

ADB Safeguard Policy Review Update – Phase 2 Regional Consultation Summary: Stakeholder Engagement, Information Disclosure and Grievance Redress Mechanisms

15, 17-19 January 2022

Disclaimer: The views expressed in this document are the views of the author/s and do not necessarily reflect the views or policies of the Asian Development Bank, or its Board of Governors, or the governments they represent. ADB does not guarantee the accuracy of the data included in this document and accepts no responsibility for any consequence of their use. The countries listed in this document do not imply any view on ADB's part as to sovereignty or independent status or necessarily confirm to ADB's terminology.

I. BACKGROUND

1. The Asian Development Bank (ADB) is undertaking a comprehensive review and update of its 2009 Safeguard Policy Statement (SPS).¹ The update process has been initiated by ADB Management following a Corporate Evaluation of the SPS by ADB's Independent Evaluation Department (IED), completed in May 2020 (IED Report).² The update will build off the findings and recommendations of the IED report, which ADB Management endorsed. Overall, the policy update will seek to strengthen safeguard implementation effectiveness and efficiency, in ways that will enhance beneficial safeguards outcomes for the environment and affected people.

2. The revised safeguard policy (the Policy) is expected to be ready for ADB Board consideration in 2024, following a process of further reviews, policy development and meaningful stakeholder engagement. As a part of this process, ADB is undertaking a series of brief analytical studies, which will benchmark ADB's current SPS against the policies of selected multilateral financial institutions (MFIs) and also briefly consider implementation experience.³ The studies will inform the development of the new safeguard policy and will be provided for stakeholder review and consultations.⁴ Stakeholder engagement and consultation will have three main phases: Phase I—preliminary information and outreach on the overall approach for the policy update and stakeholder engagement plan (SEP); Phase II—consultation on the analytical studies; and Phase III—consultation on the draft policy paper. The objective of Phase II consultations, currently being conducted, is to obtain a better understanding of the views of stakeholders on safeguards implementation challenges and good practices, as well as recommended policy directions. This document provides a summary of the consultations for the analytical study on Stakeholder Engagement, Information Disclosure and Grievance Redress Mechanism (SEID).

II. PROCEEDINGS

3. The online regional consultations for the SEID Standard were conducted on 14, 17-19 January 2022. Five sessions were organized in various time zones to allow participation of ADB's developing member countries (DMCs), other ADB regional and non-regional members, as well as civil society organizations (CSOs) and non-governmental stakeholders.⁵ A total of 80 non-ADB stakeholders participated in the five sessions, where each session ran for more than two hours, providing ample time for discussion. The main language used in all sessions was English and simultaneous interpretations were provided.⁶ Consultation materials were provided to the participants in advance, and these were translated into various languages.⁷

4. The agenda for the five sessions followed a similar format, starting with a welcome message from Bruce Dunn, Director of the Safeguards Division (SDSS), Sustainable Development and Climate Change Department (SDCC). Zaruhi Hayrapetyan, Social Development Specialist, SDSS/SDCC, and Elizabeth Mann, Lead Social Safeguards Consultant (ADB), presented the summary of the current policy provisions, policy update process and SEID Analytical Study. A moderated discussion followed, where participants were

¹ ADB. 2009. [Safeguards Policy Statement](#). Manila.

² ADB. 2020. [Evaluation Document: Effectiveness of the 2009 Safeguard Policy Statement](#). Manila.

³ The studies are intended to complement the evaluation completed by IED in May 2020 and will not duplicate IED's work on the overall effectiveness of the SPS.

⁴ The update process is guided by [SEP](#).

⁵ The five sessions were for: (i) DMCs in South, Central and West Asia; (ii) DMCs in East and Southeast Asia and the Pacific; (iii) CSOs and non-governmental stakeholders in South, Central and West Asia; (iv) CSOs in East and Southeast Asia and the Pacific; and (v) for CSOs in North America and Europe.

⁶ Languages available for simultaneous interpretations were Hindi, Urdu, Russian, Bahasa Indonesia, Chinese, Khmer, Lao, and Vietnamese

⁷ The analytical study and presentations are available in English, Hindi, Russian, Chinese, and Bahasa Indonesia.

provided space to ask questions and give their input for the policy update. The session ended with a brief event evaluation and a synthesis by Bruce Dunn.

5. In his welcome message, Bruce Dunn emphasized that SEID is one of the most critical topics for the new policy as it aims to better ensure that projects do not adversely affect people, communities, and the environment. He shared some findings from the IED evaluation report related to weaknesses in stakeholder engagement, meaningful consultation, documentation, timely disclosure, and functioning of project level grievance redress mechanisms (GRM).

6. Zaruhi Hayrapetyan presented the overview of SEID under the SPS and its update process. She highlighted the key policy principles and requirements for consultation, disclosure, and GRM. She discussed the special disclosure requirements for draft environmental impact assessment (EIA), involuntary resettlement (IR), and indigenous people (IP) frameworks and plans, including monitoring reports and demonstration of a broad community support (BCS). She also discussed several recommendations from the IED Report, which includes (i) the adoption of an integrated approach covering environmental and social dimensions; (ii) development of a separate policy standard for stakeholder engagement; (iii) preparation of SEP; (iv) considering a shorter disclosure requirement for non-sovereign operations; and (v) improvement of guidance materials and training for staff, borrowers, and clients.

7. Elizabeth Mann presented the results of the gap analysis that was undertaken to better understand ADB's current SPS policy provisions for SEID compared to those of other MFIs. This led to a discussion of key issues that are for consideration during consultations.

III. KEY TAKEAWAYS AND DISCUSSION

8. In the moderated discussion, participants were encouraged to share perspectives or recommendations for improving SEID. A set of questions and issues were shared to guide participants in formulating their views, particularly: (i) main challenges with meaningful consultation and stakeholder engagement for a project; (ii) aspects of the policy to be changed or strengthened to enhance meaningful consultation, stakeholder engagement and GRM; (iii) a separate standard for SEID; (iv) different GRMs for different scope and stakeholder categories; (v) flexibility in the GRM update ; (vi) timing, duration, language and content of the disclosure .

9. The discussion elicited important topics from participants: safe spaces; concern for human rights; explicit language against coercion, intimidation, reprisal and retaliation; information disclosure by financial intermediaries (FIs), sub-projects and sub-investments; disclosure of commercially sensitive information; relevance and risks of a shorter disclosure period; various challenges in implementing meaningful consultation; indicators for measuring meaningful consultation; confidentiality of complainants; assessing the effectiveness of GRM, involvement of the youth, different vulnerable groups including persons with disabilities through a thorough stakeholder mapping; use of simpler language, accessible format and sensitive to the needs of persons with disabilities; role of clients and sub-clients in informing project-affected communities about ADB's Accountability Mechanism; roles and expectations from social and environmental specialists in the preparation of a SEP; role of international consultants, high turnover rate, and lack of accountability; need for DMC level capacity building and consistent guiding materials and templates; among others.

10. Most of the participants agree that meaningful consultation is difficult to measure as it lacks specific requirements or determinants as to what makes any consultation meaningful. There is inconsistency in implementation due to absence of guidance documents; differences in interpretations; and lastly, variations in cultures, traditions, and legal/societal structures of borrower states. While the SPS already defines meaningful consultation as a process that is

undertaken in an atmosphere free of intimidation or coercion, some situations remain challenging. It was proposed to have a clear position on reprisals and risks of retaliation in the updated policy.

11. There were recommendations made by the participants to further enhance meaningful consultation and stakeholder engagement. The most notable of these are (i) the adoption of human rights approach to safeguards that unequivocally states a commitment to respecting internationally recognized human rights standards; (ii) ensuring inclusive participation during the pandemic where online platforms are the preferred means of consultations rather than community gatherings; (iii) involving the youth sector and different vulnerable groups in the stakeholder mapping; (iv) develop guidance materials and templates and conduct continuous capacity building of the DMCs; and (v) linking with universities to keep them abreast of the evolving standards so they can better design their curriculum and produce market-ready graduates.

12. On improving GRM, the participants were looking forward to seeing a more specific and mandatory language around strengthening public consultation and GRM to avoid being regarded as mere window dressing. There was also a suggestion to adopt the United Nations (UN) Guiding Principles on Business and Human Rights (Principle 31) for assessing the effectiveness of GRM more consistently. There were points raised around keeping complaints confidential, involving the union representatives, use of online technologies, lifting of the prescriptive period for hearing complaints under the ADB Accountability Mechanism, ensuring stakeholders are informed by borrowers/clients about social safeguards and standards and their right to seek redress of grievances through the accountability mechanism (AM).

13. There were also recommendations to review the information disclosure policies and current practices of FIs, sub-projects and sub-investments, and the rationale for shortening of the information disclosure requirement.

14. Generally, a separate standalone ADB standard on SEID was warmly received by the participants. However, there was a caution to not create an additional administrative burden on the borrowers. There were also concerns as to whose role it is to prepare the stakeholder engagement plan.

15. It was assured that ADB, as an organization, recognizes the importance of maintaining and respecting human rights and pointed out that these are areas that are carefully being considered in the context of the new policy. Although meaningful consultation under the existing safeguard policy is defined as one that is free of coercion or threat of intimidation, the new policy is envisioned to include a clear language around assessment and management of risks and prohibition on the use of intimidation or retaliation to project-affected people. It was acknowledged that there was a need to have clearer guidance where there is use of security forces for peacekeeping purposes but not in the context of public consultations. ADB agreed on a need for clear guidance for staff and undertook to compare that of the Inter-American Development Bank (IDB).

16. ADB announced further studies and a separate consultation later this year around different financing modalities which will include financial intermediary. Concerns regarding information disclosure by FIs will be discussed further during these meetings.

17. ADB agreed that the current policy lacks the specific requirements and operational details to determine meaningful consultation. ADB is committed to developing guidance documents and toolkits for each one of the standards within the new policy.

18. On GRM, ADB relayed an ongoing joint outreach program between AM and Safeguards Division that aims to build greater awareness of the continuum between the

safeguards process and accountability. There is also an ongoing discussion to work more on outreach and require ADB clients, both sovereign and non-sovereign, as well as financial intermediaries to provide information and to support awareness raising with affected people and other stakeholders about the AM.

19. On the preparation of a SEP, while ADB emphasized that there is no final decision yet as to how it will be executed, it is also looking at integrated risk assessment with both social safeguards specialists and environmental specialists working together in close coordination.

20. ADB pushed for the harmonization agenda among MFIs to create common and internationally good practice standards.

IV. EVALUATION AND WRAP UP

21. The moderated discussions were followed by a quick evaluation exercise. In all five sessions, the majority of the participants gave a rating of 4 (effective) or 5 (highly effective), on a scale of 1 to 5. Only a few participants rated the five sessions lower than 3 with written suggested comments to improve the consultations documented in Menti.com.

22. The synthesis for each consultation included a summary of key points and questions raised by participants. It was followed by an overview of next steps and a reminder to send ADB further suggestions and recommendations in writing.

Session recordings can be accessed here:

1. 14 January 2022: Government Stakeholders in East Asia, Pacific, and Southeast Asia
<https://events.development.asia/node/50531>
2. 14 January 2022: Government Stakeholders in South Asia and Central and West Asia
<https://events.development.asia/node/50536>
3. 17 January 2022: CSOs and other Non-Governmental Stakeholders in East Asia, Pacific, and Southeast Asia
<https://events.development.asia/node/50541>
4. 18 January 2022: CSOs and other Non-Governmental Stakeholders in South Asia and Central and West Asia
<https://events.development.asia/node/50546>
5. 19 January 2022: CSOs and other Non-Governmental Stakeholders in North America and Europe
<https://events.development.asia/node/50551>

FEEDBACK FROM STAKEHOLDERS

Disclaimer: In view of transparency, the feedback was documented based on the manner of delivery or sharing of the stakeholders, though some feedback was edited for brevity and clarity. They are categorized by topic and reflect questions, comments, conclusions, and recommendations of stakeholders. All the feedback is discussed in the interactive session that is part of the consultations.

1. Stakeholder engagement, meaningful consultation, and community participation

- There is difficulty in determining whether a consultation was meaningful, even when it already gathered broad support from the community and was conducted in a culturally appropriate manner. There should be concrete indicators that could measure meaningful consultation, especially when the indigenous peoples (IPs) are involved.
- ADB should involve the youth sector as part of meaningful participation of stakeholders, especially those coming from the IP community.
- One of the things that is lacking in the current discussions is the issue of consultations during the time of pandemic. There must be some discussions on how to do meaningful consultations using online platforms especially for vulnerable groups, such as IPs.
- The guidance on conducting meaningful consultation during the pandemic should be shared with the civil society organizations (CSOs) and their feedback should also be gathered to improve the document and the process.
- The Independent Evaluation Department (IED) Report (para 59, page 25)⁸ states that there is a lack of ownership on consultation because of reliance on outsourcing practices to independent third-party consultants. It further stated that such practice poses several issues, notably, trust issues with affected communities due to high turnover rates, lack of accountability and ownership by the borrowing entity, and underperformance in monitoring. This was not highlighted in the study nor in the presentation. If the ADB adopts a stand-alone standard without first addressing the structural issue, it is highly likely that this problem will persist. How will ADB address this issue?
- Using military force, barbed wire, and other tactics to prevent participation of affected people who wanted to raise their opinion about a project are true. Project affected people do not always know that a proposed project is supported by the ADB. The information may be available on the website in English, but it does not reach the affected people. How does reducing the disclosure timeline improve stakeholder engagement?
- The main challenges around meaningful consultation and stakeholder engagement include failure to show the detailed engineering design, not incorporating comments/feedback into the project detailed engineering design, and lack of participation from the project implementation consultants during the consultation.
- There is a need for guidance on stakeholder engagement during ongoing implementation and monitoring of a project.

⁸ ADB. 2020. [Effectiveness of the 2009 Safeguard Policy Statement](#)

- There is a need to see a more specific and mandatory language around strengthening public consultation and grievance redress mechanisms (GRM) to avoid it being regarded as mere window dressing.
- Making a list of stakeholders, which must be consulted (stakeholder mapping), was suggested to improve stakeholder engagement activities.
- Who would be responsible for preparing the stakeholder engagement plan-- is it the responsibility of the environmental specialist or the social specialist?
- ADB should promote nondiscrimination in the Safeguard Policy Statement (SPS) and make it compulsory for the borrowers. Persons with disabilities should be included from the earliest stages of project conceptualization and design, as well as on stakeholder engagement and in all forms of consultations. More specifically, project documents should use accessible formats and simpler language that are responsive to the needs of persons with disabilities.
- What mechanisms should be available to ensure timely and effective community consultations?
- Experiences as a foreigner engaging with locals for stakeholder dialogue and engagement were shared. The ADB consultation guidelines are effective. Should international consultants participate in consultation meetings with local stakeholders?
- The importance of conducting consultation at the grassroots level, especially with the directly impacted population was emphasized. The involvement of the ADB project staff during consultation meetings was recommended to improve community engagement and provide clarity in stakeholder engagement at the project level.
- Strengthening the current SPS is important as well as identifying gaps with country laws. The need to disclose information as early as possible was emphasized, and the enforcement of SPS over country policies should be considered especially for countries with laws that weaken the requirements for stakeholder engagement, information disclosure, and the fundamental rights of certain populations and their access to public decision making. It is important that the ADB includes in the revised policy that client follow the safeguard policy instead of defaulting to the law of the country, which has been the case based on observation.

2. Information disclosure and transparency

- On information disclosure for financial intermediaries (FIs), would ADB at least match the best practice of its peers in disclosing the very minimum (name, sector, location of high and medium risk sub-projects funded via financial intermediaries) in its revised policy? A study by Recourse in 2021 showed that ADB does not have much information about where some \$6 billion worth of money lent to FIs ends up on the ground. The lack of transparency is a big barrier to accountability, participation, and effective consultation. ADB is a little more risk averse compared to International Finance Corporation (IFC), for example. However, there is a risk where subprojects are being mis-categorized to Category B when they should have been categorized as A.
- The issue of full disclosure of environmental impact assessment (EIA) documents was raised. These documents are not easily accessible to affected people. ADB should require consultation reports, financial information, records of violations, and results of monitoring to be made public.

- The reduced number of days from the current 120-day disclosure requirement for the EIA was disagreed. The number of days for disclosure should be increased given that informal workers and IPs, for example, would require more time to grapple with the technicalities of the report. CSOs would also need more time to gather and hold consultations with their constituencies.
- NGO Forum looked at several FI energy projects in the Private Sector Operations Department (PSOD) and shared the findings related to information disclosure. They found that only two projects had disclosed environmental and social management system (ESMS) arrangements and two gender action plans (GAPs) over a 10-year period. There was no disclosure in terms of subprojects and sub-investments, and basic project information are not being disclosed at the public domain.
- One project under blue bond portfolio on recycling polyethylene terephthalate (PET) bottle does not state any social impact especially on waste workers and waste pickers. The PET bottles are already a high demand product and contribute significantly to informal waste workers and waste pickers' income. However, the potential impact of the project to them was not stated.
- ADB should make sure that stakeholders know the social safeguards and standards so that they are aware when these are violated. It could make the GRM more effective since the stakeholders already know what to do in case of violations or shortcomings.
- ADB policy on stakeholder engagement and information disclosure should not primarily focus on harmonization with other multilateral financial institutions (MFIs) but ensure timely disclosure of project information so environmental and social harms are reduced and safeguards are ensured. To illustrate, the NGO Forum's own analysis of PSOD's portfolio from 2010-2020 was shared, where 99 of the 306 approved projects are categorized as FI projects. Out of 99 FI projects, there were only two projects that had disclosed ESMS arrangements, two GAPs, and two project completion reports. Further, out of the six FIs in the energy sector, only one released its ESMS arrangement. The remaining five FIs cited confidentiality clause and reasoned that releasing the information is against their business interest. It's a lot of hard work at this point to find a solution to the FI information disclosure problem.
- There is a lack of awareness of local communities on the impacts of projects on their assets and livelihoods as evidenced in the Kolkata Environmental Improvement Project. The local communities were not compensated because only one consultation took place in a marketplace which only had representatives from a particular area and not the actual affected people who are street vendors. Project-related information and environmental and social impacts from the hydropower were not explained properly to the local communities. It is important for stakeholder engagement and information disclosure to be done together, and not in silos.
- Documents containing publicly disclosed information should be treated as living documents. Adopting the United Nations Development Programme (UNDP) human rights and business principles was suggested.

3. Grievance redress mechanism and accountability mechanism

- ADB should adopt a consistent approach to assessing the effectiveness of GRM as indicated under the United Nations (UN) Guiding Principles on Business and Human

Rights, Principle 31⁹ which offers a set of effectiveness criteria, including factors such as legitimacy, transparency, and predictability. ADB may take stock of the wider landscape of GRMs that might be available at local level and other levels, including ADB's own role in making the remedy system work.

- ADB was commended for requiring bank clients to establish project level GRMs. ADB should go further by requiring clients and sub-clients to inform project-affected communities about ADB's own accountability mechanism (AM). Requiring clients to inform communities about the mechanism during project consultation processes or other interactions is a simple way to improve the AMs accessibility to communities. Other MFIs that had updated their policies included similar provisions in their recent safeguards reviews. It would be a missed opportunity for ADB not to make sure that clients are helping with outreach about the accountability mechanism, and it would put ADB behind the curve of what other MFIs are already doing.
- An experience with an ADB-funded project in Himachal, State of India was shared, where a complaint was filed but it was dismissed because the grant has been closed. The lifting of the prescriptive period in the ADB Accountability Mechanism to allow complaints to be heard was recommended. Suggestions made include keeping complaints in the GRM confidential; involving union representatives in redress mechanisms; and using online technologies for consultations, outreach, and other processes.
- GRM must be accessible. How can ADB ensure cultural and language appropriateness in the use of GRM? There needs to be a meaningful resolution of complaints in the GRM, as well as safeguards for the confidentiality of complaints submitted.
- On GRM, it was observed that the private sector is not trained to handle GRM as seen in ADB reports and complaints. In fact, it may be against the private sector's interest to handle and settle complaints. ADB must strengthen independent complaints mechanisms and enhance obligations in the safeguards or contracts as per business and human rights law.

4. Human rights

- There are trends in the region in terms of constraints on freedom of expression and freedom of association, which can negatively impact the prospects for effective stakeholder engagement. The UN Human Rights Office submitted their comments in April 2021, which included a couple of case studies that highlighted some of these concerns. One of those case studies involved a UN Special Rapporteur on Extreme Poverty who was in Laos in September 2009 and subsequently disappeared and has not been seen since then. A University of Wyoming study was also shared that looked at some of these human rights issues in relation to borrower countries like India, Thailand, Philippines, and People's Republic of China.
- A human rights approach to safeguards was recommended. ADB should have an unequivocal statement in the policy that it is committed to respecting internationally recognized human rights standards. Stakeholder engagement, information disclosure, and grievance redress mechanism (SEID) should be drawn from international human

⁹ United Nations Human Rights Office of the Commissioner. 2011. [Guiding Principles on Business and Human Rights](#).

rights law and the country's constitutional or national laws, whichever sets the higher standards.

- The importance of identifying affected communities was highlighted, particularly the informal workers (waste workers, for example), in country poverty analysis report and sector reform programs so that avoidance and other mitigation measures that respect their human rights can also be identified beforehand.
- The UN Human Rights Office published a report on remedy and development finance.¹⁰ A separate conversation with ADB was suggested.

5. Reprisals and retaliation

- Issues of intimidation and reprisal were not discussed in the background material and presentations. There should be an explicit policy commitment and zero tolerance against intimidation reprisals in the SPS. It should also include detailed policy guidance for the staff and clients.
- ADB was appreciated for its effort to actively put into consideration an internal guidance around the issue of retaliation.
- An ADB operational administrative order covers how assessment should be done when retaliation takes place. What is missing is some guidance on how bank staff should respond to prevent it rather than how they should be evaluated afterwards. ADB should look at European Bank for Reconstruction and Development (EBRD) as a reference, particularly two papers—a public statement and the guide for staff. Will the ADB policy have an explicit statement on non-retaliation?
- The revised policy should ensure and guarantee a safe space for stakeholder consultations, provisions such as the involvement of military or police during consultation meetings can be included in the prohibition list and other relevant standards.
- On the use of various social media platforms for consultation and stakeholder engagement, these media make it easy for individuals to participate in interviews and surveys without the fear of reprisal.
- How will ADB address situations where there are limitations for people to engage (i.e., due to restrictions by authorities) or there are reprisal and retaliation risks? Who will carry out the contextual risk assessment? How is it conducted and who will be involved? The at-risk stakeholders themselves are a very important part of the process.

6. Implementation issues

- The policy will be implemented across 60+ countries with significant differences in culture, traditions, and societal structures. How will the policy be uniformly implemented across these countries? What are the minimum set of skills and experiences of those for developing and implementing the stakeholder engagement plan (SEP) and conducting consultations?

¹⁰ United Nations Human Rights Office of the High Commissioner. 2022. [Remedy in Development Finance: Guidance and Practice](#).

- Disappointment was expressed over the local EIA process. ADB should provide better safeguards and grievance mechanisms. However, the “avoid, minimize, compensate” under the 2009 SPS led to avoidance of Category A projects by ADB and provided the opportunity for the entry of other financing institutions whose safeguards were not as robust as ADB safeguards. Because of avoidance of certain projects, ADB now has fewer Category A Projects. This avoidance by ADB has left communities in a worse off situation as these projects are being implemented without safeguards at all. Is it possible to ensure equal protection and meaningful consultation to affected people no matter who is funding the project? Will the country safeguards system give equal safeguards to all communities across a country?
- Coordination issues during project formulation in Cambodia were shared, where consultants were not properly coordinating with relevant government agencies, particularly during consultation meetings on matters of compensation and resettlement of affected communities. There is a lack of specific requirements to ensure compliance with meaningful consultation. Very often, the resettlement safeguard specialist from ADB prescribed different standards. Compliance becomes difficult because of the lack of consistency. The lack of consistency in the implementation is due to the lack of guidance notes or toolkits for SEID to guide implementing agencies during implementation. Further observations are as follows: (i) ADB is asking for the level of details irrespective of the level of risks and impacts. The same format and level of detail are required for a project with 15 affected households and for the projects with 500 affected households; (ii) a clear set of guidance notes will resolve such operational requirements; (iii) a common guidance document will improve the quality of implementation and monitoring of the SEID requirements; and (iv) in the event that ADB decided on the standalone stakeholder engagement policy, it must not create an administrative burden on the borrowers through duplication.
- Policies and standards are not uniformly implemented on the ground. There are variations in actual practice because there is no perfect recipe for an effective stakeholder engagement. Standard operating procedures must be developed. Universities must keep up with the evolving standards and safeguards so they can produce market-ready graduates.
- MFIs can fill in the gap when state policies are inadequate in enforcing social and environmental safeguards. For projects seeking support from ADB or other MFIs, some states may restrict stakeholder engagement, expression of grievances, seeking redress, or may not fully divulge all material information, but the MFIs can enable these processes for transparency and accountability.