Activating Social Audits in Orissa
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Abbreviations and Acronyms

CYSD  Centre for Youth and Social Development
GP    Gram Panchayat
NGO   Non-Governmental Organization
NREGA National Rural Employment Guarantee Act
OREGS Orissa Rural Employment Guarantee Scheme
PRI   Panchayati Raj Institution
RTI   Right to Information
SAC   Social Audit Committee
TOT   Training Of Trainers
VMC   Vigilance and Monitoring Committee

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Summary

With the passing of the National Rural Employment Act (NREGA) in 2005, the Government of India established a landmark provision that enables communities to act as watchdogs on local level implementation of the Government’s flagship anti-poverty program. While the concept of ‘social audits’ builds on a great deal of experience in the country, the provisions in the Act have not been translated into clear guidelines. As a result, social audits of NREGA have tended to be driven through ‘high impact’ approaches led by civil society organizations and have been focused on exposing malpractice rather than improving implementation.

This paper discusses an initiative by the Centre for Youth and Social Development which sought to explore options to activate the social audit process in Orissa. The design draws on the provisions of the Act with a view to developing a sustainable model for the state. The pilot was conducted in six gram panchayats where the various stages of preparation, committee formation, auditing and reporting were developed. The paper highlights the importance of social audits as an instrument to support implementation, and in particular of raising awareness and ensuring clarity regarding the roles of various stakeholders. Taking this process forward demands a long term perspective, based on collaboration between the government and civil society that can develop the capacities of beneficiaries to ensure effective implementation at the local level.
National Rural Employment Guarantee Act

Purpose of the Act

The National Rural Employment Guarantee Act 2005 (NREGA) is an ambitious and visionary step towards ensuring the fundamental right to life with dignity in the rural areas of India. The Act is expected to enhance peoples’ livelihoods on a sustained basis by developing economic and social infrastructure in rural areas. It also empowers ordinary people to ‘monitor the execution of works’ through a village level social audit.1

Employment generation under NREGA has the potential to significantly contribute towards poverty alleviation in rural India. The following are the main objectives of the Act:

• Provide livelihood security to households in rural areas by providing at least one hundred days of guaranteed wage employment in a financial year to households whose adult members volunteer to do unskilled manual work.

• Create durable economic assets and strengthen the livelihood resource base of the rural poor.

Rights based development

The legislation marked a paradigm shift from previous wage employment programs, due to the adoption of a rights-based approach. In particular, the Act provides for employment on demand, payment of minimum wages within fifteen days of completion, and basic worksite facilities. In addition, the government is legally accountable for providing employment to those who demand it.

Role of the State

On the basis of the provisions set out in the Act, the states in the India Union are required to develop a state level Rural Employment Guarantee Scheme. In Orissa, the provisions of the NREGA are being implemented through the Orissa Rural Employment Guarantee Scheme (GoO 2006). At the local level, the scheme is implemented by the elected local government bodies. Rural households have a right to register themselves with the local government bodies to seek employment.

1 The provision are set out in Schedule 17 of the Act, http://nrega.nic.in/circular/Schedule17(1).pdf accessed 11.21.09
Importance of Social Audit in NREGA

**Significance**
Social audit is an ongoing process aimed at deepening beneficiary engagement at all stages of local level implementation, including planning, monitoring, and evaluation. This process helps to ensure that the project is designed and implemented in a manner that reflects the prevailing local conditions and priorities.

**Benefit of the Act**
Corruption and inefficiency are alleged to have prevented many Government schemes in India from fulfilling their potential. Mindful of this, the National Rural Employment Guarantee Act included the provision for social audits to be carried out by the village assembly (Gram Sabha) to promote transparency and public accountability.

Until the Act came into effect, the community members could only lodge a complaint to report issues or concerns. From this perspective, the right of an ordinary citizen to conduct a social audit on development work under the NREGA is a revolutionary step forward in Indian democracy. The Act empowers people to play an active role in promoting transparency through village meetings and participatory planning, and seeks to regulate the process of monitoring through the establishment of Social Accountability Committees and Vigilance and Monitoring Committees. Once the NREGA came into force, the Government of India issued operational guidelines that provided a broad operational framework for these provisions.

**Community monitoring**
Social Audits in NREGA share much in common with the concept of participatory evaluation in that it aims to supplement monitoring by external facilitators with community driven monitoring. Local monitoring strengthens the community’s capacity and promotes participation in development programmes. It brings ownership and facilitates more inclusive decision-making on issues important to the community members. It is also an important tool to generate awareness as well as generate demands from the community.

**Local Governance**
Local level government institutions (Panchayati Raj Institutions or PRIs) have been given a key role in implementing the Orissa Rural Employment Guarantee Scheme (OREGS). The effectiveness with which local government bodies fulfil their role largely depends on their ability to manage development projects and to make them responsive to local needs. In addition, grassroots institutions such as beneficiary committees, self-help groups and user groups can play a vital role in spreading awareness, mobilizing workers and in monitoring the implementation of the scheme.

The village governments (Gram Panchayats) play a critical role in scheme implementation at the local level.

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2 Panchayati Raj Institutions (PRIs) is system of governance that has 3 levels i.e. at the village (Gram Panchayats), block and district level in which Gram Panchayats are the basic units of local administration.

3 Gram Panchayat is the local government at the village level.
Activating Social Audits in Orissa

Context

Earlier Approaches

Various approaches have been developed to promote the social audit process in Orissa. These included information dissemination by the government and the high-impact approach of non-governmental organizations (NGOs). Dissemination of information by the government generates data on job registration and worksite facilities under the scheme. The high impact approach of NGOs is two-pronged; the mechanism hinges on information collected from beneficiaries, Gram Panchayat members and the members of the Block; and a ‘public hearing’ is carried out in the presence of Government officials and Panchayat members to lend transparency to the process.

Issues with earlier approaches

These approaches were only partially successful in terms of improving implementation during the first year of the scheme. Social audits were largely driven by civil society organizations, and the OREGS faced a great deal of criticism that claimed widespread irregularities and misappropriation of funds. In particular, the engagement of contractors was highlighted, despite the fact that private contractors were banned under the scheme. The contractors were often found to be acting in collusion with local political leaders to divert funds. Social audits highlighted a range of other issues, including: non-registration of workers, discrepancies in labour records (known as ‘muster rolls’), submission of incorrect and inflated utilisation certificates and lack of grievance redressal. These irregularities highlighted implementation failures, as well as more fundamental issues related to design.

Under the ‘high impact’ auditing approach, public hearings have tended to be viewed as a one-time event rather than an institutionalized process. Government and local government functionaries were often absent during the process and the participation of beneficiaries was often limited. Lack of awareness among communities regarding the audit process further undermined the potential for positive change. Rather than being a community driven process, social audits tended to be a technical processes led by external actors, most commonly non-governmental organizations or researchers. The post-implementation audit approach to detecting corruption was limited in terms of offering suggestions for follow up activities. This approach often led to opposition from local actors, and in some cases conflict.

The following year, investigation and corrective action by the state government showed some improvement in its performance indicators. However, gaps still existed and the implementation was particularly dismal in the poorest districts of Orissa. Due to the failure of these approaches, the Centre for Youth and Social Development (CYSD) felt the need to replace the post-implementation audit approach with preventive measures to establish a more sustainable process of community driven accountability and transparency at the local level.

Challenges

In the course of designing this new approach a number of key challenges were recognised.

- Inconsistent Process

There was no standard approach and central directives on procedures for social audits of OREGS, or any of which could be drawn from the national level Act. Rather, processes had evolved to reflect the needs and priorities of various actors. The guidelines prescribed the desirable outcome without specifying benchmarks. The official versions have been predisposed to meet statutory requirements rather than to enable communities to undertake social audit throughout the implementation of the project. The guidelines

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4 Block: is the intermediate level governing body for a group of Gram Panchayats
5 Three districts of Kalahandi, Balangir and Koraput known as KBK are the poorest and most backward districts in Orissa
6 CYSD (Centre for Youth and Social Development) is a non-governmental organization in Orissa
lacked the common understanding of forming an audit committee, its structure, composition, function and operations.

- **Weak Community Awareness and Participation.**
  Public indifference becomes a major bottleneck where there is a lack of clarity regarding the role of the community. There was little understanding and appreciation of the preventive role of social audits in minimizing corruption and upholding accountability. Limited community capacity, inadequate orientation to OREGS provisions, poor attendance in village meetings held by the local government body (called Gram Sabha)\(^7\) and a lack of clarity regarding new institutional structures pose a challenge to spearheading the social audit exercise at the grassroots.

- **Opposition**
  Violent opposition by powerful interest groups supported by local government functionaries was identified as another key challenge. The informants hesitated to provide accurate information for fear of reprisal. In general, record keeping at the local government level was irregular, which further accentuated the problem of ensuring availability of information to the public.

- **Access to information**
  The Right to Information Act is considered to be a powerful tool in the hands of the community to ensure the proper implementation of the Employment Guarantee Program (Box 1). Prior to passing this landmark Act, information disclosure in India was restricted by the Official Secrets Act\(^8\), and there was a tendency by the administration to use such provisions to restrict access to information. The greater the access to information, the greater is the responsiveness of government to community needs. The Right to Information (RTI) Act was believed to be an important instrument, which could enable communities to demand information from the Gram Panchayats and hold them accountable. However, there has been little integration of the Right to Information Act in the social audit initiative resulting in reluctance to share information records unless district functionaries insist and issue directives.

### Approach

The objective of this project was to explore ways to change the emphasis of social auditing, from the identification of malpractice to improving implementation. To do so, CYSD\(^9\) with support of the World Bank designed an incremental process-driven and community-led social audit model capturing the diverse dynamics and challenges of the scheme. This interactive pilot was aimed at improving community participation, establishing rapport with government agencies and strengthening the capacity of the community to supervise OREGS works. Most importantly,

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\(^7\) Gram Sabha: village meeting, public assembly  
\(^8\) Official Secrets Act 1923 is India’s anti-espionage act. The disclosure of any information that is likely to affect the sovereignty and integrity of India, the security of the State, or friendly relations with foreign States, is punishable by this act  
\(^9\) CYSD (Centre for Youth and Social Development) is a non-governmental organization in Orissa
the project set out to demonstrate a sound mechanism to address gaps in community development initiatives that in turn helps the State to institutionalize the social audit process.

The *Gram Panchayat* (GP) is the lowest planning and administrative unit for development programs and schemes. Empowering and entitling communities with the provision of social audit can play a vital role in ensuring improved implementation at the GP level across the state. With this in mind CYSD aimed to promote a vision for social auditing that was oriented towards bringing about social accountability by institutionalizing the identification of implementation and developing the capacity for mid-course corrections through local level participatory review and oversight.

The initiative was based on the activation of two important instruments of local oversight that are suggested in the Act. The first of these is the Social Audit Committee (SAC) at the Panchayat level that has been given the mandate for overall oversight of implementation at the local level. The second is the Vigilance Monitoring Committees (VMCs) that are intended as watchdogs of project level implementation\(^9\). Of the two, the VMCs were found to be largely dormant, and in need of strengthening based on a clear definition of their role and relationship to the SAC.

The formation of the SACs at the Gram Panchayat level, combined with an on-going approach of monitoring the activities of the VMC, has immense potential to improve both accountability and the active engagement of beneficiaries. The activation of these provisions can significantly contribute towards overcoming some of the failures of the earlier approaches and enhancing outcomes of the OREGS.

**Implementation**

In order to institutionalize social audit as an effective tool of social accountability, the World Bank in collaboration with the Centre for Youth and Social Development piloted this experimental structure of accountability, the *Social Audit Committee*, in six GPs, selected from the three districts of Koraput, Keonjhar and Sundergarh. Since a post implementation audit draws unfavorable reactions, the pilot proposed to focus on new projects to enable the social audit process to be applied from the inception of the activity.

The social audit pilot study was conducted in three stages namely Pre-Audit, Social Audit and Post Audit in the course of which the SAC was formed to supervise OREGS works.

**Stage – I: Pre Audit or the preparatory phase**

**Information Dissemination**

As the first step, information was made widely available to GP, block\(^11\) and district level officers and other key stakeholders, including the local Government representatives and the local non-governmental organizations (NGOs). All stakeholders were encouraged to participate in the pilot from the outset, and to play an active role in proposing improvements. This served to surmount any reluctance to grant the SAC and the local NGOs access to official records. This provided an important means to develop corrective action on issues arising out of the audits. Local programs were made more relevant and focused at raising awareness levels and educating the rural masses on OREGS, social audit and the right to information.

To deal with the challenge of illiteracy, awareness programs were first aimed at the illiterate population to seek endorsement.

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9 Vigilance Monitoring Committee (VMC): As per the NREGA, a Vigilance and Monitoring Committees (VMC) comprising of members from villages were elected for every project undertaken under OREGS. These committees supervise, exercise vigilance and monitor the flow of funds and implementation as per scheme guidelines.

11 Block is the intermediate level governing body for a group of Gram Panchayats
agreement inspired trust, thus encouraging the illiterate segment of the village to join the process. The key message that illiteracy was not an impediment to access the “beneficiary” status, and the prioritization of message from the outset was found to be important in ensuring broad-based inclusion at the grass root level.

**Environment Building**

A capacity building program was organized to develop a set of social audit facilitators identified among the local leaders and village youth volunteers. This followed a training of trainers (TOT) approach. Two or three facilitators for each pilot GP were given training in social mobilization and understanding local causes and concerns relating to the OREGS. To enable a favorable environment for social audit implementation, the facilitators were provided with information on the detailed provisions of the NREGA, RTI Act, OREGS and an initial toolkit on the social audit process. This toolkit was developed by CYSD, drawing on emerging good practice in India.

Following this first round of training, the local NGO facilitators served as resource persons, assisting and training the village social audit committees in gathering and analyzing information, physical verification and other associated activities. To counter opposition, a communications campaign was developed in local languages, which aimed to clarify key messages, and develop support and consent at the local level. The facilitators mobilized communities to participate actively and exercise their rights in the social audit process. One of the most important challenges of the environment building process was to clarify the institutional process for social auditing. In particular, emphasis was given to ensuring that the SAC emerges as a higher working group at the GP level that would draw representatives from the VMCs and facilitate their operations.

**Baseline Survey**

A baseline survey was conducted to provide a detailed account of the prevailing OREGS scenario of the GPs. The survey examined awareness levels, flows of benefits to the community, and the total number of eligible job cardholders in the sampled area. In addition, the baseline examined the target groups for the project by focusing on issues of vulnerability and the overall socio-economic environment that facilitated or prevented participation of the villagers in the scheme. The local baseline studies used both primary and secondary sources and participatory discussions with community groups.

The village committees were assisted in collecting information for the baseline, including information from the GP and government offices. This approach was revealing in that it underlined the types of barriers that villagers faced in accessing information. In some cases, local government functionaries had to be persuaded to provide records and certificates of engineering works. Other documents such as sanction letters, resolutions, estimates, work orders, muster rolls, bills and vouchers were compiled. The data was classified and analyzed to develop a status report for the GP. For instance, muster rolls in weekly or fortnightly format were converted into worker-wise records to enable individual verification. With the limited data in hand, the social audit facilitators helped the village auditors assess the extent and instances of corruption.

The following key observations were noted during the study:

- Poor work site facilities such as rest room, first aid, drinking water and childcare
- Delayed or under payment of wages
- Low level of participation of women
- Non-compliance to statutory processes for employment application
- Dysfunctional VMCs
- Involvement of external contractors
- Incomplete muster rolls
• Absence of postal accounts for workers
• Fictitious applications for employment
• Lack of grievance redressal system
• Low levels of community participation in monitoring
• Inadequate local communication of basic scheme provisions

This information was shared at the GP level, which provided an opportunity for further physical verification of works and checking documents. This process of participatory verification was found to be important in instilling trust and developing confidence in the community to participate more actively in the process.

Stakeholder Analysis
The findings from the baseline survey provided a basis for a mapping of stakeholders to understand their role in implementation. The analysis helped identify people, groups and organizations that had a legitimate interest in the success of the scheme and to anticipate stakeholder concerns. This process acted as a tool to provide essential information about the interests, perspectives and expectations of stakeholders. This process-driven approach aided in strengthening the design processes, as well as deepening rapport and trust with key local stakeholders.

Stage – II: Social Audit
Forming Social Audit Committees at the Gram Panchayat level
SACs consisting of ten to fifteen members were constituted with representatives from a wide range of stakeholder groups, including beneficiaries, self help groups, village level organizations, community leaders, youths, marginalized sections (especially scheduled castes, scheduled tribes, women and persons with disabilities) and existing VMC members. In forming these committees, emphasis was given to ensuring representation of vulnerable groups.

The low literacy rate in the pilot areas posed a specific challenge. Illiterate villagers tended not to attend GP meetings and it was often difficult to encourage them to join the SAC. Innovative processes were needed to overcome these challenges. In one of the pilot locations, small-scale meetings were preferred to GP level meetings to ensure optimal reach and more effective participation of vulnerable social groups.

During the course of implementation, it was found that genuinely interested people were already playing some role in monitoring OREGS works. In Meghdega GP in Sundergarh district, the SAC was an inactive body and hence the approach taken was to reconstitute the committee with a view to replace the dormant members with new active members who were interested in participating.

Orienting the Social Audit Committee
The SAC members were sensitized in terms of their roles and responsibilities (Box 2) and given training regarding the social audit process. The training sessions provided an understanding of the Right to Information Act, and the process for public access to key project-related records and information. They were also familiarised with key aspects of OREGS implementation, including preparation of technical estimates, project approval, job distribution, execution and monitoring, wage distribution, measurement of work, verification and the public hearing procedure.

In order to assist the VMC and SAC in monitoring project level activities, a Community Construction Works manual was developed (CYSD 2009c). The manual provides information on different types of civil works, details of estimation procedures, and quality control benchmarks. In order to make these technical processes accessible, illustrations were included to describe the construction process or various important civil works, such as building
Box 2: Role of Social Audit Committee in the Process
The SAC acts as a facilitator and helps in compilation. It does not take decisions or influence public opinion. It plays the following roles:

- Build an environment conducive for social audit
- Collect and make information available to public
- Facilitate collection of information from departments, offices or agencies using the RTI Act.
- Facilitate transparency in scheme implementation (display of information, maintenance of records for public inspection and collection of feedback)
- Transcribe information in a comprehensible medium for public
- Sort, analyze and present information
- Share findings and seek feedback, individually or collectively.
- Compile all findings from consultations
- Engage with implementing agencies to build rapport, discuss concerns and resolve conflicts
- Present findings (presentation to the implementing agency, administration, representatives and other stakeholders. This is called Social Audit day.)
- Record views and suggestions and helps the implementing body to modify the process when required and sort out discrepancies.

construction, road construction, water-bound macadam roads, cement concrete roads, bridges and culverts, tanks, ponds, stop dams, soak pits, masonry check dams, earthen embankments, land treatments and contour trenches.

The SAC members were trained to use the manual that provided a structural estimate in a comprehensible and accessible format. The manual was in turn circulated to the VMCs to help them validate estimates.

Implementation and supervision of works
The SACs were expected to supervise and monitor community construction works, as well as ensure the condition for broad based participation from potential employment seekers. On the whole it was found that, even in divided communities, villagers were united by the committee under the common agenda of employment generation. This was possible only by ensuring that all potential beneficiaries were made aware of their rights to demand employment, which in turn put pressure on the GP to respond.

An important innovation of the CYSD pilots was to initiate social audits only for new projects. This was important in terms of overcoming the potential stalemate in terms of rectification of legacy implementation issues. In the pilot areas, new sanctioned projects were to be carried out with the full participation of the SAC and VMCs. The implementation task was delegated to the VMCs, thereby ensuring transparency in the participatory work projects. The social audit committees were accountable for their effective implementation and regular monitoring. In many cases, the SAC was successful in promoting the streamlining of wage payments and unemployment allowance, and in organizing a public display of muster rolls at worksite for the first time. The SAC presented the deviations in works and pointed out improvement measures to the GP and Block representatives and functionaries, demanding the required information through RTI.
Activation of public vigilance and monitoring

SACs were responsible for activating non-functional VMCs and forming new ones where needed. The major role of the VMCs was to validate estimates and project plans and ensure that quality parameters were adopted. A final report was presented by the VMC along with the completion certificate during the village assembly (Gram Sabha). The technical manual provided the guidelines for ensuring the benchmark standards for various works to be undertaken in the six GPs. Members of the VMC were trained to use the technical manual while undertaking projects to ensure a check on corruption and quality. The SAC trained new VMCs on monitoring guidelines and provided a thorough knowledge of the audit process and its expected outcomes.

The pilots underline the definite need for VMCs as a part of the social audit process. For instance, in one of the pilot GPs that did not have a VMC, the quality of work suffered and the wage payment was irregular. The timely intervention of VMCs had a vital role to play in monitoring local issues closely when supported by the SAC.

Relationship Building

Establishing relationships with all stakeholders was considered crucial in the facilitation process. When GP members, block functionaries and PRI representatives came in the way of access to project related documents, the SAC promoted dialogue and discussion to air concerns, to engage these key persons more actively in the activities of the SAC and build rapport. In times of need for higher level intervention, the district functionaries were persuaded to put pressure on the local administration to concede and facilitate access to documents. In the Ghumar GP, it was found that Government functionaries and GP members were not cooperating with the SAC, seeing them as adversaries rather than partners. Building rapport and relationships at that stage helped to change these perceptions, resolve conflicts and ensure the mutual benefit of the social audit process. While public meetings were called to engage the village community at large, public relations and communication with government bodies and the panchayat were stressed upon equally. A cooperative environment conducive to the audit process was fostered through regular meetings and discussions at the panchayat level that led to recognition for the SAC at higher levels of administration.

Stage – III: Post Audit

Community Sharing

The SAC members presented their findings in a multi-stakeholder community level meeting conducted at the village level. The findings included analysis of the status of registration of families, distribution of job cards, receipt of work applications, project preparation and selection of sites, development and approval of technical estimates, work orders, individual allotment of work, implementation and supervision of works, payment of wages and unemployment allowance, and evaluation of work. Marginalized segments, especially women, were encouraged to voice their opinions. Officials were urged to respond and take disciplinary action to overcome delays in implementation, the most important of which were found to be the delayed payment of wages, and investigate allegations of corruption where they were found.

Public Hearings

Public hearings, called social audit forums, were held at the village assembly for all completed works. The forum provided an opportunity to the public to review compliance with the requirements of transparency and accountability. This also served as a forum where people could raise concerns and issues that had not been addressed in the audit. Discussions tended to focus on the lack of availability of complete and relevant information, failure to enforce accountability of officials, overdue entitlements, community involvement, and the lack of an effective system to resolve grievances in a timely manner.
Formation of Social Audit Committees

The SAC at the GP level has emerged as a successful model for replication and as a benchmark that could be effectively embedded in the social audit planning process. Based on this emerging institutional design, a sustainable and effective approach to social audit could be developed.

Training and capacity building

Mainstreaming social audit requires systematic and sustained training and capacity building support for stakeholders. It is important that implementation mechanisms are strengthened to achieve its full potential. Local community, user groups, village-level organizations and local government bodies need to know their rights and understand their own roles and responsibilities in the implementation of OREGS and social audit. Training modules focusing on social audit for each category of stakeholders will strengthen the monitoring and social audit process.

Simple technical manuals

A technical manual is helpful to enable ordinary citizens monitoring the process of planning, design and execution in local level civil works. Simple technical handbooks prepared in a user-friendly format with simple text, sketches and checklists bring uniformity and help check corrupt practices in projects.

Building coalitions at all levels

While community mobilization forms the foundation for social audit, there is a need to build coalitions at the higher level to create a framework that is supportive to the objectives of social auditing. There is a need to involve all stakeholders to create an enabling environment and for working together for robust results.

Public awareness and communication

The success of social audits in OREGS largely depends on social mobilization and active involvement of stakeholders. Public participation is vital in planning, mobilizing demand, vigilance, social audit, monitoring and implementation. To raise awareness, intensive communication campaigns, tailored to local conditions, are needed. This would help the communities understand their rights and entitlements, the role of the implementing agencies and government functionaries and monitoring and grievance redressal mechanisms.

Conclusion

Documentation

The experiences of the social audit were documented by the NGO facilitators and shared at the block and district level. Experience sharing events were organized at the GP, district and state level involving community leaders, local government representatives, OREGS implementing officials, policy makers, media and civil society organizations. The meetings were aimed at creating pressure to institutionalize social audit in implementation. In order to help others replicate and institutionalize the social audit process, a comprehensive handbook on the social audit process was developed and published at the end of the pilot (CYSD 2009a).
Institutionalizing grievance redressal

There is consensus that community engagement can play a role in demanding greater responsiveness, accountability, and transparency through watchdog committees like SACs, right to information and other mechanisms. An institutionalized and community-based grievance redressal system should be a permanent measure at the local government level.

Long-term process

The social audit approaches so far have been one-time methodologies to detect corrupt practices and present facts as opposed to creating a watchdog committee like SAC to identify gaps and make mid-course corrections through a participatory review.

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