

Development Bank of Southern Africa (DBSA)

Independent Grievance Redress Mechanism (IGRM)

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The Development Bank of Southern Africa (DBSA) is a development finance institution, wholly owned by the Government of South Africa and established in 1983. Its core mandate is to drive economic growth and foster regional integration by financing sustainable development projects across the African continent. The DBSA mobilizes and allocates financial resources to support infrastructure planning and development in emerging economies. To uphold accountability and transparency, the Bank established the Independent Grievance Redress Mechanism (IGRM) in March 2018, later revised in July 2020. The IGRM provides an impartial platform for individuals or groups to voice concerns related to DBSA-financed projects, particularly regarding potential environmental and social impacts.^{1 2}

STANDARDS AND SAFEGUARDS

The DBSA bases its complaints handling process on its Environmental and Social Safeguard Standards (ESSS). These standards are tailored to DBSA's mandate while aligning with international frameworks such as the World Bank's Environmental and Social Framework (ESF), the IFC Performance Standards, the Equator Principles, and other relevant global conventions. The ESSS encompass 11 thematic areas, including stakeholder engagement, labor, displacement, and biodiversity, among others.³

LAND TENURE

Land tenure grievances—such as those involving ownership, access, use, eviction, or displacement—are explicitly addressed under **ESSS Standard 5: Development-Induced Displacement and Resettlement**. This standard applies to individuals with formal, customary, or informal land rights and requires a thorough assessment of impacts, as well as meaningful community engagement.

Given South Africa's history of forced community resettlement under apartheid, the DBSA exercises particular caution when supporting projects that involve displacement. Over its three-decade history, the DBSA has rarely financed projects requiring involuntary resettlement. Land-related grievances may be formally submitted through the IGRM.

When land tenure rights are affected, ESSS 5 mandates fair compensation, livelihood restoration, and inclusive resettlement planning. Involuntary resettlement, where unavoidable, must be minimized and

¹ DBSA. n.d. About us. <https://www.dbsa.org/about-us>

² DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

³ DBSA. 2022. Environmental and social safeguard standards. <https://www.dbsa.org/sites/default/files/media/documents/2023-02/DBSA%20Environmental%20and%20Social%20Safeguard%20Standards%202022.pdf>

carried out with appropriate safeguards for all affected persons. Forced evictions are explicitly prohibited.⁴

OUTREACH AND ADMISSIBILITY

The IGRM maintains a website that provides basic information and contact details.⁵ According to policy, the Strategic Stakeholder Management Department is responsible for promoting awareness of the mechanism both internally and externally through various communication channels, although no specific outreach examples are currently available.⁶

Complaints submitted to the IGRM are considered admissible if filed in good faith by individuals, communities, or their authorized representatives who believe they are, or may be, adversely affected by an active DBSA-financed project. Submissions must clearly describe actual or potential physical, economic, social, or environmental harm and must be filed within two years of either the complainant becoming aware of the issue or the project's closure—whichever occurs first. Representatives must provide proof of authorization, and all complaints must include the complainant's contact information and any relevant supporting documentation.

The IGRM excludes complaints that fall outside its mandate. These include anonymous submissions without identifiable complainants—unless a request for confidentiality is justified and approved—issues unrelated to active DBSA-financed projects, and complaints submitted more than two years after the issue arose or following project closure. The mechanism also does not consider grievances related to unsuccessful funding or procurement decisions, matters previously concluded without new evidence, attempts to gain a competitive advantage, or challenges to DBSA's internal administrative matters or policies. Allegations of fraud, corruption, criminal activity, or gender-based violence and sexual exploitation and abuse must instead be reported through DBSA's whistleblower channels.⁷

FILING A COMPLAINT

The IGRM framework encourages project-affected parties to first raise concerns through the project-level grievance mechanism. If this mechanism fails to provide an adequate response, the complainant may escalate the matter to the IGRM.⁸

Complaints must be submitted in writing and may be in any official language. If not submitted in English, the IGRM will arrange for translation and may extend timeframes as needed. Submissions are accepted via the DBSA online system, email, post, or hand delivery to the DBSA offices.⁹

At a minimum, complaints should include the complainant's name, contact information, the name and location of the project, a description of the harm, the desired outcome, and any confidentiality

⁴ DBSA. 2022. Environmental and social safeguard standards. <https://www.dbsa.org/sites/default/files/media/documents/2023-02/DBSA%20Environmental%20and%20Social%20Safeguard%20Standards%202022.pdf>

⁵ DBSA. n.d. Independent Grievance Redress Mechanism. <https://www.dbsa.org/about-us/igrm>

⁶ Section 11 DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

⁷ Section 7 DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

⁸ Section 12. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

⁹ Section 8. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

requests.¹⁰ The DBSA maintains a zero-tolerance policy for retaliation and takes follow-up action on any credible reports of threats, harassment, or intimidation.¹¹

DESCRIPTION OF THE PROCESS

The IGRM addresses complaints through two distinct mechanisms: **Compliance Review (Investigation)** and **Problem-Solving**.

The **Compliance Review**¹² process handles grievances involving potential violations of laws, DBSA policies, procedures, or project commitments. It begins with the IGRM Committee assessing whether the complaint meets eligibility criteria. If deemed eligible, the Committee recommends a review to the IGRM Chairperson, who decides within 30 days whether to authorize it. Upon approval, a Compliance Review Panel is established to investigate the complaint based on defined Terms of Reference. The Chairperson's decision, along with a summary of the recommendation, is communicated to the complainant and relevant parties and may be published, subject to confidentiality considerations.

The Compliance Review Panel conducts its investigation in accordance with the Terms of Reference and within a designated timeline. The Panel may gather additional information, consult stakeholders, visit project sites, and engage external experts. Within 30 days of completing the investigation, the Panel prepares a draft report outlining its findings and recommendations. This draft is shared with DBSA's governance structures for factual comments, which must be provided within 21 business days. The Panel then finalizes the report and submits it to the IGRM Chairperson. The final report is shared with the complainants, published online, and used by the Chairperson to formulate a response and develop an action plan based on the findings.

The implementation of the action plan is overseen by the Monitoring and Evaluation Committee for up to three years through consultations, site visits, and document reviews. Annual progress reports are submitted to the IGRM Committee and published on the website. A final report concludes the process at the end of the monitoring period.¹³

The **Problem-Solving process**¹⁴ is a voluntary, non-adversarial mediation led by the IGRM Chairperson. All relevant parties—including complainants, DBSA representatives, project promoters, and other stakeholders—are invited to participate. The goal is to collaboratively resolve the grievance without assigning blame. The process is participatory, flexible, and conducted according to a mutually agreed timeline. To ensure impartiality, an independent mediator may be appointed.

If mediation is successful, the IGRM prepares a Problem-Solving Report within 30 days, documenting the agreed outcomes. This report is shared with the Chairperson and all involved parties. The Chairperson then decides whether to approve the recommended actions; if not approved, written reasons must be provided. The problem-solving process should ordinarily conclude within one year unless extended by

¹⁰ Section 9. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

¹¹ DBSA. n.d. Statement Against Retaliation. <https://www.dbsa.org/statement-against-retaliation>

¹² Section 10.1. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

¹³ Section 13. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

¹⁴ Section 10.2. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

mutual consent. If progress stalls or becomes inefficient, the IGRM may terminate the process in consultation with the parties.¹⁵

Implementation of the agreed outcomes is monitored by the Monitoring and Evaluation Committee, in consultation with the relevant parties.

Relevant documentation, decisions, and reports will be shared with all participating parties. All publicly disclosed IGRM reports—including eligibility decisions, problem-solving agreements, compliance reviews, and monitoring reports—will be translated into the complainant’s preferred local language, along with any other documents needed to ensure effective communication and transparency.¹⁶

¹⁵ Section 10.2. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>

¹⁶ Section 14. DBSA. 2020. Independent Grievance Redress Mechanism. <https://www.dbsa.org/sites/default/files/media/documents/2021-02/DBSA%20Independent%20Grievance%20Redress%20Mechanism.pdf>