social accountability initiative. In countries with stronger governance, the approval and implementation of legislative and regulatory frameworks for social accountability may be politically viable. Or adequate legislation for social accountability may already be in place, but systems, processes and mechanisms may not exist for these laws to be implemented. In these cases, DPLs can support the establishment of such systems. In countries with weaker governance contexts and a weak enabling environment for social accountability, neither of these two options may be viable. In those cases, governments may be more open to introduce small-scale changes through social accountability mechanisms of a more temporary character.

The experience of social accountability in PBLs to date shows that social accountability reforms have been supported in country contexts as different as Bolivia, Peru, Vietnam, Chad and Rwanda. However, the type of social accountability reforms vary, with countries like Bolivia and Peru opting for the institutionalization of citizen participation through the creation of an enabling legal framework (Law of Participatory Budgeting in Peru or the Law of National Dialogue in Bolivia) and the establishment of systems and mechanisms to operationalize these laws (the implementation of participatory budgeting in Peru or the creation of vigilance committees in Bolivia to monitor municipal expenditures and the performance of local governments).

In countries where the governance context may not be ripe for such reforms, PBLs have supported measures to increase transparency and public access to information on the national budget and public expenditures (e.g. Chad), or the establishment of spaces for citizens to provide feedback on specific policies (e.g. Vietnam), and on the quality of service delivery (e.g. Rwanda).

3.3. THE REFORM CONTEXT

The reform context also matters for the relevance of social accountability measures, with some types of reforms being more amenable to them. While the review of social accountability in World Bank-supported PBLs shows that social accountability reforms can be implemented in a variety of different reforms, they are more common in public sector reforms (including decentralization, anti-corruption, public expenditure management, procurement reforms and to a lesser extent in customs reforms). They are also found in social sector reforms (health, education and social protection reforms) and to a lesser extent, in infrastructure (water and sanitation), and forestry reforms. Reforms where social accountability measures were less common include infrastructure, private sector development and financial sector and banking reforms.

The nature of the reforms may in part explain why social accountability measures are more commonly found in public and social sector reforms, where their contribution to improving governance, reducing corruption and enhancing accountability of public service delivery is more tangible and there is already a track record of experience and lessons to draw from. These types of reforms may also offer more natural engagement spaces for citizens and civil society organizations.

Despite the higher tendency of DPLs to include social accountability mechanisms in public sector and social reforms, private sector, financial and banking sector reforms may also benefit from these
approaches which may contribute to enhance their transparency and accountability and thereby their long-
term sustainability and success.\textsuperscript{20}

3.4. DESIGN AND IMPLEMENTATION

The emerging experience in supporting the implementation of social accountability measures in the
context of policy reforms supported by World Bank-financed policy-based loans has offered some initial
lessons learned on design, implementation and monitoring issues. This section provides an overview of
these lessons and operational advice that can be useful for government officials, civil society
organizations and World Bank staff involved in such reforms.

3.4.1. Underpinning Design and Implementation with Prior Analytical Work

Underpinning the design and implementation of social accountability reforms with analytical work
can help guide their form and content. Prior analytical work can help to:

- Better understand the context for social accountability in the country.
- Assess what the main accountability issues are in a given country context.
- Help assess the key constraints, bottlenecks and opportunities for social accountability, focusing both
  on supply-side (capacities and systems of the state) and demand-side issues (capacities and actions of
  civil society).
- Provide an overview of on-going social accountability initiatives.
- Map out social accountability “champions” and “opponents”.
- Identify the main areas for social accountability reform.
- Identify the concrete social accountability actions that can be supported through the DPL.

a) Mapping Key Stakeholders

Mapping existing social accountability initiatives (both civil society and government-led) and donor
support to these will help get a better understanding of existing social accountability initiatives in the
country, their main focus, the main actors involved and some good practices that can be built on, scaled
up or institutionalized through the reforms supported by the DPL. A mapping of other donors’ support to
social accountability initiatives will help avoid duplication of efforts and can help ensure better
coordination between the World Bank and other donors, including opportunities for collaboration and
partnership.

Mapping social accountability stakeholders in government and civil society\textsuperscript{21} - with a focus on the
actors that are engaged in, support or oppose social accountability efforts - will help identify possible
government champions for the proposed reforms and help build on the existing support of public sector
officials and on-going initiatives. It will also help identify potential partners among civil society actors for
the implementation of social accountability reforms.

\textsuperscript{20} For an example of social accountability in a private sector development project, see Peru Guarantee

\textsuperscript{21} It is important to note that civil society is not a homogenous group of actors. As civil society is defined as
the arena between the family and the state (except firms and political parties), civil society organizations
can range from Non-Governmental Organizations (NGOs) to religious and professional organizations, labor
unions, the not-for-profit media and community-based and grassroots organizations among many others.
b) Assessing Supply-Side Opportunities and Constraints for Social Accountability

**Legal framework for transparency, access to information and citizen participation.** Reforms to promote social accountability can only succeed in a reasonably enabling environment. An enabling environment includes a legal framework for access to information, transparency and citizen participation and opportunities for citizen participation in policy-making. A diagnostic of existing legal frameworks related to transparency and access to information, and of rules regulating citizen participation can help assess the strengths and weaknesses of the legal and regulatory framework for social accountability. This analysis will help evaluate the strengths and gaps in the enabling legal environment for social accountability and can help identify possible of legal reform that can be supported by the DPL.

**Political and governance context that may affect social accountability measures.** An assessment of the overall governance and political context of the country will be useful for identifying politically viable social accountability actions. Contrasting the legislative framework with the existing governance context will help assess the practical constraints that may be faced during implementation. This includes both an analysis of the strengths and weaknesses of existing mechanisms for channeling citizen voice and representation (political participation, the electoral and party system, the role of the legislature and other formal accountability institutions, as well as spaces for policy dialogue and consultation), and the political and organizational culture of the state and the political system, which may facilitate or impede the implementation of social accountability initiatives. The stakeholder analysis will also help assess the incentives (or lack thereof) of elected representatives or government officials for supporting social accountability initiatives. This type of analysis will help assess the political feasibility of potential reforms supported by the DPL and help identify and prioritize areas for support.

**Public sector-facilitated mechanisms and spaces for social accountability.** Diagnosis of the strengths and weaknesses of existing public sector-facilitated mechanisms for social accountability will help assess the actual implementation of the legislative and regulatory framework and existing spaces for civil society and citizens to engage in the formulation, implementation and monitoring of policies. This will help guide the identification of proposals to either strengthen existing spaces or create mechanisms where they do not exist.

**Strengths and weaknesses of existing horizontal accountability and control mechanisms.** Social accountability mechanisms are complementary to conventional internal accountability and control bodies, such as the parliament, national audit bodies, the judiciary and the Ombudsman. Strong horizontal control mechanisms are important to social accountability as they help ensure that the demands of civil society are adequately channeled and that state corruption is adequately sanctioned. Information generated by civil society through social auditing and oversight can also serve as useful complements to control mechanisms. Therefore, the strengths and weaknesses of horizontal control institutions need to be assessed to better understand the potential complementary role that social accountability mechanisms can play, and the enabling environment in which they operate.

**Public sector information management systems.** Analysis of existing public sector information management systems will help assess the existing tools, systems and capacity of the state to provide citizens with information on public sector activities, including programs and expenditures. Even with a strong legislative framework, if systems to provide citizens with timely, reliable and user-friendly information are lacking, social accountability initiatives are not likely to succeed. The diagnostic may help identify weaknesses or gaps in the provision of public information and areas in need of reform and support. This will not only help provide a better basis for citizen participation, but also contribute to build the capacity of the government to more effectively respond to citizen demands for information.
c) Assessing Demand-Side Constraints and Opportunities for Social Accountability

Civil society capacity for social accountability. An assessment of the main weaknesses and strengths of civil society capacity (technical, human resource and financial) for social accountability, will help assess the ability of civil society to carry out and respond to social accountability initiatives. It can help identify possible areas in need of strengthening in order to enhance the impact of social accountability actions promoted through the DPL.

Bottlenecks for participation of the poor. This analysis will help identify bottlenecks for effective participation of the poor and measures to improve inclusion, and reduce asymmetries and elite capture in participatory processes.

Civil society coordination and collaboration. Social accountability initiatives often require strong collaboration and alliance-building between civil society actors to promote their agendas and demands in a coordinated fashion. The assessment can identify to what extent this occurs in each specific country context and what impact it has on the capacity of civil society to demand accountability from the state.

3.4.2. Identifying Key Reforms and Defining Benchmarks

The area of social accountability reform and the type of measures, their level of incidence and degree of institutionalization will depend on the country context, the government strategy, and the type of reform. Once that has been agreed, the specific benchmarks and triggers that form the basis of the agreement between the client government and the World Bank in the case of a policy reform supported by a DPL, will be defined. Below is some guidance that can help steer this process.

Focus on key actions that will have the greatest impact. A policy reform contains a number of actions and measures that are expected to lead to certain outcomes. The benchmarks and triggers agreed to by the World Bank and the client government will focus on those key actions that are expected to have the greatest impact on determining the reform outcomes. The same principle should apply to the social accountability actions of the reform: those likely to have the greatest impact on affecting policy outcomes should be emphasized, rather than a number of actions of which outcomes may be secondary.

Short-term frameworks, long-term impacts. Appropriate policy matrix design combines the ability to design benchmarks and triggers that can be met within the short-term time framework of the loan, but are capable of having medium and long-term impacts. For example, establishing a transparency portal linked to the public expenditure information system (Peru PSRL) is an action that can be implemented in a relatively short time, while its impact will be seen in the long term, through a reduction in corruption and a more effective resource allocation.

Focus on actions that are under government control. Social accountability actions require the involvement of both the state and civil society to succeed. However, given that the liable counterpart of the World Bank in DPLs are client governments and not civil society, the policy matrix will focus on actions that are under government control as otherwise it cannot be held accountable.
Box 8. Benchmark Design: Lessons Learned from the Peru PSRL I and IV

This was one of the lessons learned from the Peru PSRL I, in which a condition was included to design and implement a civil society-led auditing system of social programs. As this depended on civil society actors, which did not manage to coordinate their actions to achieve this, the condition was not met. In the PSRL IV, the condition was redesigned to focus on the creation of a government-led participatory monitoring and evaluation system, which in addition to internal accountability and information mechanisms, would facilitate spaces for civil society involvement and include channels to incorporate their feedback into the M&E system.

**Benchmark of Peru PSRL I:**
Evidence that a social control mechanism has been designed for the monitoring of social expenditures. Such mechanism to include a national surveillance program for social programs led by civil society (Peru PSRL I).

**Benchmark of Peru PSRL IV:**
A monitoring and evaluation mechanism system, which is participatory, transparent and with a focus on results has been designed and is under implementation for the priority social programs in the context of the decentralization process. The system has a multisectoral oversight committee involving ministries and other implementing agencies and a representative of local and regional governments (Peru PSRL IV).

Reforms requiring legislative approval also run into this problem, as the legislature is responsible for approving legislation, not the executive. The benchmark may have to focus on what the executive can realistically take responsibility for, such as for example presenting a bill to the legislature. However, when the benchmark in the policy matrix limits itself to the presentation of a bill to congress, the measure runs the risk of never becoming effective. A careful consideration of the political context and the relationship between the legislature and the executive should help to make the right choice in those cases.

**Focus on the accountability principles behind the social accountability tools** Sometimes DPLs include benchmarks on the implementation of different social accountability tools, such as for example citizen report cards. Citizen report cards can be implemented as social accountability tools, with the aim of empowering users to voice their feedback on public services and generate public debate. However, they can also be implemented as surveys that are useful in gathering feedback from users, but if not disseminated and used to generate debate and interaction between users, service providers and policy makers, their social accountability potential is limited. Therefore it is important to remember the social accountability principles that underlie social accountability tools such as citizen report cards when including them as a benchmark in a DPL. When designing triggers or benchmarks on citizen report cards, this can be done by including the dissemination in the wording for the benchmark to be considered completed. This was for example done in the Peru PSRL III case, but not in the Ghana PRSC III, where the results form the report cards were never publicly disseminated, thereby reducing their social accountability impact.

**Include both supply and demand-side actions.** In order to succeed, social accountability actions to involve citizens in the formulation, implementation and monitoring of public policies require both an enabling environment, such as a favorable legal framework and governance context, adequate access to government information and a functioning judiciary that will ensure that laws and citizen rights are enforced. In promoting reforms for social accountability, it is therefore important to identify both such “supply-side” actions that will provide the adequate conditions for social accountability to succeed as well as “demand-side” actions, to facilitate spaces and mechanisms for greater civil society involvement, and to make citizens more aware of their rights in order to claim them. However, the demand-side actions need to focus on actions that the government can take to facilitate civil society engagement in the public arena, but cannot refer to actions that rely on civil society to actually be implemented. Below are some examples of how supply and demand-side benchmarks can reinforce each other in the policy matrix of DPLs.
Table 3. Examples of Supply and Demand-Side Benchmarks

<table>
<thead>
<tr>
<th>Supply- and Demand-Side Benchmarks</th>
<th>Sierra Leone ERRC III:</th>
<th>Bolivia PSAC I, II, III &amp; IV:</th>
<th>Peru PSRL III &amp; IV:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply-side benchmarks</td>
<td>• Anti-Corruption Commission (ACC) established; • ACC Act has been amended to strengthen enforcement powers of the ACC.</td>
<td>• The Government has published the results of its anti-corruption and anti-fraud program. • Pilot operations for publishing easily understandable municipal finance information have been scaled up to 100 municipalities. • The Government has issued a Supreme Decree requiring daily disclosure via the internet, of municipal co-participation amounts and co-participation interception withholding by source and type of credits beginning July, 2003.</td>
<td>• Law of Transparency and Access to Information and its regulation approved. • SIAF (Integrated Financial Management System) made available through an internet portal “Consulta Amigable” which provides information on budget and expenditures for all government programs. • Physical goals linked to expenditures for three social programs.</td>
</tr>
<tr>
<td>Demand-side benchmarks</td>
<td>• Implement a public expenditure tracking survey. • Participatory mechanism for budget management established to keep the communities more involved in budget preparation and monitoring raising the accountability standards for the government.</td>
<td>• The Government has scaled up financing of social control efforts by Vigilance Committees to 100 additional municipalities. • Civil society representatives are included in the Board of the DUF.</td>
<td>• An M&amp;E system which is participatory, transparent and with a focus on results has been designed and is under implementation for Priority Social Programs (M). • Establishment of at least 10 local vigilance committees which are tracking expenditures, procurement and targeting of decentralized food program in compliance with the Law of Participatory Budgeting. • Launch of a campaign to make citizens aware of their rights to access public information.</td>
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</table>

3.4.3. Sequencing of Social Accountability Reforms

Programmatic loans provide the opportunity to build reform programs that can be implemented and consolidated over a number of years. In those cases, the loan instrument provides the opportunity to implement appropriately sequenced actions, allowing for gradual progress in the implementation of social accountability reforms. The appropriate sequencing will depend on the country and reform context. In some cases, this can imply starting with short-term actions to pilot test new social accountability mechanisms, gradually scaling them up until they become institutionalized. In other cases, it can start with putting in place the legal framework, while then moving on to operationalizing systems and processes to ensure their implementation. Examples of how social accountability reforms were sequenced in a programmatic series are provided below.
## Table 4. Examples of Sequencing of Social Accountability Reforms

<table>
<thead>
<tr>
<th>Loan</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolivia PSAC</td>
<td>II</td>
<td>III</td>
<td>IV</td>
</tr>
<tr>
<td>The Government has implemented a pilot program in 36 municipalities publishing municipal financial information in a manner easily understandable by the public.</td>
<td>Pilot operations for publishing easily understandable municipal finance information have been scaled up to 100 municipalities.</td>
<td>The Government has institutionalized a mechanism to regularly publish municipal financial information in a manner easily understandable by the public.</td>
<td></td>
</tr>
<tr>
<td>Peru PSRL</td>
<td>III</td>
<td>IV</td>
<td></td>
</tr>
<tr>
<td>Pilot system for people’s assessment of government services launched.</td>
<td>A monitoring and evaluation system, which is participatory, transparent and with a focus on results has been designed and is under implementation for the PSPs in the context of the decentralization process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sierra Leone ERRC</td>
<td>I</td>
<td>II</td>
<td></td>
</tr>
<tr>
<td>Budget discussion with line departments held in the presence of paramount chiefs and other civil society representatives.</td>
<td>Participatory mechanism for budget management established to keep the communities more involved in budget preparation and monitoring and raising the accountability standards of the Government.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Uganda PRSC</td>
<td>I</td>
<td>II</td>
<td>III</td>
</tr>
<tr>
<td>OPM and MOIA have created a computerized database on NGOs and faith-based organizations with public access.</td>
<td>OPM, MOIA and the NGO community mutually agree on NGO policy and code of conduct.</td>
<td>OPM and NGOs establish channels of feedback from civil society to monitor service delivery in districts and sub-counties.</td>
<td></td>
</tr>
</tbody>
</table>

### 3.4.4. Consulting Stakeholders on Social Accountability Reforms

The complex policy and institutional reforms generally associated with DPLs – including those promoting social accountability - need political support within the country to be effectively sustained. A well-implemented stakeholder participation strategy in various stages of the policy reform can help develop this support and improve the quality of the reform program. Stakeholder consultation and inputs are particularly important in the case of social accountability-related reforms as they directly involve civil society.

The policy dialogue between the Bank and the government can be informed and enriched by inputs from a variety of stakeholders, including officials from other ministries, CSOs, think tanks and donors. Dialogue with those stakeholders can help identify the main areas for DPL-supported reforms and their political viability, as well as potential allies in support of the reforms. It can also help identify the main opportunities and constraints for social accountability and possible solutions to address them, help identify good practices that can be built on, scaled up or institutionalized through the DPL, as well civil society actors that can become key partners in the implementation of the reforms.

The World Bank’s policy on Development Policy Lending (OP 8.60) approved in August 2004, explicitly recognizes the role of consultation and participation in the formulation of policy reforms supported by DPLs and advises borrowing countries to ‘consult with and engage the participation of key stakeholders in the process of formulating their development strategies’ and then “drawing on this process, determining the form and extent of consultations in preparing, implementing, monitoring, and evaluating the operation”. The accompanying Good Practice Note on Participation provides guidance on how such consultative processes can best be carried out to inform the policy reform and how to mitigate some of the associated potential risks (World Bank 2004).
The experience to date shows that around two thirds of the DPLs approved since the new DPL policy OP/BP 8.60 came into effect in August 2004 until December 31, 2005, build on some form of participatory process, either in the formulation of their country’s development strategy or as participatory arrangements carried out to inform the DPL or the sector strategy on which it was based. However, many of these processes were carried out in the elaboration of the country’s development strategy, which took place well before the DPL. 37.5 percent (or 15 out of 40 DPLs) described specific consultation and participation arrangements carried out to inform the design of the DPL.

3.4.5. Assessing the Impact of Social Accountability Reforms

The support to social accountability reforms in the context of World Bank-supported policy reforms is a relatively recent experience, which makes it difficult to assess their impact over the long-term. However, it is important to make systematic efforts to build baseline indicators on the impact of social accountability reforms so that changes over time can be tracked and measured. This will help build a body of knowledge on the impact of such reforms.

A number of indicators can be used to assess the impact of such reforms over the medium-term. Governance, transparency and corruption indicators are one way to assess the impact of social accountability reforms on public perceptions of accountability and transparency. In some countries, household surveys also provide information on perceptions of corruption, governance and quality of public services, which can be used to assess changes in public opinion on these issues. In the context of DPLs with social accountability measures, establishing baseline data on sectoral outcomes may also be useful to track improvements over time.

However, while the use of such indicators can provide measurements of the evolution of citizen perceptions on different issues, the causal link to the reforms in question is hard to establish as they can be influenced by many other factors, including overall political context and level of awareness of citizen’s rights. Therefore, more output (and not outcome) oriented indicators can be used to assess trends in the short and medium-term.

Box 9. Assessing the Impact of DPL-Supported Policy Reforms: the Case of the Peru PSRL

In the case of the Peru PSRL, both output and outcome indicators were used to assess the impact of social accountability reforms over time. One of the benchmarks of the loan was to include questions on citizen perceptions of corruption and quality of public services in the national household survey. These indicators were then used to assess changes in perceptions during the four years of the programmatic series. Output indicators included the number of organizations using the information provided on the government’s budget transparency portal.

The long-term impact of the reforms in Peru cannot yet be assessed. However, examples of concrete results emanating from the social accountability reforms include the creation of a government transparency portal with information on all public budgets and expenditures at the national and regional levels, summaries of the strategic plans of different sectors, financial audits of all public agencies and information on all internal and external debt. The portal has been an important tool for civil society to monitor government performance, with a study showing that at least 35 civil society organizations are actively using the information to monitor the state. The reforms also led to the creation of a monitoring and evaluation system of social programs that includes a social auditing and user feedback component.

3.4.6. Sustaining Social Accountability Reforms

A major challenge is to ensure that the social accountability reforms supported through DPLs are sustained beyond the period of the loan. To facilitate this, it is important to identify and build on existing practices and capacities, promote local ownership of the reforms, focus on building the capacities in government and civil
society, and help put in place systems and mechanisms to ensure their institutionalization. Support to ad hoc practices, as has been seen in some of the examples provided earlier, can be effective when seen as a first step to help institutionalize processes and practices in later phases of the loan program (in the case of programmatic loans). However, if they are only focused on time-bound actions with no mechanisms to institutionalize them over time, the likelihood of their long-term sustainability is reduced.

3.5. STRENGTHS AND WEAKNESSES OF THE DPL INSTRUMENT FOR SUPPORTING SOCIAL ACCOUNTABILITY REFORMS

While the DPL instrument offers an important framework for supporting social accountability reforms, it also presents some limitations that need to be taken into account in the design and implementation of such reforms.

Support to government actions that facilitate social accountability. For social accountability initiatives to be effective and lead to positive development outcomes, they rely both on government will and responsiveness and on civil society action and capacity to demand accountability from the state. DPLs can provide support to government reforms that aim at opening up spaces for civil society to engage in policy-making and monitor public sector performance. However, civil society activities are more difficult to support through DPLs as responsibility for implementation lies with the government, the World Bank’s main counterpart in a loan operation. However, other World Bank instruments, such as trust funds, can provide alternative sources of funding for civil society-led activities. Also, coordinating the reforms with international NGOs, bilateral donors and other multilateral organizations can ensure that complementary civil society actions and capacity-building efforts can find support through other partners.

Resources for implementation of activities. Another reason to complement DPLs with other sources of funding is that budget support loans do not provide the financial resources needed for implementation of specific activities, which in the case of social accountability reforms often include efforts to promote capacity-building of public officials or civil society actors. It can also include the operating costs of establishing information systems and spaces for citizen participation. To address this shortcoming, social accountability actions supported by DPLs generally require complementary sources of support, such as those suggested above. Other type of World Bank loans, such as investment and technical assistance loans can also provide complementary sources of funding for implementation of specific activities. The boxes below illustrate how trust fund grants and World Bank-financed investment loans have complemented social accountability reforms supported by DPLs in Sierra Leone and Peru.

Box 10. Examples of Complementary Sources of Funding for Implementation of Social Accountability Reforms Supported by DPLs

Examples of investment loans complementing DPLs for financing of specific activities include the Sierra Leone Institutional Reform Project which provided funding for the implementation and capacity-building of the budget oversight committees established through the ERRC.

It was also the case of the Peru Accountability for Decentralization in the Social Sectors Technical Assistance Project (TAL), which provided resources for the implementation of the social sector reform monitoring and evaluation system (including a participatory M&E component), supported by the PSRL IV.

Trust funds that have supported the implementation of social accountability reforms of DPLs include two TFESSD and JSDF grants in Ecuador, which provided support to the social accountability reforms of the FCCGL II and PHDRL I and II, providing resources for capacity-building of civil society in this area. In Peru, a JSDF grant provided support to the PSRL and the PDCSAL, for civil society capacity-building in participatory budgeting, budget tracking and social auditing.

Long-term changes with a fast-disbursing instrument. The DPL is a fast-disbursing lending instrument with relatively short time-frames. However, successful social accountability reforms such as for example the institutionalization of participatory practices in policy-making require a longer-term focus. To balance this potential dichotomy, the DPL should focus on supporting social accountability actions that can be
implemented relatively quickly, but that are capable of having medium and long-term impacts. To identify such actions, strategic choice and rigor in prioritization has to be exercised, which will be informed by the in-country dialogue with local stakeholders and prior analytical work.

**Leveraging social accountability actions of other World Bank operations.** The leverage provided by DPLs can enhance the impact of other World Bank-supported activities through for example investment and technical assistance loans or AAA, by complementing their actions and providing the necessary leverage for the implementation of policy reforms critical to their success.

**Box 11. Examples of DPLs Leveraging Social Accountability Activities of Other World Bank-Supported Programs**

This was for example the case of the Ecuador FCCGL II, which provided support to the Institutional Reform Project (a public sector reform loan that aimed, among other things, at enhancing the efficiency and accountability of Ecuadorian customs), by including a benchmark to create a customs monitoring system, with the participation of civil society. It was also the case of the Peru PSRL III, which included a benchmark on the approval of a Transparency and Access to Information Law and the creation of an M&E system of social programs, the implementation of which was supported by a Technical Assistance Loan.

Coordination with other loans in the portfolio - including DPLs - on social accountability benchmarks is also important to avoid duplication of efforts, ensure consistency and enhance their impact.

This was for example the case of the Peru PDCSAL I and the Peru PSRL III. In order to enhance their respective impact, it was decided that some of the benchmarks relating to participatory budgeting – originally part of the PSRL – would be moved over to the PDCSAL, as they were more in line with the objectives of that loan. The participatory budgeting benchmarks continued to provide an important leverage to several of the other social accountability benchmarks of the PSRL.
4. Conclusions

There has been a significant increase in the past years in the number of Bank-financed policy-based loans that support social accountability-related reforms that aim at enhancing citizen access to information and facilitate citizen participation in the formulation, implementation and monitoring of policies, programs, services and public budgets. This trend illustrates the growing importance attached to the role of governance in the development agenda and specifically to the demand-side processes of the governance equation that emphasize the role of citizens and civil society in improving government accountability and reducing corruption. This recognition has not only gained ground among governments, NGOs and the donor community, but also within the World Bank, which increasingly emphasizes the importance of these processes as illustrated in the increase in the number of social accountability benchmarks and triggers in policy matrixes agreed to between the World Bank and its client countries.

The research carried out for this study demonstrates that social accountability reforms supported by World Bank-financed policy-based loans have been implemented across a variety of sectors and type of reforms, although they are more common in public sector reforms (decentralization, anti-corruption, public expenditure management and procurement) and social sector reforms (health, education and social protection). They are less common in infrastructure, private sector development and financial sector and banking reforms.

The type of social accountability mechanisms supported range from measures aimed at improving citizen access to information (a fundamental pre-condition for effective participation) to reforms aimed at facilitating citizen participation in the formulation, implementation and monitoring of policies, programs, services and public expenditures, at the national, regional as well as local levels.

The social accountability measures have also varied in their degree of institutionalization, ranging from more ad hoc or temporary consultative measures in many of the cases to deeper forms of institutionalization through the establishment of more permanent systems, tools and spaces or even legislative frameworks for public access to information and citizen participation.

The type and level of social accountability measures varies not only according to the type of reform, but also to the country context. The governance climate, government openness to extra-electoral civil society participation and the capacity of civil society are all factors that will determine the viability of social accountability reforms. The study found that the more institutionalized forms of social accountability reforms were more common in Latin America than in other regions, probably because of a relatively enabling environment for social accountability and a relatively strong civil society.

The research also helped to highlight the role that Bank-financed policy-based can play in supporting social accountability reforms, and also some of the limitations of the instrument in these processes.

Policy-based loans can help improve the enabling environment for social accountability by supporting structural reforms needed for such processes to be effective in the long run. They can also help protect reform agendas and provide opportunities for inter-sectoral collaboration as social accountability reforms tend to be cross-cutting.

However, because Bank-financed policy-based loans provide general budget support, they do not allow for specific resource allocation for the implementation of activities that are often crucial to make social accountability initiatives succeed. Such activities may involve the establishment of systems and tools for
citizen access to information or spaces for citizen participation as well as capacity-building of government and civil society stakeholders. To ensure the successful implementation of such reforms it is therefore important to make provisions for alternative sources of funding for such activities. Teaming up with other donor or civil society initiatives can be crucial in this process. Trust fund grants and Bank-financed investment lending can also be important complementary sources of financing for such activities.

Finally, the scope of this research did not include an assessment of the impact of social accountability reforms. However, such impact assessments should be encouraged more systematically, to help assess more specifically the contributions of social accountability to development effectiveness and governance, in order to enhance the future effectiveness of such interventions.
Annex 1: Methodology for Statistical Stocktaking of Participation in the Contents of DPLs

The statistical stocktaking sought to assess to what extent DPLs contained stakeholder participation in their content, the type of participation promoted in the content of DPLs and the most common participatory mechanisms used.

The study refers to participation in the content of the DPL when describing participatory actions and mechanisms included in the policy reforms supported by the DPL, reflected as benchmarks in the policy matrix agreed to between the Bank and the client.

DATA SOURCES

The review covered all DPLs approved by the Board since the new policy came into effect on September 1, 2004 up until December 31, 2005, adding up to a total of 40 loans.

The statistical analysis was based solely on the information provided in the Program Documents (PDs). For participation in the content of the DPL, only the policy matrix was considered, as it represents the binding commitment between the Bank and the Borrower on the reforms to be supported by the DPL.

DEFINITIONS

The study used the definition of participation generally accepted in the Bank:

“Participation is the process through which stakeholders influence and share control over priority setting, policy-making, resource allocations and access to public goods and services.”

An operational definition of participation was used to identify which triggers and benchmarks referred to stakeholder participation:

“Stakeholder participation at the national, regional or local level in the formulation, implementation and monitoring of strategies, plans, policies, programs, budgets, expenditures and services.”
## Annex 2: Type of Social Accountability Actions Promoted by PBLS

<table>
<thead>
<tr>
<th>Type of action</th>
<th>Transparency and Access to Information</th>
<th>Participation in policy-making</th>
<th>Participation in implementation of policies</th>
<th>Participation in monitoring of policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institutionalization of mechanisms or practices</td>
<td>Uganda PRSC I, II &amp; III: Mandatory public notices on resource transfers at service delivery points (health, education, water and sanitation, agriculture).  Peru PSRL I, III &amp; III: Creation of MoF website with information on budget and public expenditures.</td>
<td>Ghana ERSOC III: National HIV/AIDS Commission with representatives from CSOs; establishment of structures to facilitate permanent dialogue between the Government and CSOs at national and local levels.  Peru PSRL I: Creation of a multi-sectoral dialogue mechanism to institutionalize citizen participation in design, decision-making and control of poverty reduction programs; creation of Commission on National Consensus for Education to influence the design and formulation of education policies.  Sierra Leone ERRC III: Creation of Community Budget Oversight Committees to participate in the annual discussion of the budget.</td>
<td>Benin PRSC: Participatory forest management; Participatory management of health facilities (COGES).  Peru PSRL II: Increase in community managed health facilities.</td>
<td>Bolivia PSAC II, III &amp; IV: Funding to vigilance committees; inclusion of civil society representatives on DUF; creation of project approval committees to ensure citizen oversight of National Compensation Policy.  Uganda PRSC III: Establishment of channels to ensure feedback from civil society on service delivery in districts and sub-counties.  Peru PSRL I, II &amp; III: Questions on citizen perceptions on government accountability included in national household survey.  Burkina Faso PRSC II: Strengthening of national health information system through inclusion of beneficiary assessments.  Brazil PHDSL I: Implementation of citizen report cards in education services at state and local levels; creation of a consumer grievance</td>
</tr>
<tr>
<td>Type of action</td>
<td>Transparency and Access to Information</td>
<td>Participation in policy-making</td>
<td>Participation in implementation of policies</td>
<td>Participation in monitoring of policies</td>
</tr>
<tr>
<td>-----------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Ad hoc practices</td>
<td>Burkina Faso PRSC I, II, &amp; III: Make publicly available the revenue and expenses for operations under HIPC; post budgets allocated to each health facility in public places.</td>
<td>Vietnam PRSC II: Consultation on the National Strategy for Environmental Protection.</td>
<td>Rwanda IRC: Community participation in the implementation of education services.</td>
<td>system, including patient satisfaction survey and toll free complaints hotline.</td>
</tr>
<tr>
<td></td>
<td>Brazil PHDSRL I: Publication of hospital ratings in the press.</td>
<td>Armenia SAC IV: Consultations on tax policies.</td>
<td></td>
<td>Sierra Leone ERC II: Implementation of a PETS.</td>
</tr>
<tr>
<td></td>
<td>Sierra Leone ERC II: Publication of PETS.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Annex 3: Examples of Social Accountability Components in PBL Matrices

<table>
<thead>
<tr>
<th>Loan</th>
<th>Objectives of Loan</th>
<th>Component</th>
<th>Sub-Component</th>
<th>Examples of Triggers</th>
<th>Examples of Benchmarks</th>
</tr>
</thead>
</table>
| Peru PSRL II | • Ensure transparent and participatory resource allocation of social programs.  
• Rationalize social expenditures.  
• Improve access to services.  
• Improve the protection of the poor against a variety of risks. | Institutional Pillar: Enhanced Governance | Transparency and access to information | Budget made available for implementation of ENAHO (national household survey) at departmental level, including incorporation of module on public perceptions regarding transparency, practices and attitudes started. | • Presentation of a strategy for increased transparency in 6 selected programs.  
• Improve access and presentation of SIAF information by linking it to sectoral program and activity information via an internet-based Ventana Amigable.  
• Dissemination campaign about the transparency program of rural A Trabajar to 530 districts.  
• Draft of an organizational law of INEI (National Statistics Institute) to ensure its functional autonomy.  
• Evidence that Ombudsman Office has launched a dissemination campaign regarding citizens’ rights of access to information. |
| | | Participation and partners in public policies | | | • Evidence that social monitoring system has been implemented in 10 districts of three regional departments.  
• At least six regional department development plans have been agreed to by the “mesas de concertacion”.  
• Directive to use participatory process in budget preparation for 2003 sent to regional departments. |
| Peru PSRL III | | Dignity Pillar: Access to Health, Nutrition and Education Services | | | • Pilot system for registering citizens complaints in the education sector has been implemented. |
| | | Education and Culture | | | • Pilot system for people’s assessment of government services launched.  
• SIAF made available through an internet portal “Consulta Amigable” which provides information on budget and expenditures for all government programs. |
<table>
<thead>
<tr>
<th>Loan</th>
<th>Objectives of Loan</th>
<th>Component</th>
<th>Sub-Component</th>
<th>Examples of Triggers</th>
<th>Examples of Benchmarks</th>
</tr>
</thead>
</table>
| Uganda PRSC I | o Provide a framework for economic growth and transformation by improving the efficiency and equitable use of public resources  
  o Ensuring good governance and security by improving management systems and practices in the public sector | Increase transparency, participation and reduce corruption | Transparency                           |  | • Physical goals linked to expenditures for three programs  
  • MOI in collaboration with MEI has reviewed the Official Secrets Act in light of best practice regarding access to information.  
  • MOFPED has produced a citizens’ guide to the budget process.  
  • MOFPED and MOLG have published on a regular basis, transfers of conditional grantst to districts in the media. Public notices have been made mandatory in primary schools. |
|            |                                                                                   | Civil Society Participation                                           |                                        |  |                                                                                                           |
| Uganda PRSC II |                                                                                   | Civil society participation                                           |                                        |  | • MOI in consultations with DEI, has initiated consultations with stakeholders on access to information.  
  • IGG and DEI have started the second integrity survey  
  • OPM and MOIA have created a computerized database on NGOs and faith-based organizations with public access.  
  • MOLG has taken the lead in promoting a harmonized framework for participation in service delivery. |
|            |                                                                                   | Transparency                                                           |                                        |  |                                                                                                           |
| Uganda PRSC III |                                                                                   | Civil society participation                                           |                                        |  | • MoLG and local governments establish channels of feedback from communities to monitor the performance of the participatory framework. |
| Ecuador FCCGL II | Fiscal Consolidation with Debt Sustainability                                    | Fiscal Framework                                                        |                                        |  | • MEF monitored the compliance of the law of Fiscal Transparency, Stability and Responsibility (FTSRL) with the support of the NGO Observatory of Fiscal Policy. |
|            | Improved Competitiveness and Market Flexibility                                   | Competition and Trade Policies                                          |                                        |  | • CAE progress in the implementation of the Customs Modernization Plan led to the promotion of the creation of a “Customs Observatory” comprising civil society organizations. |
## Annex 4: Examples of Social Accountability Measures in Policy Reforms Supported by Bank-Financed Policy Based Lending

<table>
<thead>
<tr>
<th>Type of Actions Supported</th>
<th>High: Legal Frameworks</th>
<th>Medium: Institutionalizing Processes</th>
<th>Low: Ad Hoc Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enhanced government transparency and citizen access to information</td>
<td>Congress approval of Transparency and Access to Public Information Law and its regulation (Peru PDCSAL I &amp; PSRL III).</td>
<td>Making public notices on resource transfers mandatory at service delivery points and at district and sub-county levels</td>
<td>Publication of a report on irregularities in the execution of the 2001 and 2002 budget, the posting of allocated public expenditures in all health and education facilities, the publication of a quarterly public procurement bulletin and the launch a website where to post them (Chad SAC IV).</td>
</tr>
<tr>
<td>Congress approval of Transparency and Access to Public Information Law and its regulation (Peru PDCSAL I &amp; PSRL III).</td>
<td>Inspector General to ensure and enforce, through sanctions, open citizen access to asset declarations of government officials</td>
<td>Publication of the 2004 budget and its mid-year budget update in addition to prepare and distribute a citizen’s guide to the FY04 budget and an explanation of the tax law (Timor Leste TSP II).</td>
<td></td>
</tr>
<tr>
<td>Making public notices on resource transfers mandatory at service delivery points and at district and sub-county levels</td>
<td>Production and publication of a citizens’ guide to the budget process</td>
<td>Publication of hospital ratings in the press, as a way to facilitate citizen monitoring of health services (Brazil PHDSRL III).</td>
<td></td>
</tr>
<tr>
<td>Inspector General to ensure and enforce, through sanctions, open citizen access to asset declarations of government officials</td>
<td>Regular publication in the media of transfers of conditional grants to districts (Uganda PRSC I, II &amp; III)</td>
<td>Publication of the results of participatory public expenditure tracking surveys in order to create citizen awareness around the quality and effectiveness of service delivery (Sierra Leone ERRC II).</td>
<td></td>
</tr>
<tr>
<td>Production and publication of a citizens’ guide to the budget process</td>
<td>Creation of a Ministry of Finance website with information on all projected and executed public expenditures, by sector (including defense) and programs, disaggregated to the regional and local levels (Peru PSRL I, II, III &amp; IV).</td>
<td>Make publicly available all the revenue and expenses for operations under the HIPC initiative and post the budgets allotted to each health facility in public places in the districts (Burkina Faso PRSC I, II &amp; III).</td>
<td></td>
</tr>
<tr>
<td>Regular publication in the media of transfers of conditional grants to districts (Uganda PRSC I, II &amp; III)</td>
<td>Implementation of a citizen’s rights campaign by the Ombudsman Office (Peru PSRL II).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Creation of a Ministry of Finance website with information on all projected and executed public expenditures, by sector (including defense) and programs, disaggregated to the regional and local levels (Peru PSRL I, II, III &amp; IV).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of a citizen’s rights campaign by the Ombudsman Office (Peru PSRL II).</td>
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</tr>
</tbody>
</table>

DPLs can encourage reforms or the implementation of specific actions to improve citizens’ access to information, enhance the quality of public information systems or create conditions for the establishment and functioning of civil society organizations.
<p>| Enabling legal and policy frameworks for civil society organizations | Government approval of an NGO policy and code of conduct in order to create the basis for a more effective involvement of NGOs in the formulation and monitoring of public policies (Uganda PRSC II). |</p>
<table>
<thead>
<tr>
<th>Type of Actions Supported</th>
<th>Degree of Institutionalization</th>
<th>High: Legal Frameworks</th>
<th>Medium: Institutionalizing Processes</th>
<th>Low: Ad Hoc Actions</th>
</tr>
</thead>
</table>

**Increasing citizen participation in policy-making,**

The development of legal frameworks or processes supporting national or sub-national policy dialogues, participatory budgeting or planning mechanisms are among others the type of activities that can be supported by prior actions included in the policy matrix of DPL.

- **Presentation to Congress, approval and implementation of the Law on National Dialogue establishing a national dialogue mechanism as a permanent space of multi-sectoral collaboration (including civil society) for the formulation and monitoring of policies aimed at reducing poverty.**

- **Approval by Congress of a framework Law for Participatory Budgeting and the issuing of accompanying regulations, as well the application of the law in at least 50 percent of municipalities in the first year. The law makes participatory budgeting mandatory for the investment portion of all regional and municipal governments’ annual budgets in the country (Peru PDCSAL I).**

- **Creation of a national HIV/AIDS Commission (GAC) responsible for ensuring a national response to HIV/AIDS, requiring the participation of line ministries as well as CSOs, including religious, occupational, NGOs, women’s and student organizations and other interest groups.**

- **Issuance of a Supreme Decree creating the Poverty Reduction Roundtables as multi-sectoral spaces of dialogue at the national regional and local levels, institutionalizing participation of civil society in the design, decision-making and oversight of poverty reduction programs in Peru.**

- **Issuance of a Supreme Decree creating the Commission on National Consensus for Education integrating representatives from Government, civil society, academia, the teachers’ union and industry leaders to promote a national dialogue on education policies leading to a new National Education Law (Peru PSRL I).**

- **Creation of Community Budget Oversight Committees in all the regions to participate in the annual discussion of the budget with stakeholders.**

- **Organization of consultation meetings with stakeholders, including civil society to discuss the future of the cotton sector and the definition of a policy for the sector (Mali SAC III).**

- **Stakeholder consultations on the National Strategy for Environmental Protection (Vietnam PRSC II).**

- **Consultations with tax payers on the Ministry of Revenue’s Administrative Practices and Modernization Plans (Armenia SAC IV).**

- **Implementation of stakeholder workshops to educate the public on the budget process and promote their involvement in budget preparation (Sierra Leone ERRC II).**

- **Study on income and asset register and other instruments to fight corruption discussed with civil society; discussion on media and freedom of information issues discussed with leading journalists, media owners and the public; policy on policing in TL developed and discussed with stakeholders (Timor Leste CSP I).**

- **Elaboration, publication and implementation of a participatory anti-corruption strategy in consultation with stakeholders.**
| Ministries and departments and to monitor budget execution in their respective regions (Sierra Leone ERRC III). | Regular semi-annual consultation mechanism between the government and the private sector (Lao PDR PRSC I). |
| Creation and implementation of National Education Council (CONED) to facilitate civil society participation in education policy (Bolivia SSPSAC I). | Stakeholder consultations for the preparation of the National Housing Policy (Brazil HSRL I). |
| Slum upgrading program strengthened by incorporating participatory planning in its processes (Mexico DPL II). | Quarterly meetings between donors and senior members of GoT on anti-corruption agenda (Tanzania PRSC III). |
| | Stakeholder consultations on Commercial Dispute Resolution component of Business Environment Strengthening Program in Tanzania; broad consultation on the Repeal and Enactment of the Anti-Corruption Law (Tanzania PRSC III). |
| | Stakeholder consultation on police reform; Establish multi-stakeholder committee to review NGO regulatory framework. (Bangladesh DSC III). |
**Citizens participation in the implementation and monitoring of policies, programs and services**

DPLs can be instrumental to the creation of frameworks or the encouragement of processes of specific actions supporting citizens’ involvement in policy implementation and monitoring.

<table>
<thead>
<tr>
<th>Approval of the Law on National Dialogue reinforcing and further institutionalizing the role of vigilance committees (local social control mechanisms composed of civil society representatives) with the mandate to monitor municipal administrative management and expenditures (Bolivia PSAC I).</th>
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<tbody>
<tr>
<td>Approval of the Framework Law of Participatory Budgeting and its accompanying regulation including the creation of vigilance committees (composed of civil society representatives) at the regional, provincial and district levels, to monitor the execution of the municipal budget subject to participatory budgeting (Peru PDCSAL I).</td>
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<td>Establishing of a framework for community participation in primary and secondary education and for coordination of private, public and NGO health providers. (Rwanda Institutional Reform Credit).</td>
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<td>Inclusion of civil society representatives in the Board of the Unified Directorate of Funds (DUF), the government’s main credit agency which is responsible for the allocation of transfers to municipalities. At the departmental level, the creation of Project Approval Committees to ensure citizen oversight of the National Compensation Policy. At the municipal level, the scaling up of financing to 118 Vigilance Committees; the inclusion of civil society representatives in the establishment of a monitoring mechanism for the implementation of the poverty reduction strategy at the prefecture and municipal levels, and monitoring of the social control mechanisms; and the presentation of an implementation plan for a participatory evaluation of the impact of capacity building programs for municipalities and prefectures in the area of public service delivery (Bolivia PSAC I, II, III &amp; IV).</td>
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<td>Establishment of channels to ensure feedback from civil society on service delivery in districts and sub-counties. In addition, implementation of a survey to assess citizen perceptions on state integrity (Uganda PRSC I).</td>
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<tr>
<td>Questions on citizen perceptions of corruption, transparency and government accountability included in the national household survey to monitor the evolution of perceptions throughout the implementation of the reforms. Provision of support to increase the number of community managed primary health care facilities (CLAS) in the country (Peru PSRL II).</td>
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<td>Application of citizen report cards to five social protection programs on a piloting basis (Peru PSRL III).</td>
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<td>Application of citizen report cards to three health, education and cash-transfer programs (Ecuador PHDRL II).</td>
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<tr>
<td>Implementation of report cards to capture client feedback on the performance of federal institutions in service delivery (Ethiopia Economic Rehabilitation Credit).</td>
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<tr>
<td>Piloting of a PETS exercise in Y2000, to track public expenditures and to assess the efficiency and quality of service delivery (Sierra Leone ERRC II).</td>
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<tr>
<td>Implementation of participatory community management of health and education services through so-called COGES and the introduction of participatory forest management with the aim of empowering users and beneficiaries to have decision-making and management control over the services that directly affect them (Benin PRSC I).</td>
</tr>
</tbody>
</table>
Implementation of citizen report cards to evaluate users' perception of education services at the state and municipal levels. The creation of a Consumer Grievance System in the health sector, including a patient satisfaction survey, a system to respond to grievances, a system to respond to complaints received through the surveys and the call center, and the creation of a database to systematically track and respond to client grievances and the responses provided (Brazil PHDSRL I).

Strengthening of the national health information system by integrating information from local management committees and using beneficiary assessments to ascertain citizen perceptions on the efficiency and accessibility of health services, including financial, socio-cultural and geographical barriers to care (Burkina Faso PRSC II).

An M&E system which is participatory, transparent and with a focus on results has been designed and is under implementation for Priority Social Programs (M); establishment of at least 10 local vigilance committees which are tracking expenditures, procurement and targeting of decentralized food programs (Peru PSRL IV & PDCSAL I).

The design of an M&E plan for social programs with participation of civil society and program beneficiaries (Uruguay SPDPL). 

Implementation of PETS in health and education as an independent monitoring tool to enhance accountability by engaging service delivery beneficiaries (Lao PDR PRSC I).

Citizen report cards on the use of driver's licenses and ID cards, and of health and education services (Rwanda PRSC I, II & III). PM&E of PRS (participatory expenditure tracking surveys and citizen report cards) (Ghana PRSC III).

Piloting of ethics committees to handle grievances and complaints from the public on corruption; implementation of service delivery surveys (Tanzania PRSC III).

Public official and user surveys in health and education as part of anti-corruption plan (Georgia PMSO).
Bibliography


PROGRAM DOCUMENTS:


