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# **Review of, and recommendations, for grievance mechanisms for social protection programmes**

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**Executive summary**

September 2012

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**Country**

Indonesia



Oxford Policy Management

# **Review of, and Recommendations for, Grievance Mechanisms for Social Protection Programmes**

Final Report Summary

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## Abbreviations

ADB	Asian Development Bank
BPS	<i>Badan Pusat Statistik</i> (Central Statistics Agency - Statistics Indonesia)
BSM	<i>Bantuan Siswa Miskin</i> (Cash Transfer for Poor Students)
Bulog	<i>Badan Urusan Logistik</i> (National Logistics Agency)
CBO	Community-Based Organisation
CCT	Conditional Cash Transfer
CSO	Civil Society Organisation
FGD	Focus Group Discussion
GM	Grievance Redressal Mechanism
GOI	Government of Indonesia
ISSA	International Social Security Association
Jamkesda	<i>Jaminan Kesehatan Daerah</i> (Local-level Health Insurance Scheme for the Poor)
Jamkesmas	<i>Jaminan Kesehatan Masyarakat</i> (Health Insurance Scheme for the Poor)
Kemenkominfo	<i>Kementrian Komunikasi dan Informatika</i> (Ministry of Communications and Information Technology)
KII	Key Informant Interview
M&E	Monitoring and Evaluation
MIS	Management Information System
NGO	Non-Governmental Organisation
NTT	Nusa Tenggara Timur
OPM	Oxford Policy Management
PKH	<i>Program Keluarga Harapan</i> (Household of Hopes Programme)
PKK	<i>Pemberdayaan Kesejahteraan Keluarga</i> (Household Welfare Empowerment)
Rp.	Indonesian Rupiah
RT	<i>Rukun Tetangga</i> (“neighbourhood harmonious”, lowest-level governance)
RW	<i>Rukun Warga</i> (“citizen harmonious”, second-to-lowest-level governance)

TNP2K      Team for the Acceleration of Poverty Reduction

TTS         Timor Tengah Selatan

## Executive Summary

### Section A: Background to the research

To further strengthen poverty-reduction coordination efforts, in 2009 the Government of Indonesia (GOI) issued a Presidential Regulation mandating coordination in poverty alleviation. Under the new framework, a Team for the Acceleration of Poverty Reduction (TNP2K) was developed to lead the coordination and oversight of poverty-reduction programmes in Indonesia.

**One of the key reform objectives on TNP2K's agenda is improving the efficiency and accuracy of programmes in reaching the poorest households and this study fits within this wider goal.** Grievance redressal mechanisms (from now on GM) are a crucial component of social assistance programmes, providing a formal mechanism or process for receiving, evaluating and redressing programme-related grievances from affected communities and citizens. They serve two functions. First, GMs help redress problems and improve performance in the implementation of social assistance programmes such as targeting errors, payment delays and corruption. Second, they provide a formal channel for citizens to hold governments to account for programme performance. As such, GMs are important to the broader objective of improving accountability relationships, basic fairness and 'voice' of citizens in social assistance programmes.

#### Objectives of the study and conceptual framework

As set out in the terms of reference, the study's aim is to **"document and analyse existing grievances mechanisms in the four main social assistance programmes (Raskin, PKH, Scholarship and Jamkesmas) and make recommendations for a well-functioning complaints and grievance resolution mechanism for beneficiaries of individual social assistance programs, and across social assistance programs"**.

Specifically, in order to evaluate current policy, resources, procedures and practices, **the study's conceptual framework distinguished between demand- and supply-side issues and adopted a set of criteria that are commonly cited in the literature as being essential to any GM:** commitment, fairness, transparency and access, privacy and confidentiality, accountability, learning and improvement and internal review. These were used to develop specific research questions and are summarised below.

#### Overarching conceptual framework



Source: Adapted by authors from a study on "Strengthening Governance of Social Safety Nets in East Asia" (Giannozzi and Khan, 2011).

## Methodology and conducting of the study

The methodology adopted for this study was articulated in two key stages. First, it included two in-depth **desk-reviews**: one of international best practice in GMs for social assistance programmes and one of the current GM set-up of Indonesia's four main social assistance programmes (completed in February 2012). Second, **qualitative fieldwork** took place in six communities from six districts within three provinces: West Java, Nusa Tenggara Timur (NTT) and Bengkulu. Fieldwork included a total of 44 focus group discussions (FGDs) with male and female beneficiaries and non-beneficiaries and 111 key informant interviews (KIIs) at Central, District, Sub-District and village level.

## Section B: Desk-review

### International best practise

Findings from the international review of best practice were extensive (though the literature on this topic is scarce), with useful practical examples from programmes worldwide. Some of the **main lessons learned** from this experience include the following:

- *GM cannot compensate for poorly designed or implemented programmes.* For example, eligibility criteria should be simple and there should be adequate financing to ensure all eligible target group in each province/district can be included;
- *A widespread information campaign is crucial* for ensuring the public understands programme objectives, selection criteria, how to register for the programme and who/ how to access redress if there are problems (including special measures to reach most vulnerable);
- *Setting up multiple channels for receiving complaints is the best way to ensure access;*
- *GM will need dedicated staffing/unit in order to perform adequately.* Important to set performance standards and targets for grievance handling in advance and make these central to the programme performance monitoring system and staff performance. Decentralized implementing bodies may also need financial rewards for strong performance on redress;
- *Access to independent channels for redress is important*– e.g. links to ombudsmen, contracting out facilitation or collection of complaints to third parties such as NGOs.
- *More effective to resolve complaints at the point of service delivery* where information and transaction costs are lowest. This both reduces costs and improves accessibility to citizens.

### National overview of GMs for PKH, Jamkesmas, BSM scholarship and Raskin

Based on desk research and key informant interviews with central-level stakeholders, an assessment was made of existing GMs for Indonesia's four main social protection programmes. Overall, findings showed that **PKH was the only programme with a clearly described GM outlined in a dedicated handbook separate from the General Programme Handbook.** For Jamkesmas, BSM and Raskin scattered and un-specific information on grievances was integrated into the M&E chapter of the programme handbooks. Moreover, programme websites had no information on grievances. Overall, Raskin had the least structured GM, with officials declaring great reliance on media and role of NGOs to report grievances. Regarding socialisation of GMs, none was conducted for Raskin and BSM, while some effort was declared for PKH and Jamkesmas.

## Section C: Findings

### Overall socialisation on grievance procedures for each programme

Given the low level of commitment to establishing effective GMs at the central level (for all programmes but PKH) and the overall lack of socialisation efforts, it was unsurprising to discover **very low levels of socialisation on grievance procedures in the field**.

Overall, fieldwork showed that awareness was extremely low for all four programmes. **Respondents across the provinces, male and female alike, were hardly aware of programme functioning and goals and almost never aware of any official GMs** (it should be noted that these two are interlinked).

Levels of awareness of programme functioning (*not* of GMs) were relatively higher for **PKH**, with beneficiaries reporting that socialisation had been done at an initial meeting with the Pendamping and other officials, but that they had received little information since. Nevertheless, respondents' knowledge was not always correct and very few beneficiary mothers had any understanding of the precise functioning of the programme (e.g. deductions in payments for non-compliance). For **Jamkesmas**, socialisation was never systematic and mostly happened through midwives, Posyandu Kaders, RTs and other local officials, with no respondent in any of the districts reported having seen any posters, brochures or informative material on the programme. This translated into widespread ignorance on the programme. For **BSM**, the role of informing beneficiaries was left to school principals, who were also in charge of distributing the funds – a clear case of conflict of interest. As for **Raskin**, the programme's long history ensured that most respondents knew the basics about how the programme functions. Nevertheless, these basic precepts were adapted to local contexts in every study village (e.g. distributing rice to more people and thus reducing quantities per capita), meaning that the guidelines for rice distribution were seen as an abstract precept that had no meaning in practice.

Specifically, it is important to note there was **no systematic socialisation of GMs at district government level**, leading to a lot of confusion over responsibilities for resolving the few complaints that somehow were voiced by citizens.

### Main complaints for each programme

When discussing complaints, it should be noted that many were often expressed only after probing by the research team and do not necessarily reflect complaints that were ever actively voiced. However, **one complaint that was universally expressed across the four programmes by beneficiaries and non-beneficiaries alike was the problem of programme targeting**. This was linked to a lack of understanding of the eligibility criteria and overall process, as well as to clear problems with the targeting itself.

Within **PKH**, other than targeting, several complaints were also voiced around the lack of information on payment amounts and on the non-compliance penalty system. Concerns were also voiced over PKH beneficiaries often being explicitly excluded from other programmes (such as Jamkesmas and BSM) because they were 'already receiving something' (against programme regulations).

For **Jamkesmas**, poor quality of services was the most common complaint by respondents. The majority of FGDs reported that services for those receiving Jamkesmas were slower (less beds, etc) and less thorough, that staff behaved rudely and that problems were often not solved. A second problem that was commonly cited across the three provinces regarded issues with the Jamkesmas card, most often misspelt names and mistaken dates of birth. A third issue that was

raised by respondents was the lack of adequate information on what services were included free of charge under Jamkesmas. It should also be noted that targeting was reported less frequently as an issue for Jamkesmas, but that was possibly linked to very low levels of awareness about the programme itself and its entitlements.

Complaints on **BSM** were almost all around targeting and lack of information (expressed by both FGD respondents and key informants). Targeting issues were reported in four out of the six communities where fieldwork took place, with parents mostly dissatisfied about their children not receiving the scholarship and not really understanding why. School principals also had some complaints around the distribution of BSM funds. These included: distribution during summer months (as opposed to when children most need funds at the start of the school year); being charged a fee by the post office for collecting the funds; and not being aware of the reasons behind changes in funding from year to year.

The main concerns respondents had with **Raskin** were related to the quality and quantity of the rice distributed, regular delays in procurement, and targeting. Interestingly, however, the quantity of rice distributed was not questioned as often as might be expected, given that almost all recipients received less than their entitlement due to decisions by local RTs to distribute rice to more people.

### Overall attitude to grievances

A very interesting finding of the research was that, despite widespread dissatisfaction with programme functioning, respondents were often unwilling to voice those complaints. The overall **attitude that prevailed was that complaining was not really worth the trouble for fear of receiving no response, approaching people of authority, appearing ungrateful, embarrassment, losing face, revealing one's ignorance, or retaliation.** Even in the presence of a functioning GM, overcoming these cultural barriers (is a severe stumbling block to be overcome through careful programme design.

### Main grievance channels currently used

A combination of very low socialisation on programme objectives, procedures and especially GMs (where any were in place) and negative attitudes towards 'complaining' meant that a large majority of respondents, though somewhat unsatisfied with the four programmes, did not submit a grievance. However, for those who did, the **most common channel for grievances across the four programmes was the RT.** This was especially the case for **Raskin**, where the RT is the main point of contact in the community. The RT was considered by most respondents as "closest to us and one who is most familiar with our conditions."<sup>1</sup> The **Kepala Desa/Lurah (village head) was also a very frequent point of contact** for grievances. Considered to have relatively more power than the RT, s/he was also perceived as being slightly less accessible, especially for the most marginalised households who feared authority.

For **PKH**, unsurprisingly, the most common point of contact was the village facilitator or *Pendamping*. Similarly, for the **BSM** scholarship, those who complained always addressed their grievances to the school principal. For **Jamkesmas** and issues related to health services, Kaders were a frequent point of contact, followed by midwives. Interestingly, throughout the whole research little mention was made of complaints lodged at district level, with the exception of Jamkesmas beneficiaries with errors on their card.

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<sup>1</sup> Female beneficiaries, Cipondok, Kuningan, West Java.

## How (and whether) most frequent grievances are made and addressed

This section aims to follow a few of the most frequent grievances ‘up the chain’ to understand whether they are effectively made by beneficiaries and non-beneficiaries and whether they are addressed by programme officials. Details on most complaints are addressed in a summary table, while targeting – the most contentious complaint – is analysed in more detail.

**Targeting** issues – when voiced – were addressed to a range of actors. Most often, the first points of call were local officials such as the RT (or the principal for BSM and the *Pendamping* for PKH) but eventually **complaints were (unsystematically) forwarded up the line to district-level officials**. Interviews with these officials revealed that **targeting was by far the most difficult kind of grievance for district government**, primarily because they do not have the mandate to provide a solution from within the programme. In responding to grievances related to targeting, officials tried their best to explain to non-beneficiaries that the quota of beneficiaries is determined by the national government based on a BPS survey that they were not involved in. However, the pressure they directly receive has led them to endorse local initiatives to ignore the official quotas and to distribute the assistance equally among more beneficiaries. Moreover, local governments are increasingly relying on their own resources to develop their own social protection or poverty-reduction programmes (e.g. Jamkesda).

### Potential GMs

During the FGDs and KIIs, a set of potential GMs were explored to understand how accessible they would be to potential users and what their main pros and cons were.

The **bottom-line finding from this exercise was that respondents preferred ‘face-to-face’ discussions to any other type of system**: “Face to face is better... we can immediately know the result and it is less embarrassing... we can even go in a group if we don’t have the guts.”<sup>2</sup> There was also a **strong reluctance to put anything in writing**: “We’re afraid if it’s written... talking is simpler and better”,<sup>3</sup> people explained around the three provinces.

For these reasons, people acknowledged that **complaints forms** and **complaints boxes** embarrassed them as they often did not know how to write and did not want to sign their names. When asked about their feelings towards an **SMS-based system or a call centre**, some respondents felt this may not be appropriate as “it is not clear who is at the other end.”<sup>4</sup> Some also pointed out that the poorest households would not own a phone or want to spend credit on grievances. Nevertheless, these were both viewed as useful and ‘direct’ solutions to complain to someone who could act upon their grievance. **Mobile units** were also considered a feasible solution by many as they guaranteed confidentiality and allowed an un-biased ‘outsider’ perspective.

### Cross-cutting theme: gender and grievances

The research showed that regarding programme socialisation, **male respondents had much less programme awareness than females**. This led to gender differences in complaints. Overall, **women complained of a wider range of (often practical) issues relating to programme implementation, with men mostly focusing around targeting problems and lack of awareness**.

<sup>2</sup> Female beneficiaries, Purwodadi, North Bengkulu.

<sup>3</sup> Male non-beneficiaries, Cipondok, Kuningan, West Java.

<sup>4</sup> Female beneficiaries, Karang Anyar, Seluma, Bengkulu.

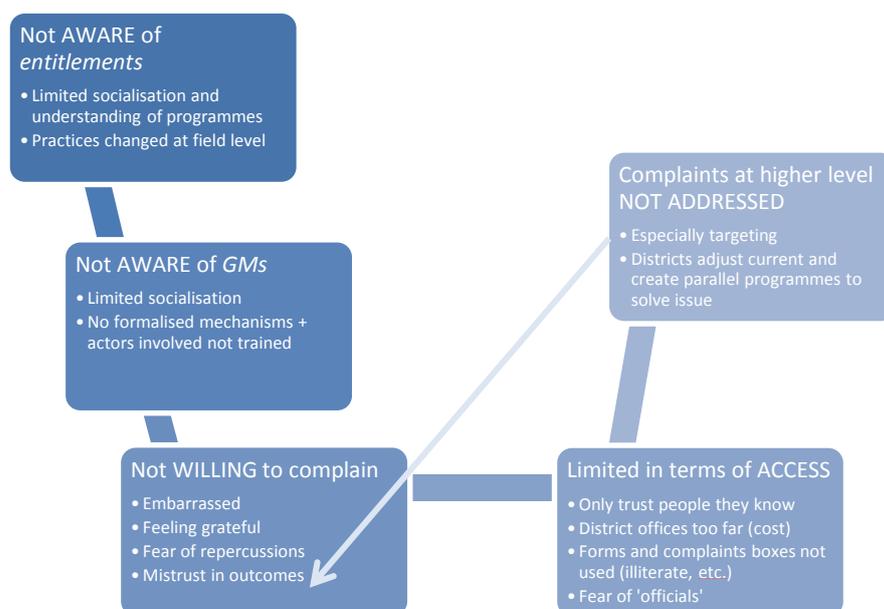
Interestingly, one of the main differences between male and female respondents regarded their attitudes towards complaining, reflecting their different gendered roles in society. **Although women generally had more complaints to make (partially because they were more aware), they tended to be more resistant to the idea of complaining to figures of authority within the community.** In many cases, this was due to the embarrassment of discussing these issues with people outside the household.

Overall, it was clear that **female respondents felt much more comfortable complaining to their peers, or to other women.** In many cases, preferred 'go-to' people for women were the head of the beneficiary association, the Kader, the midwife and at times the wives of village authorities (especially when these were women leaders in the community).

### Overall assessment: main stumbling blocks faced by complainants

Having explored current practices in the three provinces being researched, this section organises that information to assess the main 'stumbling blocks' faced by programme beneficiaries and non-beneficiaries in accessing GMs. Overall, five main stumbling blocks were identified and summarised in below.

#### Main stumbling blocks faced by complainants



Source: Authors analysis

#### Main fieldwork findings, by framework area

Based on the conceptual framework set out in the methodology, GMs for PKH, Jamkesmas, BSM Scholarship and Raskin were assessed against the main evaluation criteria. This was not always an easy task as the functioning of GMs was so basic or non-existent in the field that many of the framework areas were not relevant.

In particular, **commitment** to complaints handling at the national level was only found within PKH and, partially, Jamkesmas. **Fairness** depended on subjective factors such as literacy, marginalisation, personal networks, etc. Contrary to the ethics of programmes setup to reach out to the poorest and most marginalised households, it was often those households who had the most

problems accessing GMs as they were the most likely to be unaware and afraid of complaining. Regarding **transparency and access**, socialisation of a GM was scarce, unspecific, unsystematic and unclear (with PKH faring marginally better than the other programmes). Moreover, the few mechanisms in place for grievances within the four programmes were not **'responsive,'** especially in responding to complaints on exclusion. Similarly, given the overall lack of effective GMs and related standards, **accountability** was very low if not non-existent.

## Section D: Overall recommendations based on the evidence

### Recommendations and lessons learned

The **main benefits of better GM planning and implementation efforts are varied.** As highlighted by the literature, “well-functioning GMs provide a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, and lasting; build trust (...); enable more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement” (CAO, 2009).

The main cross-cutting recommendations arising from the fieldwork include the following:

- **Develop standardised GM procedures for the four programmes** (see below).
- **Improve programme socialisation** by dedicating more resources and thought to its design and implementation.
- While developing the **National Targeting System** strengthen the BPS data collection process and introduce some flexibility into the targeting system allowing for appeals and additional forms of on-demand self-targeting.
- Developing a **cadre of programme staff at national level and local levels responsible solely for resolving/ collecting complaints.** This would include specific job descriptions and training staff on these new roles.
- **Improve ownership of national social protection programmes at the district government level.** This could involve consultative engagements with local governments in improving design of programme implementation and M&E; creating institutional and other policy incentives for local governments to provide co-financing and other institutional support to management of national social protection programmes; etc.

The suggested basic steps for re-designing GMs for the four programmes are:

- Step 1: Taking stock of most frequent complaints.
- Step 2: Developing standard practices and responses for most common complaints (these could easily be programmed into the programme MIS).
- Step 3: Identifying points of contact for receiving complaints (the most effective approach for receiving complaints is to adopt multiple channels).
- Step 4: Identifying points of contact for registering and processing the complaints (while the process of receiving complaints can be diffused and adopt multiple channels, the process of registering and starting the processing should be mediated through a central point of contact who also has responsibility for logging them in a central register/MIS and coordinating with other agencies and higher levels of authority).
- Step 5: Defining clear roles and responsibilities up the chain and incorporating those into job descriptions and (re)training of staff.
- Step 6: Developing a process for aggregating and using compiled grievance data to improve programme functioning.

- Step 7: Extensive socialisation of grievance procedures.
- Step 8: Start running the revised grievance process.

The overall proposed system for managing complaints across programmes is graphically presented in **Error! Reference source not found.**, while details of how this could be structured are presented below.

### **Possible grievance system and action plan**

The possible grievance mechanism structure proposed incorporates best practice at the same time as addressing and incorporating findings from the field research through:

1. Multiple channels for receiving complaints to ensure complainants' convenience, cultural preference, and ease of use.
2. Combination between supply and demand-side mechanisms to strengthen accountability and transparency, as well as institutionalised and well-documented responses.
3. A central register/MIS system for registering and processing complaints as well as coordination across relevant agencies and higher level authorities.
4. Assigning clear roles and responsibilities and adequate trainings for grievance managers at every level of the structure.
5. Extensive socialisation of the system focusing not only on grievance procedures, but also on people's rights and responsibilities in relation to the programme.

### **Multiple channels for receiving complaints**

Specifically, the **multiple points of access for submitting complaints will combine both supply and demand-sides access points**. These would include:

- *Community grievance centres at village/community level managed by villagers trained to register/receive complaints* and to provide immediate basic information on social protection.
- *Mobile grievance agents dispatched from the district to regularly visit (e.g. every 3 months) villages and communities to collect grievances or complaints directly from programme beneficiaries and non-beneficiaries or from community grievance centres.*
  - Importantly, these agents will be equipped with smart mobile phones with applications for registering and uploading complaints directly to the central database.
- An *SMS system*, integrated directly into the national database and processed by trained and fully supervised database staff at national level.
- *Call centres* with operator strained not only to receive complaint calls, but also to register and upload complaints data into the national data base.
- *Community Appeals Committees* set up as a demand-side initiative to receive complaints on social protection programmes, especially on exclusion problems. Ideally these could also make claims for collective redress, providing information to citizens and providing legal aid to help access courts and legal redress mechanisms, and recommend new eligible members to the beneficiaries' list of social protection programmes.
- *Media*, if involved appropriately, can play an important demand-side access point for lodging complaints and grievances (as well as providing socialisation).

## MIS

A **central register/MIS system for registering and processing complaints as well as coordination across relevant agencies and higher level authorities designed to integrate all phases of a complaints-handling process.**

We suggest the **MIS system could use mobile internet**, which is a growing mode of communication in Indonesia and, given the country's sizable population and geographical spread, is probably the most efficient mode of communication.

The specific features of the proposed grievance mechanism's MIS system are as follows:

- *Mobile phone-based system* whereby mobile phones are distributed to community and mobile grievances agents (not to beneficiaries directly, who would have face to face contact with these actors). These agents would then have the ability to upload complaints data directly to the national data base in real-time through mobile applications from their smart mobile phones.
- In areas with poor mobile-phone coverage, an *alternative system based on regular internet is set-up at the district level* to allow district-level operators to manually input complaints data collected by community and mobile grievance agents through complaints forms.
- To ensure that operators, district and national grievance officers take action according to their tasks based on the time allocated for each transaction, the *MIS system will have an automatic prompt system by email and SMS to remind them to perform their tasks.*
- *Programme websites will have a feature of on-line complaint forms* to allow beneficiaries and non-beneficiaries to submit complaints by completing the complaint forms on-line.
- The *national database* will store information on the category of complaints; locations, identity and timing of complainants; and how these complaints are resolved.
- *On-going maintenance and IT support* to ensure smooth operation of the system and sustainability over a longer period of time.

### Responding to complaints

The system would be designed to **allow most complaints** (those relating to general technical or delivery problems, or complaints caused by poor understanding of how the programmes work) **to be resolved as close as possible to receiving points**, by community or mobile grievance agents.

**At the district programme office** in the relevant *dinas* offices, **a grievance officer would be trained and tasked with processing complaints that require case-by-case investigation and coordination with other *dinas* offices.** With an integrated MIS system, these officers will receive the complaints directly through their system and upload their responses to the system.

**At the national level, trained grievance officers would be tasked to handle more complicated complaints on corruption and targeting.** As in the district offices, complaints under this category will be automatically referred to the national office for solution within a set period of time (with responses sent back to the complainants through community and mobile grievances centres).

### Socialisation programme

The proposed socialisation programme will have three objectives: firstly, to improve community awareness of the workings of social protection programmes; secondly, to improve community awareness of their grievances mechanisms; and, thirdly to encourage them to use these mechanisms in cases where they have complaints or grievances. **The targeted audience for the**

**proposed socialisation programme are communities at the grass root level.** Given this target, the overall approach of the socialisation programme is focused on community-level activities.

The main suggested aspects of the socialisation campaign would include:

- *On-going efforts* and not only limited to a meeting at provincial or district level at the initial launch of the programme.
- *Dedicated socialisation agents at community level*, trained to provide information on the social protection programmes and who can organise on-going socialisation activities.
- *Make socialisation materials simple and visually engaging, written in an understandable format and language and focusing on the specific information needs of community members:* eligibility criteria and targeting process; Charter of Rights and Responsibilities; any conditionalities attached to the programme, e.g. for PKH; payment procedures; who the contact people are for the programme, and how to contact them; information on the community committees involved in processing grievances.
- *Taking advantage of local cultural events or celebration of holidays to convey or disseminate information* to a large number of concentrated audiences.
- *Work with local media, including call-in talk shows and radio dramas.*
- *Developing Community Empowerment Programmes* for the medium and longer-term period to enhance communities' awareness on their rights and to empower them to express complaints and grievances on social protection programmes and other development programmes.
- *Conduct regular Knowledge, Aptitude and Perception (KAP) surveys* to both provide inputs into the needs and design of socialisation programmes and subsequently measure their effectiveness.

### **Improving local government's (LG) ownership of national social protection programmes**

The **level of LG ownership will increase if the LGs can participate or they have some control over the programmes** – that they are a part of the programme, not just “passive participants”, and that the programmes are “theirs”, not just central governments.

Based on fieldwork findings and experience from PNPM, examples of how LG ownership could be increased include:

- *Reviewing lists of beneficiaries:* currently perception is programmes only create more problems that LGs, not the CG, then have to deal with. Involving LGs in developing the list of beneficiaries could increase ownership.
- *Recruiting facilitators:* allowing the LGs (as the ‘user’) to be on the panel when recruiting field facilitators./agents/etc.
- *High profile and wide-spread socialisation campaign:* not just to inform people about their rights and the programme rules, but also to show the importance of the programmes to help the poor and support development in the districts. This would also increase citizen demand for LGs to implement programmes effectively and in line with their design.
- *Capacity building:* dinas offices should get training on key variables that should be monitored and how to monitor them, and supervise the field staff, as well as on how to deal with problems or complaints, and provide feedback to central government (reporting).
- *Increased budget allocation and M&E on behalf of LGs:* as a consequence of increased ownership.
- *Enhancing incentives and sanctions:* e.g. performance based incentives based on measurable targets.

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