



**Government of the People's Republic of Bangladesh**

**Ministry of Youth and Sports**

**Economic Acceleration and Resilience for NEET Youth  
Project (EARN Project)**

**Department of Youth Development (DYD)**

WB Project ID: P178077

**Stakeholder Engagement Plan  
(SEP)**

**January 2023**

## Executive Summary

The preparation of the Stakeholder Engagement Plan (SEP) for Economic Acceleration and Resilient for NEET Youth (EARN) project 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 as living document and will be revised as necessary if changing project context requires so with clearance from the 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 IA 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-construction/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. DYD/MoYS will create a Social, Environmental and Gender Unit (SEGU) within the PMU for EARN Project. The SEGU will be headed by a deputed focal point of DPD level appointed by the PD, and he will be responsible for implementation of the ESMF and E&S compliance monitoring. Head of the SEGU will be technically supported by the full-time PMU consultants consisting of - one Environmental Specialist, one Social Development Specialist, one Gender and SEA/SH Specialist, and one Communications and Citizen Engagement Specialist

The PMU will establish and operate GRM to receive, register and attend project-specific grievances that may potentially rise in the project cycle. The GRM will be of 3 tiers; Community level, Project level, and PMU level with a Grievance Redress Committee (GRC) at each level. 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 GRM will be widely disseminated among the communities and affected persons and wider stakeholders including at site levels. The GRM will be accessible to all and all grievances will be resolved within a settled time period not exceeding 14 days. All proceedings of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by IA. All E&S related documents and information of the program and sub-projects will be disclosed in English and the local languages by the implementing agencies on their website and hard copies will be made available at project office 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 (union parishad office) 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;
- Information of involuntary displacement, compensation and entitlements;
- E&S risks and impacts

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.



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## Abbreviations and Acronyms

BoU	Bangladesh Open University
CERC	Contingent Emergency Response Component
CMC	Center Management Committee
CGs	Community Groups
CSO	Civil Society Organizations
DoE	Department of Environment
DYD	Department of Youth Development
EARN	Economic Acceleration and Resilience for NEET Youth
ECA	Environment Conservation Act
ECR	Environment Conservation Rules
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESA	Environmental and Social Assessment
ESG	Environmental, Social and Gender
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FGD	Focus Group Discussion
GBV	Gender Based Violence
GDP	Gross Domestic Products
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association
IPF	Investment Project Financing
JV	Joint Venture
KPIs	Key Performance Indicators
LGED	Local Government and Engineering Department
LGIs	Local Government Institutions
MOYS	Ministry of Youth and Sports
NEET	Not in Education, Employment or Training
NGO	Non-Government Organization
O&M	Operation and Maintenance
OHS	Occupational Health Safety
PCC	Project Coordination Committee
PMU	Project Management Unit
PWD	People With Disabilities
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEB	Socio Emotional and Behavioural
SEC	Small Ethnic Communities
SEP	Stakeholder Engagement Plan



SHE	Safety, Health and Environmental
SIA	Social Impact Assessment
SPs	Service Providers
STD	Sexually Transmitted Diseases
ToR	Terms of Reference
UC	Upazilla Coordinator
UYICs	Union Youth Information Centers
VLTC	Village Level Training Centre
WB	The World Bank
YTC	Youth Training Centre



## STAKEHOLDER ENGAGEMENT PLAN (SEP)

### 1 Introduction

‘Economic Acceleration and Resilience for NEET Project (EARN Project, the Project hereafter)’ will be implemented by the Department of Youth Development (DYD) of the Government of the Peoples Republic of Bangladesh (GoB), to establish a holistic system with greater focus on women, to enhance NEET youth’s access to skills development, education and labor market opportunities for wage and self-employment that will benefit achieving national target of reducing the share of NEET youth population in Bangladesh. As part of the requirements of ESF, 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. Extensive field visits are required at the ESA stage with the relevant stakeholders throughout the program sites to discuss components, sub-components, activities, potential positive and negative impacts and measures taken to mitigate those impacts. It is also required to record the views of each of the respondents of the consultations, irrespective of gender, profession, religion, and age groups. The ToR of the environmental and social assessment should be described in the public meetings during the initial stage of the assessment in all the sites of the proposed project. Findings of the assessment will also be presented in local language going back to the same stakeholders while the draft is ready to submit for DoE clearance. Consultation meetings are necessary to identify issues and problems to enable the IA to include corrective measures and to identify lessons and opportunities to enhance program implementation mechanisms.

#### 1.1 Background and Project Context

The Government of Bangladesh (GoB) through the Ministry of Youth and Sports (MoYS) has requested financing from the International Development Association (IDA) of the World Bank Group (WBG) to support the preparation and implementation of the ‘Economic Acceleration and Resilience for NEET Project (EARN Project, the Project hereafter) through the Department of Youth Development (DYD), to help the GoB to establish a holistic system, with greater focus on women, to enhance NEET youth’s access to skills development, education and labor market opportunities for wage and self-employment that will benefit achieving national target of reducing the share of NEET youth population in Bangladesh. The project development objective is **to reduce the share of NEET youth, especially for women, in selected rural areas through increasing access to employable skills and enhancing their employability**. With this objective, firstly, the project will establish a mechanism for identifying eligible NEET youth from selected rural areas for different types of supports, and secondly, the project will create and facilitate access to relevant skills development as well as continuing or second-chance education for the identified eligible rural NEET youth, especially women. The skills development facilities will be responsive to barriers women face in terms of their locations, safe and inclusive infrastructure and learning environment, flexible course timings, free choice of trades, child-care facilities/options, and gender of instructors as well as identifying role models. Thirdly, the beneficiaries will receive trainings in enterprise development and Socio-Emotional and Behavioral (SEB) skills development, as well as support in access to seed financing, linkages with employers and the labor market, and employment. Last but not the least, the project will create an enabling





environment for socio-economic inclusion of youth, especially women, by helping to ease the social barriers; and enhance institutional capacity of state and non-state actors. The project comprises of four defined components, with a fifth zero-budget component to facilitate future contingency requirements. The project components are as follows:

**Component 1: Enhance access to alternate education and relevant skills development opportunities**

Sub-component 1.1: Promote access to skills development on market relevant skills including SEB and EDT

Sub-component 1.2: Assist the secondary dropped-out NEET youth to reach the skills ladder

**Component 2: – Promote support for wage and self-employment**

Sub-component 2.1: Expanding the horizon by connecting the beneficiaries with markets

Sub-component 2.2: Post-training wage employment and entrepreneurship support

**Component 3: Promote Enabling Environment for NEET Youth**

Sub-component 3.1: Community Strengthening, Engagement and Ownership

Sub-component 3.2: Awareness raising and community engagement to promote positive social norms

Sub-component 3.3: Career counseling support, leadership development and positive youth engagement activities

**Component 4: Enhance institutional capacity and Project Management**

Sub-Component 4.1: Support institutional capacity development for NEET youth Programs

Sub-Component 4.2: Project Management, Communications, and Monitoring and Evaluation

**Component 5: Contingent Emergency Response Component (CERC)**

The World Bank ESF will apply to the EARN Project in addition to national legislative requirements on environmental and social management. The project finance from the World Bank is expected through Investment Project Financing (IPF) on IDA terms. The MoYS will have overall responsibility of the project while DYD under it will be responsible for the implementation of project activities including fiduciary management and environmental and social (E&S) compliance for all the components and sub-components. Field level activities will be implemented in partnership with the private sector, NGOs and CSOs. Procured service providers (SPs), one for each division, will be responsible for managing and monitoring field level activities. Operational delivery of project activities will be provided by Community Groups (CGs), SPs and Union Youth Information Centres (UYICs). Upazila Coordinators (UCs), recruited under the project equally from both genders, will be responsible for supervising the field level implementation of EARN components. Every UYIC will have at least one female staff. Union level CGs will help identify the beneficiaries and trades, monitor project activities and to organize employer events. Each village level training centre (VLTC) will be supported by a Center Management Committee (CMC), responsible for monitoring the training activities and act as the first reporting entity for all gender related issues and fraud and corruption. Besides, DYD will partner with Local Government and Engineering Department (LGED) for infrastructure works and MIS support to the project. Bangladesh Open University (BoU) will implement the Reaching the Skill Ladder sub-component.



## 1.2 Summary of Potential Environmental and Social Risks and Impacts

It is important to identify the potential risks related with project location, design, construction, and operation phases of the project on the physical, biological and socioeconomic domains. An impact is defined as any change to an existing condition of the environment. Identification of potential impacts is based on data analyses and stakeholder discussions. Environmental and social impacts can be broadly classified as those taking place during pre-construction, construction and operational phases of the project. Activities involved affecting environmental components at different phases of the project implementation as well as potential environmental impacts are discussed in the following sections:

The following are the likely **Environmental Risks and Impacts** of the project:

- Civil works would entail soil, water, light, dust and noise pollution for a prolonged period.
- Habitat of some aquatic lives and some flora and fauna could be endangered due to filling of water reservoirs in the YTC campuses.
- There would be environmental pollution due to usage of fossil fuel and lubricant and their unsafe disposal by the construction-related equipment and vehicles; during operation phase increased traffic would play along these roads increasing additional carbon emission.
- Tree cutting in the campus will remove green canopy and adversely affect the environment at least during the project implementation stage.
- Water in the ponds and in other natural water reservoirs in the campuses may be polluted and there would be a large quantity of water needed for construction and dust suppression.
- Labor and Construction workers will also generate solid waste that would also endanger the surrounding environment.

The following are the likely **Social Risks and Impacts** of the project:

- Adverse impact may occur owing to destruction of temporary and semi-permanent structure for the improvement of the YTC campuses.
- In the process petty business and linked employments along will be affected. However, they could shift to surrounding areas through the help of their association/local administration/local elected leadership support and the support rendered by the project.
- Influx of migrant workers at the works sites may put extra pressure on the local market and civic facilities. This may raise the price of daily necessities in the area adversely affecting the local population.
- Presence of migrant workers either at the Labor Camps/rented households may also increase the likelihood of SEA/SH and rise in STD in the area.
- Exposure of the female students to male teachers and staffs during skill training in the skill development institutions; training through UYICs, mobile training centers will involve different NGOs and other stakeholders where there is possibility of male instructor and presence of other project personnel, and this will increase the risk of SEA/SH.
- The contractors or their representatives may employ child labors at a lower wage to reduce construction cost and increase profiteering.



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

The World Bank's ESF underscores the importance of open and transparent engagement between the borrower and project stakeholders as an important pillar of good practice. Effective stakeholder engagement through a robust consultation and disclosure mechanism promotes environmental and social sustainability of the project, enhances its acceptance and makes important contributions to design and aids in smooth implementation of the project. Stakeholder engagement is an inclusive process and is carried out throughout the life cycle of the project. ESS10 refers to Stakeholder Engagement and Information disclosure requirements of the ESF. The following are the objectives of ESS10:

- Establishment of a systematic approach to stakeholder engagement that will enable borrowers to identify and form constructive relationships with the relevant stakeholders, including the beneficiaries and affected persons.
- To assess the level of interest and support stakeholders have for the project and ensure that through this mechanism, the views of the stakeholders are incorporated into the project design.
- Encourage and facilitate methods of effective, meaningful consultation and engagement with beneficiaries and affected persons throughout the project cycle on issues that could potentially have an impact on them
- Ensure that project information related to environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

ESS10 promotes meaningful consultation and communication with all stakeholders, and the process of stakeholder engagement involves the design and implementation of a Stakeholder Engagement Plan (SEP). The SEP covers the following aspects: (i) Stakeholder identification and analysis; (ii) planning how stakeholder engagement will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; (vi) reporting to stakeholders. The coordination and monitoring mechanisms in the SEP will be overseen by the respective IA and their field/site level project management setup, as relevant.



## 2 Legislative and Policy Requirements

### 2.1 National Provision and Citizen Engagement

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).

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.

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

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:

### 2.2 Constitution of the People's Republic of Bangladesh

**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.



**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.

**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;

**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-

(a) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.

**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;

**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.

### **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.

### **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.

**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.

**Bangladesh Labour Law, 2006 (Amended in 2013) and Labour Code 2015.** This Law pertains to the occupational rights and safety of workers and the provision of a comfortable work environment and reasonable working conditions.

The Labour Law of Bangladesh 2006 bans children under the age of 14 from working. Chapter III of the Act<sup>1</sup> under “**Employment of Adolescent Worker**” puts restrictions on employment of children and adolescents as follows:

- (1) No child shall be employed or permitted to work in any occupation or establishment.
- (2) No adolescent shall be employed or permitted to work in any occupation or establishment, unless:
  - (a) A certificate of fitness in the form prescribed by rules, and granted to him by a registered medical practitioner is in the custody of the employer; and
  - (b) He/She carries, while at work, a token containing a reference to such certificate.

## 2.3 World Bank Requirements

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, here MoYS 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

<sup>1</sup> The Bangladesh Labour Law, 2006; Act No. XLII OF 2006 [11 October, 2006]





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.

### 3 Stakeholder Engagement at Project Preparation

#### 3.1 Methodology and Tools for the Consultation

The consultation and participation process in preparing and disclosing the SEP was limited to selected stakeholders both at the project area and at the regional and national level. Stakeholders' consultation and engagement at the beneficiary area level was not carried out during the preparation of the SEP. However, this will be done at the project implementation stage and will be more inclusive irrespective of gender, age, physical and mental ability, profession, social groups and ethnicity during conducting site specific environmental and social assessment (ESA). The various tools identified in the SEP will be used for consultations including interviews, participatory rural appraisal, focused group discussion (FGD), open meetings, issue specific consultation meetings, and workshops at both local and national levels. During ESA, consultation meetings and FGDs will be carried out in all selected upazilas and unions (as applicable) and local level workshops will be organized in all selected Districts to ensure a comprehensive coverage of the entire program area and provide them specific list of interventions. During preparation of ES documents, there were several consultation meetings with different stakeholders at the initial stage and a disclosure workshop to share findings of the draft ESMF at the later stage of project preparation. The discussion and the concerns and responses are extensively documented in SEP. A summary discussion of those consultations and disclosure workshop are given in **Appendix 1**. A summary of the major consultation process is given in the below Table 1

**Table 1: Summary of Stakeholder Consultation Meetings**

No.	Date	Venue	Main Participant Groups	No. of Participants	
				Male	Female
01	19 September 2022	In person	Consultations with the NGOs and private sectors to debrief about the overall project	19	3
02	27 September 2022	In person; Department of Youth Development Office in Rajshahi Division	Consultations with the teachers of the Rajshahi YTC	30	3



No.	Date	Venue	Main Participant Groups	No. of Participants	
				Male	Female
03	27 September 2022	In person; Youth Training Center, Rajshahi	Local level consultation with the participants of district level government officials of DYD and YTC.	30	3
04	28 September 2022	In person; Youth Training Center, Chapai Nawabganj	Consultations with the teachers of the Chapai Nawabganj YTC	18	4
05	12 September 2022	In person; Chittagong Upazila Office YTC	Local level consultation with the participants of district level government officials of DYD and YTC of Chittagong	26	7
06	13 September 2022	In person; Cox's Bazaar YTC	Local level consultation with the participants of district level government officials of DYD and YTC of Cox's Bazaar	28	9

As the project overwhelmingly targets the youth women from the NEET youth, the project will carry out more consultations with the women groups including NEET youth women during the early days of implementation. At the implementation level, the Project will reserve to ensure women to represent 50% of the participants in any consultation events.

### 3.2 Summary of the Consultation and Feedback

The participants in the consultation process mentioned of works related environmental and social risks and concerns during the project implementation. The consultation process emphasized on due attention to the deliberations of the wider stakeholders and felt the need for continuous engagement with them in the project life cycle at the implementation stage. The DYD also finds ways to identify various stakeholders, ways to engage with them and close the feedback loop along with ways of reporting back to the stakeholders are discussed in this SEP. Some key environmental factors were identified, and their management measures proposed in the consultation process as summarized in the **Annex-1**.





## 4 Stakeholder Identification and Analysis

### 4.1 Stakeholders Analysis

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 EARN was initiated during the inception stage of the project and initiated by the DYD. 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.
- Analyze the level of impact the Project have on each stakeholder group, their level of interest, influence and importance, to identify the level of engagement required for each group; and
- Identify engagement strategy with each stakeholder group and assign responsibility to team members.

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, female-headed households, person with disabilities (PWD), ethnic and religious minority’s communities 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.

### 4.2 Affected Parties

Affected Parties include individuals, groups, and communities directly affected by project interventions or who may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:



- Informal occupants who will be displaced and face loss of livelihoods as a result of interventions of the project;
- Small shop owners who may face disruptions in their income and livelihood from project interventions;
- Training participants, particularly women, in the training
- Public who uses the YTC facilities,
- Neighboring communities to the project sites, due to noise and air pollutions
- Primary and high schools, colleges, universities, and other educational institutions
- Families of the NEET youth, particularly the socially conservative ones
- Staff members of the IA due to relocation of temporary office facilities

### 4.3 Other Interested Parties

This includes stakeholders who are not directly affected but otherwise have an interest and/or can exercise influence in the outcome of the project. This includes the following:

- Civil Society Organizations (CSOs)
- Educational institutions
- Vocational Training Centers
- NGOs working with women education
- National and International NGOs
- Traditional national and local media
- Local government institutions (LGIs) including the city/municipal corporations, etc.
- Government officials at the sites/local level

### 4.4 Disadvantaged and the Vulnerable People

It is particularly important to understand that project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups or communities who often do not have the voice to express their concerns or understand the impacts of a project or otherwise, may not be able to access the project benefits equally due to their vulnerable social, economic, occupational or cultural conditions. It is important to ensure that awareness raising of and engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account the needs of such community/groups or individuals, their concerns and cultural sensitivities, and to ensure a full understanding of project activities and benefits. Within the Project, the vulnerable or disadvantaged communities/groups may include are, although not limited to the following:

- Poor women and girls
- Transgender groups
- Persons with disabilities (PWD)
- Poorest households
- Women headed households
- Slum/tenement dwellers
- Tea garden workers
- People living in the temporary islands within rivers
- Poor people living in the remote coastal areas
- Tribal peoples across the country
- People living in the hilly areas in the hill districts
- Fisheries dependent households
- Minority occupational groups (cobblers, snake charmers, sweepers, and the like)
- Households displaced by riverbank erosion, cyclones and other natural disasters



## 5 Program for Stakeholder Engagement

### 5.1 Advance Notification

Advance public notification of an upcoming consultation meeting will be given, and it will be available via publicly accessible locations and channels. Selected participants for formal public meetings or consultation workshops will be notified individually formally through e-mail and phone notifications and sharing invitation letters to the address of the selected participant stakeholders. The primary means of notification for formal and informal meetings may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the notification (i. e. a copy of the newspaper announcement, and/or email correspondence) for the accountability and reporting purposes. Existing notice boards in the communities may be particularly useful for distributing the announcements, such as boards adjacent to the widely visited public premises like local government office (ward counselors office, city corporation/Paurashava/union parishad offices), highway side and local markets, bus stops and terminals, and offices of the local NGOs and women educational organizations, and workers association offices and any other public places.

The notification should contain date, time and venue, consultation agenda, objectives of consultation, and commitment of potential review and consideration of stakeholders' feedback in project design and the environmental and social planning documents. Informal spot consultations may also be resorted to to disclose information about the purpose and frequency of stakeholder engagement sessions.

### 5.2 Mechanisms for Stakeholder Engagement

This sub-section details all possible measures deployed to consult each of the stakeholder groups, from surveys, polls and questionnaires to public workshops, provide them relevant information and opportunities to voice their views on matter of important. The table below presents topics of engagement, methods used, targeted stakeholders for each of the activities, among others. Please note that the sessions and items for consultation will be bundled to the extent possible in order to maximize the cost effectiveness and efficiency of the engagement process.

**Table 3: Stakeholder Consultations and Corresponding Engagement Mechanisms**

Target stakeholders	Topic(s) of engagement	Method(s) used	Responsibilities
Preparatory			
<b>People residing in project area</b>	All the ES documents will be disclosed	Public meetings, separate FGD for women and vulnerable	PMU/E&S consultants
<b>Women</b>	Project risks and impacts and mitigation measures	Face-to-face meetings	
<b>Local government</b>	Project scope and rationale including timeline	Disclosure of written information: brochures, posters, flyers, website Information boards or desks in local language	
<b>Media</b>		Grievance procedures through consultation, information brochures	
<b>Construction workers</b>	Grievance mechanism process		
<b>Local education and training providing NGOs</b>	Future consultation	The following modes to be adopted specifically for the vulnerable groups:	
<b>Others</b>		Robust engagement with local community-based organizations. The project would arrange separate consultation	



		<p>sessions for women to discuss any gender or SEA/SH concerns. Manageable and gendered FGD to be arranged so that women can speak freely.</p> <p>The project must have adequate means to reach the disabled ones in the community. If need be, teams must visit the disabled ones in their habitat</p> <p>Resources allocation towards local administration representatives and councilors.</p> <p>Engagement of local NGO's who work with vulnerable people at the community level to help disseminate information and organize consultations. Use of radio, mobile phones and other forms of communication to engage stakeholders.</p> <p>Notice board for employment recruitment and student admission.</p>	
<b>Implementation Phase</b>			
<b>Project Affected People</b> <b>Vulnerable households</b> <b>Contractors</b> <b>Local Government</b> <b>Local NGOs</b> <b>Government office</b> <b>Local Press</b> <b>Local businessmen</b> <b>Construction workers</b> <b>Others</b>	<p>Grievance redress mechanism (GRM) and awareness raising process to close the feedback loop.</p> <p>Health and safety impacts (Community H&amp;S, community concerns)</p> <p>Employment opportunities</p> <p>Project status</p> <p>Actual risks and impacts</p>	<p>Public meetings, open houses, trainings/workshops</p> <p>Separate meetings as needed for women and vulnerable</p> <p>Individual outreach to beneficiaries and affected persons as needed</p> <p>Disclosure of written information: brochures, posters, flyers, website</p> <p>Information boards in local offices/education institutions</p> <p>Notice board(s) at construction sites</p> <p>Grievance redress mechanism (GRM)</p> <p>The following modes to be adopted specifically for the vulnerable groups:</p> <p>Robust engagement with local community-based organizations.</p> <p>The project would arrange separate consultation sessions for different target groups</p> <p>Resources allocation towards local administration representatives and local government institutions.</p> <p>Engagement of local CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations</p>	<p>PMU/E&amp;S consultants</p> <p>Contractor</p> <p>NGO</p> <p>External Monitor</p>
Disadvantaged and vulnerable individuals, groups and communities	Access restrictions to education, training and employment, discrimination and way forward	<p>Common meetings to identify subgroups and common interests and problems</p> <p>Focused group meetings with subgroups</p>	Service Providers

### 5.3 Engaging with Disadvantaged and Vulnerable Groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups or communities 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 the needs of such community/groups or individuals, their concerns and cultural sensitivities, and to ensure a full understanding of project activities and benefits. Vulnerable groups consist of people who may not be able to access Project information and articulate their concerns and priorities about potential Project impacts owing to certain barriers that disadvantage them. The barriers could be socio-political, for example in Bangladesh, and especially rural patriarchal societies, women are expected to not speak out in public. Other factors could be related to poverty, socio-economic conditions or physical conditions as people influenced by these factors are not expected to or do not feel that they can have a 'voice' in public.

Following specific measures will be used to remove obstacles to participation for vulnerable groups:

- Focus groups for women, led by a female facilitator, to introduce the Project and discuss any issues and concerns that the women may have regarding the Project development.
- Individual household visits to as many households in 'deep poverty', single female headed households, people with disability, the elderly who have mobility issues, and households of minority religious groups in the Directly and Indirectly Affected Population as possible at each Project milestone to ensure they are provided with the Project information and have opportunities to raise their questions and concerns freely without intimidation, discomfort or ridicule.
- While reaching out to different groups particularly vulnerable groups such as women, elderly, disabled, transgender, ethnic minorities, the Project team will make sure time and location of consultation are appropriate to their needs.
- Throughout implementation, DYD will continue to identify representatives of these groups locally and at the district level to facilitate two-way communication on the Project development.

Engagement with all identified stakeholders may incentivize their maximum contributions to successful implementation of the project by drawing on their existing expertise, experience and networks. It also facilitates community and institutional endorsement of project activities.

#### 5.4 Mechanism for Information Disclosure

The SEP and other relevant documents will remain in the public domain for the entire project life cycle and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of and engagement with any new stakeholders and interested parties to tracking of changes to characteristics and subsequent methods of engagement, if required. To that extent, the latter would also be revised periodically to maintain their effectiveness and relevance to project performance and external circumstances. Based on this, the table in **Annex 2** highlights information that would be disclosed, stage of the project lifecycle when they are each publicized and generic timeline, specific stakeholder to whom they may hold particular relevant, their means of disclosure to various stakeholder groups, entities responsible for the output and targeted percentage of reach of said product.

The mechanism of information dissemination should 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) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the beneficiaries and affected persons; grievance mechanism) that can be kept in the offices of local government (union parishad office)/councilor's office (city corporation) 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 project by components.



- Information on beneficiary participation.
- Information of involuntary displacement, compensation and entitlements.
- Information of participation of small ethnic communities.
- Time line for acquisition of land using voluntary donation, direct purchase and any other voluntary approach.

Also, opinion and consensus of the community needs to be sought for livelihood transformation, relocation of any community assets and involuntary resettlement management. 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.

Distribution of the disclosure materials will also be done by making them available at venues and locations frequented by the community and places to which public have unhindered access. Free printed copies of the ES documents in Bangla and English will be made accessible for the general public at the following locations, if situation permits:

- PMU
- District Administration offices
- Project offices at Local and Regional
- Other designated public locations to ensure wide dissemination of the materials
- Newspapers, posters, radio, television
- Information centers and exhibitions or other visual displays
- Brochures, leaflets, posters, nontechnical summary documents and reports
- Official correspondence, meetings

**Table 4: Disclosure Requirements**

Topic	Documents to be Disclosed	Frequency	Where
<b>Environmental and Social Assessment;</b>	Initial Environmental Examination (IEE); Environmental and Social Assessment (ESA); Environmental and Social Management Plan (ESMP)	Once in the entire project cycle. But to remain on the website and other disclosure locations throughout the project period.	World Bank's website; On the website of IA (MoYS) The client would make the ESA Report, ESMP available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to the stakeholders and beneficiaries and affected persons in the following offices: UP Office Municipality Office City Corporation/Councilor Office Public Library if any Project Office
	Information regarding impacts and their entitlements in local language	Once at the start of the project and as and when demanded by the beneficiaries and affected persons.	Through one-to-one contact with beneficiaries and affected persons. Community consultation List of beneficiaries and affected persons with impacts and entitlements to be pasted in the project office and website of IA (MoYS)
	R&R monthly progress report.	10th day of every month	Website of IA (MoYS) Hard copy in the project office
<b>Small ethnic communities (if any)</b>	Small Ethnic Community Development Framework and Plans	Identification, design and implementation, monitoring and evaluation	IA (MoYS) websites Hard copies in local language in the following offices: UP Office





			Municipality Office City Corporation/Councilor Office Public Library if any Project Office SECs to be informed on one-to-one contact
<b>Public Consultation</b>	Minutes of Formal Public Consultation Meetings	Within two weeks of meeting	On the web sites of IA (MoYS) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office
<b>Grievance redressed process</b>	Proceedings of grievance process/ monitoring reports	Continuous process throughout the project cycle.	On the web sites of IA (MoYS) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office Beneficiaries and affected persons to be informed on one-to-one contact
<b>Beneficiary identification and engagement</b>	Approach and proceedings/long and short list of beneficiaries	Continuous process throughout the project cycle.	On the web sites of IA (MoYS) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office Potential target group beneficiaries to be informed on one-to-one contact

## 5.5 Disclosure of Information and Public Access

The draft ESMF will be disclosed to the local and national level stakeholders through different methods as described below.

**Workshop:** A national workshop will be held at Dhaka to present the detailed project including The Environmental and Social aspects of the project to the key stakeholders. In addition, stakeholders' meetings will be held at all selected administrative areas to disclose the ToR and results of the IEE and ESA. Representative of implementing authority, the study team, and the government officials from different departments, representatives from NGOs, local communities of different occupation, journalist, and local elite/civil society may attend the workshops. In the workshops, the participants will share their observations, views, and remarks with the study team. Appropriate suggestions and recommendations on different issues from the stakeholders of the meeting would be incorporated in the program specific IEE/ESA. The workshops will also help to resolve conflicting issues among stakeholders. Besides, FGDs and personal interviews will be carried out at the all selected administrative areas of the project area to generate communities' views and concerns.

**Publication in electronic and print media:** The information on program interventions and the findings of environmental assessment would also be disclosed through newspapers and electronic media (e.g., internet, TV, radio, etc.). The report would be disclosed in Bengali language.

**Availability of the Document:** Summary of the IEE, ESA and ESMF report along with ESMP will be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will also be uploaded in the website of IA (DYD/MoYS) and World Bank. Hard copy of the IEE, ESA and ESMF will also be available at District offices of the program area.



## 5.6 Documenting Consultations

Consultation proceedings in any format will be recorded for transparency, accuracy of capturing public comments and feeding the information obtained from the consultation process into project design and implementation approach. The consultation proceedings will be recorded in the following three ways, including:

- Taking written minutes of the meeting by a specially assigned person;
- Audio recording of the discussions with prior information to the participants (if virtual); and
- Photographing.

Photographs of notable scenes during consultation will be captured at reasonable interval but not distracting or disturbing the audience excessively. Where feasible, the video recording may also be undertaken. Combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.





## 6 Grievance Redress Mechanism (GRM)

The project will establish a Grievance Redress Mechanism (GRM) for addressing grievances and complaints received from the target group beneficiaries, any project affected parties (beneficiaries and affected persons), other interested parties and stakeholders on any implementation issues including environmental and social impacts. The GRM will have three tiers; community level, project level and PMU level. The project GRM will also be equipped to receive SEA/SH related complaints with a protocol of survivor centric approach proportionate to sensitivity. Labor GRM will be constituted where civil works will be involved at any sites. The GRM is a valuable tool which will allow affected people to voice concerns regarding environmental and social impacts for the project activities. The proposed project will ensure that grievance redress procedures are in place and that all project actors and beneficiaries are informed of the processes involved in filing a complaint. The project would monitor those procedures to ensure that grievances are handled properly. The project office will establish a procedure to answer sub-component related queries and address complaints, disputes, and grievances about any aspect of the sub-component, including disagreements regarding the assessment and mitigation of environmental and social impacts. Details of the institutional arrangements and procedures are discussed in following sections.

### 6.1 Objectives and Scope

The project will establish and will follow the GRM for answering queries, receiving suggestions and addressing complaints and grievances likely to arise in the project cycle including identification, planning, design and implementation. The GRM spans the entire implementation period and will cater to both the beneficiary communities and the directly and indirectly affected population including the staff, beneficiaries and other stakeholders. Though the GRM proposed here a mechanism of redress has been designed to address environmental and social problems identified during implementation, it will also cater to manage any disconnects that emerge from the site level and that has significant implications for effective implementation of the project interventions. The project GRM will be mainstreamed with the centralized national level Grievance Redress System (GRS) and the corporate complaints handling mechanism available with DYD/MoYS.

The fundamental objective of GRM will be 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 community 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 community, including women, 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 and the Grievance Redress Committee (GRC) will include a representative from these communities.

### 6.2 Special GRM for SEA/SH Complaints

All three tiers of the GRM will be sensitized to receive SEA/SH related complaints. PMU, the project unit and the contractor are not 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 gender-based violence be reported through the project/contractor, 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.



Also, the ESA may identify additional mitigation measures related to gender and such measures will be reflected in site-specific ESMPs, including the contractors ESMP or contractors specific Labor Management Plans, and Codes of Conduct for laborers where required. This will include engagement with communities on gender-related risks, grievance and response measures available, as identified in the manual. PMU, with support from consultants, will identify institutions and services providers who are actively engaged in the prevention of gender-based violence, sexual exploitation and workplace sexual harassment to establish a manual available for all project actors to create awareness and mitigate risks of SEA/SH.

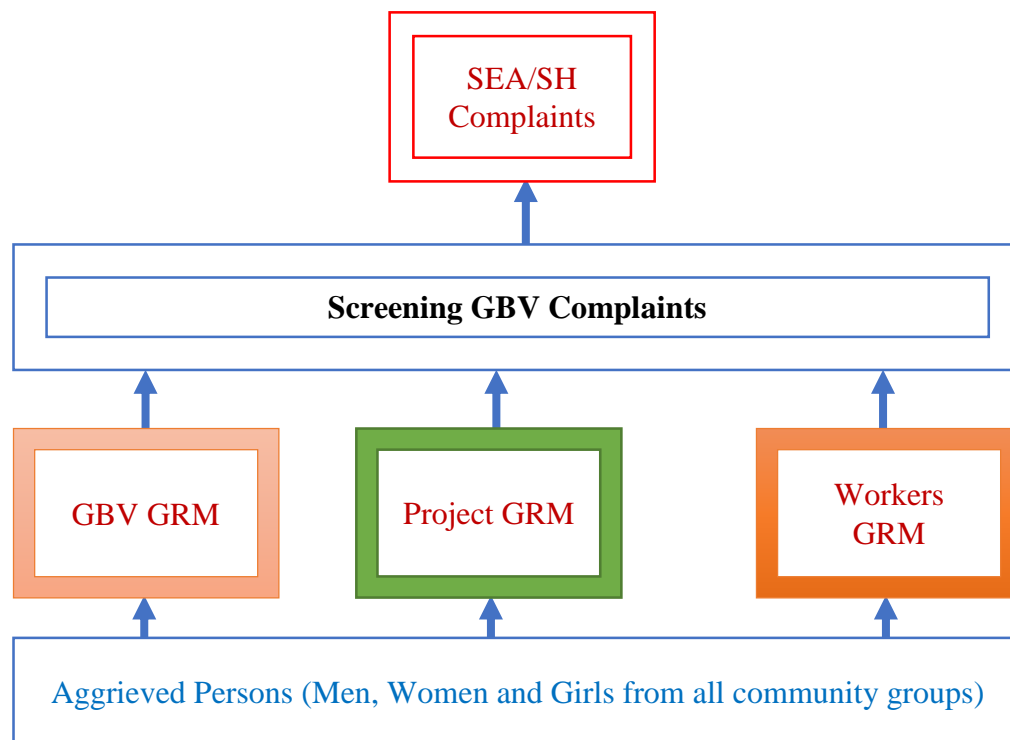


Figure 1 GRM for SEA/SH Complaints

### 6.3 Communication & Awareness Raising on GRM

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 and poster format) to all project locations with the staff on site and in the offices at Villages, Upazila, District and City Corporation.

Project beneficiaries, affected persons and communities will be informed of the project's grievance mechanism in open meetings at important locations and in FGDs and open meetings. 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 GRM 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.

## 6.4 Operationalization of Central GRS for the Project

All Government offices have been using the Government's web-based Central GRS (<http://www.grs.gov.bd>) following the GRS Guideline 2015 issued by the Cabinet Division of the Ministry of Law, Justice and Parliamentary Affairs. DYD has its own Grievance Redress Officer accessible at [ddadmin@dyd.gov.bd](mailto:ddadmin@dyd.gov.bd) and Appeal Officer accessible at [diradmin@dyd.gov.bd](mailto:diradmin@dyd.gov.bd). The Central GRS is linked with the DYD official website at <http://www.dyd.gov.bd/>. The Central GRS online platform has windows for Frequently Asked Questions, Feedback, Request for Appeal, and Suggestions for Improvement links. It also includes a User Manual, GRM Process map, Citizen Charters, GRM Guidelines and Contact Points. The site is both in Bangla and English languages.

Project GRM will also establish and operate Grievance Redress Committee (GRC) at respective locations with the GROs as the key member with applicable responsibility to coordinate and communicate between the Project GRM and the Central GRS. The project GRCs will deal with the project related questions, complaints, and suggestions.

Any question, complaint or suggestion can be placed with the Central GRS (<http://www.grs.gov.bd/>) referring the project. Project GRM will also arrange for dedicated phone number to call or send SMS and an email address to ask questions, produce complaints or share suggestions. The centralized National GRS has guidelines (available at <http://www.grs.gov.bd>) for grievance redressal system with clearly defined roles and responsibilities and timelines, which will be followed for design and operation of project GRM.

The PMU at DYD 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, the project GRCs and a road map to mainstream the Central GRS dealing with project specific issues (Figure 3). 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 within 3 months of activation of the PMU, and adopted following the approval by MoYS and concurrence from the World Bank.



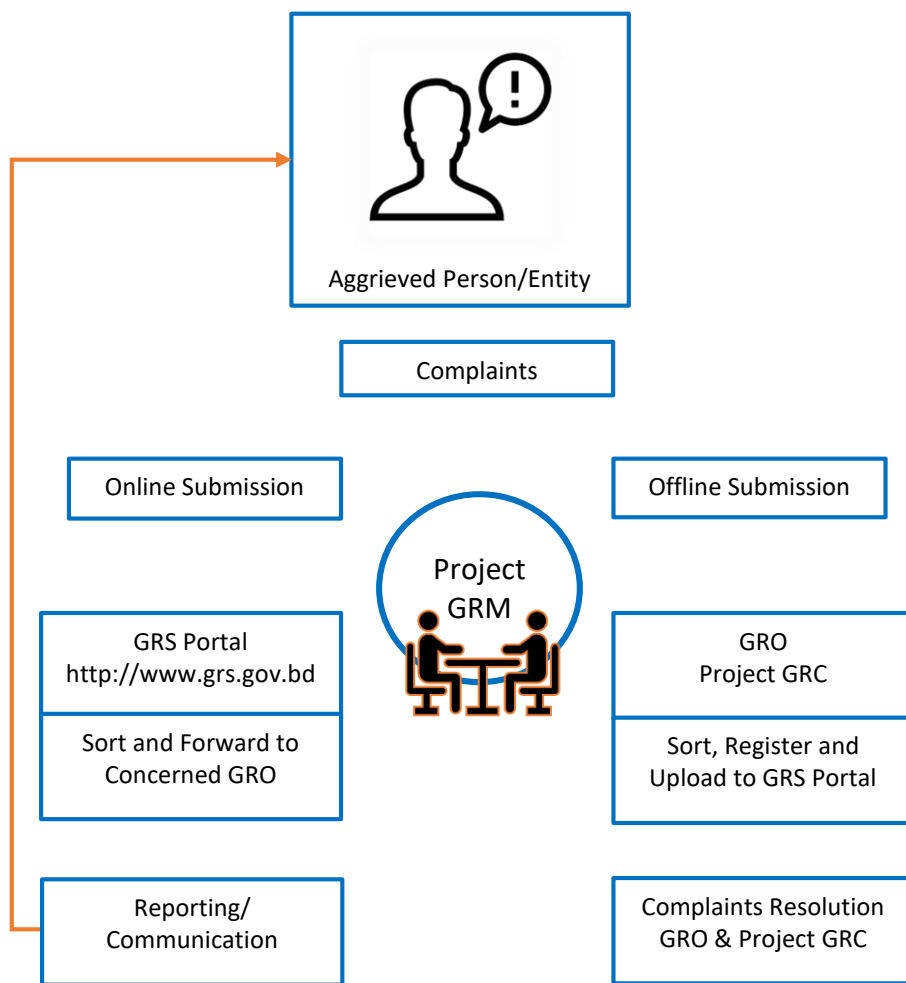


Figure 2 Interlinkage of Project GRM with Central GRS

## 6.5 Grievance Mechanism Structure

A three-tier grievance redress mechanism has been proposed for the affected people and other stakeholders (Project GRM) 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 GRM will be at community level project level and IA (MoYS) level. A separate GRM for the construction workers (Labor GRM) has also been formulated which will be activated at the construction sites to address complaints/grievances of the laborers. Sample Grievance Registration Form is provided as **Annex 3**

### Community level

The community level grievance redress committee (GRC) shall have the following members:

- Regional/Local Officer - (MoYS/DYD) (Convener)
- An Elected Member of the Union Parishad or Upazila Parishad or City Corporation
- A Female Member of the Union or Upazila Parishad or City Corporation
- A Representative of the beneficiaries and affected persons in the subprojects
- An Elected-UP Chairman or Upazila Chairman or City Corporation Mayor
- Social development Officer (Member Secretary)
- A member of the NGO working in the locality on Social Development/Gender/SEA/SH issues
- A Representative of Small, Ethnic Communities (if any present around sub-project area)

The Community level GRC shall resolve or reach a decision in fifteen (15) days from the date of lodging the complaint. The chairperson of the GRC shall communicate the committee's decision to the aggrieved persons in writing and maintain a record of all decisions related to each case.

### Project Level Grievance Redress Mechanism

The project level GRM shall have the following Grievance Redress Committee (GRC) members: -

- Project Director (Convener)
- Local Officer - YTCs
- An Elected Member of the Union Parishad or Upazila Parishad or City Corporation (Project Level Only)
- A Female Member of the Union or Upazila Parishad or City Corporation (Project Level Only)
- A Representative of the beneficiaries and affected persons in the subproject
- An Area Representative of an NGO working in the area on Social Development /Gender/SEA/SH and labor issues
- Social/ Resettlement Specialist (Member Secretary)

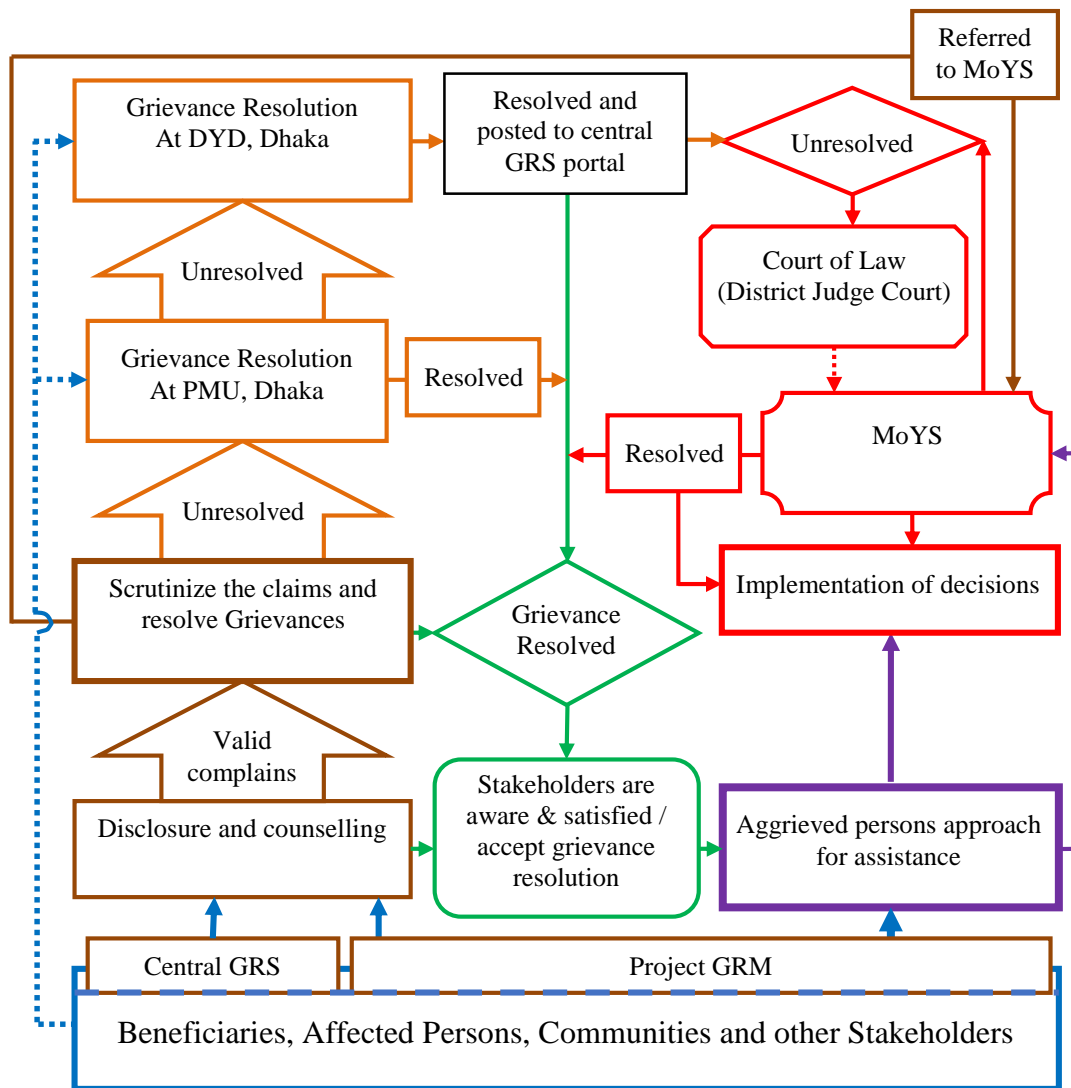
The project level GRC shall resolve or reach a decision in fifteen (15) days from the date the complaint is received. The GRC members can consult the local level GRC and visit the field for clarification, where required. The chairperson of the GRC shall communicate the committee's decision to the aggrieved persons in writing and maintain a record of all decisions related to each case.

## 6.6 Grievance Mechanism

Information about the GRM will be publicized as part of the initial disclosure consultations in the participating subproject areas. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the respective IA websites (MoYS: <http://www.moysports.gov.bd/>). The overall process for the GRM will include six steps and listed in **Annex 4**



Any SEA/SH related complaints will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on gender-based violence. SEA/SH-related complaints will be dealt with strict confidentiality, based on the wishes of the SEA/SH-survivor. Any SEA/SH-survivor will be referred to an NGO assigned for the project by the Borrower to manage and respond to SEA/SH cases. This NGO will support SEA/SH survivors in accessing service providers and guiding them through options of lodging a complaint. The GRM will determine disciplinary action against the perpetrator. Process of grievance resolution is presented in Figure 1 below:



### Figure 3: Grievance Resolution Process

## 7 Resources and Responsibilities

### 7.1 Institutional Responsibilities

The PMU will coordinate and support the IA and will lead the implementation and updating of the SEP as the implementation progresses. The PMU will identify the stakeholders of their respective component activities and will assist in communication. Social, environmental and genders experts with the PMU consultants will provide technical support in the process of engagement with their stakeholders. PMU specific stakeholder engagement program (SE Program) will be developed following the guidelines in this SEP and implemented throughout the identification, design, procurement, and implementation of the activities. The activities under the PMU for implementation of the project and the stakeholders who have been identified will be updated at the implementation level as the SEP will be considered as a living document.

DYD will create an Environmental, Social and Gender Cell (ESG Cell) within the PMU for EARN Project. The ESG Cell will be headed by a deputed focal point of DPD level appointed by the PD, and he will be responsible for implementation of the ESMF and E&S compliance monitoring. Head of the SEGU will be technically supported by the full-time PMU consultants consisting of one Environmental Specialist, one Social Development Specialist, one Gender and SEA/SH Specialist, and one Communications and Citizen Engagement Specialist. Consultants at ESG Cell will monitor ESMF, ESCP, SEP and LMP implementation and ensure compliance with both World Bank and Government E&S requirements. The partner organizations, at each division will also have Environmental and Social staff dedicatedly responsible to look after the E&S compliance monitoring, divisional partners will also provide support for E&S management in subproject processing.

The PMU is responsible for the implementation of activities listed. The implementation of SEP, coordination and administration will be the Communication Specialist's responsibility in coordination with the Senior Social Development Specialist. The PMU will receive monthly reporting which will reflect on the performance of stakeholder engagement activities, alongside monthly stocktaking of Grievance Redress and Feedback, and Accidents and Incidents Reports. These materials are compiled into the bi-yearly Progress Report mandated by the Environmental and Social Commitment Plan (ESCP). The World Bank Task Team for the Project provides oversight on these and may request any of the monthly reports as needed. The PMU's responsibility will include the following major activities:

- Organize regular meetings with stakeholders
- Update the SEP half yearly and report to WB
- Quarterly reporting on GRM to the WB
- Responds to stakeholder feedback
- Keep WB posted on all matters relating stakeholder engagement
- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project
- Administer and coordinate the grievance mechanism
- Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement
- Proactively identify stakeholders, project risks and opportunities and inform Implementing Agency's senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.





## 7.2 Human Resources and Budget

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, and adjusted as needed.

**Table 5: 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	6 times	3000		18,000.00
3	Information Desk officer (will be nominated from /PIU existing staff)				Paid from Project Consulting Service Budget
4	Stakeholder/Community/UCs/CGs Sensitization meeting in Project areas	Lump Sum			40,000.00
5	Meeting with District and Upazila Govt Officials	4 meeting/yr	1000	16	12,000.00
6	Meeting at PMU with SPs and IPs	3 meeting/yr	2000	12	18,000.00
7	Satisfaction Survey	1/yr	7000	4	21,000.00
8	Travel expenses	Lump Sum/yr	5000	4	20,000.00
9	Communication materials (Poster, Brochure, flier, billboards, website)	Lump Sum			7000.00
10	GRM Guidebook/ Manual	Lump Sum			3000.00
11	Suggestion/complain Boxes	40	50		2000.00
12	GRM /GRC expenses	Lump Sum			10000.00
13	GRM MIS Database	Lump Sum	5000		6000.00
14	Honorarium for committees	Lump Sum	7000		7000.00
	Sub-Total				164,000.00
15	Contingency (10%)				16,400.00
	<b>Total (Less Serial 1 and 3) (Rounded)</b>				<b>180,400.00</b>

**Table 6: Estimated Human Resources for SEP Implementation**

Sl.no	Staff Position/Expertise	Quantity	Duration (Months)	Input (man-month)
1	Chief Information and Communications Officer (DYD Staff Equivalent to Deputy Director)	1	48	48
2	Information Desk Officer (one for each SPs)	4	48	192
3	Stakeholders Analyst (Consultant)	1	16	16
4	Information and Communications Specialist (Consultant)	1	48	48
5	IEC Designer (Consultant)	1	16	16
6	Automation and IT Expert	1	16	16
7	Communications Assistant (Consultant)	4	48	192





## 8 Monitoring and Evaluation

### 8.1 Monitoring and Evaluation

The SEP will be periodically revised and updated by the Social Specialists of respective IAs as necessary in the course of project planning and implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This way there would also be room to include a freshly identified stakeholder group who might have been missed/were absent during the initial SEP preparation.

Regular monitoring of project progress will be built into the design, in the form of appropriate indicators, targets, information systems, and review mechanisms. Project progress will be assessed using monitoring data, and course corrections will be made as necessary. PMU officials will undertake regular supervision visits to project sites for supervision and monitoring, at least quarterly. Innovative actions under the project would include their own impact evaluation. The officer designated (preferably the Social and Environmental Consultant) for will be responsible for the monitoring and reporting of this SEP. S/he will prepare periodic monitoring report as required (monthly, quarterly, six-monthly, annual, etc.) by the PMU. In case consolidated report on E&S management is prepared, s/he will ensure that specific sections/chapters on the SEP implementation are entered in such reports.

Monitoring and reporting will involve Project Affected Parties, internal and external stakeholders, interested group and the vulnerable in monitoring mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns, thus, promoting transparency. The Project will establish a monitoring system that is participatory, which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate findings and involve them in participatory discussions of external and monitoring and evaluation missions. The monitoring report will include clear and specific indicators as regards to the engagement with stakeholders and also the project's grievance redress mechanism. The Social Consultant will work on a reporting matrix in this regard.

**Table 7: Monitoring, Evaluation and Reporting of Stakeholder Engagement Processes**

Key Elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
<b>Stakeholders' access to project information, consultations, public information and dissemination materials</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, attendance registers	PMU/IA	Number of Interviews and surveys held, number of beneficiary and stakeholder organization covered
<b>Project beneficiaries' awareness of project activities, their entitlements and responsibilities</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist	PMU/IA	Number of survey and beneficiary covered. Sample beneficiary tested for awareness
<b>Acceptability and appropriateness of consultation and engagement approaches</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PMU/IA	Number of concerns raised by beneficiaries, comparison between expected and actual beneficiary engaged



Key Elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
<b>Community facilitators' engagement with target beneficiaries</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PMU/IA	Number of engagement and number of beneficiaries covered
<b>Public awareness of GRM channels and their reliability</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist	PMU/IA	Random sampling public response of awareness
<b>Acceptability and appropriateness of GRM mechanisms</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PMU/IA	Number of complaints received and average days to solve the same
<b>Reporting, processing and resolution of grievances</b>	Periodic (maintained throughout project implementation)	Review of case reports, interviews, survey, score cards, spot checks, process evaluations	PMU/IA	Number of complaints received and average days to solve the same

## 8.2 Reporting Back to Stakeholders

The PMU will ensure regular/periodic reporting back and information sharing with the beneficiaries, affected persons and other stakeholders to close the feedback loop. This reporting back measures should always be done face-to-face meeting. Other pertinent media, such as website, social media, press briefing, may also be used. 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. 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.

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 Grievance Procedure. Information on public engagement activities undertaken by the Project 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, and may be posted on the project page for each IA, 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;



- *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;*

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 Implementing Agency website, social media accounts, communication materials, etc.



## Annex 1: Summary of Stakeholder Consultation Outcomes

Issues	Discussion
<b>Environmental Risks and Management</b>	<p>Followings are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> <li>Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be demolished to build new ones. There should be a proper plan in place to minimize air and noise pollution during the implementation period.</li> <li>Waste management system during construction will be one of the major issues and a proper management system will be in place to mitigate the impacts.</li> <li>Sound pollution management system in the new buildings given most of the YTCs are very close to the main road or highways; this needs to be taken into consideration; could be by installing sound proof windows and other ventilation systems.</li> <li>Most of the YTCs has decent number of trees inside their compound. During the implementation of the project, the number of trees that will be cut down need to minimize.</li> <li>Water logging during the rainy season: This temporary yet hazardous problem makes lives miserable for the people who live and work in that area. Proper drainage system needs to be in place; the final designs of the sub projects will have proper details on this issue. While designing and planning for this system, need to consider sustainability issues, like capacity and proper management in mind.</li> <li>Green space management can be considered to increase the aesthetic aspect of the building. Also, plantation, proper sitting area for small meetings, well managed open area for different activities can be considered within the design which can potentially benefit everyone.</li> </ul>
<b>Social Risks and Management</b>	<ul style="list-style-type: none"> <li>Sometimes there are accidents and even fatalities during construction. Proper measures have to be taken to avoid these kinds of incidents.</li> <li>Temporary resettlement of the trainees living in the compound of YTCs' sites; proper management and related issues has to be considered with utmost care. There are no squatters/informal occupants at any sites.</li> <li>Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this.</li> <li>Traffic congestion: During the construction period, the amount of usable land will be reduced, hence creating traffic congestion inside the compound. An alternative plan needs to put in place to minimize the congestion.</li> <li>Noise during demolishing the existing structure: An alternative plan needs to put in place to minimize the noise.</li> </ul>
<b>Planning and Operational Management</b>	<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 of YTCs.</li> <li>Monitoring and Evaluation</li> </ul>



## Annex 2: Stakeholder Consultation and Information Disclosure Method

Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
PREPARATION (i.e., prior to project effectiveness)	Project Information Document	Project/IA website, and physical informational products	Following approval of the document	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries	PMU
	Environmental and Social Commitment Plan	Project/IA website, and physical informational products	Following approval of the document	PIU & all project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries	PMU
	Stakeholder Engagement Plan	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of first draft and every time thereafter accompanying a revision	All project stakeholders and interested parties for initial session only, with emphasis only on implementing entities and project beneficiaries thereafter	PMU
	Environmental and Social Management Framework	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of first draft	Partner Organizations and other industry partners contributing to project activities	PMU
	Terms of Reference for Environmental and Social Specialist, and other recruited staff positions	Project website, job search portals and appropriate physical news outlets	Following approval of the document	Eligible candidates, Partner Organizations and other industry partners contributing to project activities	PMU
	Labor Management Procedures	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of first draft, with online publication only taking place after final approval	Partner Organizations, industry partners, master craftsmen and direct project beneficiaries	PMU
	Occupational Health and Safety Measures				
	Emergency Action Plan				
	Sexual Exploitation and Abuse/ Sexual Harassment Prevention and Response Plan				
	Grievance Redress and Feedback Mechanism	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of first draft, with online publication only taking place after final approval	Partner Organizations, industry partners, master craftsmen and project beneficiaries	PMU



Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
IMPLEMENTATION	Project Appraisal Document	Project/IA website, and physical informational products and in-person consultations as needed	Following World Bank Board approval of the Project	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	PMU
	Annual Work Plan	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of the document	Partner Organizations, industry partners and master craftsmen	PMU
	Project Procurement Plan				
	Bidding Documents for Procurement	Project/IA website and appropriate physical news outlets	Following approval of the document	Eligible candidates and firms, Partner Organizations and other industry partners contributing to project activities	PMU
	Environmental and Social Standards Training and Corresponding Module	Project/IA website, and physical informational products and in-person consultations as needed	Published following completion of training sessions	Partner Organizations, industry partners, master craftsmen and project beneficiaries	PMU
	Implementation Arrangements in Response to Covid-19 Training and Corresponding Module	Project website, and in-person training sessions for each of the target stakeholder groups	Published following completion of training sessions	Partner Organizations, master craftsmen and project beneficiaries	PMU
	Labor Management, Occupational Health and Safety Training and Corresponding Module, including Code of Conduct				
	Sexual Exploitation and Abuse/Sexual Harassment Training and Corresponding Module, including Code of Conduct				
	Emergency Response and Preparedness Training and Corresponding Module				



Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
	Stakeholder Mapping and Engagement Training and Corresponding Module				
	Grievance Redress and Feedback Mechanism Training and Corresponding Module				
	Environmental and Social Management Plans for Sub-Projects	Project/IAs website, and physical informational products and in-person/virtual consultations as needed	Following approval of first draft	Partner Organizations and other industry partners contributing to project activities	PMU
	Informational Products on Case Management System and Eligibility Criteria	Project/IA website, and physical informational products and in-person/virtual consultations as needed	Following approval of the document	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	PMU
	Informational Products on Life Skills, Apprenticeship and Self-Employment Curriculum				
	Employer and Skills development trainer's selection	Project/IA website, dissemination in other online and print media, public launching sessions and, for targeted stakeholders,	Following approval of final draft	All project stakeholders and interested parties, with particular emphasis on Partner Organizations, industry partners, lending institutions, master craftsmen, potential employers and other service providers contributing to project activities	PMU, and if contracted skills development firm(s)
	Midterm & Impact Evaluation	Project website, public information sessions, as needed, and focus group discussions	Following approval of the document	World Bank	PMU, and Research Firms
	Incidents and Accidents Report	Project/IA website, and physical informational products and in-person consultations as needed	Following resolution of issues presented, or otherwise as needed	World Bank	PMU
	Grievance Redress and Feedback				



Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
	Reports and/or Resolution				
	Monthly Report from PIU/IAs and if contracted firms	Physical informational products and in-person consultations as needed	Following approval of the document	World Bank	PMU
	Bi-Yearly and Annual Project Reports (Includes Mid-Term Review and External Audits)	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank	PMU
	Additional Spot Checks				PMU
CLOSURE	Sustainability Plan and Exit Strategy	Project/IA website, public information sessions and, for targeted stakeholders, focus group discussions	Following approval of first draft, with online publication only taking place after final approval	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	PMU
	Impact Evaluation	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of the document	Project stakeholders	PMU
	Final Audit	Project/IA website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank & other Stakeholders	PMU





### Annex 3: Sample Grievance Registration Form

Grievance Form: Bangladesh Road Safety Program			
<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	
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.			
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>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>			



## Annex 4: Six steps of the GRM Process

**Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, Union, project, and Upazila offices) and at project sites, and by mail, telephone, and email.

**Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Assistant Manager/Social Development Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the planning department for processing and resolution and submissions related to SEA/SH will be delegated to a mapped service provider.

**Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.

**Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and resolve the complaints following the Figure 7.1. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

**Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions. Typical grievance resolution process is shown on Figure 4.

**Step 6: Providing feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. On a monthly basis, the Planning Department will report to the Executive Chairman on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days.

