



**IFI WATCH**  
MYANMAR

# **How community-driven are CDD projects in Myanmar ?**



An independent report from IFI Watch Myanmar

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## A. Introduction

The National Community Driven Development Project (NCDDP) was created by the World Bank with the objective of assisting the progress of development in Myanmar through a people-centered approach. Central to the goals of this project is its “community-driven” nature. The end results are not envisioned to be solely a school or a road, but rather a shift in the way community needs are identified and addressed. But if the people that this project is intended to benefit and empower are not able to participate fully, then the project is not “community-driven” and warrants a test if the Bank meets its stated goals. As a lender, bound by its safeguards and transparency requirements, the Bank has a responsibility to ensure adequate oversight so that what is said on paper matches what is happening on the ground.



*IFI Watch Myanmar Press Release*

IFI Watch Myanmar has been engaging on the NCDDP since its inception in 2012. There are intersecting reasons why the engagement has persisted across multiple layers of decision making and project management.

- Reason 1: the governance of the previous government was problematic where they suffered many deficits: untrusted and lack capacity.

Lack of capacity: the nature of the project good level of technical expertise, on the ground exposure, had weak understanding of CDD as they themselves have never had had meaningful engagement with the communities as they were still entrapped by the highly centralized planning and decision making devoid of substantial community inputs, this making it suspected that it would indeed reinforce community-driven efforts

- Reason 2: communities were not fully aware of the project and the full information did not reach them from the get go. From the early stage of the project, that was in 2012 which was prior to the township selection in early 2013, we have received reports of project issues which we verified these reports with the concerned communities



*Training in Kanpetlet*

- Reason 3:
  - ❖ We believe community empowerment – KyunSu and Kanpetlet, it urged us to look deeper into it.
  - ❖ We wanted informed engagement because if it works, it would indeed help uplift their condition. If it doesn't, it would only reinforce a culture of corruption; if it fails, it fails the objective. We believe that accurate information, delivered on time and in accessible format can increase the ability of communities to engage meaningfully in the project decision process: from project selection, community representation, project approval, implementation, monitoring, etc. – see the project cycle.

- ❖ There was many misinformation that reached communities. Apparently, the information that reached communities showed disconnect with what the project operation manual. Practically speaking, was it a deliberate misinformation? If so, could that be attributed to project consultants or township government or the higher authorities?
- ❖ We thought the Bank could use this project as opportunity to showcase that a real CDD is possible in the context of transitioning Myanmar. Its reputation can be at stake. If it does good, Bank can really catalyze a good model of empower communities managing their self-identified projects. You wanted to help because it's new for our country, for us; and knowing that it would benefit communities, we wanted to help to make it work.
- ❖ That's why we embraced the tripartite approach: that there is power and value of interacting and working with the government, IFIs and the communities even if there is history of adversarial relents and even distrust. We wanted to promote  
We feel it was rushed, not fully inclusive process. Lacked substantive community input that resulted in lacked community buy-in. It also reinforced intra-community tension, fighting within project committee members.
- ❖ They did not see the CDD as a whole, but only the infrastructure.

The engagement entailed a series of with the Bank's senior management, country mission, the implementing agency of the Union government, the state, regional and township governments, the project consultants, and more importantly, the targeted communities so that real project management issues and responses were covered in depth and in breadth. Rationale for engaging in the project since its inception is loaded. IFI Watch Myanmar has been engaging on the NCDDP since its inception. Through the course of its engagement, IFI Watch Myanmar has identified a number of weaknesses in implementation of the NCDDP. Even in areas that report success, the results on the ground tell a different story. While some individual problems have been resolved, there still remain serious questions about the overall implementation.



*CSO and World Bank Meeting*

There are concerns about the quality and sufficiency of trainings and capacity-building, the overall speed of the project, the outreach methods and lack of access to information, and the prioritization of short-term results at the expense of the long-term goal. If these weaknesses, are not

addressed and fixed at the source in the existing communities, then scaling up will only exacerbate the problems. For example, issues of corruption, lack of community participation and transparency are going to reoccur, both at the national and local governments and at the project sites, as projects supported by bilateral and multilateral donors like the World Bank are beginning to increase significantly owing to geo-political and economic interests.

**This report was envisioned to:**

- *Probe the extent to which the World Bank claims that communities have ownership and leadership in project management do manifest on the ground*
- *Assess how realistic the project's timeline is in providing sufficient training to management so that they can implement the projects properly*
- *Assess how the Bank has ensured public participation and access to information, including for the handling of reported grievances*

**Taking stock from our independent findings, the intention of this report moving forward is to:**

- *Inform the World Bank of the ground-level reality, which they may find useful to verify their own public reports and press release.*
- *Highlight what can be improved and what actions the World Bank could take in order to realize the intended benefits of the project.*
- *Offer the Bank recommendations on how to adequately address the issues identified on the ground, in order to help the Bank to better meet its objectives for the NCDD Project.*

**IFI Watch Myanmar and its engagement with National Community Driven Development Project [NCDDP]:**

IFI Watch Myanmar works to ensure democratic space for civil society and communities in the activities of International Financial Institutions (IFIs) in Myanmar. Community-based and national-level organizations initiated the IFI Watch in October 19, 2012 in response to the early stage of re-engagement by multilateral banks including the World Bank Group and Asian Development as the Myanmar government was undergoing multiple transitions.

We believe that civil society and communities have equally important roles to play in decision-making in the development process. IFI Watch Myanmar employs a number of approaches to inform the decisions on and results of IFI investments: facilitating dialogue between the government, IFIs and local communities; independent monitoring; and capacity development.

The NCDDP was among the first projects that IFI Watch Myanmar engaged on, and we have been working closely since 2012. We engage with both the World Bank and the Implementing government; Department of Rural Development under the Ministry of Livestock – Fisheries providing our feedback on the strengths and weaknesses of the project and what needs to be improved so that appropriate actions at the project and township levels can be addressed.

## **B. The NCDD Project**

### **The NCDDP's objective**

The World Bank's NCDD Project was developed "to enable poor rural communities to benefit from improved access to and use of basic infrastructure and services through a people-centered approach and to enhance the government's capacity to respond promptly and effectively to an eligible crisis or emergency."<sup>1</sup> The project aims to empower rural communities to identify and implement investments they need the most, such as roads, bridges, irrigation systems, schools, health clinics, and rural markets. According to the Bank, the project's objective will be achieved through: "financing community-identified rural infrastructure investments; strengthening the capacity of communities in partnership with local authorities to effectively identify, plan and implement their development priorities; and facilitating the participation of the poor and vulnerable, both women and men throughout the project cycle at the community level."<sup>2</sup>

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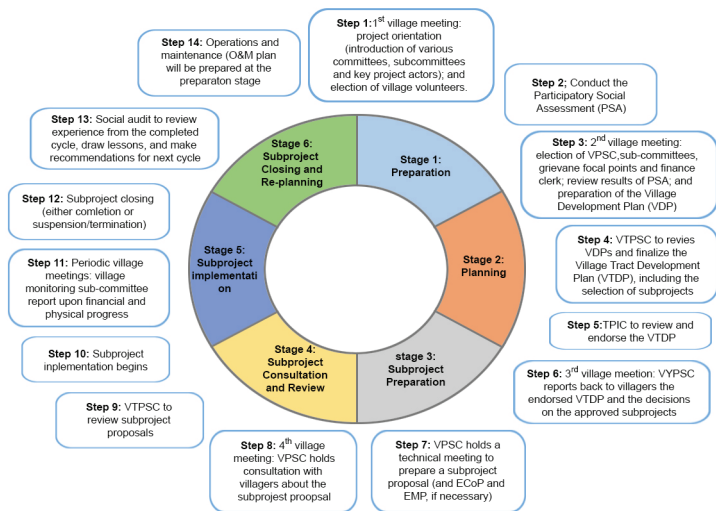
<sup>1</sup>Government of the Republic of the Union of Myanmar, National Community Driven Development Project, Ch1, para 2 (2015), available at, <http://cdd.drdmyanmar.org/eng/wp-content/uploads/2016/01/151105-WB-NOL-NCDDP-Operations-Manual-English.pdf>

<sup>2</sup>Id.





# NCDD Project Cycle (Stages and Steps) 2015 Operational Manual



## The World Bank plans to Scale up, Despite the High Risks and Implementation Challenges

A 2014 Press release after a visit from the World Bank’s Vice President for the East Asia and Pacific Region stated that “World Bank Group Reaffirms its Strong Support to Myanmar.”<sup>3</sup> The press release praises the NCDDP for setting “a good example of how a program can empower local communities by giving them the power to manage development resources,” and says it “empowers rural communities to identify and implement investments they need.”<sup>4</sup> The press release also applauds the people-centered approach and the intention to match resources with the community’s priorities.

<sup>3</sup>Press Release, World Bank Group Reaffirms its Strong Support to Myanmar (16 May, 2014), available at, <http://www.worldbank.org/en/news/press-release/2014/05/16/world-bank-group-reaffirms-its-strong-support-to-myanmar>

<sup>4</sup>Id.

However, the visit refers only to high-level meetings, so a crucial voice is missing from those updates; the voice of the people, who are meant to be participating in, and leading, these projects. This information gap prevents the Bank from having a fully informed assessment. The Bank's goals may reflect what the press release says, but the implementation on the ground is more complicated.

Similarly, the 2015 MSR Report highlights the success so far. However, it appears to gloss over an in-depth discussion of the challenges. Instead, issues regarding the need for more capacity-building, time, and training were merely mentioned as suggestions for next year.<sup>5</sup>

The Implementation Status & Results Report found that the second year “continues to achieve significant results towards its development objective” although it gives the overall project a “high” risk rating, and the overall implementation progress was only “moderately satisfactory.”<sup>6</sup>

### **C. The Findings of IFI Watch Myanmar**

Since 2013, IFI Watch Myanmar has conducted a number of township workshops and monitoring trips in many of the participating communities. From these workshops and monitoring trips, IFI Watch Myanmar has identified a number of areas of concern about the implementation of the NCDDP. We have raised individual issues and location-specific issues, and some have been resolved. But there are a number of more systemic issues, listed below, that we remain concerned about, and request the Bank to fully address before scaling up the Project.

<sup>5</sup>National Community Driven Development Project Summary Report of the Union-Level Multi-Stakeholder Review Week (24-28 August, 2015), available at, <http://cdd.drdmyanmar.org/eng/wp-content/uploads/2015/10/150924-MSR-summary-report-without-PPTs.pdf>.

<sup>6</sup>Myanmar National Community Driven Development Project (P132500), Implementation Status & Results Report (27 December, 2015), available at, [http://www.worldbank.org/external/default/WDSContentServer/WDSP/EAP/2015/12/27/090224b083ff-01dc/1\\_0/Rendered/PDF/Myanmar000Myan0Report000Sequence007.pdf](http://www.worldbank.org/external/default/WDSContentServer/WDSP/EAP/2015/12/27/090224b083ff-01dc/1_0/Rendered/PDF/Myanmar000Myan0Report000Sequence007.pdf).

We have documented numerous instances of violations of World Bank Group policies and the NCDD Operational Manual during year II of the National Community Driven Development project. As some of these violations have been documented across numerous townships and communities, and have repeated from year I to year II of the project, this indicates a more systemic problem. We believe accelerated or impractical implementation timeframes should be discarded and the Italian donors, those within the World Bank Group, and the Myanmar Government should be realistic with the pace of the scaling up of the project. It is better to proceed at a sustainable pace, through a more well- resourced and careful roll-out than to rush towards expanded implementation.

### **1. Overall design of CDD Program**

The NCDDP is an ambitious project, and there is potential for real positive change. Because of the scale of the project, the capacity of the participants, and the historical context in Myanmar regarding political and social issues, it is critical that the project provides sufficient time and oversight. The design should reflect adequate time to develop the capacity of managers, empower the communities, and create a real community-driven environment. Further, it must ensure that the projects run in a transparent, legitimate, and fair way. Will actually not get to the overall design which reflects good intentions if what needed is not closely looked at.

*Major areas of concern include:*

- *Time (the timeline does not allow for sufficient time to inform the community, train the management, or implement the project. This results in the community members feeling left out, the facilitators and managers either being overworked or following their own interests, and deadlines being rushed)*
- *Coercion and threats to local communities*

- *Corruption (kickback payments connected to recruitment of local staff)*
- *Gender discrimination*
- *Transparency (insufficient information disclosure to local communities at all stages)*
- *Capacity-Building and Training (inadequate training of NCDD community facilitators)*
- *Timing- most of the sub-projects periods coincide with the communities livelihoods peak seasons and is not appropriate for them to participate in the projects.*
- *The implementation period was too short to implement their 1st priority for most of the villages.*
- *Few believe that there are discrepancies, although they have no proof of this.*
- *The villagers were too busy with their livelihood and could not work as hired laborers in the CDD Project. As such, they do not feel the belongingness.*

The World Bank needs to address these issues sufficiently before scaling up the project, because if it does not, the project will reinforce existing forms of corruption and elite capture that the project was designed to change, and will only exacerbate existing conflicts and patronage politics. A poorly-implemented project risks losing trust, interest and community participation, as well as the loss of the projects' integrity.

## 2. Project management structure on sub-projects

The current management structure of the NCDDP places a lot of responsibility on the Committees, volunteers, and facilitators. While we support the goal of having local people in these leading roles, we are concerned about the lack of training and capacity-building for them, which risks poor implementation.

In some townships, the communities have a sense of ownership and have good future plans for sustainability, such as collecting monthly funds [200 Kyats/per household], or even seeking donors. However, much more often, we heard about management challenges.

IFI Watch Myanmar has identified a number of weaknesses in management at the sub-project level, including:

- Awareness of NCDDP was lacking in the community-at-large, thus effective community participation was not found.
- The majority of the communities were not aware of how the committees were formed or how the members were chosen.
- Adequate representation by village leaders was absent.
- Although the committees provided financial statements related to project activities these reports were not trusted by a majority of communities as they find that there were discrepancies between the actual works and the amount of money budgeted from the grant.



*Local voices*

Committees themselves have implied that the training was insufficient, and suggested more training for CFs and TFs prior so that they can effectively train the committees.<sup>7</sup> Ensuring that management is fully trained and capable is critical to implementation of the project, because the management roles are the ones extending the capacity-building into the broader communities.

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<sup>7</sup>National Community Driven Development Project Summary Report of the Union-Level Multi-Stakeholder Review Week (24-28 August, 2015), Annex 6., available at, <http://cdd.drdmyanmar.org/eng/wp-content/uploads/2015/10/150924-MSR-summary-report-without-PPTs.pdf>.

## **Community Facilitator**

The Community Facilitators play an important role, providing support for the other management positions, assisting committees in all stages of projects, and being the key people to build community capacities, self-initiative, and ownership. They are also tasked with supervision of implementation and financing, and ensuring the grievances mechanisms work, through trainings in the communities and monitoring. Proper training will enhance the Facilitators' ability to explain things to the communities, which will help them understand and accept the importance of this project. This will lead to inclusive participation.

However, these Facilitators come to the position with little-to-no-experience, and are given minimal training and support. This leads to Facilitators either being overworked and under capacity, or allows them to take advantage of the lack of oversight. To offer a couple of specific examples: in one township the CF manipulated the whole project stating that the communities have neither skills nor knowledge and gradually the whole committee was demolished. In another, the communities stopped participating when they became confused and lost track of the situation, which resulted lack of trust and delay in the implementation of the project.



### 3. Management capacity at the township level

IFI Watch conducted five awareness-raising workshops as part of our effort to prepare local CSOs and villagers for the DRD consultation on township selection. These workshops took place in:

- Taunggyi Township, Shan State on February 13-14, 2013
- Hakha Township, Chin State on February 25-26, 2013
- Dawei Township, Tanintharyi Region on February 27 and 28, 2013
- Magway Township, Magway Region on November 18, 2013
- Pathein Township, Ayeyarwaddy Region on 19-20 November 2013



*Awareness Raising on Pre Township Selection*

Through these workshops, we discovered a number of problems. First, township selection was finalized in May 2013 but most of the project communities only had their initial CDD project information session in late

November 2013 while others were informed only in late January 2014. The implementation did not start until funds were transferred by March 31, 2014. Project implementation was supposed to be completed by end of June 2014. However, the communities were pressured to complete the project by end of May 2014 as WB monitoring was coming.



*Training at Moe Nyo*

By rushing the process to have all the boxes checked, not only has this caused stress and anxiety to the communities, but also compromised the quality of project materials and the manner in which it was being executed. These actions go against the people-centered development principle that the Bank is seeking to promote. Further, most of the facilitators and township level DRD officers did not have enough training, with practically zero community development experience or basic skills.

The MSR Report noted that going forward, there needs to be sufficient time

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<sup>8</sup>Id. at page 7, Highlights from Year 2 Implementation

for training facilitators and community, and “planning and implementation at the community level.”<sup>8</sup> The Bank must ensure that adequate training takes place before projects start, and that communities are given enough time and support to have ownership over the project.

**4. Public access to information and participation**

The objective of the NCDDP is to empower communities. In order for real participation, the communities and facilitators need to know about the project, how it works, and how to take advantage of it. For a people-centered approach to work, the people must have access to information so that they can participate fully. Transparency is crucial for this project in order to gain the trust of communities.



*Ann Township Information Board*

However, this does not appear to be the case on the ground. None of the project communities we visited in 2013 have CDD Operation Manual or any documents regarding NCDD except a simple vinyl poster hanging on the community bulletin board, a copy of DVD, and 10 copies of pamphlets. While we checked with the facilitators, it turned out that they have no access to Operations Manual either. They were also unaware of the existence of the DRD web site, or have difficulty accessing internet.

Another challenge we discovered was the lack of information in local languages. None of the English or Burmese documents were translated into local languages. Thus, result being that facilitators were not always able to communicate with the local community members. For example, this was the case in a Karen village in Kyun Su. Because of this, we have reason to suspect the quality of proposals and projects in these villages.

If the intended participants do not have access to the information to enable them to participate, then the projects are not meeting the World Bank's goal of a people-centered approach. The Bank must ensure that both the trainers and the community members have continuous access to all of the relevant information. Sufficient outreach must be conducted, in a manner that is accessible to the local community, and materials must be available in a similarly accessible manner.

## 5. Quality and direct benefits from projects

The objective of the NCDDP is for the community to participate in the development of their communities. Discreet, individual projects and results form only a piece of the long-term goal of empowering impoverished communities to take a leading role in the positive development of their communities. To achieve this goal, success must be measured not only on satisfaction of individual results, but on the overall strengthened capacity and empowerment of the communities.

There have been positive ground results, in the form of basic infrastructure such as roads to schools, monastery, jetty and installation of generator, Electricity (Pico hydro), concrete water tank, jetty construction and bridges. Superficially, the qualities of these are good and the entire communities are happy as their need of the villages has been implemented. These projects improve access to energy, clean water for children in schools, with good roads it is easy access to health clinics, monasteries, schools and market. Trading is better and faster with new jetties.



*Extension Road*

While we are pleased with the individual results, IFI Watch Myanmar has identified some structural issues with the implementation. First, sustainability is a challenge as only some villages have plans; like collecting monthly cash and saves in bank whereas in most they have no plans. Second, because community capacity-building and participation is so limited, people are often happy with only the specific result, and not seeing it as part of the broader goal.

While villagers have expressed satisfaction with the results of some of the subprojects, IFI Watch is concerned that this satisfaction is not a reflection of an interest in the long-term objectives, but rather happy that specific, immediate needs were met. This does not further the objective of the project, as it does not support the community to have actual ownership.

## 6. Dealing with complaints (corruption, wasteful spending, social impacts)

The development of a Grievances Mechanism serves to provide a new type of bottom up feedback loop to local communities. It enables problems to be addressed and resolved before they escalate, and to provide remedy where harms occur. The most recent Implementation Status & Results Report states that “The project’s grievance handling mechanism has been actively used across all project townships and has been effective in identifying shortcomings that in turn have been addressed effectively through the leadership of the Department of Rural Development (DRD).”<sup>9</sup>

While on paper it appears as though this system is functioning well, on the ground we were informed about a number of different problems with the



*Ann Township Complain Letter Box*

functioning of the mechanism. In some situations, the villagers submitted the complaint letters but none of them were informed whether the actions were taken or not. Due to delay in response, in some places, the community discussed with the committee members and solved the problems on their own. We have also heard from communities that because the letter boxes are at the public area, they are reluctant to use it.

According to the Union-Level Multi-Stakeholder Review of 2014 and 2015, according to the presentation of DRD on the types of grievances on violation of Project polices, guidelines; it has increased by [3] times within [17]

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<sup>9</sup>Myanmar National Community Driven Development Project (P132500), Implementation Status & Results Rport (27 December, 2015), available at, [http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/EAP/2015/12/27/090224b083ff-01dc/1\\_0/Rendered/PDF/Myanmar000Myan0Report000Sequence007.pdf](http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/EAP/2015/12/27/090224b083ff-01dc/1_0/Rendered/PDF/Myanmar000Myan0Report000Sequence007.pdf).

months. While this may indicate wider knowledge of how to access the mechanism, it could also indicate a rise in actual problems.

The Grievance Mechanism needs to be improved so that the process is accessible, independent, transparent, and people feel safe using it. The reports should also reflect user satisfaction, not only the number of grievances filed



## 7. **Violations of the World Bank Group Guidelines and the Operational Manual**

### **Recruitment and Corruption:**

*Case:* Some applicants for Community Facilitators (CF) and Technical Facilitators (TF) positions had to pay 200,000 to 500,000 MM Kyats to DRD township officers in Ann, Rakhine and in Htantabin, Yangon. There were similar cases in Tatkone, Nay Pyi Taw Territory and Laymyethnar, Ayeyawaddy but the amount was not mentioned.

This practice of corruption/bribery and kick-back payments violates a number of provisions of the Operational Manual [OM] and the World Bank Group Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants, of October 15, 2006.

### **Operational Manual: nepotism**

*Part I, Principle 7.1(c).* Project stakeholders have among other, the following rights under the project: (c) Right to a project free of fraud and corruption.

*Part I, Code of Conduct 7.3(d) (e) (g) [para 91.* Simplified Code of Conduct including 5 Do's and Don'ts] (para 89(d),. All involved in project implementation [government staff, NGO/firm staff, consultants, Village Tract Project Support Committee [VTPSC] members, Village Project Support Committee [VPSC] members, facilitators, and village volunteers] perform duties honestly and constructively. They follow a code of conduct to: (d) Refrain from any fraudulent or corrupt activities including . . . bribes, kick-backs and short changing of village sub-project value.

*The Operational Manual, Part I, Principle 7.4 Sanctions, para 93(e)* specifically allows reporting of grievances for allegations of fraud and corruption directly to the World Bank and specifies that the World Bank will inform DRD and coordinate on resolving the allegations.

*World Bank Group Guidelines on Preventing and Combating Fraud and Corruption Revised in January 2011. Definitions of Practices Constituting Fraud and Corruption*

7 (a). A “corrupt practice” is the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party

7 (b). A “fraudulent practice” is any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.

### **Coercion and Threats:**

*Case:* Township Technical Assistance (TTA) staff from Relief International Myanmar, threatened villagers in Ann Township, Rakhine that if they do not use the grant properly and complete the CDD project within the project period, World Bank can either arrest and detain them.

Due to these threats, the community feared for their safety and therefore did not accept the block grant. This practice of coercion and threats violates provisions World Bank Group Policies, including:

World Bank Guidelines “On Preventing and Combating Fraud and Corruption in Projects Financed by IRBD Loans and IDA Credits and Grants, October 15, 2006. (d) A “coercive practice” is impairing or harming, or threatening to impair or harm, directly or indirectly, any party ... to influence improperly the actions of a party.

### **Pubic Communication, Information Disclosure and Community**

#### **Awareness:**

*Case:* The communities from the NCCD Townships, Kanpetlet, KyunSu, Namhsan, Pinlebu, Sidoktaya, Ann,Lemyethna, Htantabin and Tatkone Village Tracts and Villages have no clue what CDD is all about. The communities are not aware of the importance of this project and the objectives; which is to empower the communities in the transitional period to democratization, the importance of the community inclusive participation and having the ownership. They are not aware of their rights, benefits and responsibilities to enable communities to fully participate in all stages of implementation.

Moreover, the communities were provided with false information that increased their fear.

*World Bank Group Policies:*

- o Access to information
- o Consultancies

Operational Manual, Part 1, Project Information, Structure of the Project Operations Manual, 10. Part II

Explains the community project cycle which is the main element of the project in detail. The cycle contains six stages: preparation, planning, sub-project preparation, sub-project implementation, [Community Project Cycle] [para. 112 (a)] “Familiarize villagers with the project and the community project cycle and project procedures and regulations”.

## 8. Voices from the fields:



*Group Discussion*

Because we do not know about the NCDDP, we have no interest and no participation. The sub-projects are carried with only few people and we are only interested in the result of the sub-projects.

CFs cannot explain us to understand about CDD. They provided half day training, and we do not understand, and were not able to raise any questions. Moreover, we don't have experience what to ask and what not to ask also. When some asked, they were not able to answer too.

In year 1 and 2 the engineers came only at the end of project, but this year [year 3] we went to Myeik and call him, when we don't find him, we go the next day. We are transparent.

Regarding the grievance mechanism, we used to send letters before, but now as it does not make any difference we do not submit any more letters.

We dealt directly with the committee members and solve at the village level. In Year 1 and 2, we submitted 2 and 10 letters respectively. The only way they solved these complaints were 'please tolerate as the CFs lack capacity.' [From another village]

Community participation is very weak as most of us do not know what 'CDD' is at all.

There were issues in our village for not allowing fake vouchers and were solved at village level.

Year 3 is more transparent than year 1 and 2.

We do not know clearly of grievance mechanism. There were clashes in committee since forming committee. In the committee; unity and transparency is not found.

As the engineers and CF did not come the contractor was able to use bamboo instead of iron for the concrete water tank. The villagers had to contribute to rebuild another water tank. We do not have any technical knowledge.

#### **Request to World Bank and DRD:**

We want clear, understandable awareness on CDD.

The engineers should visit the project sites at the beginning of the implementation as we need technical advice.

We want efficient engineers to explain technical issues and provide good advice”

We also want capacity building for the female communities.

To move the complaint letter box from the public place [as we are afraid of others seeing]

We want TAs and CFs to monitor the project regularly

#### **D. Recommendations**

The following are detailed recommendations for each of the broader categories of issues addressed, which we believe will help the Bank to more fully meet its stated objectives for the NCDDP.

## 1. Overall Design of NCCDP Project:

- *Oversight:*
  - ❖ Increase oversight by the Bank to ensure proper implementation
  - ❖ Conduct oversight to ensure that coercion and threats to local communities do not happen, and if it does, deal with them immediately and in a way that maintains the safety of the person who brought it to the Bank's attention
  - ❖ Conduct oversight to ensure that corruption does not occur and if it does, deal with it immediately and in a way that maintains the safety of the person who brought it to the Bank's attention
  - ❖ Provide additional training and conduct oversight to prevent gender discrimination
  - ❖ Improve transparency at all stages through regular reporting, audits, and increased oversight
  
- *Time:*
  - ❖ To proceed at a sustainable pace, through a more well-resourced and careful roll-out than to rush towards expanded implementation.
  - ❖ Do not scale up until existing problems addressed adequately
  - ❖ Reassess the 14 steps of the project cycle, so that the communities will have sufficient time to internalize as they are new to such projects, time provided as per Operational Manual 2015 is too limited.
  - ❖ Increase the implementation period so that communities can implement their priority projects
  - ❖ Increase time for Capacity-Building and Training for all management and the communities.
  
- ***Community ownership:***
  - ❖ Enforce more robust outreach and feedback collection from the communities
  - ❖ Provide more time to enable the communities to take ownership and feel part of the process
  - ❖ Consider the context of each community to assess how they can be involved
  - ❖ Ensure that the outreach emphasizes the long-term goals

## 2. Management:

- Conduct sufficient trainings and subsequent support to ensure that the Community Facilitators (CFs) are well versed and knowledgeable of the NCDDP and the Bank's local staff to assess these trainings at the township level.
- Take action immediately for any kinds of inappropriate deeds
- Ensure transparency through regular reporting and oversight
- Disburse staff travel allowance in a timely manner.
- Ensure that the committee members are not only elected, but also committed to this crucial project.
- Introduce power sharing and accountability mechanisms to the communities.
- Have separate trainings for the respective committee members to empower their skills on Project Management.
- Increase time for the first step of the Project Cycle; half a day [as mentioned in the Operation Manual] is insufficient for them to understand fully.
- Ensure that the Community Facilitators have skills to mobilize the communities and are able to build up the confidence and encourage the communities to have an informed engagement; to discuss and participate in their villages.
- Have upward accountability to the donors and make sure that the project is being implemented with less negative impacts to the communities.
- Make real changes based on lessons learnt each phase from townships so that negative patterns are not repeated.
- There should be meaningful and adequate consultations with local CSOs before the final decision is made to expand to larger scale to other areas especially where arm conflict is going.

### **3. Public Access to Information and Participation**

- Use simple IEC materials broadly
- Make all information available in local languages and in pictur form for community members who cannot read
- Develop and implement a robust outreach plan and ensure that it reaches all community members

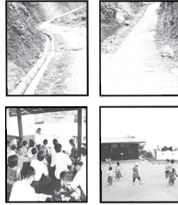
### **4. Quality and direct benefits from projects**

- Develop measures, including additional outreach and trainings, to ensure that the community knows how the immediate results tie to the larger picture
- Develop measures, including additional outreach and trainings, to ensure that the community is included in order to feel invested in the larger goal

### **5. Dealing with Complaint:**

- Implement feedback procedures encourage the community to use this mechanism.
- Report on the progress of each complaint regularly to the person filing the complaint
- Provide detailed reports annually on the number and types of complaints, the resolution, and the user satisfaction with the result, but emphasize respecting the confidentiality of the person filing the complaint
- Improve the types of access points for filing a complaint to ensure that users can access the mechanism in a safe environment
- Include measures to prevent retaliation for filing a complaint





2013 january to 2016 march