Government of the People's Republic of Bangladesh

Bangladesh Road Transport Authority
Ministry of Road Transport and Bridges

Dhaka Transport Coordination Authority
Ministry of Road Transport and Bridges

Department of Environment
Ministry of Environment, Forest and Climate Change

Bangladesh Clean Air Project

Project Code: P502572

<u>Draft</u> Stakeholder Engagement Plan (SEP)

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1. Introduction/Project Description

This Stakeholder Engagement Plan (SEP) is an important element of the Bangladesh Clean Air Project, a venture financed by the World Bank and executed by the Bangladesh Road Transport Authority (BRTA) and Dhaka Transport Coordination Authority (DTCA) under the Ministry of Road Transport and Bridges, and the Department of Environment (DoE) under the Ministry of Environment, Forest and Climate Change. Your involvement and feedback are not just welcomed but crucial to the success of this project.

The project development objective is to strengthen air quality management and reduce emissions from the transport sector.

The project will aim to (a) strengthen air quality governance, including enhanced regulatory, monitoring, and enforcement capacity of DoE, BRTA, and other agencies, as well as collaboration within the IGP-HF region, and (b) incentives for emissions reductions in the transport sector through modernized bus services.

Aligned with the World Bank's Environmental and Social Framework (ESF), especially ESS10 on Stakeholder Engagement, the project committed to providing transparent, inclusive, and culturally respectful community engagement. This commitment, free from manipulation or discrimination, is designed to support informed and meaningful participation throughout the project, and we hope it instills confidence in the project's integrity.

The project comprises two components:

- **Component 1: Strengthening Air Quality Governance**

This component will support the GoB to reinforce its regulatory and institutional foundations for achieving its long-term vision of air quality. Accordingly, this component will finance (a) the development of regulations and policies, in-depth studies, training, and other capacity-building activities to support MoEFCC, DoE, NBR, and LGD in fulfilling their AQM mandates; (b) capacity-building and environmental infrastructure for DoE and key stakeholders on core competencies of AQM; (c) the operationalization of the Continuous Emissions Monitoring Program (CEMP) for significant point sources of air pollution, and (d) project management of the DoE activities.

- **Component 2: Reducing Emissions from the Transport Sector**

In Component 2, BRTA and DTCA will implement targeted measures to mitigate air pollution from vehicular emissions while improving urban mobility in critical areas of Dhaka. This project's implementation will be phased to ensure stakeholder buy-in in the reformed bus operations framework. The first half of the project will focus on advancing no-regret infrastructure components, including vehicle inspection centers and depot upgrades.

In parallel, the Government will advance the DTCA reform on franchise-based bus services so that, in the second half, it can implement the first cluster. This phased approach will allow for the necessary institutional and regulatory groundwork to be established while progressing with the infrastructure.

The project is being prepared under the World Bank's Environment and Social Framework (ESF). All proposed activities under the Project will be subject to an Exclusion List to screen out any High-risk related activity.

2. Objective/Description of SEP

This SEP is a crucial component of the project, as it defines a comprehensive program for stakeholder engagement, including public information disclosure and consultation throughout the project cycle. It outlines how the BRTA, DTCA, and DOE will communicate with stakeholders and includes a mechanism for people to raise concerns, provide feedback, or complain about the project and any related activities. The SEP emphasizes methods to engage groups considered most vulnerable and at risk of being excluded from project benefits, ensuring that all voices are heard and believed in the project's implementation.

3. Stakeholder Identification and Analysis per Project Component

3.1 Methodology

The following stakeholders have been identified and analyzed per project component: affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3), and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

Table 3-1: Stakeholder Identification and Analysis per Project Component

Component	Implementing Agency	Stakeholders	Analysis
Component 1: Strengthening Air Quality Governance	DOE, NBR and LGD	**Public Sector:** Local Administration, Local Government Representatives, and other Government Officials, Environmental Protection Authorities, and Health Authorities. (e.g., *Dhaka South City Corporation, Dhaka North City Corporation, Gazipur City Corporation, BRTC, NBR, DoE, Ministry of Information and Broadcasting, Power Division, Armed Forces Division, Ministry of Fisheries and Livestock, Bangladesh Hi-Tech Park Authority, RTHD, Forest Department, DSHE, Sustainable*	They oversee and coordinate development activities, ensure regulation compliance, and safeguard public health and environmental integrity. They ensure the transparency of the project implementation and confirm accountability of the project team. They also facilitate the process of consultations with stakeholders at all stages of the project at all levels.

		and Renewable Energy Development Authority, DPHE, ERD, Finance Division, Health Services Division, BPDB, AG Office, ICTD, SHED, Ministry of Commerce, DTCA, National Skill Development Authority, Press Information Department, Ministry of Industries, BRTA, BCSIR, NIPSOM, BSTI, Bangladesh Betar, HBRI, Ministry of Shipping, BNF, DMTCL, IDCOL)	
		Private Sector: *Bangladesh Brick Manufacturing Owners Association, Bangladesh Steel Manufacturers Association, Bangladesh Steel Mills Owners Association, Bangladesh Auto Brick Manufacturers Association, Bangladesh Independent Power Producers Association, Bangladesh Solar and Renewable Energy Association, Bangladesh Cement Manufacturers Association)*	Stand to benefit from enhanced infrastructure, increased employment opportunities, and improved service provision, contributing to local economic development. There is also the possibility of resisting the proposed transformation in policy and practice. Some of the fourms may be affected by the project's activities and have to cope with the changed conditions.
		Civil Society: *BAPA, Academia, ICDDR,B, BELA, Paribesh O Jalabayu Paribartan Andolan (Environment and Climate Change Movement), MIST, Nature Conservation Management, UNIDO,*	Among the most affected are older adults, women, children, persons with disabilities, small ethnic communities, and laborers. Nevertheless, the critical mass as identified will be to ensure appropriate

| | | UNDP, BIDS, and Media) | implementation of project activities.

Suppliers, Contractors, and Laborers: Their role is imperative in implementing project activities. |
|---|---|---|---|
| **Component 2:** Reducing emissions from the transport sector | BRTA and DTCA | **Public Sector:** Ministry of EFCC, Ministry of Industries, Ministry of Home Affairs, Ministry of Commerce, RHD, Power Division, Bangladesh Police, DOE, Dhaka North and South City Corporations, and LGD.

Private Sector: *Jatri Kalyan Samity* (Passengers Welfare Society), *Nirapad Sarak Andolan* (Safe Road Movement), Road Transport Labour Federation, Truck Driver Labour Federation, Bus and Truck Owner's Association, Truck And Covered Van Owners Association, Reconditioned Vehicles Importers and Dealers Association, Manufacturers and Merchants Association, and Covered Van and Truck Prime Mover Goods Transport Owners Association.

Civil Society: Academia, Media, CSOs. | (as above) |

3.2 Affected Parties

Local communities, community members, and other parties affected by the project's direct impacts include affected parties. Specifically, the following individuals and groups fall within this category:

- Project Affected People (PAP), whose lives and livelihoods will be affected if any incidents of involuntary resettlement and/or livelihood losses happen

- Women, adolescents, and children living in affected communities or user of e-mobility bus services

- Communities in the vicinity of the project's planned activities

- Local population and communities, including local/neighborhood associations/clubs, youth groups/associations

- Small Ethnic Communities living around the project area

- Residents, business entities, and individual entrepreneurs around 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

3.3 Other Interested Parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Officials of Government agencies directly and indirectly linked with the project

- Local and national media, including electronic 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 communities

- Suppliers, contractors, contractors' workforce, et al.

- Agencies working with sustainable environmental practices

3.4 Disadvantaged / Vulnerable Individuals or Groups

Assessing whether the project's effects might unfairly affect disadvantaged or vulnerable individuals or groups is crucial. These individuals often lack a platform to voice their concerns or fully comprehend the project's impacts. Tailoring awareness-raising and stakeholder engagement efforts for these groups, considering their specific sensitivities, problems, and cultural aspects, is essential.

Vulnerability can arise from various factors such as origin, gender, age, health, economic status, financial insecurity, marginalized position in the community, dependence on others or natural resources, and more. Engaging with these vulnerable groups requires implementing specific measures and assistance to facilitate their involvement in project-related decision-

making. This ensures their awareness and input in the overall process are on par with other stakeholders.

Within the project, these vulnerable or disadvantaged groups may encompass, but are not restricted to, the following:

- Persons with disabilities

- Women

- Children

- Female-headed households

- Elderly (especially those 60 years and above) people

- Low-income people including from Small Ethnic Communities living in the project area

- Community laborers

- Transgender and LGBTQ groups/people

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. The following sections describe the methods of engagement that the project will undertake.

4. Stakeholder Engagement Program

4.1 Summary of Stakeholder Engagement Done During Project Preparation

Table 4-1: Summary of Consultation Meetings

SI	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	Female	
1	12th December 2024	The World Bank	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and Korean Government Agencies	19	12	• Proposed activities of the project • Korean experience • Issues to be considered acknowledging private sector actors' engagement • National policies and practices • Technological options/alternatives
2	14th January 2025	BRTA Office, Rangpur	BRTA, DoE, private sector actors, and landowners	24	0	• Proposed project activities • Considering private sector actors issues/challenges

SI	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	Female	
3	26th January 2025	The World Bank	Journalists	11	01	• Proposed activities of the project • Engagement of media
4	29th January 2025	DoE	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	101	19	• Proposed activities of the project • Issues to be considered acknowledging private sector actors' engagement • National policies and practices • Technological options/alternatives
5	11th February 2025	DTCA	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	33	05	• Proposed activities of the project • Issues to be considered acknowledging private sector actors' engagement • National policies and practices • Technological options/alternatives
6	19th February 2025	BRTA	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	45	02	• Importance of considering a feasible business model. • Busy traffic is a critical challenge for private transport. • Not only the condition of transport but also the fuel, mobil, battery etc. should also be factored in to bring the pollution level down. • Heavy duty for importing transports is a big challenge for private owners. • Specifications should be as per the local context and condition.

SI	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	**Female**	
						• Capacity building of related stakeholders will be an important matter in adopting the proposed transformation in this sector.

4.2 Summary of Project Stakeholder Needs and Methods, Tools and Techniques for Stakeholder Engagement

The Stakeholder Engagement Plan below outlines the engagement process and methods, including sequencing, topics of consultations, and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 4-2: SEP Summary Table

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
STAGE 1: Project Preparation	Project Affected People: Affected people residing in the project area, Vulnerable households	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF; Project scope and rationale; Project E&S principles, Grievance mechanism process	Public meetings, separate meetings for women and vulnerable groups, 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 into operation, continuous communication through mass/social media and routine interactions.	BRTA, DTCA, DOE
	Other Interested Parties (External)- NGO working in waste management, climate resilience	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan, and RPF. Project scope, rationale, and E&S principles,	Face-to-face meetings Joint public/ community meetings with PAPs	Quarterly meetings with affected communities. Disclosure meetings at local and national levels	BRTA, DTCA, DOE

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
	issues and GBV sectors	Grievance mechanism process			
	Other Interested Parties (Internal) Press and media Local NGOs, Different Government Departments having link with project implementation	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF; Grievance mechanism, Project scope, rationale, and E&S principles	Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable people as needed), 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 and in affected locations/ communities as needed. Communication through mass/social media (as needed) Information desks with brochures/posters in affected villages (continuous)	PIUs
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required. Business people, Contractors, and suppliers	Legal compliance issues, Project information scope and rationale and E&S principles, Coordination activities, Grievance mechanism process, ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF	Face-to-face meetings, Invitations to public/community meetings, Submission of required reports	Disclosure meetings, Reports as required	PIUs

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
STAGE 2: Implementation Phase	Project Affected People, including Vulnerable community	Grievance mechanism Health and safety impacts (RAP, ESMP, ESIA community H&S, community concerns) Employment opportunities Project status	Public meetings, open houses, trainings/workshops, and Separate meetings as needed for women and vulnerable groups. 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 the construction phase. Communication through mass/social media as needed. Notice boards are updated weekly. Routine interactions Brochures in local offices	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 the construction phase)	PIUs
	Other Interested Parties, (External) Press and media, Various Government Departments	Project information- scope and rationale and E&S principles, Project status, Health and safety impacts, Employment opportunities, Environmental concerns, GBV-related consultation, Grievance mechanism process	Public meetings, open houses, trainings/works hops Disclosure of written information: brochures, posters, flyers, website, Information boards, Notice board(s) at construction sites. Grievance mechanism, GBV-related issues would be handled, and awareness of the issue, including change of mind	The same is for PAPs/ at regular intervals throughout the project period to educate and raise awareness amongst the population about the pitfalls of GBV and make them capable of addressing GBV in their respective communities	PIUs

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
			on the matter by the society at large, would be addressed by implementing agencies, including NGOs, NGOs specifically working on GBV matter, local leadership, religious leaders, elders including women representatives, teacher at the local schools and Madrassas.		
STAGE 3: Operation and Maintenance	The project Affected People, including vulnerable community	Satisfaction with engagement activities and GRMGrievance mechanism process	Outreach to individual PAPs, PIUs website, Grievance mechanism, Newsletter	Outreach as needed. Meetings in affected people and villages (as needed/ requested)	PIUs
	Other Interested Parties (External), Press and media, NGOs linked with the GBV issue, Various Government Department, local people, et al.	Grievance mechanism, Issues of concern Status, and compliance reports	Grievance mechanism PIUs websites, Face-to-face meetings Submission of reports as required	As needed	PIUs

4.3 Proposed Strategy to Incorporate the Views of Vulnerable Groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs regarding accessing project information, facilities, services, and other challenges they face at home, at workplaces, and in their communities. The project will benefit vulnerable groups by increasing and improving access to services in the project area. However, the project will pay special attention to addressing any potential barriers to the most vulnerable groups meaningfully participating in the project, including using local languages for some community engagement activities with local ethnic groups.

5. Resources and Responsibilities for Implementing Stakeholder Engagement

5.1 Implementation Arrangements and Resources

The Project Implementation Units (PIUs) will oversee stakeholder engagement activities. The entities responsible for stakeholder engagement activities are E&S and gender experts of all PIUs. The overall responsibility for SEP implementation lies with the PIU Director. BRTA, DTCA, and DOE PIUs will recruit Social, Environmental, and Gender Specialists who will be field-based and will implement the SEP.

The project's stakeholder engagement implementation arrangements are as follows:

PIUs will manage the project's E&S risks, including implementing the SEP through existing structures. The project implementation team will be recruited from the market or delegated from the existing. Suitable institutional arrangements are necessary to manage and implement the proposed project's relevant social management planning documents for efficient and smooth implementation of the project. Although the project is now at the preparation stage, the most likely institutions that would be involved are as follows:

The Implementing Agency (IA) and Project Implementation Unit (PIUs)

PIUs will have overall responsibility for project implementation and management. PIUs, with the support of the Communication Specialists, will coordinate the consultation and communication needs of the project as per the SEP.

The PIUs will (i) help to supervise and streamline the Grievance Redress Mechanism (GRM) management system based on the experience from the field; (ii) provide support to respective communities in arranging training on SEA/SH-related risk mitigation ; (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.

Each project implementation agency will have a Project Implementation Committee (PIC) chaired by the head of the agency, which will assist in supervising the respective components. The PIC must include representatives from relevant ministries, divisions, departments/agencies, and The PIC will ensure that implementation follows both Government and Bank rules and regulations.

Specifically, the PIC will be responsible for (i) supervising and reviewing implementation and providing necessary advice for timely delivery; (ii) monitoring and evaluating implementation progress and suggesting necessary course corrections; (iii) resolving issues and conflicts that may emerge during implementation; (iv) facilitation coordination and convergence with other line ministries, division, and departments/agencies; and (v) keeping the Project Steering Committee apprised on overall performance and key issues relating to the project.

The firms and contractors will provide the PIUs with monthly progress reports on implementing mitigation measures. The reports prepared by the contractors and quarterly monitoring reports prepared by project consultants will be consolidated and submitted.

Table 5-1: Role and Responsibilities for SEP Implementation

Responsible Person	Responsibilities
E&S Specialist/SEP team	• Overall planning and implementation of the SEP • Lead activities on stakeholders' engagement • Management and resolution of grievances • Guide/coordinate/supervise the contractors for activities related to the SEP • Monitoring and reporting on SEP to PIC and World Bank • Take the lead in carrying out the beneficiary satisfaction survey
PIU Officials	• Visit project area for M&E (quarterly)
Implementation Consultants	• Supervision/monitoring of Contractor on SEP
Site Contractor(s) / sub-contractors	• Report/inform PIUs of implementing the SEP/stakeholder engagement issues. • Resolve and convey management/resolution of grievance cases, particularly labor-related grievance cases, to the project GRM team • Prepare, disclose, and implement the contractor's code of conduct, Labor Management Plan, etc. • Collaborate/inform the local communities and other local-level stakeholders on the E&S monitoring
Other Interested Stakeholders (External/Regulatory agencies)	• Participate in the implementation of SEP activities • Monitor/ensure the project's compliance with the laws of Bangladesh. • Engage with the project's stakeholders on E&S issues

The stakeholder engagement activities will be documented through PIUs.

Budget

The budget estimate for the preparing and implementing SEP is BDT 52,470,000 (USD 433,636.36). The budget breakdown can be found in Annex 2. However, this budget will be updated before the implementation of this SEP.

6. Grievance Mechanism

A Grievance Mechanism (GM) is a system that allows not only grievances but also queries, suggestions, positive feedback, and concerns of project-affected parties related to a project's environmental and social performance to be submitted and responded to on time. A three-tier GM will be established for this project. The Labor Management Procedures (LMP) and Annex 6 of this SEP describe detailed grievance management procedures in communities.

Before hiring specialists, existing GMs or designated focal points will handle grievances. Each IA will provide monthly GM reports, which the hired Project M&E Firm will compile into quarterly reports.

6.1 Description of Grievance Mechanism (GM)

Table 6-1: Description of Grievance Mechanism (GM)

Step	Description of process	Timeframe	Responsibility
GM Implementation Structure at the Communities	**Local level GRC:** Nominated official by the PD- Convener (from where complaint originates) Environment Specialist and/or Social Specialist or both, from the PIU (as per nature of the complaint)- Member-Secretary(s) (will be common across the GRCs for that particular IA) Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA – Member A representative from the respective area (where the complaint originates; must be female if the complainant is female) A representative from the community (teacher, NGO, or local person nominated by the complainant)	Specialists are to be hired within 3-6 months of effectiveness. All cases at the local level will be heard within 10 days of their receipt.	All complaints will be received at the Office of the respective project site
	PIU Level GRC: Project Director-Convener Social Specialist and Environmental Specialist of PIU-Member-Secretary	Decisions on unresolved cases will be communicated to the PIU-level GRC and solved within 15 working days	If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings of the local GRC to the project level for further review. With active assistance from the PIU will decide and

Step	Description of process	Timeframe	Responsibility
	Local Government Representative (can be the same representative who was present at the local GRC hearing or other as required; must be female if the complainant is female) A representative from the community (teacher, NGO, or local person nominated by the complainant-preferably the same person who was present at the local GRC hearing)-Member		communicate it to the concerned GRC Social/Environmental Specialist at PIU, with the support of the member secretary of the local GRC will make periodic visits to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints, and suggestions to register with the GRM books
	PSC Level GRC: Representative of the Secretary from Respective ministry-Convener Project Director-Member Secretary	Four weeks	All the unsolved cases at the project level, decisions on unresolved cases, if any, will be made by no more than four representatives of the Secretary, respective ministry. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon IAs
Grievance uptake	**Face to face:** The supervision firms/contractors will establish a few field offices, and each field office will nominate an individual to register complaints. S/he will register to note the complaints and fill out complaint forms. The forms will be signed by both the staff and the Complainant	Will operate from 7 am to 7 pm This information will be disseminated to the public	The complaint desk will be manned only during working days. Virtual means (SMS, Telephone, email, etc.) will be suggested for non-working days The field-level staff will welcome the Complainant, make him/her comfortable, and begin with greetings. The staff will note, fill up the company form, get the Complainant's signature, and sign the form him/herself

Step	Description of process	Timeframe	Responsibility
			The Staff will also provide an estimated timeline and a tracking number The staff will also inform the local GRC level for eligibility checking After the local level's eligibility check, the Staff will inform the Complainant if the complaint is eligible to be considered. If not eligible, the Complainant will be provided with other options (NGO, police, legal, etc.)
	Telephone: 01711-XXXXXX **Phone number of the Member Secretaries** (this is a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage) All level telephone numbers are attached to the SEP for all IAs Telephone numbers will be available for all IAs	Will be operated from 6 AM to 10 PM	Grievance site focal and E&S specialist Following will be noted (Action 1): Name and address (none required if anonymity sought) Complaint, in summary Nature of Complaints If it is project-related. Complaint against, if any Operator will (Action 2): Register the complaint in a register Provide a tracking number Provide a timeline Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing) Intimate the first level of GRC about the complaint Intimate Central GRC aggregator

Step	Description of process	Timeframe	Responsibility
			After the first/local level eligibility check, inform the complainant if the complaint is eligible to be considered. If not eligible, the complainant will be provided with other options (NGO, police, legal, etc.)
	E-mail: Project.GRM@email.com	Will be monitored as per the above timing (12 hours)	It will be operated by the social development specialist/communication specialist/any other nominated staff member of the PIU at the project office. We will request the number (Action 1) above if no details are given If a phone number is given, the Complainants will be called to get the above information; otherwise, the email will suffice Then, the Staff will carry out the second step above
	Website: www. project.com/GRM	It will be monitored at the above time (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 GRM From Web – Date and Time**	As Above
	Letter: Social Development Specialist.	Will be received and opened during office hours	After the letter is received, the complaint will be studied, and if eligible, will be intimated to the Complainant,

Step	Description of process	Timeframe	Responsibility
	Environmental Specialist XXX Project H XX, Rd XX, Sector XX Dhaka Phone: 01711-XXXXXX		including provision of other options If eligible Actions 1 and 2 above will be implemented
	Drop- Box: Suggestion Boxes will be placed in front of every field office	It will remain open around the clock. Will be opened during the beginning of office hours by the staff responsible for registering complaints in each field office	As above
Sorting, Processing	Any complaint received is forwarded to the local GRC office and logged in by the member secretary of the local Recategorized according to the complaint types	Upon receipt of the complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by cell or written as suitable	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Local GRC leads investigation of the complaint Member Secretaries document unresolved complaints, promptly address non-project-related grievances and consider anonymous complaints SEA/SH/GBV-related complaints go to the Gender and GBV Specialist The Convener and Member Secretaries work with site	Within 5 working days of receipt	Local GRC

Step	Description of process	Timeframe	Responsibility
	managers to resolve issues		
	Unresolved complaints should be escalated to the full GRC for resolution within 10 days		
	Compensation follows RPF/RAP procedures; complainants are notified		
	Unresolved issues may go to the PIU Level GRC and the Project Steering Committee GRC		
	If necessary, the Project Director may conduct field investigations within 15 days		
	Complainants can seek legal recourse if issues persist		
	Bank-received complaints are reported to GRS and forwarded to the Project Director		
	The local GRC formulates a proposed resolution and communicates it to the complainant by cell phone, email, or physically, as appropriate		
Monitoring and evaluation	Supervision Firm hired, including: Environmental Specialist Social Specialist	Within 6-9 months of project effectiveness	PIU & Monitoring and Supervision Firm

Step	Description of process	Timeframe	Responsibility
	Both will be members of all the local-level GRCs convened at the area where the IA will be active and where complaints will originate.		
	Data on complaints are collected and reported to PIU every month	Every month	PIU & Monitoring and Supervision Firm
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by monitoring and supervision firms and local GRCs	Every month	Local GRC and Monitoring and Supervision firm
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are grievance uptake, sorting, record, response, address, and feedback mechanism	Every quarter	Monitoring and supervision firm
If relevant, payment of reparations following complaint resolution	Following the guidelines of RPF, ESMF and SEVCDF	A warrant	Respective PIUs and Monitoring and supervision firm
Appeals process	If the aggrieved person is not satisfied with the decision of the local GRC, she can appeal to the project-level GRC	Within 10 working days of the decision of the local GRC	An aggrieved person with the support of local GRC or directly to the PIU

Labor GM:

A separate mechanism will be available for the laborers working under contractors and sub-contractors. For contracted workers, the Contractor is obligated under the Contract (as per ESS2) to set up the Workers GM to redress complaints relating to workers deployed for construction works under this Project.

Contractors must set up a Workers' GM according to contractual obligations, ensuring compliance with international standards such as transparency, confidentiality, and protection against retribution. Upon engagement, workers must sign the Labor Code of Conduct (CoC) and undergo training on the GRM processes. The labor GRC will be in affected communities, as described in detail in the Labor Management Procedures and Annex 6.

In affected communities, Contractors and subcontractors appoint Site Managers as focal persons for the Labor GM. These managers are responsible for receiving, recording, and addressing grievances from workers or related to workers at their respective construction sites. The GM includes training for workers on the CoC and associated issues such as SEA/SH.

A structured grievance resolution process involves an inquiry, an opportunity for the worker to be heard, and communication of findings within a stipulated timeframe. Overall, the labor GRM aims to ensure the fair and transparent handling of labor-related issues within the project's operational framework.

6.2 Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

All three GM tiers/levels (mentioned below) will be sensitized to receive SEA/SH-related complaints. As per the latest World Bank Good Practice Note on SEA/SH, GM will also be responsive to child SEA/SH complaints. The project GM will be linked with service providers supported by the World Bank. The SEA/SH/GBV-related complaints will go to the specifically designated focal point in each PIU of the project or the PIU Gender and GBV Specialist. Utilizing GBV service providers from the project, PIUs will refer any person to relevant service providers, including health facilities, law enforcement's gender unit, or others, as appropriate, using the information on available services.

Grievances related to SEA/SH will be reported through the project/contractor, after which the nature of the complaint (without details) will be recorded, along with the age and sex of the complainant, and relation to the project will be recorded. After consultation with the service providers and assessment of the complaint, appropriate disciplinary measures will be taken against the perpetrator. It will adopt a survivor-centric approach when responding to SEA/SH complaints. A survivor-centric approach will prioritize the survivor's wish and take measures accordingly.

The project intends to strengthen the GRM through information and communication technology to ensure that all complaints, including those of SEA/SH, are immediately reported to the Government. It integrates the GRM on a web-based dashboard to adequately and promptly address any potential grievance related to GBV and SEA/SH. The complaints registered in this system will be managed by a dedicated administrator who will liaise immediately with any GBV and SEA/SH complaints with the contractors and consultant for immediate measures.

In the case the project GRM receives a case of sexual exploitation and abuse related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. The supervision consultant will keep the information confidential to protect the privacy of GBV and SEA/SH complainants. In cases where the perpetrator(s) is linked to project activities, the contractor will take appropriate actions as per the Code of Conduct signed by the person and under the effective law in Bangladesh. The project will regularly report activities and outcomes of GBV and SEA/SH surveillance and management to the World Bank.

SEA/SH/GBV GRM Process: The following steps will be followed to address SEA/SH/GBV cases.

Table 6-2: SEA/SH GRM process

Step	Function	Detail
Uptake	Receive SEA/SH allegations through multiple reporting channels established for the project	The project GRM channel will be used. All GBV/SEA/SH cases should be sent to the project GRM. The survivor must be informed that her/his wishes to continue with the case will prevail. Upon receiving the allegation, the GRM focal will immediately refer the survivor to a GBV service provider. With the survivor's consent, the PIU-level GRC will be informed at the same time, as overall they will deal with the case in its entirety, given its sensitivity and requirement for training. All PIU-GRC will have staff oriented and assigned for SEA/SH cases. All efforts should be made to minimize the number of people the survivor speaks to.
Sort and Process	Document and register allegation	When documenting a SEA/SH allegation, the following elements should be recorded: (i) the allegation in the survivor's own words; (ii) whether the alleged perpetrator is, to the best of the survivor's knowledge, associated with the project; and (iii) if possible, the age and sex of the survivor. The GRM operator should report minimal information to the implementing agency, which will then inform the Bank task team. This information should include four key points: (i) the nature of the case; (ii) whether the case is project-related; (iii) the age and sex of the survivor (if available); and (iv) whether the survivor was referred to services. The SEA/SH coordinator (Gender and GBV Specialists under PIUs) at PIU GRC is responsible for

Step	Function	Detail
		documenting and registering the allegation. It can be done over the phone, by video conferencing, or in person (suggested) The SEA/SH allegation will be documented 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, provide 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 legal obligations to report SEA/SH to the Police. Wherever possible, this information should be delivered to the communities and the survivors prior to the 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 Survivors must consent to share the four nonidentifiable data with PIU and WB. In accordance with the principle of survivor-centricity, data sharing should be prohibited without consent.
	Notify the World Bank following the required reporting protocols	If a survivor consents, the SEA/SH coordinator will inform PIU and WB of the four data sets. Otherwise, only an intimation to the WB and PIU about the survivor's non-consent will be made. Bank should still be informed that a complaint has come through the system.

Step	Function	Detail
Acknowledge and Follow- up	Refer the survivor to relevant GBV service providers	Note: The PIU GRC Coordinator will keep a list of various SEA/SH service providers (Medical, psychosocial, legal, livelihood, etc.). Service providers supported under the project will be mapped and listed. 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 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.
Verify, Investigate, and Act	Provide support services to survivors	GBV service providers support survivors until survivors choose to stop availing of services
	Review the allegation and determine the likelihood that it is project-related	Suppose a survivor wishes to proceed with accountability measures. In that case, 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 per employment contracts and local labor laws	If SEA/SH allegations are confirmed, the appropriate party— the perpetrator's employer, the implementing agency, the supervising engineer, or a contractor—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

Step	Function	Detail
		The SEA/SH GRM Coordinator records the resolution of the incident, the date it was resolved, and marks it as closed. The PIU and World Bank are notified that the case is closed
Monitor and Evaluate	Monitor, track, and provide regular reports	The SEA/SH Coordinator is responsible for issuing regular (e.g., monthly/quarterly) reports to the PIU 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
Provide Feedback	Respond to survivors	The SEA/SH Coordinator needs to provide ongoing feedback to the survivor throughout the process but especially: when the grievance is received; when the case is reported to PIU and WB; when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and 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.

Following issues to be kept in mind while dealing with SEA/SH issues:

Table 6-3: Issues While Dealing with SEA/SH Complaints

ISSUES	DO'S	DON'T'S
Confidentiality	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	Register the case in a logbook used for other types of grievances Leave information/logbook easily accessible Underestimate the importance of keeping

ISSUES	DO'S	DON'T'S
	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	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
Consent	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.)

The site manager will provide every complainant with a one-page information brochure on the GM process containing the contact information of the relevant GRC Convener (nominated official by the PD where the construction site is located) so that the complainant can also raise the issue directly to the GRC if he/she is not satisfied.

7. Monitoring and Reporting

7.1 Summary of how SEP will be Monitored and Reported upon (Including Indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

(i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP).

(ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design and reflected in the essential documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) Issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that the project cannot address due to technical, jurisdictional or excessive cost-associated reasons. Meeting minutes summarizing the attendees' views can also be annexed to the monitoring reports.

(iii) Quantitative reporting based on the indicators included in the SEP. Annex 3 consists of an illustrative set of indicators for monitoring and reporting.

7.2 Reporting Back to Stakeholder Groups

The SEP will be revised and updated as necessary during project implementation.

Responsible staff will collate monthly summaries and internal reports on public grievances, inquiries, and related incidents, together with the implementation status of associated corrective/preventative actions and refer them to the project managers.

Specific mechanisms to report back to the stakeholders include 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 within the Project Area of Influence (PAI)
- 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

This reporting back to the stakeholders will be compiled and shared/disclosed with the stakeholders and public using proper media, line ministries' websites, social media accounts, communication materials, etc. It will also include other urban areas/municipalities as and when such areas are selected under the project.

Annex 1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

Annex 2: SEP Budget Table

Budget categories	Quantity	Unit costs (BDT)	Times/ Years	Total costs (BDT)	Remarks
1. Estimated Staff salaries* and related expenses					
a. Communications Consultant	1	350,000	60	21,000.000	-
b. Travel costs for staff	1	10,000	60	600,000	-
2. Consultations/ Participatory Planning, Decision-Making Meetings					
a. Sensitization meetings	10/year	25,000	5	1,250,000	-
b. Meeting with LGIs	10/year	25,000	5	1,250,000	-
c. Meeting with local administrations	4/year	40,000	5	1,000,000	-
3. Communication campaigns					
a. Posters, flyers	Lumpsum	200,000	5	1,000,000	
b. Social media campaign	Lumpsum	100,000	5	500,000	
4. Trainings					
a. Training on social/environmental issues for PIU and contractor staff	Lumpsum	200,000	5	1,000,000	-
b. Training on Gender-Based Violence (GBV) for PIU and contractor staff	Lumpsum	100,000	5	500,000	-
6. Grievance Mechanism					
a. Specialist (as assigned)	1	350,000	60	21,000,000	-
b. Travel expenses	1	10,000	60	600,000	-
c. GRM MIS Database	Lumpsum	300,000	-	300,000	-
d. GRC Meetings	Lumpsum	500,000	5	2,500,000	
7. Other expenses					
a. Contingency (5%)	Lumpsum	-	-	1,470,000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				52,470,000	433,636.36 (USD)

*Note: Salary costs can be indicative. 1 USD=121 BDT.

Annex 3. Monitoring and Reporting on the SEP

Key Evaluation Questions	Specific Evaluation Questions	Potential Indicators	Data Collection Methods
GRM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	• Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved?	Usage of GM and/or feedback mechanisms Requests for information from relevant agencies Use of suggestion boxes placed in the villages/project communities Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame Number of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal, and security support according to the referral process in place. (If applicable) Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii)resolved, (iv) closed, and (v) number of responses that satisfied the complainants during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	Records from the implementing agency and other relevant agencies
Stakeholder engagement impacton	Was there interest and support for the project?	Active participation of stakeholders in activities	Stakeholder Consultation

Key Evaluation Questions	Specific Evaluation Questions	Potential Indicators	Data Collection Methods
project design and implementation. How to have engagement activities made a difference in project design and implementation?	Were there any adjustments made during project design and implementation based on the feedback received? Was priority information disclosed to relevant parties throughout the project cycle?	Number of actions taken promptly in response to feedback received during consultation sessions with project-affected parties Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results
Implementation effectiveness. Were stakeholder Are engagement activities effective in implementation?	Were the activities implemented as planned? Why or why not? Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? Percentage of SEP activities implemented. Key barriers to participation were identified by stakeholder representatives. Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness	Percentage of SEP activities implemented Key barriers to participation identified with stakeholder representatives Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness	Communication Strategy (Consultation Schedule) Periodic Focus Group Discussions Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives

Annex 4: Summary of Stakeholder Consultation Outcomes

Issues	Discussion	How the inputs of consultations are taken into consideration during the redesigning phase of the project
Environmental and Social Risks and Management	• Key objectives of the project and potential E&S impact • A grievance mechanism at different levels • Vulnerable communities will be consulted throughout the project, and they will be able to access the project information easily	• Consultation also aided in understanding the local context and developing ES risk profile mitigation measures • Involvement of agencies and other partners and their scope of work
Planning and Operational Management	• During the project implementation, temporary arrangements will be made for many issues, like labor sheds, service reinstallation, and more. The temporary operational issues need to be smooth and not interrupt daily activities • Monitoring and Evaluation: An efficient reporting system may be developed using the existing MIS systems • Sustainability of the present modalities of service delivery through NGOs	• Issues of medical waste management • Facility refurbishment • Labor Engagement • ES Risk management and community involvement
Operational Arrangement	• Proper institutional arrangements for improved effectiveness of the project interventions. • Clarity in the scope and the work items. • Environmental and Social Documents like LMP, SEP, ESCP, ESMF, RPF SEA/SH Action Plan. • Mid-term evolution	• The DPP will clearly define the scope, working modalities and the project activities.

Annex 5: Grievance Submission Form

<table>
<tr><td colspan="4" align="center">Grievance
Form</td></tr>
<tr><td colspan="4">Grievance reference number (to be completed by Project):</td></tr>
<tr>
<td rowspan="4">Contact details

(Can be submitted anonymously)</td>
<td colspan="3">Name (s):</td>
</tr>
<tr><td colspan="3">Address:</td></tr>
<tr><td colspan="3">Telephone:</td></tr>
<tr><td colspan="3">Email:</td></tr>
<tr>
<td>How would you prefer to be contacted (check one)</td>
<td>By mail/post:

☐</td>
<td>By phone:

☐</td>
<td>By email

☐</td>
</tr>
<tr>
<td>Preferred language</td>
<td colspan="1">☐ Bangla</td>
<td colspan="2">☐ English</td>
</tr>
<tr><td colspan="4">Provide details of your grievance. Please describe the problem, who it happened to, when and where, how many times, etc. Describe in as much detail as possible.</td></tr>
<tr><td colspan="4">What is your suggested resolution for the grievance, if you have one? Is there something you want IA or another party/person to do to solve the problem?</td></tr>
<tr>
<td rowspan="2">How have you submitted this form to the project?</td>
<td>Website

☐</td>
<td>Email

☐</td>
<td>By hand

☐</td>
</tr>
<tr>
<td>In person

☐</td>
<td>By telephone

☐</td>
<td>Other (specify)

☐</td>
</tr>
<tr>
<td>Who filled out this form (If not the person named above)?</td>
<td colspan="3">Name and contact details:</td>
</tr>
<tr>
<td>Signature</td>
<td colspan="3"></td>
</tr>
<tr>
<td>Name of IA's official   assigned

responsibility</td>
<td colspan="3"></td>
</tr>
<tr>
<td>Resolved or referred to GRC1?</td>
<td>☐ Resolved</td>
<td>☐ Referred</td>
<td>If referred, date:</td>
</tr>
</table>

Resolved referred to GRC2?	□ Resolved	□ Referred	If referred, date:	
Completion				
Final resolution (briefly describe)				
	Short description		Accepted ? (Y/N)	Acknowledgement signature
1st proposed solution				
2nd proposed solution				
3rd proposed solution				

Annex 6: Sample Grievance Report Format

Period from…………………to…………………………20…………

Project Phase………………….

Case No.	Complainant's name, gender and location	Nature of complaints and expectation on of complainant	Date of Petition submitted	Method of resolution with dates	Decisions and date of communication to the complainant	Agreement with and commitment to complainant	Progress (Solved/ pending)	Reason, if pending