



## Government of the People's Republic of Bangladesh

### Inclusive Services and Opportunities (ISO) for Host Communities and Displaced Rohingya Population (DRP)

Ministry of Disaster Management and Relief (MoDMR)  
Ministry of Women and Children Affairs (MoWCA)  
Ministry of Health and Family Welfare (MoHFW)  
Ministry of Primary and Mass Education (MoPME)  
Ministry of Social Welfare (MoSW)

(Project Code: P500727)

### Stakeholder Engagement Plan (SEP)

Draft

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## Executive Summary

The preparation of the Stakeholder Engagement Plan (SEP) for Inclusive Services and Opportunities (ISO) for Host Communities and Displaced Rohingya Population (DRP) started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project's implementation strategy.

This Stakeholder Engagement Plan (SEP) is prepared and will be followed throughout the project life cycle. The SEP will be considered a living document and will be revised as necessary if changing project context requires so with clearance from the World Bank (Bank). Both in person and virtual consultations were carried out to develop this SEP. The SEP identifies the “project affected parties”, “other interested parties” and the “vulnerable and disadvantaged groups” specific to Implementing Agencies, here Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Disaster Management and Relief (MoDMR), Ministry of Social Welfare (MoSW) and Ministry of Primary and Mass Education (MoPME), of the project and includes the relevant provisions to engage all the stakeholders from the inception to the project to all through the project cycle, till completion and post operational phase. The purpose of this SEP is to identify the potential stakeholders, detail how stakeholders will be engaged throughout the course of the project and methods that will be used as part of the process. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project design and implementation approach. Timely and two-way information sharing, and communication will be resorted for mobilization and maintaining stakeholders' support for the project and advance the overall project goals.

The SEP has been prepared to comply with the requirements of the World Bank Environmental and Social Framework (ESF) on Stakeholder Engagement and Information Disclosure (ESS-10), which applies to this project and cross-cutting to all ten standards of the ESF. The Project Management/Implementation Units (PMU/PIUs) will be established in each implementing Agencies (IAs), who will establish and operate their own GRMs, the consolidated report of which will be shared with the Bank by the PMU. The GRMs will be of three tiers/levels; site/community level, PIU level (with a Grievance Redress Committee (GRC) at each level) and PMU level (therefore PMU will have two tiers of GRC). Members of the GRCs will include women and affected persons (beneficiaries and likely affected persons). Training will be provided to the staffs who will work on managing the grievances. The GRMs will also be equipped to deal with labor and SEA/SH related grievances. Any SEA/SH related complaints will be handled following a survivor-centric approach with confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence.

Information on the GRMs will be widely disseminated among the communities and affected persons and wider stakeholders including at site levels via posters, notice boards, brochures, etc. The GRMs will be accessible to all stakeholders (including the disadvantaged and the vulnerable i.e. women, children, person with disability etc). All grievances will be resolved within a settled time period not exceeding days mentioned in the GRM structure table (Table 4.3). All proceedings of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by the PMU after consolidation of reports from the PIUs. All E&S related documents and information of the program and sub-projects will be disclosed in English and the local languages by the IAs on their websites and hard copies will be made available at project offices throughout the project life cycle.

The mechanism of information disclosure dissemination will be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community

consultation sessions. The briefing material (all to be prepared in local language i.e., *Bangla*) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the communities and stakeholders; grievance mechanism) that can be kept in the offices of local government and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons of the following:

- Timeline and progress of the program and sub-project by components;
- Information on beneficiary participation;
- E&S risks and impacts and mitigation measures (including grievance handling)

Information disclosure procedures are mandated to provide citizen centric information as well as all documentation necessary for addressing any queries. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

## Abbreviations

BoQ	Bill of Quantities
CoC	Code of Conduct
CHS	Community Health and Safety
COVID-19	Novel coronavirus disease
DRP	Displaced Rohingya Population
EHS	Environment, Health and Safety
EPI	Expanded Program on Immunization
ESMP	Environmental and Social Management Plan
ESSs	Environment and Social Standards
FDMN	Forcibly Displaced Myanmar Nationals
GBV	Gender Based Violence
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HNP	Health, Nutrition and Population
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HNP	Health, Nutrition and Population
LMP	Labor Management Procedure
HSD	Health Services Division
ICT	Information and Communications Technology
IEDCR	Institute of Epidemiology and Disease Control Research
ILO	International Labor Organization
NCD	Non-Communicable Diseases
NGO	Non-Government Organization
NID	National Identification Card
MoFA	Ministry of Foreign Affairs
MoWCA	Ministry of Women and Children Affairs
MoHFA	Ministry of Health and Family Welfare
MoDMR	Ministry of Disaster Management and Relief
MoSW	Ministry of Social Welfare
MoPME	Ministry of Primary and Mass Education
PIU	Project Implementation Unit
PMU	Project Management Unit
SEP	Stakeholder Engagement Plan
WASH	Water, Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization

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## Chapter 1: Introduction

### 1.1 Introduction

1. The “Inclusive Services And Opportunities For Host Communities and Displaced Rohingya People (DRP) (ISO)” is prepared by the Ministry of Disaster Management and Relief (MoDMR), Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Social Welfare (MoSW) and Ministry of Primary and Mass Education (MoPME). The Government of Bangladesh (GoB) intends to implement the Project with finance from the International Development Association (IDA) of the World Bank. To improve access to economic opportunities, safety nets, learning, health, and gender responsive services for vulnerable Host and Rohingya communities. As part of the core requirements, the preparation of the Stakeholder Engagement Plan (SEP) started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project’s implementation strategy. In the context of the above, in person consultations with different stakeholders were carried out to develop this SEP.
2. The purpose of this SEP is to support the proposed Project in delivering efficient and effective engagement and communication with stakeholders of the project so that their views and concerns are reflected in the project design and implementation, and that they are fully informed about the project activities. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

### 1.2 Project Description and Components

#### **Component 1: Building Community Resilience and Self-Reliance**

*This component will support short-term work opportunities in the host and DRP communities and would finance (i) wages and stipends under the Employment Generation Program for the Poorest Plus (EGPP+) for the HC; (ii) wages and stipends under a community services/works program for the DRP communities; and (iii) goods, consultant services, operating costs and training for the Project Management Unit (PMU) for the component. Activities will be implemented by the Department of Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MoDMR).*

#### **Component 2: Supporting Education Opportunities for Children**

*This component will support children and adolescents (5-14 years) from the host and DRP communities to access and continue basic education. In the DRP communities, funds will support the procurement of goods, works and services for (i) operation of the LCs including need-based refurbishment; (ii) teacher/instructor salaries and costs, trainings; (iii) TLM/SRM; (iv) stipends as attendance incentives for the families of the students; and (v) psychosocial support to DRP adolescents and children. Funds will also support goods, services, operating costs, and training under the Project Implementation Unit (PIU) for the component. In the HC, the funds will support procurement of goods, and services for (i) need-based rehabilitation of school infrastructure and furniture for selected schools; (ii) Teaching Learning Materials (TLM), Supplementary Reading Materials (SRM), and other necessary supplies; (iii) piloting mid-day meals; (iv)*

expansion of the remedial education; (v) school health and psychosocial support, social awareness and mobilization; (vi) management, monitoring and evaluation, and capacity enhancement of the teachers, officials and relevant stakeholders. Activities will be implemented by the Department of Primary Education (DPE), under the Ministry of Primary and Mass Education (MoPME).

### **Component 3: Enhancing Social Care and Economic Empowerment**

This component will support social care and livelihoods in the HC, and child protection services for the DRP. Financing will be provided for (i) goods, services, works for minor refurbishment and renovation of child protection facilities in the HC; (ii) goods and services for training and operation of beneficiaries of livelihood support programs in the HC; (iii) stipends for beneficiaries of livelihood support programs in the HC; (iv) goods and services for child protection services for the DRP; (v) goods and services for social care services for elderly DRP; and (vi) goods, services, operating costs and training under the PIU for the component. Activities will be implemented by the Department of Social Services (DSS), under the Ministry of Social Welfare (MoSW). In the DRP communities, the project will finance DSS' social care and protection activities for vulnerable groups across the lifecycle. For children, the project will support the continuation and expansion of DSS' child protection services for DRP children. The activities will be guided by DSS' Child Protection Case Management Standard Operating Procedures (CPCM-SOP), Child Protection Sub-Sector Strategy (CPSSS), and Case Management SOP for Cox's Bazar.

### **Component 4: Healthier Communities**

This component will support the provision of (i) goods and services to provide essential HNP services in the host and DRP communities; (ii) works for minor refurbishment and renovation of existing health facilities; and (iii) goods, services, operating costs and training under the PIUs for the component. Activities financed under this component will include: supporting government system capacity to make service delivery for the host and DRP fully functional. Activities will be implemented by the Health Services Division (HSD) and Medical Education and Family Welfare Division (MEFWD) of the Ministry of Health and Family Welfare (MoHFW).

### **Component 5: GBV Response and Prevention**

This component will finance (i) goods and services to enable provision of GBV response and prevention services in the host and DRP communities; (ii) works for minor refurbishment of facilities for GBV response and prevention services; and (iii) goods, services, operating costs, and training under the PIU for the component. Activities will be implemented by the Ministry of Women and Children Affairs (MoWCA).

### **Component 6: Contingent Emergency Response Component (CERC) (US\$ 0 million)**

This component will support provision of immediate response to an Eligible Crisis or Health Emergency, as needed.

## **1.3 Potential Environmental and Social Impacts**

3. The proposed project is not envisaged to involve any civil works, such as new construction or significant rehabilitation of existing buildings in the targeted area. It will, however, involve minor repair, refurbishment and renovation of schools, waste management, which will be done by the government agency in accordance with national and local laws and procedures. The environmental and social impact assessment are aligned



with the Bank's 10 Environmental and Social Standards in the environmental and social framework (ESF), as following:

4. **Environmental Risks:** The environmental risk is rated as “Moderate” considering the type, scale of operation, nature, magnitude of potential environmental risks and impacts. The main concerns will be generation of medical waste in medical facilities. Work at individual locations will involve small scale repair and refurbishment work and are not supposed to have significant environmental impacts.
5. **Social Risks:** The social risk is rated as “Moderate” due to the potential of exclusion of vulnerable stakeholders from consultations, owing to their economic status, lack of access to information and decision-making abilities. There will be no land acquisition and displacement. There will also be no risk on cultural heritage. Due to minor repair and refurbishment, the risk of labor influx is expected to be minimal.
6. **Gender:** SEA/SH risk of this project is determined as Substantial. The project will include screening, case management, psychosocial support, multisectoral referral, and mental health support through the One-stop Crisis Centers/Cells, Trauma Counseling Centers, DNA Labs, Shelters, Women-Friendly Spaces (WFS) in the host community in Chittagong Division, and WFS and Women and Youth Support Centers (WYSC) in the DRP communities in CXB and Bhasan Chor. The project will support the institutional capacity building of MOWCA through training staff, strengthening monitoring and reporting systems, review and implementation of policy and plans, and enhancing coordination with key stakeholders such as the MoH to ensure comprehensive GBV response and prevention services. MOWCA will build on their experience of implementing the Multisectoral Program on Violence against Women, and a scale up of the Health and Gender Support Project for CXB.

#### 1.4 Objectives of the Stakeholder Engagement Plan (SEP)

7. The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the implementation of the project, starting from the early stage of the project preparation. The SEP outlines the ways in which the project will engage the relevant stakeholders including the marginalized and disadvantaged groups and provide them with a mechanism through which people can raise concerns and provide feedback.
8. The involvement of the stakeholders is essential to the success of the project in order to ensure smooth collaboration with the project staff to minimize and mitigate environmental and social risks related to the proposed project. The project's stakeholder engagement is an inclusive process conducted throughout the project life cycle. It supports the development of strong, constructive and responsive relationships that are important for successful management of environmental and social risks identified in the project. Communicating early, often, and clearly with stakeholders will help the project management to manage expectations and avoid risks, potential conflict, and project delays. In addition, the plan assists in managing stakeholder expectations, which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively with stakeholders to support project interests. The SEP will:

- Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the Project.
  - Involves interaction with the Project Affected Parties (PAP) include communities where the project activities will take place, households and communities under the project, members of the public who use the public facilities that will come under project intervention, vulnerable groups include children in the community, women, female-led households, persons with disability, waste handlers and waste pickers etc. Begins early during the project planning process to gather initial views on the project proposal and design.
  - Encourages stakeholder's feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
  - Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.
  - Considers and responds to feedback.
  - Supports active and inclusive engagement with project affected parties, project beneficiary group and Project's Other Interested Parties include Government officials, mass media, various NGOs and suppliers.
  - Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.
9. In addition, the SEP of the proposed Project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

### 1.5 Requirements for Stakeholder Engagement

10. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. As per ESS10 the process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting back to stakeholders. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

## Chapter 2: Legislative and Policy Requirements

### National Provision and Citizen Engagement

11. Bangladesh has relevant laws on right to information, information disclosure, transparency, and citizen participation in development decisions. The Constitution of the People's Republic of Bangladesh guarantees freedom of thought and conscience, and freedom of expression and speech, subject to any reasonable restrictions imposed by law. The Right to Information Act 2009 makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. Citizen participation in development decisions is recognized and obliged under the laws on local governments including the zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), paurashavas (2009), city corporations (2009) and hill district councils (1989).
12. The right to information shall ensure that transparency and accountability in all public, autonomous, and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established. The Government of Bangladesh (GoB) 2014 Secretariat Instructions (chapter 8 instructions 262(1) and (2)) mandate provisions for receiving opinions from citizens and to redress grievances in a transparent and neutral manner. The Cabinet Division's Coordination and Reform Unit issued a revised version of the 2015 guidelines on the GoB's grievance redress system in 2018, which provides instructions on a range of issues, such as classification and monitoring of grievances and the responsibilities of various ministries including the Cabinet Division.
13. Key legislative instruments governing citizen rights to information, freedom of expression and speech, citizen participation in development decisions and policy formulation inclusive of gender and social vulnerability are as follows:
  - The Constitution of Bangladesh
  - The Right to Information Act 2009
  - The Zila Parishad Act 2000
  - Local Government (Upazila Parishad) Act 1998
  - Local Government (Union Parishad) Act 2009
  - Local Government (Paurashava) Act 2009
  - The Local Government (City Corporation) Act, 2009
  - Hill District Council Acts 1989
  - The Five-Year Plans (Bangladesh)
  - Bangladesh Secretariat Instructions 2014
  - Grievance Redress System Guidelines, 2015

### Key National, Social, Legal Provisions and Citizen Engagement

14. Bangladesh has relevant and adequate law/regulation on right to information, information disclosure, transparency during decision making/public hearing etc. Relevant laws and regulations pertaining to these issues are given below:

## Constitution of the People's Republic of Bangladesh

15. **Article 36. Freedom of movement.** Subject to any reasonable restrictions imposed by law in the public interest, every citizen shall have the right to move freely throughout Bangladesh, to reside and settle in any place therein and to leave and re-enter Bangladesh.
16. **Article 37. Freedom of assembly.** Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order health.
17. **Article 38. Freedom of association.** Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order;
18. **Article 39. Freedom of thought and conscience, and of speech.**
  - (1) Freedom of thought and conscience is guaranteed.
  - (2) Subject to any reasonable restrictions imposed by law in the interests of the security of the State, friendly relations with foreign states, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence-
  - (3) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.
19. **Article 59. Local Government.**
  - (1) Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law.
  - (2) Everybody such as is referred to in clause (1) shall, subject to this Constitution and any other law, perform within the appropriate administrative unit such functions as shall be prescribed by Act of Parliament, which may include functions relating to-
    - (a) Administration and the work of public officers.
    - (b) the maintenance of public order;
20. **Article 60. Powers of local government bodies**

For the purpose of giving full effect to the provisions of article 59 Parliament shall, by law, confer powers on the local government bodies referred to in that article, including power to impose taxes for local purposes, to prepare their budgets and to maintain funds.
21. **The Consumers' Right Protection Act, 2009**

This Act aims at protection of the rights of the consumers, prevention of anti-consumer right practices and related matters connected therewith.
22. **Right to Information Act (RTIA) 2009**

The Act makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to

information is an alienable part of it. The right to information shall ensure that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established.

23. **Law on Local Government.** Bangladesh is a democratic republic with two spheres of government: national and local. Local government is enshrined in the constitution (Chapter IV Articles 59 and 60) and the main legislative texts include the Acts covering zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), pourashavas (2009), city corporations (2009) and hill district councils (1989). The local government division within the Ministry of Local Government, Rural Development and Cooperatives is responsible for local government, with the exception of the hill district councils, which are under the Ministry of Hill Tract Affairs.

## World Bank Requirements

24. The World Bank's ESF came into effect on October 1, 2018. The ESF includes Environmental and Social Standard 10 (ESS10) on "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. As defined by the ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS 10 include:

- Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project.
- Borrower agency will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrower will engage in meaningful consultations with all stakeholders. Borrower will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders

consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

- Borrower will develop SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders would be identified, and the SEP would be disclosed for public review and comment as early as possible, before the project is placed for the World Bank appraisal.
- ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

### Chapter 3: Stakeholder Identification and Engagement Process

25. The World Bank Environmental and Social Framework 2018 defines “stakeholder” as individuals or groups who: (a) are affected or likely to be affected by the Project (project-affected parties); and (b) may have an interest in the Project (other interested parties). Stakeholder identification for the project was initiated during the inception stage of the project and initiated by the IAs. The stakeholder mapping workshop was undertaken to:

- Confirm the stakeholders and groups who were identified in initial scoping exercises and further revise and update the stakeholder list with input from key stakeholders.
- Identify engagement strategy with each stakeholder group and assign responsibility to team members.

26. Mapping project stakeholders marks the first step in preparing the Stakeholder Engagement Plan (SEP), given its contribution to developing the Project’s approach to consultation and communication. Doing so entails identifying relevant Project stakeholders or groups of stakeholders, their key characteristics, specific needs or demands, preferred means of communication and appropriate level of engagement needed for each. In order to ensure effective and tailored engagement, stakeholders of this proposed project have been classified into three overlapping categories:

**Affected peoples** refer to individuals, groups, local communities and other stakeholders that are directly or indirectly affected by the Project, with particular focus being accorded to those directly and/or adversely affected. It also refers to those who are more susceptible to changes associated with project activities, and thus need to be closely engaged in identifying impacts and their signification, as well as in decision-making on mitigation and management measures.

**Other interested parties** predominantly refer to those who are not directly affected by project activities, but are interested owing to its proximity, as in broader local communities where beneficiaries are located, or by virtue of their role in project preparation and implementation.

**Disadvantaged and vulnerable groups**, although somewhat covered under the first category, they experience unique limitations and barriers to participating in consultation process and being minimally represented in stakeholder engagement. By extension, they are disproportionately impacted or further disadvantaged due to their vulnerable status, notably women, elderly, children, low-income female-headed households, person with disabilities (PWD), ethnic and religious minority’s communities, people living in slums etc. Given particular engagement efforts required to enable their equitable representation in

*consultation and decision-making process for the project, this additional category seeks to explore their constraints, means of receiving information and any additional assistance required.*

### 3.1 Stakeholder identification and analysis

27. Project stakeholders are defined as individuals, groups or other entities who are grouped into affected parties, interested parties and vulnerable groups as discussed in para 32.

28. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback:* information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity:* stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly, persons with disabilities, and those with underlying health issues.
- *Flexibility:* if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication.

29. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

**Affected Parties:** Persons, groups and other entities directly influenced, either positively or adversely, (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. The following individuals and groups fall within this category:

- People, particularly women living in the host communities
- Women and children living in the camps
- Communities in the vicinity of the project's planned activities, including host communities.
- Waste (solid and liquid) handlers and medical waste-pickers in the camps and host communities
- Local population and communities including local/neighborhood associations/clubs, youth groups/associations
- People who opt for public health service assistance

- Third Gender Community, if exists.
- People of ethnic minority living around the project area
- Residents, business entities, and individual entrepreneurs in the area of the project that can benefit from the employment, training and business opportunities
- Local government officials in the project area, environmental protection authorities and health authorities

**Other Interested Parties:** Individuals/groups/entities that may not experience direct impact from the Project but who has interests in the project and could affect the project and the process of its implementation in some way, for example:

- Officials of Government agencies, directly and indirectly linked with project
- Local and national media, including electronics and print media
- Participants/ influencers of social media
- Civil society and local Politicians
- Other national and international health organizations
- National & International NGOs currently operating in camps and host communities
- Businesses and service providers in WASH sector
- Suppliers, contractors and contractors' workforce, etc.
- Agencies working with sustainable energy sources

30. **Vulnerable individuals or Groups:** It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups, be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community, dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

31. Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Third Gender communities
- People with disabilities
- Female-headed households
- Elderly (especially those of 60 years and above) people
- Low-income people from ethnic minority living in the project area/host communities
- Waste collectors

32. **Vulnerable** groups affected by the project will be further reviewed and confirmed all through the project implementation, and will be engaged through dedicated means, as appropriate.



### 3.2 Stakeholder Engagement Process

33. Stakeholder engagement process for this project starts from the identification stage. This Stakeholder Engagement process will help clarify the stakeholder identification procedure at project level. **Table 3.1** show the plan and techniques suggested to be used during the engagement process:

**Table 3.1: Stakeholder Engagement Plan (SEP) and Techniques**

ENGAGEMENT TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
<b>Correspondences (Phone, Emails, Text, instant messaging)</b>	<ul style="list-style-type: none"> <li>• Distribute information to IAs and officials of different government agencies, NGOs, and organizations</li> <li>• Invite stakeholders to meetings and follow-up.</li> </ul>
<b>One-on-one meetings</b>	<ul style="list-style-type: none"> <li>• Seeking views and opinions</li> <li>• Enable stakeholder to speak freely about sensitive issues.</li> <li>• Build personal relationships.</li> <li>• Record meetings</li> </ul>
<b>Formal meetings</b>	<ul style="list-style-type: none"> <li>• Present the Project information to a group of stakeholders.</li> <li>• Allow group to comment – opinions and views.</li> <li>• Build impersonal relation with high level stakeholders.</li> <li>• Disseminate technical information of the project.</li> <li>• Record discussions</li> </ul>
<b>Public meetings/workshop</b>	<ul style="list-style-type: none"> <li>• Present Project information to a large group of stakeholders, especially communities</li> <li>• Discuss about the all-project components.</li> <li>• Allow the group to provide their views and opinions.</li> <li>• Build relationship with the communities, especially those impacted.</li> <li>• Distribute non-technical information.</li> <li>• Facilitate meetings with presentations, PowerPoint, posters etc.</li> <li>• Record discussions, comments, questions.</li> </ul>
<b>Focus group meetings</b>	<ul style="list-style-type: none"> <li>• Present Project information to a group of stakeholders</li> <li>• Allow stakeholders to provide their views on targeted baseline information.</li> <li>• Build relationships with communities.</li> <li>• Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions.</li> <li>• Record responses</li> </ul>
<b>Project on website/Information Centre/information Boards/GRMs</b>	<ul style="list-style-type: none"> <li>• Establish Information Board in each project area.</li> <li>• Present project information and progress updates</li> <li>• Disclose E&amp;S documents</li> <li>• Disclose component wise project activities</li> </ul>
<b>Direct communication with affected people</b>	<ul style="list-style-type: none"> <li>• Share information on timing of project activities.</li> <li>• Collect the opinion about the project</li> </ul>
<b>Project information on site</b>	<ul style="list-style-type: none"> <li>• Share information on project activities.</li> <li>• Provide information on construction materials that will be needed to incite potential suppliers</li> </ul>
<b>Project leaflet</b>	<ul style="list-style-type: none"> <li>• Brief project information to provide regular update</li> <li>• Site specific project information in local language</li> </ul>
<b>Surveys</b>	<ul style="list-style-type: none"> <li>• Gather opinions and views from individual stakeholders</li> <li>• Gather baseline data and develop database for monitoring impacts</li> <li>• Record data and analysis</li> </ul>

During situation where face to face interaction will be difficult	
<b>Video Conference/Phone Calls for all appropriate meetings- Focus Group, Interviews, One-One</b>	<ul style="list-style-type: none"> <li>• Share information on project activities and timing of activities</li> <li>• Collect the opinion about the project</li> <li>• Discuss about the all-project components</li> <li>• Allow the group to provide their views and opinions</li> <li>• Build relationship with the communities, especially those impacted</li> <li>• Distribute non-technical information</li> <li>• Record discussions, comments, questions</li> <li>• Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions</li> <li>• Facilitate meetings with presentations, PowerPoint, posters, online polls etc.</li> <li>• All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>
<b>Virtual Workshops (WebEx, Skype, and in low ICT capacity situations, audio meetings)</b>	<ul style="list-style-type: none"> <li>• Virtual registration of participants: Participants can register online through a dedicated platform.</li> <li>• Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.</li> <li>• Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.</li> <li>• Discussion, feedback collection and sharing: Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this. Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.</li> <li>• Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.</li> <li>• All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>
<b>Social media and online channels</b>	<ul style="list-style-type: none"> <li>• Create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders.</li> <li>• Information can be disseminated through digital platform (where available) like Facebook, Twitter (X), What’s App groups, Project web links/ websites</li> <li>• All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>

**3.3 Planned Stakeholder Engagement Strategy**

34. Stakeholder engagement strategy will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. Table below presents the stakeholder engagement activities PMU/PIUs will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation and implementation.

**Table 3.2: Stakeholder Engagement Strategy**

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage I: Project preparation	Project Affected People: People residing in project area Vulnerable households	Project scope and rationale; Project ES risk and impacts; Grievance mechanism process	Public meetings, separate meetings for women and the vulnerable group; Face-to-face meetings Mass/social media communication (as needed) Disclosure of written information: brochures, posters, flyers, website Information boards or desks Grievance mechanism Local newspaper	Quarterly meetings at project sites and as various components are executed and put to operation, continuous communication through mass/social media and routine interactions	PMU and PIUs
	Other Interested Parties (External) – NGO working in waste management, climate resilience issues and GBV sectors	ES Code of Practice (ESCoP), LMP, SEP, SEA/SH Action Plan disclosures; Project scope, rationale and E&S risk and impacts and mitigation measures, Grievance mechanism process	Face-to-face meetings Joint public/community meetings	Quarterly meetings with interested parties	PMU and PIUs
	Other Interested Parties (Internal) Press and media Local NGOs, Different Government Departments having link with project implementation etc. General public, jobseekers etc.	ESCoP, LMP and SEP, SEA/SH Action Plan disclosures Grievance mechanism Project scope, rationale and E&S risks and impacts and mitigation measures	Public meetings, trainings/workshops, Mass/social media communication Disclosure of written information: Brochures, posters, flyers, website Information boards Grievance mechanism Notice board for employment recruitment	Project launch meetings with relevant stakeholders Meetings in affected locations/communities as needed; Communication through mass/social media (as needed) Information desks with brochures/posters	PMU and PIUs
	Other Government Departments from which permissions/clearances are required; Businessmen, Contractors and suppliers	Legal compliance issues Project information scope and rationale and E&S risks, impacts and mitigation measures, Coordination activities	Face-to-face meetings Invitations to public/community meetings	Disclosure meetings Reports as required	PMU and PIUs

		Grievance mechanism process ESCoP/LMP /SEP, SEA/SH Action Plan disclosures, Submission of required reports			
<b>STAGE 2: Implementation Phase</b>	Project Affected People, including Vulnerable community	Grievance mechanism Health and safety impacts, Employment opportunities Project status	Public meetings, open houses, trainings/workshops Separate meetings as needed for women and vulnerable group Individual outreach to PAPs as needed Disclosure of written information: brochures, posters, flyers, website Information boards; Notice board(s) at construction sites Grievance mechanism -Local monthly newsletter	Quarterly meetings during construction phase Communication through mass/social media as needed Notice boards updated weekly Routine interactions Brochures in local offices	PMU and PIUs
	Other Interested Parties (Internal)	Reporting, monitoring, incidents handling, contract management.	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction phase)	PMU and PIUs
	Other Interested Parties (External)	Project scope, rationale and E&S principles Grievance mechanism Project status	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction phase)	PMU and PIUs

	<p>Other Interested Parties (External) Press and media Various Government Departments General public, jobseekers</p>	<p>Project information - scope and rationale and E&amp;S principles, Project status Health and safety impacts Employment opportunities Environmental concerns GBV related consultation, Grievance mechanism process</p>	<p>Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards Notice board(s) at construction sites Grievance mechanism</p> <p>GBV related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, medical sector NGOs, NGOs specifically working on GBV matter, local leadership, religious leaders, elders including women representatives, teacher of the local schools and Madrassas.</p>	<p>At regular intervals throughout the project period to educate and raise awareness amongst the population</p>	<p>PMU and PIUs</p>
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**3.4 Description of Information Discloser Method**

- 35. As a standard practice, the Project ESF documents (ESCoP, LMP and SEP, SEA/SH Action Plan etc.) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PIUs in a formal manner. PMU/PIUs will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. The ESCoP, LMP, SEP and SEA/SH Action Plan in English with Bangla translation of the executive summaries will be made available for public review for meaningful engagement with the stakeholders.
- 36. Distribution of the disclosure materials will also be done by making them available online, with hardcopies at PMU/PIUs and field offices. This will allow stakeholders to obtain information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. Basing on the improvement of situation, free copies may be available at office locations.
- 37. The SEP along with the other E&S documents will remain in the public domain for the entire project life cycle. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically.

38. The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table below provides a description of recommended stakeholder engagement and disclosure methods to be implemented during stakeholder engagement process.

**Table 3.3: Stakeholder Engagement and Disclosure Methods**

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
<b>Project-affected parties</b>	Public Grievance Procedure; Regular updates on Project development.	Online notices. Electronic publications (in Bangla and English languages) and press releases on the Project website. Dissemination of hard copies (in Bangla and English languages) at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures (in Bangla and English languages). Separate focus group meetings with vulnerable groups, as appropriate. Door to door campaigns
<b>Non-governmental and community-based organizations</b>	ESCoP, SEP, LMP, SEA/SH Action Plan, Public Grievance Procedure; Regular updates on Project development.	Public notices (in Bangla and English languages). Electronic publications and press releases on the project website. Dissemination of hard copies at designated public locations. Press releases in the local media (in Bangla and English languages). Consultation meetings. Information leaflets and brochures (in Bangla and English languages)
<b>Government authorities and agencies</b>	ESCoP, SEP, LMP, SEA/SH Action Plan; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESCoP, LMP, SEP and SEA/SH Action Plan at PIU offices Project status reports. Meetings and round tables.
<b>Related businesses and enterprises</b>	SEP; Public Grievance Procedure; Updates on Project development and procurement announcements.	Electronic publications and press releases on the Project website. Information leaflets and brochures.

## Chapter 4: Grievance Redress Mechanism

39. The fundamental objective of GRM is to resolve any project related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. The GRM will be consistent with the requirements of the World Bank policies to ensure mitigation of stakeholders' concerns, risk management, and maximization of environmental and social benefits. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level. The GRM will be accessible to diverse members of the stakeholders, including

women, children, senior citizens and other vulnerable groups. Culturally-appropriate communication mechanisms will be used at all project sites both to spread awareness regarding the GRM process as well as complaints management. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance management system available with the small ethnic communities (SECs) and the Grievance Redress Committee (GRC) will include a representative from these communities.

40. The Department of Disaster Management (DDM) and other IAs involved in this project are currently using the government’s central GRM accessible online and by phone: <https://www.grs.gov.bd/>, which also include a detailed user manual as well as guideline and process map on the website. However, given the number of IAs involved in the project, each PMU/PIU will have their own GRMs which will be designed and implemented. The PMU will consolidate reports of all GRMs and report to the Bank periodically. The GRM will be brought into effectiveness as per timeline mentioned in ESCP.

#### SPECIAL GRM FOR SEA/SH RELATED COMPLAINTS

41. All three tiers/levels (mentioned below) of the GRM will be sensitized to receive SEA/SH and labor related complaints. PMU/PIUs, the project unit and the contractor may not be equipped to handle complaints or provide relevant services to survivors but will refer any person to relevant service providers, including health facilities, law enforcement’s gender unit or others, as relevant using the information on available services. Grievances related to SEA/SH be reported through the GRMs, the nature of the complaint will be recorded along with the age of the complainant and relation to the project will be recorded. After consultation with the service providers and assessing the complaint, appropriate disciplinary measures will be taken against the perpetrator. The project GRMs will also be equipped to receive SEA/SH related complaints with a protocol of survivor centric approach. Survivor centric approach will prioritize the wish of the survivor and take measures accordingly.
42. **SEA/SH GRM Process:** The following will be the steps to be followed addressing SEA/SH cases:

**Table 4.1: SEA/SH GRM process**

STEP	FUNCTION	DETAILS
<b>Uptake</b>	Receive SEA/SH allegation through multiple reporting channels established for the project	Project GRMs channels will be used. Survivor must be informed that her/his wishes to continue with the case will prevail. Upon receiving the allegation, the survivor will be immediately referred to PMU level GRC who will deal with the case in its entirety, given its sensitivity and requirement of training. PMU GRC will have staff trained and assigned for SEA/SH cases
<b>Sort and process</b>	Document and register allegation	The SEA/SH coordinator at PMU GRC is responsible to document and register the allegation. It can be done over phone, video conferencing or in person (suggested). The coordinator needs to visit the survivor in person immediately after initial documentation if the survivor consents to proceed with the case and consent for the coordinator to disseminate the four information. The SEA/SH allegation will document only (1) the nature of the allegation—what a survivor says in his or her own words without direct questioning; (2) if, to the best of the survivor’s knowledge, the perpetrator is associated with the project; (3) when possible, the age and sex of the

		survivor; and (4) when possible, information about whether the survivor was referred to services (Health, psychosocial, legal etc.).
	Inform survivors about legal and internal data-sharing obligations	If applicable, the survivor will be informed about any legal obligations to report SEA/SH to the Police. Wherever possible, this information should be delivered to the communities and the survivor <b>prior to the</b> disclosure of any information that could trigger mandatory reporting, both through community awareness-raising activities and by providing information as a first step in the uptake phase. Survivor must consent to share the four nonidentifiable data with PMU and WB. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity.
	Notify the World Bank in accordance with the required reporting protocols	If a survivor gives consent, the SEA/SH coordinator will inform PMU and WB on the four sets of data. Else, only an intimation to the WB and PMU about the survivor’s non-consent will be made.
<b>Acknowledge and follow-up</b>	Refer the survivor to relevant GBV service providers	Note: A List of various SEA/SH service providers (Medical, psychosocial, legal, livelihood etc.) will be kept at the PMU GRC Coordinator. At this stage the survivor will be referred to various service providers. Before referral, the survivor’s consent must be documented. This means that the survivor can choose to fill out, sign, or fingerprint a consent form that outlines the survivor’s choices regarding whether information about the case is shared and whether the survivor wants to take up the proposed referrals or not.
<b>Verify, investigate and act</b>	Provide support services to survivors	GBV service providers support survivors until their services are no longer needed.
	Review allegation and determine the likelihood that it is project-related	If a survivor wishes to proceed with accountability measures, the SEA/SH Coordinator, with the help of other GRC members/Contractors as appropriate, will determine the likelihood that it is related to the project.
	Implement sanctions for perpetrators in accordance with employment contracts and local labor laws	If SEA/SH allegations are confirmed, the appropriate party—the employer of the perpetrator, implements disciplinary actions in line with labor law, employment contract and Code of Conduct (CoC).
	Resolve and close cases	If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the case can be closed by the coordinator. The SEA/SH GRM Coordinator records the resolution of the incident, the date it was resolved, and marks it as closed. The PMU and World Bank are notified that the case is closed
<b>Monitor and evaluate</b>	Monitor, track, and provide regular reports	The SEA/SH Coordinator is responsible for issuing regular (e. g., monthly/quarterly) reports to the PMU that can only contain data such as the total number of allegations, the number of alleged perpetrators who have a relationship to the project, the type of incident, the age and sex of survivors and the referral status.
<b>Provide feedback</b>	Respond to survivors	The SEA/SH Coordinator needs to provide ongoing feedback to the survivor throughout the process but especially: (1) when the grievance is received; (2) when the case is reported to PMU and WB; (3) when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and (4) when an investigation concludes or when any outcomes are achieved or disciplinary action taken.



		When an investigation is concluded, the survivor must be informed first to assess his or her safety before the investigation's conclusions are communicated to the perpetrator, particularly when sanctions will be taken.
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Following issues to be kept in mind while dealing in SEA/SH issues:

**Table 4.2: Issues to keep in mind while dealing with SEA/SH complaints**

ISSUES	DO'S	DON'T'S
<b>Confidentiality</b>	To record SEA/SH allegations, use an encrypted electronic storage system with proper tracing or a separate logbook that will be kept safe and that guarantees the confidentiality of data Create a sound coding system to anonymize case files by, for example, assigning tracking numbers Establish a formal protocol with clear rules and procedures for interagency information-sharing of case-level data to ensure confidentiality	Register the case in a logbook used for other types of grievances Leave information/logbook easily accessible Underestimate the importance of keeping survivor files confidential, even within an organization or with colleagues Discuss survivor files with anyone unrelated to the case or include identifiable data or information about individual cases in interagency reports Include any elements in shared data that could help identify survivors, including names, characteristics, or specific locations
<b>Consent</b>	Document a survivor's consent to receive referrals and for the sharing of any data Depict the benefits and risks of every referral option and clearly relate to the survivor what cannot be provided as well as any limitations on services Adopt a context-sensitive approach for reporting to the police and making referrals to the legal justice system. Security actors and the rule of law may not be reliable in some context; and some survivors may prefer to turn to traditional, informal justice mechanisms	Force a survivor to file a formal complaint with the grievance mechanism (some survivors may only wish to access services) Act on the allegation in any way without the consent of the survivor Coerce a survivor to make a particular decision or create false expectations of available services and support Assume that reporting to the police, accessing legal support or dealing with the justice system is necessarily desirable. (In many cases, survivors do not want to pursue security- or police-related actions, and their decisions must be respected.)

## Communication & Awareness Raising on GRM

43. The final processes and procedures for the GRM will be translated into local language (i.e., Bangla) and disseminated at all project locations. These shall be made available (in handout/leaflet/notice board and poster format) to all project locations with the staff on site and in the project offices. Project beneficiaries, affected persons (including the disadvantaged and the vulnerable—women, children, person with disability) and relevant stakeholders will be informed of the project's grievance mechanisms in open meetings at important locations, door to door visits, and in FGDs. Bangla translations of information brochures will be distributed among the communities and stakeholders. The communities and stakeholders will also be briefed on the scope of the GRC, the procedure for lodging grievances cases and the procedure of grievance resolution at the project level. The GRMs approach and procedures will be conducive to the sensitivity of social stigma to the women and girls alleged to be affected. Traditional conflict resolution existing system of the tribal communities will also be accommodated in the project GRM.

## OPERATIONALIZATION OF PROJECT GRMS

44. Project GRMs will be established by each PMU/PIU and operated by Grievance Redress Committee (GRC) at respective locations with applicable responsibility to coordinate and communicate. The project GRCs will deal with the project related questions, complaints, and suggestions.
45. The PMU/PIUs will develop a Project GRM Manual with clearly defined mandates, roles, and responsibilities of itself, the implementation partners and service providers, channels for producing complaints and grievances. A GRM Handout will also be produced in national Bangla language, circulated among the stakeholders, and briefed in formal and informal discussion sessions. The GRM Manual and the Handout will be developed by PMU/PIUs within the timeline (mentioned in ESCP) of activation of the PMU/PIUs, and adopted following the approval by all IAs and concurrence from the World Bank.

## GRIEVANCE MECHANISM STRUCTURE

46. A three-tier/level grievance redress mechanism will be established by each PMU and PIUs for the affected people and other stakeholders under this project to address all grievances/claims and allow the people to go to the upper level or to the courts of law for seeking final judgment. The GRMs will be at site/sub-project level, PIU level and PMU level. Sample Grievance Registration Form is provided as **Annex 3**

**Table 4.3: GRM Structure (including GRCs at various Levels) and Responsibilities**

Level	Organogram	Role	Timeline
<b>Level 1 Local Level</b>	<p><b>Local GRC Head/Chair:</b> Regional/ Local Officer of the respective PMU/PIU</p> <p><b>Member 1:</b> Local camp head (Majhi, for DRP communities)</p> <p><b>Member 2:</b> An Elected Member of community (Chairman for the host community)</p> <p><b>Member 3:</b> A Female Member of the camp or host community who is in a leadership position</p>	<p><b>Uptake Staffs:</b></p> <ul style="list-style-type: none"> <li>Maintain and implement GRC uptake channels (Phone, SMS, email, in person etc.)</li> <li>Log in grievances and provide tracking number</li> <li>Receiving grievances for logging forwarded from other Tiers/levels</li> <li>Intimating progress to Complainant</li> <li>Keeping and maintaining Logbook and files</li> <li>Report quarterly progress to level two</li> </ul> <p><b>Local GRC:</b></p> <ul style="list-style-type: none"> <li>Ensure GRM is publicized locally</li> <li>Screening against eligibility criteria (If admissible or not)</li> <li>Carryout inquiry on eligible grievances</li> <li>Arrange to solve simple complaints informally</li> <li>Consult with Contractors and other parties against whom complaints have been launched and mediate, if feasible</li> <li>Carryout GRC meeting and provide final decision on complaints</li> <li>Forward complaints to level two if Complainant is not satisfied with resolution</li> </ul>	<p>Uptake to Initial Feedback on eligibility and next course of action = 48 hours</p> <p>Eligibility acceptance to level one/level one Resolution = 7 days</p>

	<p><b>Member 4:</b> A Representative of the beneficiaries and affected persons in the area</p> <p><b>Member 5:</b> Labor representative for labor related dispute</p> <p>GRC Uptake Staff</p> <p>At least one will be a female member. They may be posted to subproject sites.</p>	<ul style="list-style-type: none"> <li>• Refer to Legal and law Enforcement Agencies, NGO if deem fit</li> <li>• Carryout local stakeholder consultation quarterly</li> <li>• Provide GRM related training to staffs</li> <li>• Monitor GRM progress</li> </ul>	
<b>Level Two: PIU level</b>	<p><b>PIU GRC Head:</b> Assigned head of the Respective PIU for the Project</p> <p><b>Member 1:</b> E&amp;S Specialist of the Project (consultant or assigned from the organization)</p> <p><b>Member 2:</b> An elected member of the respective camp or host community</p> <p><b>Member 3:</b> A female member of the respective camp or host community</p>	<ul style="list-style-type: none"> <li>• Monitor GRM status of level one - Local GRC</li> <li>• Combine the report of all level one GRC and provide feedback to level three PMU GRC</li> <li>• Inquire and decide on cases forwarded from level one GRC</li> <li>• Forward case to level three GRC if unable to decide or if decision rejected by Complainant</li> <li>• Train own staffs on GRM</li> <li>• Monitor GRM Progress of level one</li> <li>• Arrange meeting with stakeholders</li> <li>• Provide guidance to level one Local GRCs</li> </ul>	Receive from level one to Resolution = 7 days
<b>Level Three: PMU Level</b>	<p>GRC Head/Chairman: Head of the Project (PD)</p> <p>Member 1: Deputy Project Director (DPD)</p>	<ul style="list-style-type: none"> <li>• Develop GRM policy and implement</li> <li>• Train staffs on GRM Procedure and provide guidance incl SEA/SH GRM</li> <li>• Provide logistics to various GRCs</li> <li>• Develop and maintain various uptake channels</li> <li>• Monitor GRM progress of level 1 and 2</li> <li>• Compile GRM database and share with World Bank and PMU (<b>GRM Aggregator</b>)</li> </ul>	Receive from level two to Resolution = 7 days

	<p>Member 2: E&amp;S Specialist of the PMU (consultant or assigned from the organization)</p> <p>One will be trained SEA/SH Coordinator</p>	<ul style="list-style-type: none"> <li>• Carryout field visits</li> <li>• Provide resolution to complaints forwarded from level two GRC</li> <li>• Ensure Telephone/SMS receivers receive complaints and forwards to level one GRC and keep log of complaints</li> <li>• Carryout high-level stakeholder consultation</li> <li>• Maintain database of all GRC members at all levels/tiers</li> <li>• Be responsible for addressing SEA/SH issues</li> </ul>	
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The Project GRM process will be followed as under. This will be tested in the field and may be changed depending on practicality.

**Table 4.4: GRM Process (Uptake, Investigate, Response, Closure)**

Stage	Activities	Responsibility	Timeframe
<b>Uptake</b>	<p>Carryout activities listed as per GRM Uptake Channel paragraph.</p> <p>If complaint not eligible as decided by first level intimate the Complainant and refer him/her to Legal/Law Enforcing Agency/NGOs etc. if the complainant desires</p> <p>If eligible, level one will begin their activities</p>	<p>The Uptake staffs assigned at each field office.</p> <p>If complaint is received via telephone, SMS, Website and email these will be referred to the uptake staffs of that specific field office where the complaint originates who will record, assign tracking number and follow Activities 1 and 2.</p>	<p>The Complainant will be informed if the complaint is legible or not within 48 hours</p>
<b>Screening for Eligibility (Just after uptake)</b>	<p>After receiving complaints level one GRC will test complaint for eligibility. The eligibility will be informed to Uptake Channel staffs</p>	<p>The Level one GRC will be responsible to inform Uptake Channel staffs of eligibility</p>	<p>Eligibility will be intimated to Uptake Channel Staffs in 48 hours</p>
<b>Complaint Assessment</b>	<p>If the initial assessment establishes the eligibility of the complaint to be pursued, a further assessment is recommended of the <b>seriousness</b> of the complaint—classified in terms of high, medium, or low—and its impact on both the complainant and the project. Criteria for classification include the following:</p> <ul style="list-style-type: none"> <li>• Severity of the problem,</li> <li>• Potential impact on the well-being of an individual or group,</li> <li>• potential impact on the project, and</li> <li>• public profile of the issue.</li> </ul> <p>Additional data collection through field visits to the sites, discussions and interviews with Complainants and other relevant persons or groups in the community, and cross-checking the information already provided will</p>	<p>Level one GRC</p>	<p>3 working days from eligibility intimation</p>

	be required. This phase is an investigation phase		
<b>Formulate a Response</b>	<p>Having completed the complaint assessment, a response along with options will be formulated on how to proceed with the complaint for solution. This response should be communicated to the complainant. The response should include the following elements:</p> <ul style="list-style-type: none"> <li>• acceptance or rejection of the complaint</li> <li>• reasons for acceptance or rejection</li> <li>• provide an initial solution including options</li> <li>• a time frame; and</li> <li>• further documents or evidence required for investigation, if required.</li> </ul> <p>In case further evidence is required, the GRC will carry out further investigation with new evidence and repeat the process above</p>	Level one GRC	2 working days assessment
<b>Implementing the Solution (if accepted)</b>	<p>If Complainant agrees with the solution the GRC will settle grievances through:</p> <ul style="list-style-type: none"> <li>• requesting the relevant agencies responsible for the grievance to take appropriate measures to remove the cause of grievance (e.g., remove garbage, warn workers or take disciplinary measures against workers etc.)</li> <li>• provide timeline for the resolution by the responsible party</li> <li>• signing agreements between Affected Parties (APs) and the GRC for solutions mutually agreed upon</li> <li>• initiating a monitoring process to see if the agreed actions are being implemented or not</li> <li>• After action is completed, intimate the Complainant and get his/her signature in GRM Resolution Satisfaction Form</li> </ul>	Level one GRC	Starts within 2 working days from intimation of options
<b>Implementing the Solution (if not accepted, or for a complex issue not under level one jurisdiction)</b>	<p>The complaint will be forwarded to Level two with intimation to the Complainant about timeline. Monitor complain handling process</p>	Level one GRC	2 working days from solution being unaccepted by Complainant
	Level two GRC will repeat complain resolution process mentioned above for level one.	Level two GRC	Presentation of solution in 7

	Complaint resolution and options will be intimated to level one by level two who will interact with the Complainant. Resolution activities will also be coordinated by level two. For complex issues, level two will directly contact Complainant		working days from receiving complain from level two
<b>If level two Solution is not accepted</b>	Level two will forward the Complaint to Level three and same process will follow	Level three GRC	Presentation of solution in 7 working days from receiving complain from level two
<b>Complaint Evaluation</b>	<p>An evaluation system should assess the overall effectiveness and the impact of the GRM. Such evaluations will take place biannually, and their results should contribute to improving the performance of the GRM and provide valuable feedback to PMU. The following questions will be addressed in such evaluations:</p> <ul style="list-style-type: none"> <li>• How many complaints have been raised?</li> <li>• What types of complaints have been raised?</li> <li>• What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?</li> <li>• How long did it take to solve the problem?</li> <li>• How many APs have used the grievance redress procedure?</li> <li>• What were the outcomes?</li> <li>• Is the GRM effective in realizing the stated goals, objectives, and principles?</li> <li>• Is the GRM capable of responding to the range of grievances specified in their scope?</li> </ul>	All GRC levels	Biannually

**Note 1:** for serious Complaints (GBV, fatality, near misses, hazardous spill etc.) initial reports must be given to PMU and World Bank within 24-hour time

**Note 2:** Complainant will not be barred from seeking redress from Legal/ Law Enforcement/NGOs. All levels of GRC should maintain a good communication network with them, including local Government officials so that Complainant referred to these agencies can be given adequate attention.

**Note 3.** The above processes should not create incentives for Affected Parties (APs) to seek further redress (e.g., by having the level two routinely yield more benefits or higher compensation than level one etc.). The process should not encourage unjustified multiple appeals.

**Note 4.** GRCs must upkeep *Complaint Forms, GRC Review Meeting Form, M&E/Quarterly Report Compilation Form and GRM Satisfaction Forms* – both blank and those filled by the GRM process for future references. *Filled form must also be saved digitally*

There will be several uptake channels for complaints to be received:

**Table 4.5: GRM Uptake Channels**

Channel	Particular	Timetable	Responsibility
<b>Face-to-Face</b>	There will be a number of field offices, and each field office will nominate an individual to register complaints. He/ She should have a register to note the complaints and complaint forms to fill up. The form will be signed by both the staff and the Complainant.	Will be operated from 6 AM to 6 PM (12 hours)  This information must be disseminated to the public	The complaint desk will be manned during working days only. For non-working days, virtual means (SMS, Telephone, email etc.) will be suggested. The field level staff will welcome the Complainant and make him/her comfortable and begin with greetings. The staff will note, fill up the form ( <b>Annex A</b> ), get complainant's signature and sign the form him/herself. The Staff will also provide estimated timeline and a tracking number. The Staff will also intimate the first GRC level for eligibility checking as well as the Central GRC aggregator for compilation. After eligibility check by the first level, the Staff will inform the Complainant if the complaint is eligible to be considered or otherwise. If not eligible, the Complainant will be provided other options (NGO, police, legal etc)
<b>Telephone</b>	01711-XXXXXX	Will be operated from 6 AM to 6 PM (12 hours)	Will be manned by two operators working 6 hours shifts. One female and one male. Will be open 7 days a week, even in Government holidays. Following will be noted ( <b>Action 1</b> ): <b>Name and address (none required if anonymity sought)</b> <b>Complaint, in summary</b> <b>Nature of Complaints</b> <b>If it is project related.</b> <b>Complaint against, if any</b>  Operator will ( <b>Action 2</b> ): <b>Register the complaint in a register</b> <b>Provide a tracking number</b> <b>Provide a timeline</b> <b>Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing)</b> <b>Intimate the first level of GRC about the complaint</b> <b>Intimate Central GRC aggregator</b>  <b>After eligibility check by first level, inform the complainant if the complaint is eligible to be considered or otherwise. If not eligible, the complainant will be provided other options (NGO, police, legal etc.)</b>
<b>SMS</b>	01911-XXXXXX (different from above number)	Will be operated from 6 AM to 6 PM (12 hours)	Will be manned by above two operators. After SMS is received, Operator will call back and execute above steps
<b>Email</b>	Project.GRM@email.com	Will be monitored as per above timing (12 hours)	Will be operated by the Social Development Specialist/Communication Specialist/ Any other nominated staff of the PMU/PIU at Project Office. If no details are given will request number (Action 1) above.

			If phone number is given, the Complainants will be called to get the above information, else email will suffice. Then the Staff will carry out Action 2 above.
<b>Website</b>	Will be established by PMU and PIUs	Will be monitored as per above timing (12 hours). The site will provide a format for complaint registration. This will include info required in Action 1 above. The complaint will be redirected to the email above with a Subject <b>GRM From Web – Date and Time.</b>	As above
<b>Letter</b>	Social Development Specialist XXX Project H XX, Rd XX, Sector XX Dhaka Phone: 01711-XXXXXX	Will be received and opened during office hours	After the letter is received, the complaint will be studied and if ineligible, it will be intimated to the Complainant including provision of other options. If eligible Action 1 and 2 above will be implemented
<b>Suggestions Box</b>	Suggestion Boxes will be placed in front of every field office	Will remain open round the clock. Will be opened during the beginning of office hours by the staff responsible to register complaints in each field office	As above



## Chapter 5: Implementation of the SEP and Budget

### 5.1 Implementation Arrangements of the SEP

47. PIUs of the respective IA and PMU are responsible for managing the E&S risks of the project, including implementation of the SEP through their existing structures. For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the proposed project relevant ES management planning documents. Although the project is now at preparation stage, the most likely institutions those would be involved are the Implementing Agencies (IAs) and their Project Implementation Unit (PIUs) and Project Management Unit (PMU).
48. This project's institutional and implementation arrangements reflect the unique nature of the development challenge that it is trying to address, while working within the confines of the GoB's rules of business, and policy stance on Displaced Rohingya Population (DRP), while also presenting a multisectoral response, as requested by the government. DDM will have a PMU and will play the role of central coordination across all implementing agencies (IAs) within the project, while all other IAs will have a PIU. Each PMU/PIU will be responsible for implementation, coordination, monitoring and supervision of their respective component in consultation with the Secretary/Senior Secretary of their respective parent ministry. The coordination and monitoring between IAs will take place at the central, divisional, district and upazila levels for implementation of the interventions for both the Host Communities (HC) and DRPs using existing GoB mechanisms. For services to the DRP community, each PMU/PIU will coordinate with the office of the Refugee Relief and Repatriation Commissioner.
49. The PMU/PIUs will (i) help to supervise and streamline the GRM management system based on the experience from field; (ii) provide support to respective camps and host communities in arranging training on SEA/SH related risk mitigation and sensitization; (iii) manage the overall training and capacity-building program; (iv) monitor and supervise all project management activities; (v) organize monitoring and evaluation activities, including GRM management; (vi) prepare necessary project progress and project completion reports; and (vii) ensure full compliance with GoB and World Bank ESF.

**Table 5.1: Role and Responsibilities for SEP Implementation**

Actor/Stakeholder/ responsible person	Responsibilities
Communication/SEP team of PMU/PIUs	<ul style="list-style-type: none"> <li>- Overall planning and implementation of the SEP;</li> <li>- Lead activities on stakeholders' engagement</li> <li>- Management and resolution of grievances;</li> <li>- Guide/coordinate/supervise the contractors for activities related to the SEP</li> <li>- Monitoring and reporting on SEP to DDM and other IAs and World Bank</li> <li>- Take lead in carrying out the beneficiary satisfaction survey</li> </ul>
PMU and PIU Officials	<ul style="list-style-type: none"> <li>- Visit project area for M&amp;E (at least quarterly)</li> </ul>
Site Contractor(s) / sub-contractors (if any)	<ul style="list-style-type: none"> <li>- Report/inform PMU on issues related to the implementation of the SEP / engagement with the stakeholders.</li> <li>- Resolve and convey management/resolution of grievance cases to the project GRM team, in particular labor related grievance cases.</li> <li>- Collaborate/inform the local communities and other local level stakeholders on the E&amp;S monitoring</li> </ul>
Other interested stakeholders (external/regulatory agencies)	<ul style="list-style-type: none"> <li>- Participate in the implementation of SEP activities</li> <li>- Monitor/ensure project's compliance with the laws of Bangladesh</li> <li>- Engage with the project's stakeholders on E&amp;S issues</li> </ul>

## 5.2 Budget for SEP Implementation

50. A tentative budget for implementing the Stakeholder Engagement Plan throughout the entire program management cycle is provided below, to be finalized post effectiveness. This will be annually reviewed by the PMU/PIUs, and adjusted as needed.

**Table 5.2: Tentative Annual Budget to Implement Stakeholder Engagement**

Sl.no	Stakeholder Engagement Activities	Quantity	Unit Cost (US \$)	Times/ Months	Total Cost (US \$)
1	Staff/Consultants Salaries				Paid from Project Consulting Service Budget
2	Training on Stakeholder Engagement and GRC issues	3 times	500		1500.00
3	Information Desk officer (will be nominated from /PIUs existing staff)				Paid from Project Consulting Service Budget
4	Stakeholder/Community/Sensitization meeting in Project areas	Lump Sum			5000.00
5	Meeting with District and Upazila Govt Officials	4 meeting/yr	500	12	6000.00

6	Meeting at PMU/PIUs with SPs and IPs	1 meeting/yr	500	3	1500.00
7	Satisfaction Survey	1/yr	1000	3	3,000.00
8	Travel expenses	Lump Sum	2000		2,000.00
9	Communication materials (Poster, Brochure, flier, billboards, website)	Lump Sum			3,000.00
10	GRM Guidebook/ Manual	Lump Sum			500.00
11	Suggestion/complain Boxes	20	50		1,000.00
12	GRM /GRC expenses	Lump Sum			2,000.00
13	GRM MIS Database	Lump Sum	5000		1,000.00
	Sub-Total				26,500.00
14	Contingency				2,500.00
	<b>Total (Less Serial 1 and 3) (Rounded)</b>				29,000.00 USD
					BDT 35,00,000.00 (Rounded)

## Chapter 6: Monitoring and Evaluation

51. PMU/PIUs will be responsible for the overall coordination and supervision of the M&E tasks through their existing structures. The Environmental and Social Specialist be responsible for the monitoring and reporting of this SEP. PMU/PIUs will prepare periodic monitoring report as required by the ESCP. In case consolidated report on E&S management is prepared, they will ensure that specific sections/chapters on the SEP implementation are entered in such reports.
52. The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. The Social Expert will work on a reporting matrix in this regard.

**Table 6.1: Monitoring requirements**

Key elements	Time frame	Methods	Responsibilities
Stakeholders' access to project information and consultations	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey	<b>PMU and PIUs</b>
Project beneficiaries' awareness of project activities, their entitlements and responsibilities	Periodic (during project implementation)	Interviews, observations, survey	<b>PMU and PIUs</b>
Acceptability and appropriateness of consultation and engagement approaches	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	<b>PMU and PIUs</b>

Community facilitators' engagement with target beneficiaries	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	<b>PMU and PIUs</b>
Accessibility and readability of public information dissemination materials	Periodic (during project implementation)	Spot checks, interviews, desk-review	<b>PMU and PIUs</b>
Tones in social media and broader public perceptions (including NGOs)	Periodic (during project implementation)	Social media monitoring, interviews, observations	<b>PMU and PIUs</b>
Rate of grievances and complaints (reported and unreported)	Periodic (during project implementation)	Desk review, interviews, survey	<b>DDM and PIUs</b>

### Closing the Feedback Loop: Reporting back to stakeholder groups

53. The PMU/PIUs will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs will involve, preferably, through face-to-face meeting or direct interactions. But in case this found to be impractical, it'll be done through written correspondence or by using IT, such as SMS, phone call, etc. Other pertinent media, such as website, social media, press briefing, may also be used.
54. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.
55. The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations.
56. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:
  - ✓ Publication of a standalone annual report on project's interaction with the stakeholders.
  - ✓ A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

- Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);
- Frequency of public engagement activities;
- Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas;
- Number of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
- Type of public grievances received;
- Number of press materials published/broadcasted in the local, regional, and national media;

57. The outcomes/feedback from these 'reporting back' measures will be compiled and shared/disclosed with the stakeholders' and general public through the use of proper media, such as websites, social media accounts, communication materials, etc.

## Annex 1: Summary of Stakeholder Consultation Outcomes

Issues	Discussion	Inputs of consultations for designing phase of the project
<b>Environmental and Social Risks and Management</b>	<ul style="list-style-type: none"> <li>• Learning from existing interventions to reduce risk.</li> <li>• The support in the same areas in immunization and maternal and newborn health. Nutrition is aligned.</li> <li>• Some of the support currently providing is a continuation and that would be for the HR at the upazila and the HH and those that were never recruited.</li> <li>• Renovation – there will be renovation and construction and GoB would like to do this themselves and we are happy with that.</li> <li>• For short-term, the exact areas of interventions need to be mentions. Camp interventions will remain the same.</li> <li>• There has been a lot on investment in CXB and on the credit side – in terms of health there is not much reconstruction not needed in CXB and hence we are expanding the host areas to allow the IDA credit to be utilized in renovating facilities in the whole of Chattogram Division.</li> <li>• The impact may not be as acute, but the rest of Chittagong is impacted through inflation the influx of DRP.</li> <li>• Nutrition Package: within the camp it would be similar, and we are going ahead with it</li> <li>• Renovation will be in Upazila Health Complexes and some of the District Hospitals. Also, some schools of the Chittagong division.</li> <li>• Expanding Child protection (CP) services for both population and livelihoods and skills training for Host population, focused on microcredit program which is underfunded currently. WB perspective using an existing program is more desirable.</li> <li>• On CP there is an MoU in place between UNICEF and DSW- what are the findings and gap from the current interventions?</li> <li>• We emphasize learning lessons from CBPS (has a TAPP that covers the whole country and Chittagong Division and CXB District)</li> <li>• Refurbishment of government orphanages shelter homes and others.</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation assisted in the selection of schools, medical facilities, types of activities for project interventions.</li> <li>• Consultation also aided in understanding of local context and develop ES risk profile mitigation measures.</li> <li>• Involvement of UN agencies and other partners and their scope of work</li> </ul>

	<ul style="list-style-type: none"> <li>• Coherently working in the camps and has case workers and the MoU here has helped get these services into the camp.</li> <li>• Accelerate CP across the country. and happy to have the Bank on board – there are huge caps in HR and building capacity on case management and this links to GBV and the service delivery for GBV comes from MoSW – responding to the GBV case management through the GBVIMS.</li> <li>• Work on the multipurpose centers in the camps; Integrated services for CP and women and we are having the discussion with GoB in aligning efforts and provision here.</li> <li>• MoU here for ISO would be inter ministry not for the service delivery.</li> <li>• The resilience and service operations – GoB 2 umbrella DPP – one for construction and one for services defining activities and allocations for hosts and DRP. These DPPs are in writing.</li> <li>• Anything that can be done to allow whatever program design has been done to keep coherence will help the gov to have consistency between what is done outside and inside the camps and also the angle of cost effectiveness plays out here.</li> <li>• Social Safety Net: previous project EMRCRP there were 2 activities – (i) public works in camps and (ii) employment generation program in the HC and once again public works to provide temp employment (aka safety net). CXB program was expanded to include a large of days and the benefits was almost doubled for all EGPP+ beneficiaries across the country.</li> </ul>	
<p><b>Planning and Operational Management</b></p>	<ul style="list-style-type: none"> <li>• During the project implementation, there will be temporary arrangement for many issues, like labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities.</li> <li>• Integrated Vector management to be considered involving different ministries to cover the whole country effectively. Besides, adequate technical support to be arranged to check the efficiency of the vector control method.</li> <li>• HNP capacity building; in small urban body with one medical officer needs to be improved by assigning additional manpower.</li> </ul>	<ul style="list-style-type: none"> <li>• Issues of medical waste management</li> <li>• Facility refurbishment</li> <li>• Labor Engagement</li> <li>• ES Risk management and community involvement</li> </ul>

	<ul style="list-style-type: none"> <li>• Mayors of the urban bodies may be integrated with the project for increased patronization.</li> <li>• Monitoring and Evaluation: Efficient reporting system may be developed by using the existing MIS systems.</li> <li>• Sustainability of the present modalities of service delivery through NGOs</li> </ul>	
<b>Operational Arrangement</b>	<ul style="list-style-type: none"> <li>• Proper institutional arrangements for improved effectiveness of the project interventions.</li> <li>• Clarity in the scope and the work items.</li> <li>• Environmental and Social Documents like LMP, SEP, ESCP, SEA/SH Action Plan.</li> <li>• Mid-term evolution</li> </ul>	The DPP will clearly define the scope, working modalities and the project activities.



## Annex 2: Consultations held during project preparation phase

No.	Date	Venue	Main Participant Groups	No. of Participants	
				Male	Female
01	22 January 2024	In person	Consultations with the task team and debrief on the overall project	19	3
02	28 January 2024	In person	Consultations with the UNICEF	30	3
03	1 February 2024	In person	Consultation with the government officials	30	3
04	18 January 2024	In person	Local level consultation with the IAs	28	9
05	9 January 2024	In person	Representatives of DRP in the camps	20	40
06	9 January 2024	In person	Representatives of Health Centers, one stop crisis cell, service beneficiaries	10	20

### Annex 3: Sample Grievance Registration Form

Grievance Form			
<b>Grievance reference number (to be completed by Project):</b>			
<b>Contact details</b> (Can be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
<b>How would you prefer to be contacted (check one)</b>	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
<b>Preferred language</b>	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
<b>Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.</b>			
<b>What is your suggested resolution for the grievance, if you have one? Is there something you would like IA (RHD, BRTA, DGHS, BP) or another party/person to do to solve the problem?</b>			
<b>How have you submitted this form to the project?</b>	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
<b>Who filled out this form (If not the person named above)?</b>	Name and contact details:		
<b>Signature</b>			
<b>Name of IA's official assigned responsibility</b>			
<b>Resolved or referred to GRC1?</b>	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Resolved referred to GRC2?</b>	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Completion</b>			
<b>Final resolution (briefly describe)</b>			
	Short description	Accepted? (Y/N)	Acknowledgement signature
<b>1<sup>st</sup> proposed solution</b>			
<b>2<sup>nd</sup> proposed solution</b>			
<b>3<sup>rd</sup> proposed solution</b>			