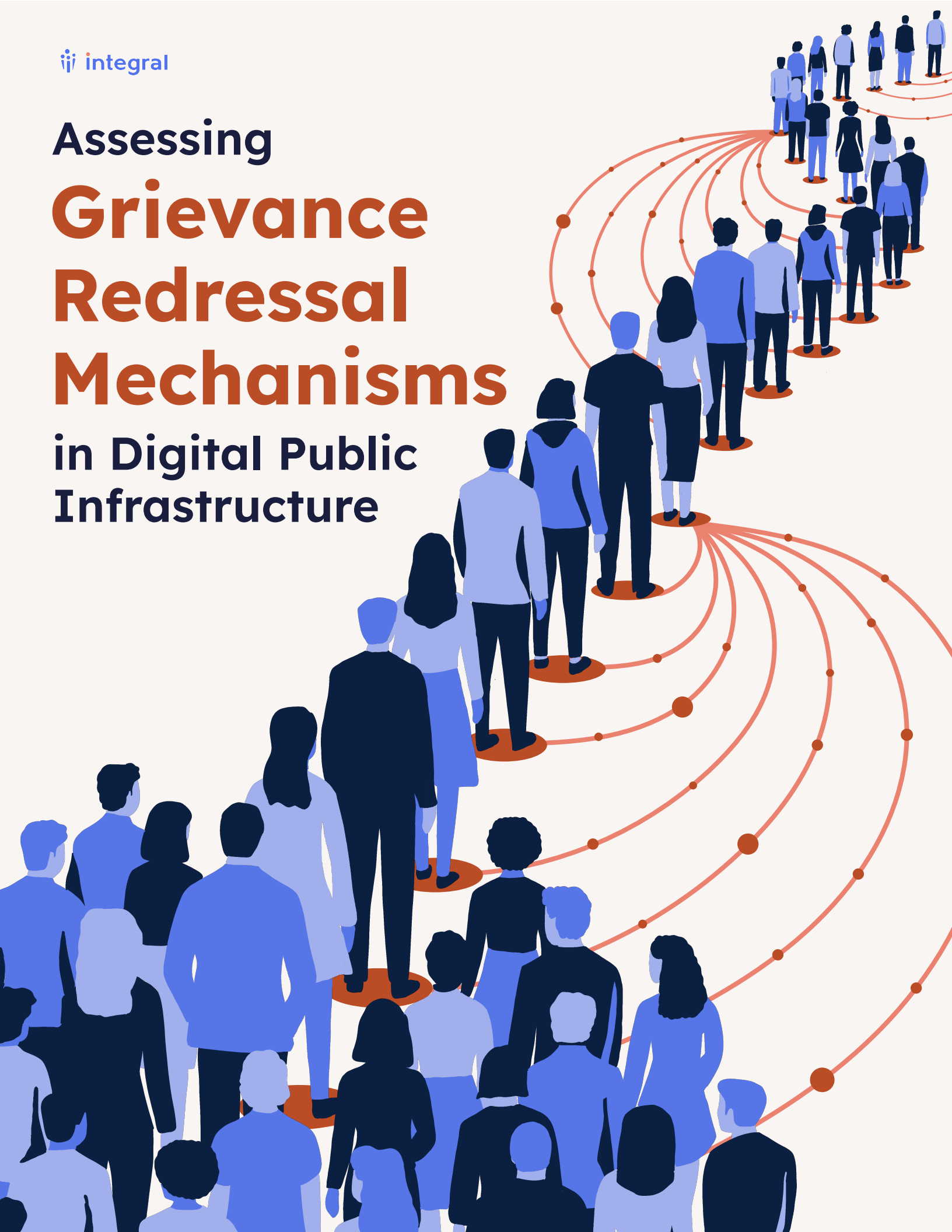


Assessing Grievance Redressal Mechanisms in Digital Public Infrastructure



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AUTHORS

This report was co-authored by David Porteous of Integral: Governance Solutions, with Deepti George of Yutadhi, Sahana Arun Kumar of Amarante Consulting and Maria Luciano. These co-authors and their teams on the ground in the countries selected for research led the process of collecting evidence.

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Glossary

Term or acronym	Definition
APP	Authorized push payment
BCB	Banco Central do Brasil (Brazilian central bank)
Complaint	Expressed dissatisfaction by a user with a specific service failure from a provider of a good or service
CPGRAMS	India's online platform for public sector grievance redressal, developed by the Department of Administrative Reforms and Public Grievances, Government of India
CPMI	The Committee on Payments and Market Infrastructures (the international standard setting body for payments, housed at BIS)
DARPG	Department of Administrative Reforms and Public Grievances (India)
Dispute	A contested claim between two or more parties
DPI	Digital Public Infrastructure
ESS	Environmental and Social Standards (from World Bank)
FI	Financial Institution
FOS	Financial Ombudsman Service (UK)
GRAI	Grievance Redressal Assessment and Index (used in India)
Grievance	A perceived harm, injustice or rights violation of defined rules, policies or laws
GRM	Grievance Redressal Mechanism— the umbrella term for the set of measures taken directly or indirectly by a DPI operator—policy, procedures, and actions—to address grievances in a DPI.
ICODR	International Council for ODR (a professional body setting professional standards for ODR)
IPS	Instant payment system or scheme, a category of DPI
Liveness	'Liveness' is the minimum viable threshold definition proposed in this report for a GRM in a DPI being regarded as functional, based on publicly available information only
MED	Mecanismo Especial de Devolução, the Special Return Mechanism in Brazil's Pix
NPCI	National Payments Corporation of India, operator of UPI
ODR	Online Dispute Resolution
ONDC	Open Network for Digital Commerce (India)

RBI	Reserve Bank of India
Research countries	Brazil, India, Benin, Ethiopia and South Africa, in which field work was undertaken
UNCITRAL	UN Commission on International Trade Law
UPI	Unified Payment Interface, India's instant payment system
WB	World Bank
Wellness	The measure defined in the report which scores the extent to which GRM is fit for purpose using internationally accepted yet generalizable indicators

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Executive Summary

Digital public infrastructure (DPI) is scaling faster than the means to correct it when it fails. The Universal DPI Safeguards Framework calls for effective remedy and redress but does not define "effective" or say how to get there. No one can currently say how many DPIs offer meaningful recourse.

The stakes are rising. More than 39 countries have signed up to launch at least one DPI component by 2028. Fraud and scams create new harms, and grievances cross institutional lines: a stolen identity credential surfaces as a failed payment, and outdated registry data results in a denied benefit. Redress across DPI systems - when weak or absent - erodes the trust on which adoption depends.

What we found. We studied one payment, one digital identity and one data-exchange or other DPI-like system each in Brazil, India, Benin, Ethiopia and South Africa: 15 systems, using document review, mystery shopping and operator interviews between May and July 2026. Grievance redressal mechanisms (GRMs) were complex, opaque and fragmented. In many systems, users usually deal with participating banks or providers, not the DPI operator, and because of this, in some of them, operators can lose sight of how first-tier providers perform. Only two of the 15 systems regularly publish some form of GRM volumes. Those two, Pix and UPI, count different things, so their numbers cannot be compared.

Two ways to measure. *Liveness* is a minimum test built on public information and mystery shopping. Four of the 15 GRMs were fully live, eight were underway and three were not live. It proved feasible across all five countries. *Wellness* is a scorecard of how well a GRM performs. It needs operator data, so it depends

on cooperation or a mandate. Researchers judged it could be completed in about 20 working days where data exist. It was not scored across the sample and needs piloting.

From measurement to interoperability. Existing international standards on grievances and disputes agree on principles but not on data. Countries need not adopt one institutional model. A common grievance taxonomy and data object would let cases be counted consistently and passed between providers, schemes and DPIs without the complainant starting over. Because such an object makes the complainant traceable as well as the case, limits on what is collected, who is authenticated and how long data are kept, must be built in from the start.

What should happen next

1. International stakeholders, such as those behind the DPI Safeguards Framework and the DPI Map, test and agree on a minimum liveness benchmark. Operators launch every new DPI with a live GRM.
2. Willing operators, with funders and overseers, pilot wellness and calibrate it for system size and maturity.
3. Oversight agencies, operators, open-source communities and vendors start a technical workstream on grievance semantics.

This work is exploratory: five countries, 15 systems, and measures that need further testing. However, the direction is clear. Infrastructure that cannot correct its own failures or that does not design for GRM from the start, will not build the public's trust.

01 Why DPI Needs Better redress

“Effective remedy and redress” is one of the eight foundational principles in the Universal DPI Safeguards Framework. Yet the principle does not specify what “effective” means across payments, digital identity and data exchange, or how it should be measured. As a result, there is no consistent way to tell whether a Digital Public Infrastructure (DPI) offers meaningful recourse in practice.

Grievance redress is not an add-on for society-scale digital systems. It is an integral part of their governance and legitimacy. Effective Grievance Redressal Mechanisms (GRMs) help users recover from error or harm, preserve trust in systems that depend on widespread adoption, and generate feedback that allows operators to correct recurring design and implementation failures.

The problem is becoming more urgent. More than 39 countries have now signed the 50-in-5 campaign to design, implement and scale at least one DPI component by the end of 2028.¹ Growing use raises the absolute number of errors and grievances, which can swamp the capacity of basic systems to handle effectively. The result can then significantly dampen the trajectory and even reverse the intended outcomes for everyone involved. Digital systems also create new attack surfaces: the 2025 Global Anti-Scam Alliance survey reported that 57% of adults worldwide experienced a scam and 23% suffered loss. Cross-border use and AI-enabled fraud add further complexity.

The distinctive challenge is that DPI grievances often cross institutional boundaries. A payment dispute may originate in stolen identity credentials. Incorrect registry

data may cause denial of benefits. A data-sharing error may lead a downstream provider to refuse service. Redress therefore must work not only within a single organization, but across multi-party evidence chains which may span multiple DPIs.

Effective redress in DPI therefore requires the mandates, tools and systems to address complex grievance patterns: where users may experience a significant harm while the underlying cause, evidence and liability are unclear and often distributed across several institutions or DPI systems.

Redressal is one layer in a wider system of rights protection in digital systems, not a substitute for it. Global Partners Digital's 2026 human rights impact assessment framework for DPI asks operators to assess rights risks at every lifecycle stage, from design to decommissioning. It treats grievance mechanisms as the "canaries" that show whether those safeguards work in practice. This report accepts that premise. It also understands effective GRM as generating essential feedback loops to operators and overseers to make improvements which build trust in digital systems. To achieve these outcomes of greater protection from harm and greater digital trust requires the means to tell whether a GRM exists and how it functions and performs.

1.1 Evidence base

The project was exploratory rather than definitive. It tested whether comparable GRM information could be collected and whether such information would be useful to operators, overseers, funders, researchers and civil society. **Five countries were selected across different**

¹ As at 19 September 2026: see <https://50in5.net/>.

levels of digital-government maturity: Brazil, India, Benin, Ethiopia and South Africa. Within each, the study examined one system in each of three DPI categories—instant payments, digital identity and data exchange/other—creating a

sample of 15 systems. The research combined public-document review, mystery shopping of grievance channels and structured interviews with operators, overseers and key informants during May–July 2026.

Figure 1: DPI systems selected for analysis with their operators

	 Instant Payments	 Digital ID	 Data Exchange/Other
BENIN	Trésor Paie /Quittance (Public Digital Payments Platform operated by Benin's Directorate General of Treasury and Public Accounting)	ANIP / RAVIP / NPI (National Digital Identity System)	National Public Services Portal (Agency for Information Systems and Digital Technology (ASIN))
BRAZIL	Pix (Central Bank of Brazil)	CIN National Digital ID (Ministry of Management and Innovation in Public Services - MGI)	CadÚnico Single Registry for Social Programs (Ministry of Development and Social Assistance, Family and Fight Against Hunger - MDS)
ETHIOPIA	EthioPay-IPS (EthSwitch)	Fayda Digital ID (NIDP)	National Services One-Stop-Shop (MESOB)
INDIA	UPI (NPCI & RBI)	Aadhaar (UIDAI)	Account Aggregator (Sahamati & RBI)
SOUTH AFRICA	PayShap (PayInc)	HANIS / ABIS (DHA)	SARS IT3 (SARS Third-Party Data Platform)

Operator -specific findings based on privileged access are not attributed in this public report. They remain documented in confidential country reports. The aim of the public report is to look across countries and categories, not to express an opinion or to report on particular entities.

02 What We Found

Across the sample, the common pattern was not the absence of GRM, but **uneven development**. Three features recur: complexity, opacity and fragmentation.

COMPLEX	OPAQUE	FRAGMENTED
Multiple stakeholders and tiers are common, particularly where users deal with participating providers rather than the DPI operator.	Only two of the 15 DPIs regularly published meaningful GRM volume data.	Terminology, complaint categories, metrics, escalation rules and reporting differ within countries and across DPI types.

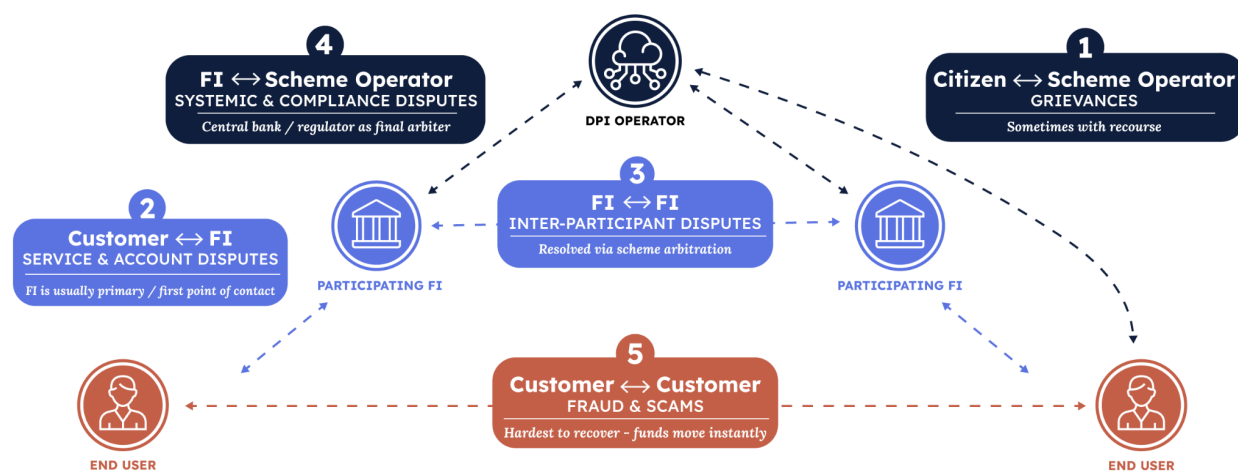
2.1 Tiered architectures are normal, but they create accountability gaps

GRM architecture differs by DPI type.

Digital identity agencies often receive

grievances directly. Instant payment systems and open-data schemes commonly operate through participants: a user complains first to a bank or provider, and only some cases move into an inter-participant or scheme-level process. Escalation pathways to an ombudsman, regulator or court add further tiers.

Figure 2: Different types and levels of disputes in DPI systems



Adapted from Porteous (2026b)

Tiering of redressal is not inherently a weakness. Good redress systems encourage resolution close to the user while preserving independent escalation. The risk arises when a scheme operator cannot see whether first-tier providers are performing consistently, or when liability and evidence-sharing rules are unclear.

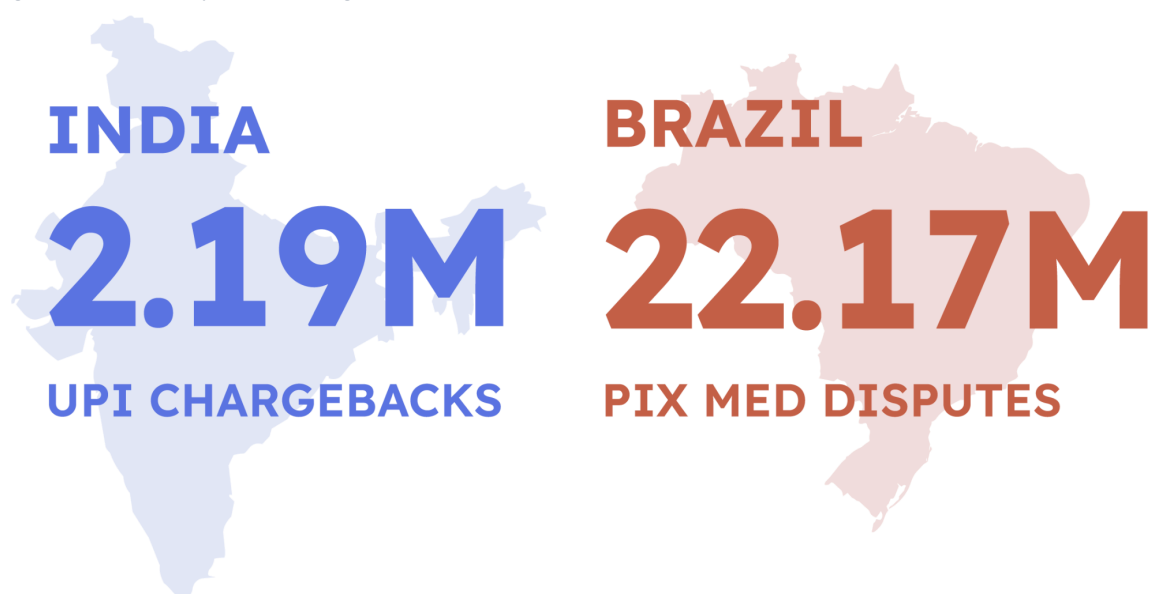
In those cases, the scheme as a whole lacks transparency and accountability, not just to external stakeholders but to internal ones too.

2.2 Similar systems report different things

The strongest illustration comes from the two largest payment systems in the sample. Pix and UPI both publish redress-related statistics, yet their numbers are not meaningfully comparable. NPCI reports bank-originated UPI chargebacks, which can

arise from error, delay or dispute. Brazil's central bank reports consumer-initiated cases under Pix MED, which covers fraud and operational error, and have risen ten times in 4 years. These two measures therefore differ on initiator, scope and point in the complaint funnel. Without common definitions of what is being counted, more disclosure does not automatically create useful comparability.

Figure 3: Publicly reported grievance numbers for UPI and Pix in 2025



Note: The values are not directly comparable because the underlying reporting objects differ.

NPCI reports monthly UPI 'chargebacks' by bank; these are bank originated requests for reversal which can result from any reason—error, delay or dispute. They also report chargebacks accepted (which were 587,000 or 28% of the annual total shown above).

Source: <https://www.npci.org.in/product/ecosystem-statistics/upi>

The Brazilian Central Bank also reports monthly grievances received by its MED redressal system, which addresses only two categories (fraud and operational error) of Pix issues; but is directly captured at top of the complaints funnel from users.

Source: <https://dadosabertos.bcb.gov.br/en/dataset/pix/resource/7eb5efdd-d4dd-47da-a74a-d93ce68ea185>.

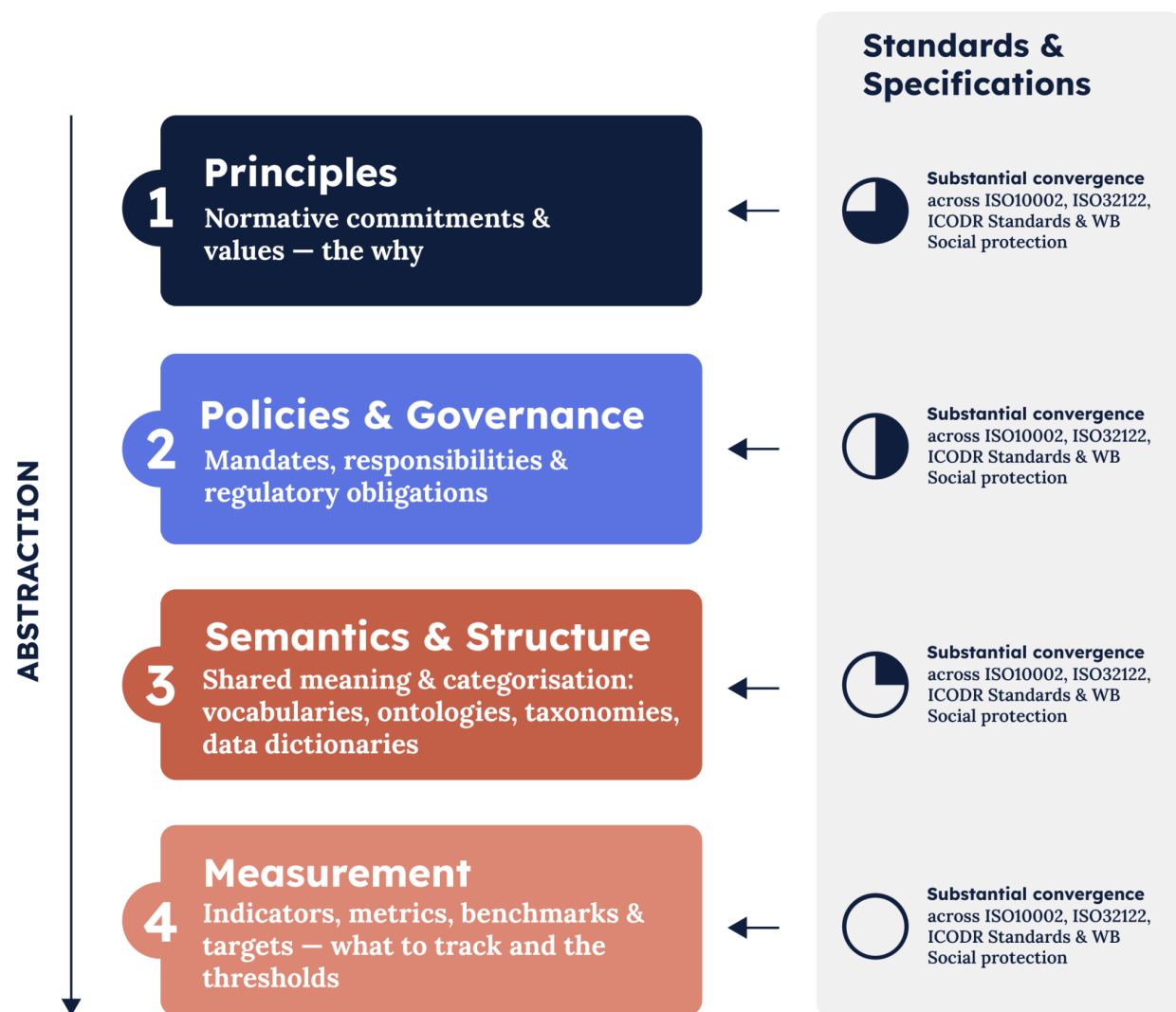
2.3 Existing standards converge on principles, not operational data

International frameworks already show substantial convergence around high-level principles. These include accessibility, impartiality, confidentiality, transparency, responsiveness, timeliness, competence, accountability, continuous improvement and

inclusion as summarized in Annex B1. But there is much less convergence at the applied layers of policy, semantics and measurement (See Figure 4).

The layers serve different purposes. Common measurement makes systems comparable. Common semantics can make grievance information portable. The report therefore focuses first on practical measurement, then on the deeper semantic layer needed for interoperability.

Figure 4: The standards ‘stack’ applied to GRM



Source: Author assessment

03 Two practical measurement tools

The project developed and tested two complementary lenses. They answer different questions and require different levels of evidence.

	Liveness	Wellness
 CORE QUESTION	Is a functioning minimum GRM visibly in place?	How well is the GRM performing?
 EVIDENCE	Public documents + mystery shopping	Operator data + judgment; possibly user surveys
 WHAT THIS REQUIRES	No shared semantics, other than defining a liveness threshold	Common definitions for data collected to compare across DPIs

3.1 Liveness: a minimum observable threshold

Liveness is designed as a parsimonious threshold test that can be applied without privileged access. It asks whether a DPI has more than a policy on paper: there must be observable grievance channels and basic evidence that complaints can be recorded and followed up.

The tested measure covered three areas:

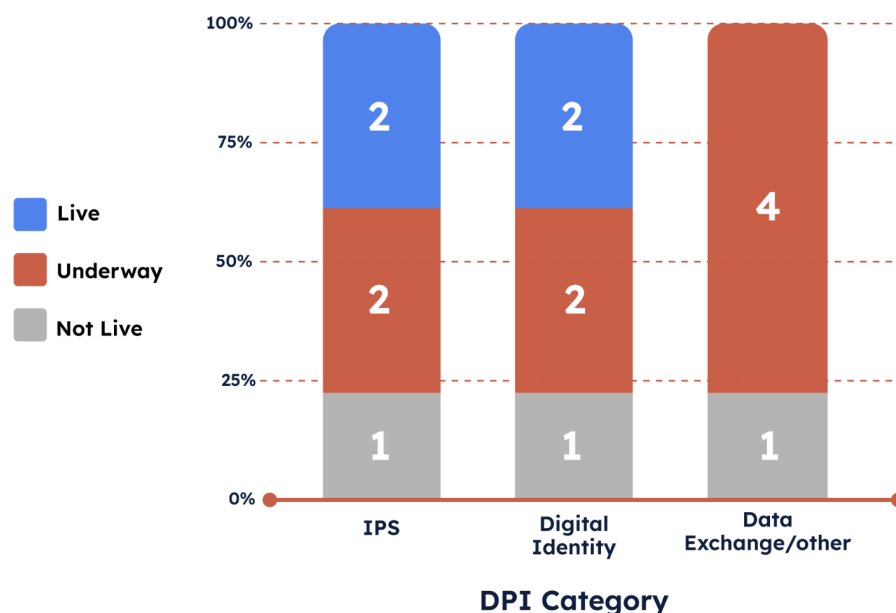
- (1) a policy framework that sets acknowledgement, resolution, liability and escalation expectations;
- (2) suitable and accessible channels, including language and cost considerations; and

(3) basic case-management capacity, including a record of submission, a reference number and complaint categories.

The proposed detailed instrument (labeled as V3 because it is the third version after two rounds of testing and refinement on earlier versions) is reproduced in Annex C.

Four of the 15 GRMs met the full liveness threshold; eight were “underway” in the sense of having indicators met in each category; while three were not live (See Figure 5). Digital payments and digital identity performed similarly in this small sample, while the data-exchange/other category lagged.

Figure 5: Distribution of liveness status across DPI categories



Source: Aggregated from country reports

Researchers also assessed the feasibility and usefulness of this measure. Most indicators could be collected with modest effort, although local knowledge materially improved mystery shopping. The measure was judged particularly useful for funders and researchers, and potentially useful for oversight agencies and DPI operators as a minimum design target.

Uses of liveness for operators and funders:

- *Before launch:* use liveness as a minimum design checklist for policy, channels, languages, liability, escalation and case tracking.
- *After launch:* repeat it periodically because channels, policies and functionality can degrade or change.
- *For tiered schemes:* test a sample of first-tier participants as well as the scheme-level framework, because user experience of the GRM occurs primarily at the participant layer.

3.2 Wellness: a performance and improvement scorecard

Wellness goes beyond minimum functionality and asks whether a GRM is fit for purpose. It therefore requires data that only operators or their overseers normally possess. The proposed framework draws on three adjacent sources: India's GRAI, the UK Financial Ombudsman Service and World Bank guidance on social-protection GRMs which are contrasted in Annex B2.

Across those sources, these characteristics recur: access, process quality, responsiveness, fair remedy, and learning/accountability. The project translated these into a weighted scorecard built on four main categories: policy salience, operational performance, efficiency and transparency. The detailed scorecard (labeled V2 as it follows initial testing and application of a first version) is reproduced in Annex D. The category summaries and proposed weights are shown in Figure 6.

Figure 6: Categories of the wellness scorecard

	Category	Illustrative Focus	Indicative Weight	Why It Matters
	Policy Salience	Coverage, review, senior management attention	20%	Is the GRM governed as a live management function?
	Performance Effectiveness	Response and resolution time, resolution and appeal rates, satisfaction	50%	Does the GRM resolve problems predictably and fairly?
	Efficiency	Cost and resource use	10%	Is the mechanism supportable at scale?
	Transparency	Timely, disaggregated and auditable reporting	20%	Can operators, overseers and the public see what is happening?

The research did not attempt to score every DPI fully for wellness: this would require more time and greater access to data. In at least three systems, most of the required data already existed; in most others, at least some of it was already collected. Researchers judged that, where data existed and access was granted, an assessment could generally be completed within roughly 20 working days of effort. However, no research country had yet undertaken representative surveys of GRM awareness and user experience comparable to the UK's FOS approach.²

The more valuable use of wellness may be longitudinal rather than comparative: An operator can use it to identify weak components and track improvement over time. The value of a wellness assessment is that it focuses operator attention on the underlying operating components of redress and provides a basis for management action. While cross-DPI comparison is possible, it should be calibrated for system scale, maturity and complexity

rather than reduced to an unqualified league table.

More rigorous comparability of GRMs matters not for its own sake but for three reasons, the relevance of which will vary across levels of DPI maturity:

- *Leadership and competitiveness.* For mature DPI markets, comparable performance data offers a way to benchmark against peers, stay ahead, and actively shape what "good" looks like in this space – turning GRM performance into a dimension of global DPI leadership rather than a purely domestic concern.
- *Inspiration and best practice transfer.* For newer or smaller DPI ecosystems, visibility into what more advanced countries have already built and tested offers a practical shortcut – enabling them to adopt proven approaches rather than developing GRM practice from first principles.
- *Oversight, research, and funding decisions.* For funders, researchers, oversight bodies, and governments, comparable data makes it possible to understand performance and trends across countries and DPI categories – informing where to direct resources, what to investigate further, and how to hold systems accountable over time.

² The FOS commissions YouGov to run quarterly awareness surveys drawn from a nationally representative panel of the general public, separate from FOS's own direct surveys of those who used the service. The awareness surveys include the views of people who have never complained or have dropped out in order to capture societal views of awareness, trust, confidence, and understanding.

04 From measurement to interoperability

Measurement is a practical first step, but the research points to a more strategic need. If grievance data are to be understood, routed and tracked across providers or systems, some common semantics are needed. This does not mean standardizing the institutional architecture of GRMs such as creating single complaint portals. Rather, countries can retain different legal, regulatory and operational arrangements while using common data fields and categories for selected grievance information.

4.1 A common grievance taxonomy

Every effective GRM needs a way to classify cases for triage, routing and analysis. The specific reason codes differ by DPI type, but the study found sufficient overlap to suggest a common meta-taxonomy with sector-specific subcategories shown in Figure 7 as a starting point.

Figure 7: Categories of grievances illustrated across DPI types

Meta Category	Instant Payments	Digital ID	Data Exchange/Other
1 Access & availability failures	Payment not received; downtime	Enrollment/authentication	API outage; failed data pull
2 Erroneous outcomes	Wrong recipient; duplicate debit	Wrong/duplicate identity record	Incomplete or inconsistent data
3 Downstream harm / service denial	Funds unavailable; merchant refusal	Denial of welfare, banking, SIM, healthcare	Service refusal due to missing/incorrect data
4 Irreversibility & time sensitivity	Recall windows; instant transfers	Persistent propagated ID errors	Persistent errors across downstream users
5 Consent & user control	Weak/implicit authorization	Limited choice where ID is mandatory	Misleading or unenforced consent
6 Data misuse & purpose creep	Profiling/surveillance	Use beyond original purpose	Secondary use for marketing/scoring/research
7 Fraud & impersonation	APP fraud; account takeover	Identity theft; impersonation	Third-party misuse after lawful access
8 Error-correction difficulty	Slow refunds; liability disputes	Lengthy correction/re-issuance	Corrections fail to propagate
9 Redress & appeals failures	No clear escalation; slow dispute process	Fragmented/inaccessible channels	No neutral forum; regulator as last resort

Financial-sector authorities already impose complaint taxonomies for reporting; and card schemes use standardized reason codes within their own ecosystems. But these standards are generally one-way reporting requirements or proprietary scheme semantics; they do not create cross-system interoperability.

In addition, any categorization could not be static. Specific sub-categories are always evolving: for example, in instant payments, the increasing practice of freezing accounts in

response to tracking and tracing funds following an alleged scam can lead to innocent people being denied access to their own funds for a period, with limited recourse.³ This new sub-category could for example be included under meta-categories 3 (downstream harm/service denial) or 9 (redress failures).

³ See Maxwell (2026)

4.2 A common grievance object

The more ambitious next step is to develop a common grievance data object: a defined set of fields that can travel with a case.

Candidate fields include a unique case identifier, grievance category, authenticated complainant reference where needed, date and time, originating channel, entities involved, evidence references, status, escalation level, applicable liability rule, remedy sought, remedy delivered and closure information.

India's ONDC provides a useful precedent for moving in this direction. Its Issue and Grievance Management framework defines a multi-field data dictionary and escalation model for grievances between buyers and sellers. Its reason codes are specific to e-commerce, but the architecture illustrates how a common object can support transfer and tracking without requiring every participant to use the same internal case-management process.

A common grievance object could support several DPI use cases.

- Transfer of a complaint from a participating provider to a scheme operator without re-keying the case or requiring the complainant to re-complain.
- Handoffs between different DPIs when the cause of harm lies upstream from where the user first complains.
- Cross-border routing and evidence exchange as instant payment and data-sharing systems internationalize.
- Comparable reporting to regulators and overseers without forcing every institution to replace its own ticketing system or undertake manual reconciliation.
- A larger market for reusable GRM software components and open-source tooling.

However, a common grievance object also carries risks. A record that holds complainant identity, authentication status and a tracking number across institutions makes handoffs traceable. It also makes people traceable. The features that enable interoperability can enable profiling, surveillance or reuse of complaint data for purposes the complainant never agreed to. Function creep is a recurring risk for DPI building blocks, so any approach to shared objects should therefore set three defaults from the start:

- Collect only the fields needed to route and resolve the case.
- Authenticate the complainant only where the case requires it.
- Limit use to handling the grievance and reporting in aggregate, with defined retention and deletion of personally identifiable information when a case closes or a system is retired.

4.3 Why standardization can unlock capacity

Standardization is not sufficient to solve GRM weaknesses. These weaknesses also reflect lack of political commitment, resources, institutional coordination and staff capability. But standardization can reduce those constraints. Shared taxonomies and metrics package know-how in reusable form; comparable measurements help target scarce funding; common interfaces can reduce software costs; and international soft standards can provide a default where domestic coordination is difficult.

The objective is practical rather than technical for its own sake: a user's DPI-related grievance should be fairly resolved through a traceable process within an appropriate timeframe, even when the underlying evidence or responsibility crosses institutional boundaries.

05 What policy makers and DPI operators should do next

Redress alone is insufficient to address the rising volume and nature of digital grievances. However, more effective redress systems not only reduce the risk of harm to users but can also support feedback loops which lead

operators to better prevention strategies as well. This project was exploratory, and the proposed measures and semantic structures for redress need further testing. The evidence nevertheless supports three tangible next steps with implications for different stakeholders mapped in Figure 8 and described further below.

Figure 8: Relevance of next steps to different GRM stakeholder groups, with the roles they can play

	 DPI Operators	 Digital Government Agencies	 International Agencies & Funders
1 Establish a minimum liveness benchmark	✓ Engage	✓ Test & agree domestically	✓ Support cross-cutting testing
2 Pilot wellness measures with existing operators	✓ Request & participate	✓ Propose & review	✓ Fund & review
3 Launch technical workstream on grievance semantics	✓ Participate & shape	✓ Participate & shape	✓ Fund & convene, with open source software & other vendors

5.1 Establish a minimum liveness benchmark

International DPI stakeholders could test and refine the proposed liveness measure, then collect it more widely.

Potential hosts include bodies associated with the Universal DPI Safeguards Framework and research initiatives such as the DPI Map. A practical model could separate indicators that

can be assessed remotely from those requiring in-country mystery shopping.

For operators, the immediate application is simpler: every new DPI should have a minimum viable GRM live at launch. This means a published policy, clear liability and escalation rules, accessible channels suited to the target population, trained staff and a ticketing process that generates a traceable case record.

5.2 Pilot wellness with willing operators

A second workstream should pilot the wellness scorecard with operators willing to provide data.

The pilots should refine definitions, test the burden of data collection, establish which indicators are essential versus desirable, and calibrate expectations for system size and maturity. Over time, wellness could become a self-assessment tool, an independent diagnostic, or part of funder and oversight due diligence.

5.3 Launch technical workstream on grievance semantics

Digital oversight agencies, DPI operators, open-source communities and case-management vendors should test the value of a common taxonomy and grievance object. Existing work in ONDC, Beckn, DIGIT, financial-sector complaint taxonomies and payment reason codes provides useful starting material. The aim should be a minimal common core that enables interoperability while allowing sector-specific extensions.

Absent concerted actions like these, the default trajectory is continued fragmentation: countries and DPI sectors will improve redress at different speeds, using different terminology, data and operating models. That trajectory is increasingly misaligned with the architecture of DPI itself. Grievances already cross providers and systems; cross-border DPI will make that more widespread.

This research suggests a feasible alternative. Start with measurement that is simple enough to use: liveness for minimum functionality and wellness for performance improvement. Use those measures to expose where semantics are

inconsistent. Then standardize only the grievance data needed for comparison, transfer and tracking. In that sequence, standardization is not an end state; it is an enabling layer for better redress and more trusted DPI.

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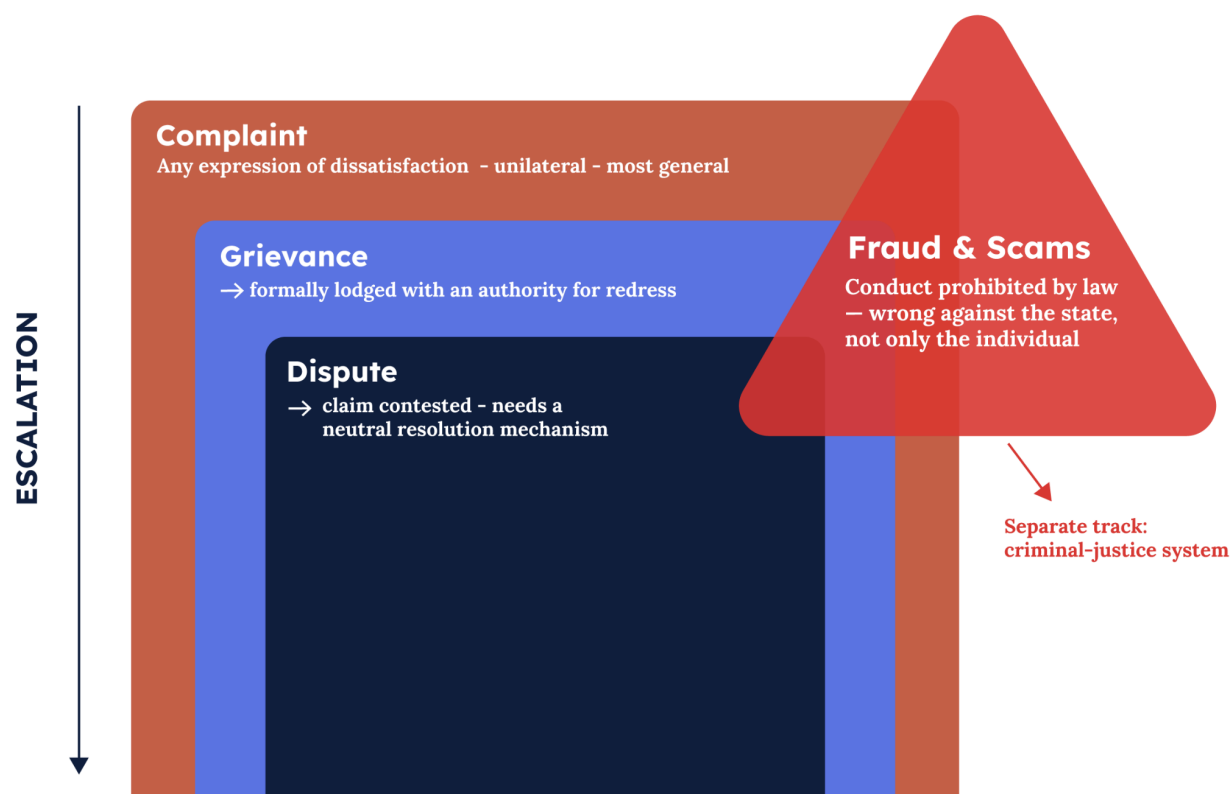
Annex A: Supporting concepts

A1. Terminology and adjacent concepts

For this report, a complaint is an expressed dissatisfaction with a specific service failure; a grievance is a formally asserted harm, injustice or rights violation requiring redress; and a

dispute is a contested claim between two or more parties. GRM is used as the umbrella term for the policies, procedures, systems and actions that address these issues in a DPI context.

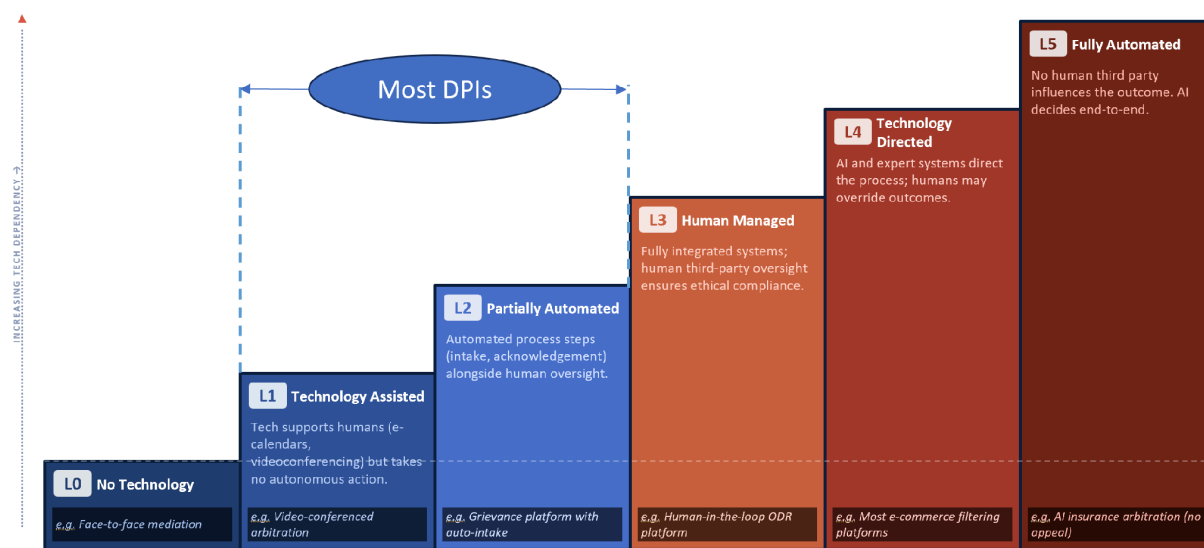
Figure A1. Relationship among complaints, grievances, disputes and fraud/scam cases.



Fraud and scams do not fit neatly within conventional grievance taxonomies because the direct cause of harm may be an unknown malicious third party and the conduct may be criminal. Nevertheless, a victim normally first encounters the problem through a service channel and needs a redress path that coordinates scheme rules, evidence, liability and—where appropriate—law enforcement.

Online Dispute Resolution (ODR) refers to resolving disputes using electronic communications and information technology. Wing and Draper describe levels ranging from no technology to fully automated resolution. Most GRMs in the 15 systems examined appeared to operate at relatively low levels of automation, despite the scale of some DPI platforms.

Figure A2. Levels of technology use in dispute resolution, adapted from Wing & Draper (2022).



A2. Case: outdated data and denial of emergency cash transfers in Brazil

Brazil's Auxílio Emergencial program during COVID-19 used an automated eligibility process that cross-referenced applicants against CadÚnico and other data. Many CadÚnico records were outdated. The initial design did not provide an administrative human-review step: a negative automated decision generally had to be challenged through the Federal Justice system. By November 2020 roughly 140,000 lawsuits concerning the program had been filed. A subsequent DPU–Caixa fast-track process was created for cases linked to outdated registration data, allowing correction without litigation. The example illustrates why a generic justice channel is poorly matched to a single automated decision that can affect millions of people simultaneously, and why a purpose-built administrative redress path should be designed upstream.

A3. Equity, gender and vulnerability

A DPI and its GRM may be gender-blind,

gender-neutral or gender-intentional, and each stance creates different obligations. A gender-blind system can reproduce upstream bias invisibly; a gender-intentional system can surface bias through sex-disaggregated enrollment, complaint and resolution data, but poorly designed “inclusive” features can themselves create barriers. Where a country already has financial- or digital-inclusion commitments, the GRM can align its data collection and reporting with those objectives rather than inventing a separate standard. The unresolved policy question is how much responsibility should sit with a DPI and its GRM for bias originating upstream. At a minimum, disaggregated data can make otherwise invisible disparities visible.

A4. AI and GRM

AI has a dual effect. It expands attack vectors for fraud, scams and automated-decision harms, but it can also reduce the cost of multilingual intake, classification, triage and case management. Any use in adjudication or automated resolution raises separate concerns around access, discrimination, explainability and accountability.

Annex B: Detailed comparison of existing frameworks

B1. Convergence of principles frameworks for grievance handling

Key to table below: green means that the stated principle is explicitly covered in the relevant framework; yellow that it can be inferred though not explicitly mentioned; red if it is missing.

Common principle	ISO 10002: 2018	ISO 32122: 2025	World Bank Social Protection Sourcebook
	Complaints handling in organizations	ODR for Cross border E-commerce	Social Protection GRM
A. FULL CONVERGENCE (where there is literal reference in all three)			
1. Accessibility & ease of access <i>The mechanism is easy to find, reach and use through multiple channels for all users.</i>			
2. Fairness & impartiality (objectivity) <i>Every case is treated equitably, without bias for or against any party.</i>			
3. Confidentiality <i>Complainant information is protected and not disclosed improperly.</i>			
B. PARTIAL CONVERGENCE (where there is literal reference in two and inferred in one)			
4. Transparency (process, costs, outcomes) <i>How the mechanism works, its costs and its outcomes are openly disclosed in advance.</i>			
5. Information integrity & data security <i>Data is accurate, not misrepresented, and protected from unauthorized access.</i>			
6. Responsiveness & closing the feedback loop <i>Complaints are acknowledged, acted on, and the outcome communicated back.</i>			
7. Timeliness & efficiency <i>Cases are handled promptly and make efficient use of the parties' time.</i>			
8. Competence & capacity (skills + resources) <i>Staff have the expertise, the mechanism & the resources to resolve cases well.</i>			
9. Accountability & auditability <i>Clear ownership of decisions; performance can be reviewed and audited.</i>			
10. Continuous improvement & effectiveness			

The mechanism learns from complaint data to improve itself and the wider system.			
11. Equity, inclusivity & non-discrimination The mechanism reaches marginalized users and prevents replicating disadvantages.			
C. LIMITED CONVERGENCE (literal in one, inferred in the others)			
12. Complainant-centered focus, voice & participation The complainant's needs drive the process; users are empowered to be heard.			
13. Affordability (free / low-cost handling) Bringing a complaint imposes little or no cost on the complainant.			
14. Independence / freedom from conflict of interest The mechanism operates at arm's length from the parties whose conduct is in dispute.			
15. Leadership commitment & ownership The organization actively backs, resources and owns the mechanism.			
16. Legality / alignment with rights & regulation The mechanism operates within, and discloses, applicable law and standards.			

B2 Comparison of indicator categories in existing applications

#	Category	Consolidated indicator	GRAI (DARPG, India)	Financial Ombudsman Service (UK)	Sourcebook on social protection (World Bank S8.5)
1	Awareness and access	Client or public awareness of the mechanism	NONE Not measured. Awareness-raising is an administrative instruction, not an index indicator.	FULL Level of public awareness of the service monitored through regular surveys.	FULL % of clients able to name at least one complaint uptake channel (requires client survey).
2		Accessibility for users facing barriers	NONE Not measured.	PARTIAL Accessibility services provided (BSL, Recite Me, Welsh); not expressed as a measured standard.	FULL % of clients with access barriers receiving adequate accommodation for voicing grievances (survey).
3		Ease of use / user effort	NONE Not measured.	FULL "Net Easy" score, measured stage by stage and end to end.	PARTIAL Captured indirectly through process-satisfaction indicators.
4		Channel mix of intake	NONE Not applicable: single national portal (CPGRAMS) by design.	PARTIAL Multi-channel intake operated (phone, online, post) but not reported as an indicator.	FULL Number and % of complaints by uptake channel, disaggregated by level.
5		Complaints received	FULL Receipts, brought-forward and pending volumes published monthly; an index input rather than a scored indicator.	FULL Complaints received published quarterly and annually (214,600 in 2025/26, down 30%).	FULL Number of complaints collected in each period (monthly, quarterly, annually).
6	Volume and demand	Complaints by type or category	PARTIAL Measured only as adequacy of categorization by the Ministry/Department [0.060, negative] - it penalizes over-use of "Others".	FULL Published by product, sector and named business.	FULL Number and % of complaints by type (eligibility, payments, service quality and so on).
7		Equity disaggregation (for example by gender)	NONE Not measured.	NONE Not published as a performance indicator.	FULL Number and % of complaints submitted by women; other characteristics of interest encouraged.
8		Potential versus actual use (unvoiced dissatisfaction)	NONE Not measured.	NONE Not measured.	FULL % who would complain about poor delivery, against % who judged quality low and complained (survey).

#	Category	Consolidated indicator	GRAI (DARPG, India)	Financial Ombudsman Service (UK)	Sourcebook on social protection (World Bank S8.5)
9	Timeliness	% resolved within the stipulated timeframe	FULL % of grievances resolved with ATRs within 30 days – the single heaviest indicator in the index.	FULL 46% of cases resolved within 3 months and 77% within 6 months of acceptance.	FULL Number and % of complaints resolved within the stipulated timeframe.
10		Average resolution time	FULL Average resolution time .	FULL Reported in the annual report; not itself a published target.	FULL Average time required to resolve grievances.
11		Pendency, backlog and case aging	FULL % pendency with Grievance Redress Officers beyond 30 days.	FULL No more than 1,400 cases over 12 months old by financial year end (1883 in 2025/6)	FULL Open complaints by type and age; open and outstanding complaints by months overdue.
12		First response or acknowledgement speed	NONE Not measured separately.	FULL 97% of initial enquiries actioned within five working days.	NONE Not in the indicator set.
13	Resolution and outcomes	Disposal or resolution rate	FULL Disposal volumes published; resolution quality folded into the 30-day indicator above.	FULL Cases resolved published annually (227,445 in 2024/25).	FULL Number and % of complaints by resolution status: open, referred or closed.
14		Uphold rate (outcome in the complainant's favor)	NONE No measure of the merits of the outcome anywhere in the index.	FULL Uphold rate published in aggregate and per named business (30% in 2025/26, 34% in 2024/25).	NONE Not in the indicator set.
15		Redress delivered (compensation, reversal, reinstatement)	NONE Not measured.	PARTIAL Awards and directions reported and individual decisions published; not a standing performance indicator.	NONE Not in the indicator set.
16		Appeals and escalation	FULL Two indicators: % of appeals filed and % of appeals redressed.	PARTIAL Cases escalated to a formal ombudsman decision rather than settled at investigator stage; reported, not targeted.	PARTIAL Appeals discussed in the narrative but absent from the indicator list.

#	Category	Consolidated indicator	GRAI (DARPG, India)	Financial Ombudsman Service (UK)	Sourcebook on social protection (World Bank S8.5)
17	Process quality	Handling conforms to defined quality standards	NONE No quality-assurance sampling; categorization adequacy is the only proxy.	FULL (Quality score 94%).	FULL % of registered grievances placed in the resolution process according to quality standards.
18		Complainant kept informed of case status	PARTIAL The Action Taken Report requirement is embedded in the 30-day indicator, not measured.	PARTIAL Case tracking and named case handlers provided; not a published indicator.	FULL % of grievances for which the beneficiary is notified of status according to quality standards.
19		Complaints about the redress body itself	NONE Not measured.	FULL No more than 2% of resolved cases to generate a service complaint; such complaints resolved or with a plan in place within 15 working days.	NONE Not in the indicator set.
20	Complainant satisfaction	Satisfaction with the handling process	FULL % of resolutions carrying "Satisfied" feedback remarks, collected by call center.	FULL Customers surveyed to assess confidence in the service provided.	FULL % of complainants satisfied with the response and grievance redress process (survey).
21		Satisfaction with the action taken	PARTIAL A single feedback measure covers process and outcome together.	PARTIAL Not separated from overall service satisfaction.	FULL % of complainants satisfied with the action(s) taken - measured separately from process satisfaction.
22	Institutional capacity and commitment	Officer-to-caseload ratio	FULL Ratio of Grievance Redress Officers to grievances received.	NONE Capacity handled through plans and budget, not performance standards.	PARTIAL Staffing and frontline capacity discussed as determinants of effectiveness, not as an indicator.
23		Officer engagement / system activity	FULL % of active Grievance Redress Officers - the heaviest single non-efficiency indicator.	NONE Not measured.	NONE Not measured.
24		Cost efficiency per case	NONE Not measured.	FULL Unit cost per case (GBP 1,029 in 2024/25, down almost 8% year on year).	NONE Not in the indicator set.

#	Category	Consolidated indicator	GRAI (DARPG, India)	Financial Ombudsman Service (UK)	Sourcebook on social protection (World Bank S8.5)
25	Integrity and priority handling	Corruption-related grievances	FULL % resolution of grievances in the Corruption category [0.068]; also subject to separate monthly senior review.	NONE Not applicable to the mandate.	PARTIAL Addressed through a separate error, fraud and corruption monitoring framework (section 8.6), not GRM indicators.
26		Urgent or priority cases	FULL % resolution of complaints labeled "Urgent".	PARTIAL Vulnerability-based prioritization applied operationally; not a published indicator.	NONE Not in the indicator set.
27	Learning and transparency	Grievance data used to correct root causes	FULL Indicator-based root cause analysis published as a standing annexure to the monthly report.	FULL Published insight and data reports; "wider implications" cases referred to the FCA and other regulators.	FULL The stated purpose of performance monitoring; recurring grievances trigger business-process redesign.
28		Public reporting and comparative benchmarking	FULL Composite score and public ranking of 89 Ministries/ Departments, split into Group A and Group B by caseload.	FULL Named-business complaints data published half-yearly plus a searchable decisions database.	PARTIAL Internal and external dashboards and public aggregate reporting recommended; no ranking or benchmarking function.

Source: prepared by Claude Opus 5 using source materials from each.

Annex C: Liveness measure V3

C1. Liveness Scorecard

DPI operator:

Date of assessment:

V3.0 7 August 2026

LIVENESS INDICATORS		
1	Is there an appropriate GRM Policy or Framework in the form of a clear written statement specifying how grievances are handled across participating entities?	☐
a	Does the Policy or Framework ("it" below) require that all complaints are responded to within a specified time frame?	☐
b	Does it specify a time period within which resolution should happen?	☐
c	Does it specify liability allocation in event of fraud and scams which does not rest on users alone?	☐
d	Does it specify an appeal/escalation pathway?	☐
e	Is it available online?	☐
f	Is a plan language summary available at the point at which service is provided?	☐
2	Are there suitable channels through which complaints can be submitted?	☐
a	Is at least one channel available outside office hours?	☐
b	If a voice channel is available, is it tollfree for users?	☐
c	Can all channels receive verbal complaints in all official languages or at least in the dominant language groups of people served?	☐
d	Are the channels publicized at point of enrolment?	☐
3	Is there sufficient evidence to support resolution?	☐
a	Is a record provided to complainant of the date and time of complaint submission ?	☐
b	Is a reference number issued to the complainant for followup?	☐
c	Does the data collected at point of complaint include a set of reason categories for the complainant to select from?	☐

Guidance

If the GRM Policy is a general one e.g. for public sector as a whole, then it must accommodate all the grievance types expected in this DPI.

Note that if DPI provides service other than through online channels only, the it is not sufficient to offer only an online platform or email address for complaints.

This refers specifically to voice channels.

Note that this could be digital or on paper.

This should include "other" for users who cannot decide; the categories should provide for triage across types of complaints relevant to the system.

Overall liveness rating:

Not live	Not underway (i.e fails underway test)
Under way	Fails in respect of at most 3 indicators overall (out of 11); and of those, not more than 2 indicators in either of categories 1 & 2 (out of 5 and 4 resp.) and 1 indicator in category 3 (out of 2).
Live	Satisfies all the criteria above

Guidance on finding: the inference should relate to category generalization from limited evidence; not the absence of evidence.

C2: GRM Liveness checklist for DPI Operators

			✓
A	Draft a GRM Policy or Framework		
	1	Start by undertaking a harms and errors impact assessment	
	2	If the DPI is subject to an umbrella government GRM policy, assess whether it covers all harms and errors and if not, develop a supplementary document	
	3	Use the harms and errors assessment as the basis for building a catalog of complaint categories relevant to your DPI which can be tracked	
	4	Also, ensure that the policy addresses at least likely and high impact harms from the start e.g. user liability for frauds and scams	
	5	Ensure that the policy includes your expected response times to complaints lodged and how a user can escalate or appeal	
	6	Undertake consultation on a draft with users, other linked DPIs and relevant oversight agencies	
B	Make the finalized version of the GRM Policy accessible to users		
	1	Post the policy or framework online	
	2	Draft a plain language version suitable for users	
	3	Make sure the plain language version is available at point of presence or as part of complaint processes	
C	Based on the expected profile of target users including their languages and device ownership, decide on the minimum viable channels for complaint at launch		
	1	Normally, this would include a postal address and voice channel, but may also include physical point of presence, WhatsApp number and email	
	2	If voice is used, ensure that it will be toll free to users	
	3	Ensure that the voice channel supports the minimum viable languages of the launch users	
	4	Ensure that the staff supporting the channel/s have adequate training to accept and route complaints	
D	Select a ticketing system to handle complaint workflow (recording, tracking and reporting) appropriate to expected scale and complexity		
	1	Ensure that the specifications include issuing a record (digital or printed) of complaints received and can issue a unique number and reason codes	

Annex D: Wellness measure V2

D1. Wellness Scorecard

DPI operator:

Date of assessment:

V2 7 August 2026

Wellness score %

WELLNESS INDICATORS		Weighting	Scoring	Available?	Level of assurance	Method of evaluation	Comments if any on the value of the indicator; specific prompts below
1	Relevance/ salience	20%					
a	Does the GRM Policy for the DPI adequately cover the range of complaint circumstances?	☐	If YES=2, NO=0	☐		Assessment of grievance categories against generic frameworks	
b	Has the GRM policy been reviewed within the past 12 months?	☐	If YES=2, NO=0	☐		Minutes of meeting	
c	Does the senior management body receive GRM reports on at least a quarterly basis?	☐	If YES=2, NO=0	☐		Minutes of meeting; interviews with Digital Workstream of the DPI Intergovernmental Working Group at The National Treasury	
d	Is there evidence that the majority of the target group is aware of at least one GRM channel?	☐	If YES=2, NO=0	☐		Survey evidence	
e	Are the GRM channels collectively accessible to the target user groups?	☐	If YES=2, NO=0	☐		Cross with other survey evidence; balanced with stage of maturity and scale	
2	Performance effectiveness	50%					
a	Does the operator set specific targets for time to acknowledge and time to resolve?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target	
b	Are waiting times for calls to be answered reducing over time?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target	
c	At the time of filing, does the complainant obtain full clarity on what to expect and on what steps if any they need to take to resolve it?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target	
d	Is the average time to resolve within the specified target?	☐	If YES=2, NO=0	☐		Compare most recent reported average time to resolution rate to target	
e	Is the trend and level of the resolve rate within expectations?	☐	If YES=2, NO=0	☐		Compare most recent reported average time to resolution rate to target	
f	Is the trend and level of the appeal rate within expectations?	☐	If YES=2, NO=0	☐		Compare most recent reported average time to resolution rate to target	

g	Is the rate of reversal of initial decisions upon appeal within acceptable thresholds?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target
h	Are satisfaction levels for resolutions provided within acceptable thresholds?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target
i	Is there consistency of resolution across channels and across complaint-originating locations for the same issue types?	☐	If YES=1, NO=0	☐		Compare most recent reported average time to resolution rate to target
j	Has a representative survey of all eligible users been undertaken in the past 12 months to establish awareness of GRM and satisfaction with it ?	☐	If YES=2, NO=0	☐		Results of survey available; see key questions below
3	Efficiency		10%			
a	Is the average cost per complaint calculated and monitored?	☐	If YES=1, NO=0	☐		Costs for GRM unit in period/ total complaints received
b	Is the average cost per complaint received in the period within budget?	☐	If YES=1, NO=0	☐		Costs for GRM unit in period/ total complaints received
c	Has the resource costs for the same types of complaint reduced over time?	☐	If YES=1, NO=0	☐		
4	Transparency		20%			
a	Were aggregated reports on GRM published at least quarterly during the past year?	☐	If YES=1, NO=0	☐		Check availability on website
b	Was the reported GRM data made available within 1 month of quarter end?	☐	If YES=1, NO=0	☐		Ask date of publication
c	Has the annual GRM data reported been audited in the most recent full period?	☐	If YES=1, NO=0	☐		Ask for auditor's report
d	Is the number of GRM staff and GRM budget reported annually?	☐	If YES=1, NO=0	☐		Annual report
e	Is GRM data (e.g complaints rec'd, resolved, pending) disaggregated by sex and reported as part of the regular / aggregated GRM reporting?"	☐	If YES=1, NO=0	☐		Ask for data

D2: User survey questions

These are questions which could be inserted into an omnibus national survey of citizens/ DPI users to establish the awareness of and incidence of complaints, and of how they were handled.

B	SURVEY DATA OUTCOME INDICATOR	
1	All: % of target group who are aware of at least one channel to report a complaint about the DPI	
	All: % of the target group who can actually access at least one channel to report a complaint.	
2	All: % of target group who have had grounds for complaint relating to the DPI in the period	
3	Of those at 2: the % who reported the complaint	
	Of those who did not report: select a reason from dropdown	
4	Of those in 3: % who were notified of the status of the complaint during the process in clear and accessible language	
5	Of those in 3: % satisfaction with the outcome	
	Give a reason for the score	
6	Of those in 3: % indicating that the complaint was satisfactorily resolved	
	Give a reason for the score	
7	All: % who indicate confidence in the GRM process	

D3: A Wellness Data Checklist for DPI Operators at different stages

Preparing for a wellness assessment		Early stage	Maturing	Mature
Independent assessment: a wellness score may be self-assessed if you have the time and expertise internally. However, you may desire or need independent assessment especially at the early stage.			YES	YES
Reports and data to hand:				
1	GRM policy and evidence of any updates to it	YES	YES	YES
2	GRM reports to management, and evidence that they are discussed	YES	YES	YES
3	GRM data over time			
i	volumes of complaints received	YES	YES	YES
ii	average time to resolution	YES	YES	YES
iii	resolution rate within time set	YES	YES	YES
iv	appeal/ escalation rate	YES	YES	YES
v	% appeals upheld	YES	YES	YES

vi	average satisfaction rates/ NPS of complaints	YES	YES	YES
	disaggregated by			
	--complaint category	YES	YES	YES
	--channel received	YES	YES	YES
	--demographics of user base e.g. gender	YES	YES	YES
4	Data on capacity including staffing levels & budget assigned to GRM		YES	YES
5	Survey data of target user audience			YES
6	Published reports on GRM (links to website showing date stamp)	YES	YES	YES

Undertaking the scoring exercise

With the right data in hand, the scoring may be done quickly. However, the point of the assessment is to measure over time and be able to set goals for improvement.

In addition, a skilled assessor would be able to provide benchmarks and suggestions to use as a basis of relevant comparison.

Making use of the wellness score

The wellness score is designed to be presented and discussed with management and oversight agencies. Its aim is to encourage improvement over time.