

# **Recovery & Advancement of Informal Sector Employment (RAISE)**

## **STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**Palli Karma-Sahayak Foundation (PKSF)**

**Aug 2020**

## Acronym

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BMET	Bureau of Manpower, Employment and Training
BTEB	Bangladesh Technical Education Board
COVID-19	Corona Virus Infection Disease-19
DoSS	Directorate of Social Services
FGD	Focus Group Discussion
FID	Financial Institutions Division
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
ICT	Information and Communication Technology
IDA	International Development Association
IFC	International Finance Corporation
IPOs	Implementing Partner Organizations
JCF	<i>Jagoroni Chakra</i> Foundation
MIS	Management Information System
NGO	Non- Governmental Organization
NSDA	National Skills Development Agency
PKSF	<i>Palli Karma-Sahayak</i> Foundation
PMU	Project Management Unit
POs	Partner Organizations
PWD	Persons with Disabilities
RCCE	Risk Communication and Community Engagement
RPL	Recognition of Prior learning
RRF	Rural Reconstruction Foundation
RAISE	Recovery & Advancement of Informal Sector Employment
SEIP	Skills for Employment Investment Program
SEP	Stakeholder Engagement Plan
SNF	<i>Shishu Niloy</i> Foundation
USD	US Dollar
WB	World Bank
WHO	World Health Organization

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## **Executive Summary**

This Stakeholder Engagement Plan (SEP) has been developed by PKSf to maintain and ensure the process of continuous taking part with the different stakeholders in the course of implementation of the Recovery & Advancement of Informal Sector Employment (RAISE) project. PKSf considers the process of engaging stakeholders is important for successful implementation and attaining the goal of the project.

During the preparation stage of the SEP, a series of stakeholder consultations were taken place which pave the way for constructing a robust stakeholder engagement plan for the RAISE project. Formerly, the Active Labor Market Program initiated the consultations of PKSf and its POs for preparing the project for the informal sector of Bangladesh. PKSf being the apex body of the MFIs always ensured transparency and greater participation of the beneficiaries. Thus this stakeholder engagement plan attempted to address the maximum stakeholders of this project and portrayed their roles according to their engagement in this project. To achieve above mentioned objective, the SEP will be considered as a public document and open for discussion with the stakeholders subject to regular revision to remain up-to-date. The first draft of the SEP has already been disclosed with stakeholder consultation feedback. The SEP followed the legal regulations and requirements of the GoB and also complied with the international protocols. It also analyzed the previous stakeholder engagement activities and figured out the lessons learnt to apply the best practices in designing the stakeholder engagement program. A suitable grievance redress and feedback mechanism was designed considering the country context. The Monitoring, Evaluation and Reporting system has designed through an integrated system so that throughout the project implementation all interested parties are kept informed. The SEP will act as a guide to ensure the accountability of the implementing agency.

## Stakeholder Engagement Plan (SEP)

### 1. Introduction and Project Description

#### 1.1 Introduction and Rationale for Stakeholder Engagement Plan

Stakeholder engagement and communication is critical to ensuring transparency, accountability and effectiveness of development and investment project financing. Timely and two-way information sharing and communication can help mobilize and maintain stakeholder support for the project and advance overarching project objectives

Consequently, this Stakeholder Engagement Plan (SEP) represents the commitment of the Government of Bangladesh (GoB) and lays out its strategy to engage stakeholders associated with the World Bank-financed Bangladesh: Recovery and Advancement of Informal Sector Employment (RAISE). The Project's Component 1, 2 and 4.1 will be implemented by the implementing agency— *Palli Karma-Sahayak Foundation* (PKSF).

The purpose of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the lifecycle of the Project. It outlines means in which various stakeholders are identified and includes a mechanism through which they each can raise concerns, provide feedback, or make complaints related to project activities and their execution. Such an engagement begins during inception and be based on prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders. Doing so enables stakeholders to understand the risks and impacts of the project as well as potential opportunities. The SEP is a living document and will be updated throughout project implementation based on feedback and information received through continued consultation throughout the lifecycle of the Project.

#### 1.2 Institutional and Sectoral Context, Project Description, Location and Beneficiaries

With the informal sector in Bangladesh being disproportionately affected in the aftermath of the pandemic, the need for targeted labor market program is more critical than ever before, with low-income youth and involuntarily returned migrants being most severely affected. Yet, existing Active Labor Market Programs predominantly offer short-term technical and vocational training suited for formal sector employment, thus neglecting constraints facing low-income youth and returning migrant labor that limit their access to income generation opportunities and restrict them instead to low-return low-income economic activities.

Poor educational attainment within the youth population, with only about 6.8 years of education on average, confines 44 percent of those employed in informal wage labor and another 17 percent in own microenterprises. Youth from poorer households are less likely to have well-developed personal networks, particularly if they are rural-urban migrants, which penalizes them within formal job-matching system, access to informal employment and expansion of their small-scale ventures. Female labor force participation is further inhibited by social norms, insecurity and household labor. Experiencing a similar set of constraints, involuntarily returned migrants experience even more disadvantaged in the absence of initiatives to support their transition back to the domestic economy.

Based on this, through 200M USD in credits from the International Development Association and another 100M USD in co-financing from the counterpart, the Recovery and Advancement of Informal Sector Employment Project seeks **to enhance access to improved income earning opportunities for low income youth and entrepreneurs including**

**COVID-affected enterprises in urban and peri-urban areas.**<sup>1</sup> It is composed of four inter-related components:

- **Component 1 (PKSF): Program Design and Systems Development**, which supports development of life skills, self-employment and business management curriculum, and corresponding training to Partner Organizations, master craftsmen and relevant project-level staff to deliver them, and an accompanying case-based Information, Counseling and Referral Systems to identify, provision and track services provided to eligible participants.
- **Component 2 (PKSF): Economic Inclusion Programming**, which facilitates community engagement, identification and profiling and eventually life skills training, informal apprenticeships, microenterprise development and access to microfinance to eligible beneficiaries.
- **Component 3 (WEWB): Reintegration for Returning Migrants**, that provisions field offices, psychosocial support, training referral and stipend to returnee migrants as well as provisions of integrated database.
- **Component 4 (PKSF 4.1 and WEWB 4.2): Project Management and Implementation** that finances operational activities of the Project Management units within PKSF and their partner organizations, including associated capacity strengthening initiatives.
- **Component 5: Contingent Emergency Response Component**, a provisional zero amount component to enable rapid reallocation of loan proceeds from other components in the event of eligible emergencies

### 1.3 Summary of Environmental and Social Impacts

Environmental risks associated with Project activities largely emanate from threats to resource efficiency and biodiversity owing to beneficiaries either matched with economic opportunities utilizing environmentally damaging technologies or engaging in microenterprises with deleterious consequences. To that end, an eligibility criteria, composed of the IFC's exclusion list and additional negative list to screen out activities with more than moderate risks, is being put in place. This is complemented by a screening mechanism requiring individual entrepreneurs, industry partners employing informal laborers and beneficiary microenterprises to exercise environment-friendly practices and leave only minimal environmental footprint. Thus, environmental risks posed are considered moderate.

Meanwhile, with informal wage labor and small-scale microenterprises being hardest hit in the aftermath of COVID-19, low-income youth and returning migrant workers remain severely disadvantaged. Coupled with their poor educational attainment, lack of access to social networks, prevailing social norms against those particularly vulnerable (Persons with Disabilities and ethnic minorities access of intended beneficiaries to economic opportunities and services remains encumbered). This is managed through efficient and effective stakeholder engagement, including advocacy, consultation and outreach, as well as Grievance Redress and Feedback Mechanism. Further, with eligible beneficiaries entering apprenticeships and microenterprise development programs as employees, there remains a need to also safeguard their occupational rights provide reasonable working conditions, and ensure Protection from Sexual Exploitation and Abuse through proposed Labor Management Procedures and Sexual Exploitation and Abuse/Sexual Harassment and Prevention Plan. Granted, given the nature of the health crises, Occupational Health and Safety and emergency measures remains of prime importance. Based on this, social risks associated with this Project are deemed substantial.

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<sup>1</sup> This encompasses towns, cities, city and municipal corporations, *pourashavas* and other municipality areas, upazila headquarters and cantonment areas, potential business clusters and extends unto peri-urban areas.

## 2. Legal Regulations and Requirements

### 2.1 Key National Legal Provisions

This section details relevant national laws, and their subsequent amendments, on the right to information disclosure, public engagement, transparency and accountability, and labor force participation as applies to the Project. The legal tenets provided herein inform the Project design and nature of engagement activities undertaken and as defined in this Plan.

- **Constitution of the People's Republic of Bangladesh:** The Constitution enshrines values of equality of opportunity to all citizens and adoption of effective measures to remove social and economic inequalities towards sound economic growth (Article 19). It attests to citizens' right to work and compensation as is owed (Article 20), and engage in any lawful profession, occupation, trade or business (Article 40), extending such provisions unto its tribes, minor races, ethnic sects and communities (Article 23A). It prohibits all forms of forced labor (Article 34). It also guarantees its citizen's rights to move, reside and settle freely throughout the country (Article 36); as well as assemble and participate in public meetings and processions, subject to reasonable restrictions in the interest of public health (Article 37); and form associations or unions (Article 38). Freedom of thought, conscience, speech, expression and press are guaranteed subject to them not overriding interests of the State (Article 39). The Constitution also espouses the formation of local governments responsible for public administration, maintenance of public order, delivery of public services and economic development, financial management and imposition of taxes (Article 59-60)
- **Consumers' Right Protection Act, 2009:** This Act aims at protection of the rights of consumers, prevention of anti-consumer right practices and related matters therewith. In particular, it mandates temporary closure of any shop, commercial enterprise, factory, workshop or go down if it appears that any goods of anti-consumer right are being sold, manufactured or stored therein (Article 27). It also prohibits manufacture, import, marketing, sale, distribution and transportation of goods injurious to human health (Article 29), bearing particular relevance to selection of master craftsman involved in training apprentices and vocations chosen by beneficiaries engaging in informal labor or self-employment.
- **Right to Information Act, 2009:** This Act makes provisions to ensure free flow of information and people's right to information. It articulates individual rights to information from Authority (Article 4), request thereof (Article 8) and receipt within 20 working days (Article 9). It mandates cataloguing and indexing to preserve information (Article 5), publish and publicize all information relevant to decisions taken in a manner accessible to all citizens (Article 6) save those not regarded as being mandatory (Article 7). It further guarantees rights of the people to lodge complaints in response to decisions or non-action and satisfactory disposal (Article 25) and oversight over officers in charge (Article 27), all taken into consideration in the design and delivery of information disclosure.
- **Information and Communication Technology (ICT) Act, 2006:** This Act provides legal recognition and security of Information and Communication Technology and rules of relevant subjects. Specific to the proposed Project, it cautions against publishing fake, obscene or defaming information in electronic form (Article 57), misrepresenting and obscuring information (Article 62) and disclosing confidentiality and privacy (Article 63).
- **Digital Security Act, 2018:** This Act is instituted to ensure national digital security and enact legislation around digital crime identification, prevention, suppression, and trial, among others. Bearing relevance to Project activities, it enables the removal or blocking of data or information deemed threatening (Article 8). It cautions against digital or electronic fraud (Article 23), identity fraud or being in disguise (Article 24), publishing or sending offensive, false or fear inducing data or information (Article 25) and collecting or using identity information without consent (Article 26). It further



prohibits publication or broadcast of information that hampers religious sentiments or values (Article 28) and defamatory content (Article 29). Alongside barring illegal transfer or saving of data or information (Article 33), it takes into consideration activities done in good faith (Article 57).

- **Telecommunication Act, 2001 and Telecommunication Policy, 1998 and 2018:** The Act provides for the development and efficient regulation of telecommunication system and services. It identifies the standard of telecommunication, its apparatus and terminal apparatus, and also towards the prevention of harmful interference (Chapter VII). It identifies licensing procedures for radio apparatus (Article 55), as well as penalties for false and incident messaging, interference and eavesdropping, misuse and annoyance, trespassing and damages, among others (Chapter XI). Telecommunications Policy 2018 highlights speaks to the need for universal access (Paragraph 4.1) and telecommunications-based employment and entrepreneurship (Paragraph 6.8), as ensured in designing and delivering stakeholder engagement and potential income-generating opportunities.
- **Broadcasting Act, 2018:** This Act creates provisions for regulation of broadcasting services and measures to promote independent and pluralistic broadcasting in public interest. In particular, it sets out Advertising Code (Article 33) that provides useful guidance towards dissemination of program information to a broad audience.
- **Labor Act, 2006 and Labor Rules, 2015:** This Act pertains to the occupational rights and safety of workers and provision of reasonable working conditions. With overarching tenets being directly applicable to the Project, specific provisions on leave (Article 10), payment of wages for unveiled leave (Article 11), stoppage of work (Article 12), grievance redress procedure (Article 33) and prohibition of employment of children and adolescent (Article 34) have particular relevance to Project activities. Taken further, this Act outlines standards for health, hygiene and safety, including its special provisions, with particular emphasis on disposal of wastes and effluents, fire safety (and also against fumes, explosives and inflammable dust), access to drinking water, latrines and urinals, safe usage and safety with(in) machineries and premises, and response to accidents, diseases and other dangerous occurrences (Chapters V-VII). It also provisions welfare, working hours, leave, payment of wages, and compensation for injuries, focusing on access to first aid appliances, shelters and daycare; daily hours, holidays, shifts, overtime, and casual, sick and annual leave; and schedule, form, deductions, claims and appeals on wages; and liability of employers, amount of redress and investigation of damages received (Chapters VIII-X and XII). Even more so, it outlines obligations of employers and apprentices for arrangements for apprenticeships (Chapter XVIII), which are further elaborated upon in Chapter VII of the Labor Rules, notably on inclusion of eligible participants, allowance and working hours, among others.
- **National Skills Development Policy, 2011:** This Policy guides skill development strategies, outlining commitments and reforms envisioned to that affect. With direct relevance to the Project, it the standards for demand-driven, flexible and responsive provisions for skills training (Chapter 4), competency-based training and assessment (Chapter 6), quality assurance of programs and providers (Chapter 7), data collection and analysis on skills availability and labor market (Chapter 9), and effective and flexible institutional management (Chapter 11). It further sets the stage for competencies and certification of instructors and trainers (Chapter 10), design and delivery of apprenticeships (Chapter 12), recognition of prior learning (Chapter 13), industry training and workforce development (Chapter 17), and skills development for overseas employment (Chapter 18). And, it advises on improved access for underrepresented groups (Chapter 14), enhanced social status of Technical and Vocational Education and Training (Chapter 16), and extends unto roles of industry sectors in skills development (Chapter 8).
- **National Youth Policy, 2017:** Seeking to ensure fulfillment of youth potential and employment, this Policy outlines priorities and programmatic measures around the thematic areas of empowerment. Its emphasis on education, training, employment and entrepreneurship, and development of information and communications technologies provide key implications towards the design and delivery of Project activities.

- **National Women Development Policy, 2011:** This Policy espouses specific measures to enhance safety, security, socioeconomic empowerment and participation of women and reduce male-female disparities. Specific to the Project, it emphasizes on support to women's human resource development and entrepreneurship, recognition of women's contribution and use of women-friendly technologies, prioritization of their access to shelter and targeted support to those with disabilities, from smaller ethnic groups and those who are widowed, unmarried and childless, among others. Provisions herein are further reinforced by the **Prevention of Oppression Against Women and Children Act, 2000**, which safeguards women against social injustices, including those they could risk within the scope of Project design and implementation.
- **Microcredit Regulatory Authority Act, 2006:** This Act outlines guidance on the efficient regulation of microcredit programs and transparency and accountability in the activities of microcredit organizations. It mandates receiving certificate from the Authority (Chapter 4), submitting yearly balance sheets (Article 22), providing loan support and advise to poor people, alongside other eligible activities (Article 24) for an organization to be considered eligible, for the purposes of the Project.
- **Mobile Financial Services Regulations, 2018:** The Regulations provides regulatory framework to facilitate cost-efficient and prompt services, particularly for poor and underbanked population segments, as serviced through this Project. It sets models for business-to-person and government-to-person payments, including their operation modalities (Articles 5-7), thus guiding mechanisms for delivery of cash transfers to targeted beneficiaries.
- **Money Laundering Prevention Act, 2012 and Money Laundering Prevention Rules, 2019:** In mandating punishment for money laundering (Article 4) and other related offenses, this Act, complemented by the Rules, supports financial due diligence in the activities of Financial Intermediaries, Partner Organizations in this case, involved in the Project.

## 2.2 World Bank Requirements

As defined by the Environmental and Social Framework 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 the successful management of a project's environmental and social risks. As per ESS10 the process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders. ESS10 also requires the development and implementation of a grievance redress (and feedback) mechanism that allows project-affected parties and others to raise concerns and provide suggestions related to the environmental and social performance of the project, and other consequences at it affect them, and to have them addressed in a timely manner.

## 3. Previous Stakeholder Engagement Activities and Lessons Learnt

### 3.1 Previous Consultations and Engagement

In the lead up to drafting the Stakeholder Engagement Plan and Appraisal, a number of consultations and engagement sessions were held to inform communication, sensitization and mobilization mechanisms deployed for the Project as well as the design of project activities, each of which are summarized below:

**Table 1: Summary of Previous Stakeholder Engagement**

<b>Date and Location</b>	<b>Participants</b>	<b>Main Points Discussed</b>	<b>Responses and Measures Adopted</b>
October 2018 Agargaon, Dhaka	Executive Directors and Focal Persons of PKSf POs, PKSf Officials, WB Representatives	Design and data collection for World Bank study on <i>Addressing Youth Employment in Bangladesh</i>	Objectives, data needs, study area and participants of the study were finalized, with the final product found herein: <a href="https://documents.worldbank.org/eng/publication/documents-reports/documentdetail/817911585631502879/addressing-youth-employment-in-bangladesh-insights-on-design-from-five-programs-implemented-by-pksf">https://documents.worldbank.org/eng/publication/documents-reports/documentdetail/817911585631502879/addressing-youth-employment-in-bangladesh-insights-on-design-from-five-programs-implemented-by-pksf</a>
April 2019 Godagari, Rajshahi	Santal youth, community leaders and senior citizens, Wave Foundation and PKSf Officials	Inclusion of ethnic minorities in skills development training	<ul style="list-style-type: none"> <li>▪ With unemployed Santal youth experiencing constraints to attend skills training with other participants.</li> <li>▪ PKSf opened a branch of Training Institute in that vicinity to enroll Santal and other youth from low income households.</li> <li>▪ Targeted communities received information on skills training.</li> <li>▪ Increased participation of Santal and youth from the low income households.</li> </ul>
April 2019 Chuadanga, Bogura, Shariatpur, Jessore	Participants of PKSf-SEIP, Nielsen Bangladesh research team and PKSf Officials	Study on Self-employed Graduated Trainees of SEIP Project, PKSf	<ul style="list-style-type: none"> <li>▪ Institutional financial support was found to be critical to early-stage entrepreneurs who receive low returns on investment, calling for low-interest rates to support self-employment. This led to PKSf piloting “Start-Up Capital Loan” offering longer grace period and lower interest rates.</li> <li>▪ The creditworthiness of potential borrowers evaluated by respective POs found to contribute 20% of the total investment.</li> <li>▪ Identified individuals who may success in new ventures; psychological indicators were incorporated into the assessment.</li> <li>▪ An orientation of psychometric profiling was held by a Behavioral Economist to conceptualize entrepreneur’s mindset to support potential entrepreneurs.</li> </ul>
May 2019	Senior Officials at PKSf	Introduction to Psychometric Profiling for assessing	<ul style="list-style-type: none"> <li>▪ Behavioral economic tools as a means to select potential entrepreneurs based on entrepreneurial ability and</li> </ul>

Date and Location	Participants	Main Points Discussed	Responses and Measures Adopted
		Entrepreneur's ability & creditworthiness.	creditworthiness.
June 2019 Moulivibazar, Sylhet	Tea garden workers, Representatives from Skills for Employment Investment Program (SEIP) Partner Training Institutes, Local Government Representatives & PKSF Officials	Strengthening livelihoods of Tea garden workers	<ul style="list-style-type: none"> <li>With the unemployed youth in Tea gardens unable to step outside, PKSF opened a branch of Training Institute in the area to encourage their participation.</li> <li>Targeted communities received information on skills training</li> <li>Increased scopes of improving livelihood, and a community-based group were formed.</li> </ul>
July 2019	PKSF Officials and Credit Coordinators from its POs, including Rural Reconstruction Foundation (RRF), Jagoroni Chakra foundation (JCF), Wave Foundation, Shishu Niloy Foundation (SNF) and Bandhu Kalyan Foundation (BKF)	Introductory meeting on how to Prepare Psychometric Profile of Entrepreneurs	<ul style="list-style-type: none"> <li>A pilot survey has been conducted on Psychometric Profiling of existing Entrepreneurs in Jessore. The objective of that pilot survey was to reveal the necessity of Psychometric Profiling &amp; check the effectiveness of the tools developed by the expert.</li> <li>It is found that half of the entrepreneurs can't fill up the questionnaire. They suggested that language of questionnaire should be simple and legible.</li> <li>Relevant staff of POs thought this kind of assessment will help them to understand potential micro entrepreneurs.</li> </ul>
June, 2020 Dhaka	Focal Person of POs and SEIP-PTI	Program design, training modalities and potential trades for apprenticeships under RAISE project	<ul style="list-style-type: none"> <li>Provision of non-residential training for aspiring and current entrepreneurs participating as project beneficiaries.</li> <li>Targeting low income unemployed and partially employed youths for market-responsive opportunities with potential growth</li> <li>Provision of credit support for the fresh skilled entrepreneurs and Covid-19 affected borrowers.</li> </ul>
June 2020 Dhaka	Supervisors of PKSF Core Operations	Credit channeling to RAISE Participants, analyzing urban and peri-urban credit flow and economic status of Covid-affected micro-entrepreneurs	<ul style="list-style-type: none"> <li>Participants to begin identify from the POs working in urban and peri-urban areas.</li> <li>A rapid survey on economic damage to micro entrepreneurs indicates inability to sell owing to lockdown and changing buying capacities of consumers, hence significant losses in monthly revenue. Many with</li> </ul>

Date and Location	Participants	Main Points Discussed	Responses and Measures Adopted
			<p>microenterprises thus entered below the poverty line as a new vulnerable group.</p> <ul style="list-style-type: none"> <li>Financial support to be structured in consideration of the special needs of the Covid-affected enterprisers</li> <li>Preliminary discussion held regarding selection of Partner Organization (PO) under this project.</li> </ul>

### 3.2 Salient Issues from Engagement

Previous stakeholder engagement yielded some unique observations that guide both stakeholder engagement and Project design, including but not limited to:

- Inclusive end-to-end skills training program combined with employment services targeting different vulnerable groups such as tea garden workers, ethnic minorities and more is critical to the overarching success of such programs.
- Success of home-based entrepreneurship ventures such as tailoring may be a strong motivator for future female participation in similar initiatives.
- Male participants indicate a preference for training in Mobile Phone Servicing, electronics and plumbing for employment in different manufacturing industries or even starting their own business with credit support from POs.
- Community mobilization play vital role to select appropriate trainees as well as ensure community engagement.
- There is a keen interest towards utilizing Psychometric Profile for Entrepreneurs as a tool to assess creditworthiness of entrepreneurs and entrepreneurial ability, as indicated by different initiatives taken in the past year by PKSf.
- Financial support is required for severely affected micro-entrepreneurs to reverse the effect of pandemic on their livelihoods.
- Financial support to graduated trainees will promote their self-employment activities.

## 4. Stakeholder Identification and Analysis

Mapping project stakeholders marks the first step in preparing the Stakeholder Engagement Plan, 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.

### 4.1 Stakeholder Category, Identification and Analysis

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;

- **Interested parties** predominantly refer to those who are not directly affected by project activities, but are invested 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 represented in overarching stakeholder engagement. By extension, they are disproportionately impacted or further disadvantaged due to their vulnerable status, notably women, elderly, children, female-headed households, people with disabilities, 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.

Engagement with all identified stakeholders may incentivize their maximum contribution 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. A general list of stakeholder groups identified and one of vulnerable or disadvantaged stakeholders are each tabulated below:

**Table 2: Description of Project-Specific Stakeholder Groups and Interested Parties**

Stakeholder Groups and Interested Parties	Relevance of Engagement
International Development Association (IDA)	Financier of the proposed Project
Financial Institutions Division, Ministry of Finance, GoB	Direct recipient of the financing provided to the Government of the People's Republic of Bangladesh
Implementing Partner Organizations (IPOs) of PKSf	Responsible for identifying eligible participants and deliver economic opportunities and services as identified in the Project Appraisal Document at field levels.
National Skills Development Authority (NSDA) and Bangladesh Technical Education Board (BTEB)	NSDA was established by the GoB to coordinate skill development program around the country. BTEB prepares different course standards for short courses and other diploma courses. If necessary, PKSf can take technical assistance from NSDA & BTEB. In case of RPL, POs will select BTEB registered training organization to assess trainees.
Ministry of Fisheries & Livestock, Ministry of Agriculture, Ministry of Industry, Ministry of Youth & Sports, Ministry of Labour and Employment, Bureau of Manpower, Employment and Training (BMET), Directorate of Technical Education (DTE)	If necessary, PKSf will seek cooperation from them for the smooth implementation of the project.
District Administration, Directorate of Social Services (DoSS), and other district-level entities	Support POs at <i>upazila</i> levels for successful implementation of project activities
Project Beneficiaries	Poor urban and peri-urban youth with low educational attainment, micro entrepreneurs who have been affected by the COVID-19 pandemic.
Prospective employers, including owners	Provide employment opportunities and skills training

<b>Stakeholder Groups and Interested Parties</b>	<b>Relevance of Engagement</b>
of microenterprises and workshops, and master craftspersons	to project beneficiaries
Print and electronic media	Implementing Partner Organizations may communicate with media for promotional activities.
Civil Society Organization (CSOs), NGOs	Can provide inputs for design of the project including beneficiary engagement and selection
Academia, Think Tanks, Influencers	For inputs in project design, baseline analysis and future predictions, experience sharing from similar projects

**Table 3: Vulnerable or Disadvantaged Stakeholders, Their Circumstances and Engagement Mechanisms**

<b>Vulnerable or Disadvantaged Stakeholders</b>	<b>Limitations and Needs Experienced</b>	<b>Preferred or Potential Means of Receiving and Exchanging Information</b>	<b>Resources Required (or Activities Envisioned for Which Resources are Needed)</b>	<b>Recent Engagement</b>
<b>Low-Income Youth</b>	<ul style="list-style-type: none"> <li>Many are responsible for their entire households, and may require extensive mobilization and financial incentives to override the opportunity cost of participating in disclosure, consultation and broader engagement activities</li> <li>Poor educational attainment calls for higher investment to distil and synthesize project-related information in a manner that is accessible.</li> <li>An increase in bus fares raises the financial and administrative costs of partaking in project activities.</li> <li>A lack of well-developed personal networks, especially if they are rural-urban migrants, may exclude them from participation in engagement, consultation and other project activities, notably expanding the microenterprises and seeking informal wage labor on their own.</li> <li>Although rural-urban youth are the most vulnerable, there may be barriers to targeting them as many have returned to their villages from being unable to retain any form of livelihoods in urban and peri-urban areas.</li> </ul>	<ul style="list-style-type: none"> <li>Community mobilization, distribution of leaflets &amp; brochure and social networks can play vital role in order to enable voluntary participation and registration of the youth of the low income groups of PKSf Partner Organizations (PO)</li> <li>Soliciting of listing of low-income youth with lack of access to income generation opportunities through consultation with Partner Organizations.</li> <li>PO's beneficiaries in areas most affected by the pandemic.</li> <li>Focus group discussions in proximity to their own locations for awareness raising and consultation on project activities.</li> <li>Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop initial listing of potential eligible youth beneficiaries.</li> <li>Preparation of information materials, including website and leaflet/brochure for the project</li> <li>Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities.</li> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	<p>March 2019 in Rangpur</p> <p>Participants: Unemployed youth from low income family, their guardians, PKSf officials</p>
<b>Informal Workers</b>	<ul style="list-style-type: none"> <li>That informal wage employment structure not being connected to an efficient job-matching systems means that there is some reluctance, even amongst those who engage in them. As such, informal works can be reluctant to participate in project activities despite this being their only source of livelihoods.</li> <li>In the aftermath of Covid-19, with those in</li> </ul>	<ul style="list-style-type: none"> <li>Community mobilization, distribution of leaflets &amp; brochure and social networks can play vital role in order to enable voluntary participation and registration of the youth of the low income groups of PKSf Partner Organizations (PO).</li> <li>Soliciting of listing of Informal sector workers with lack of access to income generation opportunities through</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop initial listing of potential eligible youth beneficiaries.</li> <li>Preparation of information materials, including website and leaflet/brochure for the project</li> <li>Provision of, participation</li> </ul>	<p>March 2019 in Bogra</p> <p>Participants: Young informal workers like plumbers, electricians, Master craftsperson (<i>Ustad</i>) , PKSf officials</p>



Vulnerable or Disadvantaged Stakeholders	Limitations and Needs Experienced	Preferred or Potential Means of Receiving and Exchanging Information	Resources Required (or Activities Envisioned for Which Resources are Needed)	Recent Engagement
	<p>informal employment being heavily affected, more extensive communication and sensitization activities would be required to target and mobilize them.</p> <ul style="list-style-type: none"> <li>Further, with those in informal labor lacking access to any form of social safety, assistance and insurance, they may require commitments to early response and preparedness in order to safeguard themselves against future shocks and participate in project initiatives.</li> <li>Additional needs and characteristics correspond with those already identified in the first row for low-income youth.</li> </ul>	<p>consultation with Partner Organizations.</p> <ul style="list-style-type: none"> <li>PO's beneficiaries in areas most affected by the pandemic.</li> <li>Focus group discussions in proximity to their own locations for awareness raising and consultation on project activities.</li> <li>Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<p>grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities.</p> <ul style="list-style-type: none"> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	
<b>Self-Employed and those wage Employed by Microenterprises</b>	<ul style="list-style-type: none"> <li>Identification of those who have been self-employed after or in response to the pandemic may be hard wrought.</li> <li>In particular, for low-skilled youth, businesses that they launch may not necessarily be climate or Covid-19 sensitive, in which case they risk exclusion from the Project altogether despite meeting other eligibility criteria</li> <li>For those with inadequate education, there should be opportunities for those who participate in the program to obtain formal certificates for graduation in order to increase their employability in the long run. Given cultural considerations, official recognition of their time in the program would provide them the confidence about their time invested in the program.</li> <li>Lack of formalized knowledge and access to capital amongst those who are considered self-employed or may enter self-employment for the purposes of this project</li> </ul>	<ul style="list-style-type: none"> <li>Soliciting of listing of and sharing of information with those self-employed or employed by micro-enterprises in need of further assistance through consultation with Partner Organizations, and past beneficiaries in areas most affected by the pandemic.</li> <li>Awareness raising sessions and extended behavior change communication campaign with potential beneficiaries</li> <li>Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop initial listing of potential eligible youth beneficiaries.</li> <li>Awareness raising, social behavior change campaign, and small-group consultations with potential beneficiaries with support from previous successful corresponding participants.</li> <li>Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities</li> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	<p>April 2019 in Chuadanga</p> <p>Participants: Self-employed youth those who owns small business like mobile phone servicing, tailoring shop, PKSf officials</p>

<b>Vulnerable or Disadvantaged Stakeholders</b>	<b>Limitations and Needs Experienced</b>	<b>Preferred or Potential Means of Receiving and Exchanging Information</b>	<b>Resources Required (or Activities Envisioned for Which Resources are Needed)</b>	<b>Recent Engagement</b>
	<p>means that thorough confidence building initiatives would be required for them to foresee potential benefits from partaking in project activities.</p> <ul style="list-style-type: none"> <li>With majority of those who are or have been self-employed solely responsible for sustaining their entire households, opportunity cost of participating in project activities needs to be commensurate with benefits from activities envisioned.</li> </ul>			
<b>Informal Microenterprises</b>	<ul style="list-style-type: none"> <li>With assistance and stimulus packages thus far having predominantly targeted formal microenterprises, there remain a need for awareness raising campaign around support provided to them are commensurate with their circumstances and shock responsive as well.</li> <li>Prior losses and lack of access to broader value chain may have left many of them depleted, and options towards potential recovery of assets and losses incurred may need to be explored by the project.</li> <li>Additional needs and characteristics correspond with those already identified for “self-employed and those employed by microenterprises”</li> </ul>	<ul style="list-style-type: none"> <li>Community mobilization, distribution of leaflets &amp; brochure and social networks can play vital role in order to enable voluntary participation and registration of the youth of the low income groups of PKSf Partner Organizations (PO)</li> <li>Awareness raising sessions and extended behavior change communication campaign with potential beneficiaries</li> <li>Soliciting of listing of and sharing of information with informal micro-enterprises in need of further assistance through consultation with Partner Organizations, and past beneficiaries in areas most affected by the pandemic.</li> <li>Focus group discussions in proximity to their own locations for awareness raising and consultation on project activities.</li> <li>Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop initial listing of potential eligible youth beneficiaries.</li> <li>Preparation of information materials, including website and leaflet/brochure for the project</li> <li>Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities.</li> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> <li>Awareness raising, and FGD with potential beneficiaries with support from previous successful corresponding participants.</li> </ul>	<p>January 2019 in Bhairab (Shoe cluster)</p> <p>Participants: Youth working at microenterprises like shoe factory, owners of the shoe factory, NGO officials, PKSf officials</p> <p>February 2019 in Munshiganj (mini garments business cluster)</p> <p>Participants: Workers (youth) of the mini garments, owners, association members, NGO officials, PKSf officials</p>
<b>Female Laborers and Business</b>	<ul style="list-style-type: none"> <li>Conservative gender norms and presumptions around vocations that are</li> </ul>	<ul style="list-style-type: none"> <li>Community mobilization, distribution of leaflets &amp; brochure and social networks</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop</li> </ul>	<p>September 2019 in Chuadanga</p>

<b>Vulnerable or Disadvantaged Stakeholders</b>	<b>Limitations and Needs Experienced</b>	<b>Preferred or Potential Means of Receiving and Exchanging Information</b>	<b>Resources Required (or Activities Envisioned for Which Resources are Needed)</b>	<b>Recent Engagement</b>
<b>Owners</b>	<p>considered appropriate for women may limit them to only certain forms of wage labor and home-based microenterprises. If the latter is considered more feasible, then improved virtual connectivity and linkages with the value chain need to be ensured for women to be able to maximize.</p> <ul style="list-style-type: none"> <li>▪ Aforementioned customs are also tied to limitations on women's safety and mobility, which can be mitigated by through provision of transportation facilities for them to jointly travel together to access training opportunities and other project activities.</li> <li>▪ Lack of access to childcare facilities and inability to find suitable replacement during assigned consultation or training hours can dissuade participation. Likewise, those requiring to prepare meals and support through other forms of domestic labor directly contributing to household income may choose to not join in the absence of due compensation.</li> <li>▪ Past instances demonstrate women requiring additional resources than their male counterparts to excel in the same ventures, which needs to be adequately compensated for in order to retain them and help them succeed.</li> <li>▪ Taken further, attempting to reach them through heads of households, in the absence of successful social behavior change communication campaign, may not only exclude them, but also subject them to further domestic and financial abuse.</li> </ul>	<p>can play vital role in order to enable voluntary participation and registration of the youth of</p> <ul style="list-style-type: none"> <li>▪ Soliciting of listing of female-headed households, families left behind, women from households hardest hit (or without dual incomes), and other vulnerable women with lack of access to income generation opportunities through consultation with industry partners, Partner Organizations, community-based organizations, women support organizations and past beneficiaries in areas most affected by the pandemic.</li> <li>▪ Focus group discussions with successful female entrepreneurs, to bring in additional potential female beneficiaries for sensitization and mobilization to project activities.</li> <li>▪ Access to psychosocial support and counseling on a case-by-case basis.</li> <li>▪ Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<p>initial listing of potential eligible female beneficiaries.</p> <ul style="list-style-type: none"> <li>▪ Additional consultations with successful female entrepreneurs, politicians, traditional leaders and influential figures to develop initial listing of potential female beneficiaries.</li> <li>▪ Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities, and access to pooled transportation if possible.</li> <li>▪ Psychosocial support offered by trained Case Management and Enterprise Development Officers within Partner Organizations, females in this case to reflect their concerns more keenly</li> <li>▪ Preparation of information materials, including website and brochure for the project</li> <li>▪ Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	<p>Participants: Female workers and owners of cottage industry, tailoring shop, NGO officials, PKSf officials</p>
<b>Persons With</b>	<ul style="list-style-type: none"> <li>▪ Societal stigma against those disabled may</li> </ul>	<ul style="list-style-type: none"> <li>▪ Community mobilization, distribution of</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consultations with Partner</li> </ul>	<p>April 2019 in Dhaka</p>

Vulnerable or Disadvantaged Stakeholders	Limitations and Needs Experienced	Preferred or Potential Means of Receiving and Exchanging Information	Resources Required (or Activities Envisioned for Which Resources are Needed)	Recent Engagement
<b>Disabilities</b>	<p>severely discourage those with disabilities from participating the any consultation, engagement and broader project activities.</p> <ul style="list-style-type: none"> <li>Those with physical, speech, hearing and intellectual disabilities often remain in the fringes of commonly used means of communication, demonstrated through their limited knowledge of coronavirus. As such, more targeted sensitization and mobilization campaign would be required to access and incentivize their participation.</li> <li>Those with disabilities also experience higher need for relief assistance, special healthcare services and mental health support, which may be accommodated by the project through referrals.</li> <li>Failure to host activities where persons with disabilities may be present in non-accessible locations may present physical deterrence to their involvement.</li> <li>Their relatively low educational attainment may further impede them from effectively participating in or learning from engagement and training sessions unless adapted to their specific circumstances.</li> <li>The same selection criteria as applied to the rest of the beneficiary groups may further impede persons with disabilities from with substantive vulnerabilities from being included in the program.</li> </ul>	<p>leaflets &amp; brochure and social networks can play vital role in order to enable voluntary participation and registration of members of PKSf-POs.</p> <ul style="list-style-type: none"> <li>listing out of eligible persons with disabilities</li> <li>Guided focus group discussions with potential eligible PWDs in close proximity to their own locations for awareness raising, behavior change communication and consultation on project activities.</li> <li>Access to psychosocial support and counseling on a case-by-case basis.</li> <li>Social media account for proposed program to allow individualized solicitation of information.</li> <li>Disclosed list of partner organizations providing information materials on the project and additional follow-up if desired.</li> </ul>	<p>Organizations to develop initial listing of potential PWD in their project areas.</p> <ul style="list-style-type: none"> <li>Subsequent focus group discussions with PWDs.</li> <li>Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities, including access to transportation as needed.</li> <li>Psychosocial support offered by trained Case Management and Enterprise Development Officers within Partner Organizations and additional arrangements to facilitate their participation</li> <li>Preparation of information materials, including website and brochure for the project</li> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	<p>Participants: Persons with disabilities, their guardians, Founder of an organization ‘PFD’ who are working with the skills training for PWD, Development officials who are working with PWD, PKSf officials</p>
<b>Tribes, Minor Races, Ethnic Sects and Communities</b>	<ul style="list-style-type: none"> <li>Their status as ethnic minorities mean more targeted outreach and advocacy strategies may be required in order to encourage their participation</li> <li>Different linguistic and cultural barriers mean that engagement and training</li> </ul>	<ul style="list-style-type: none"> <li>Community mobilization, distribution of leaflets &amp; brochure and social networks can play vital role in order to enable voluntary participation and registration of members of PKSf-POs.</li> <li>Soliciting of listing of potential</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with Partner Organizations to develop initial listing of potential ethnic minority beneficiaries in their project areas.</li> <li>Focus group discussions with</li> </ul>	<p>August 2018 in Khagrachari</p> <p>Participants: Unemployed youth from ethnic community <i>Chakma</i>, their guardians, NGO officials,</p>

Vulnerable or Disadvantaged Stakeholders	Limitations and Needs Experienced	Preferred or Potential Means of Receiving and Exchanging Information	Resources Required (or Activities Envisioned for Which Resources are Needed)	Recent Engagement
	<p>activities should be adapted in a manner that can accommodate their circumstances</p> <ul style="list-style-type: none"> <li>With many individuals from communities such as these living in hard to reach areas, attention should be provided to bearing costs of their transportation.</li> <li>Based primarily on their livelihoods, the nature of income generation activities they had been engaged in may not be immediately comparable with those envisioned by the Project. Attention should be given towards ensuring that activities presented to them as options are as culturally sensitive as possible.</li> </ul>	<p>beneficiaries through consultation with organizations working with these communities,</p> <ul style="list-style-type: none"> <li>Guided focus group discussions with potential eligible beneficiaries for awareness raising, consultation on project activities.</li> <li>Access to psychosocial support and counseling on a case-by-case basis.</li> <li>National hotline, SMS-based texting and social media account for proposed program to allow individualized solicitation of information.</li> <li>Disclosed list of partner organizations, include others working with these communities, providing information materials on the project and additional follow-up if desired.</li> </ul>	<p>eligible migrants to raise awareness of and mobilize them to project activities.</p> <ul style="list-style-type: none"> <li>Provision of, participation grants, covering transportation, and monthly basic sustenance for attendance in assigned project activities</li> <li>Psychosocial support offered by trained Case Management and Enterprise Development Officers within Partner Organizations.</li> <li>Preparation of information materials, including website and brochure for the project</li> <li>Promote informal networking systems among project beneficiaries, POs and other relevant stakeholders</li> </ul>	<p>PKSF officials</p> <p>April, 2019 in Godagari, Rajshahi</p> <p>Participants: Unemployed youth from ethnic community <i>Santal</i>, their guardians, Community leader, School teacher, NGO officials, PKSF officials</p> <p>June, 2019 in Moulivibazar, Sylhet</p> <p>Participants: Unemployed youth from Tea garden workers community, their guardians, Community leader, NGO officials, PKSF officials</p>

4.2. Stakeholder Mapping and Further Categorization

A stakeholder mapping was undertaken to identify the level of engagement required for each group of stakeholders based on their level of interest and influence, as denoted in **Figure 1**. Those that appear in the top right quadrant are stakeholders that need to be proactively engaged on a regular basis, by virtue of them being most interested in the Project and having the potential to impact its outcome. Ones in the second and third quadrant need to be kept informed, that is provided information and consulted on issues of interest to the stakeholders. The final stakeholders need to be monitored by tracking changes, if any, to their levels of interest and impact.

LEVEL OF INFLUENCE	<b>High Influence-Low Interest (Q2 – Keep Satisfied)</b>  Print and Electronic Media Academia, Think tanks	<b>High Influence-High Interest (Q1- Manage Closely)</b>  International Development Association CSOs, NGOs Implementing Partner Organizations (IPO)
	<b>Low Influence - Low Interest (Q4- Monitor)</b>  General Public	<b>Low Influence - High Interest (Q3- Keep Informed)</b>  Covid affected micro-entrepreneurs  Poor urban and peri-urban youth with low educational attainment.  Owners of microenterprises and workshops, and master craftsperson.
LOW   HIGH	LOW	HIGH

The stakeholder list as well as stakeholder analysis and mapping will continue to be revised and updated during the consultation during the planning phase, based on the ongoing receipt of comments and input from local, national and international stakeholders directed to the Project.

5. Program for Stakeholder Engagement

5.1 Objective and Adaptation to Covid-19

This section summarizes the timeline, timeframe, objectives, attendees and any additional description of various proposed activities and at what stage of the project’s lifecycle are they undertaken. It articulates key information that would be relayed to each of the stakeholder groups regardless of the stage of the Project.

In light of the outbreak of Covid-19, individuals are mandated by national directives to exercise social distancing, and avoid public gatherings to prevent and reduce the risk of the virus transmission. Meanwhile, WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. These can be accessed at: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

Aforementioned considerations require a review of existing approaches to stakeholder engagement and consultations. These are premised on:

- Identifying planned activities requiring stakeholder engagement and public consultations, and for which any postponement may hinder project performance
- Assessing the level of required direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Evaluating the risks of the virus transmission for and the effect of ongoing restrictions on these engagements
- Investigating the level of ICT penetration among key stakeholder groups, *if feasible*, identifying the type of communication channels that can be effectively used in the project context.

In the event public gatherings with a representative sample of project beneficiaries, affected peoples and other interested parties are not feasible, the Project may elect a community representative based on inputs provided by beneficiaries. A network of such representatives can be established across the target communities to determine feasible methods of wider community outreach and consultation with stakeholders. Alternate forms of messaging would be explored and contingency plans instituted to tailor engagement when the intended tools cannot be deployed. Some of these include:

- All public gatherings, hearings, workshops and community meetings shall be avoided until deemed safe in line with national and international advisories. However, small-scale focus group discussions may be arranged if permitted, with guidance around social distancing and other precautions closely adhered to
- Online channels, social media platforms and chatgroups will be dedicated and deployed subject to ability of all stakeholders to equitably participate in consultations. Traditional channels, notably television and radio broadcasting, dedicated phone-lines and mails will also be leveraged to raise awareness of project activities amongst all user groups as needed. Each of the proposed channels of engagement should specific mechanisms to solicit feedback from relevant stakeholders.
- In which case direct communication with certain affected peoples are of the essence, channels for engagement, employing a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators, will be designed based on preference expressed by said beneficiaries
- Everyone involved in stakeholder planning will be trained in positive social behavior and hygiene practices, and are required to preface every engagement session by articulating them.

**5.2 Proposed Mechanisms for Information Disclosure**

As a standard practice, project documentation, including Environmental and Social Safeguards instruments, released for disclosure are accompanied by an invitation for comments and suggestions that are formally recorded by the Project Management Unit. The Stakeholder Engagement Plan is produced in English and is made available for public review for 60 days from publication. The salient features of the plan will also be made available in Bangla.

In light of the pandemic and subsequent shut down, materials will only be disclosed online for the time being, with the website equipped with a feedback feature enabling readers to enclose comments therein. The SEP 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 main their effectiveness and relevance to project performance and external circumstances. Based on this, the table below underscores 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.

**Table 4: Disclosure Methods for Relevant Information Products**

<b>Project Phase</b>	<b>Information to be Disclosed</b>	<b>Mechanism Used (Tentative)</b>	<b>Schedule and Location</b>	<b>Target Stakeholders (Tentative)</b>	<b>Responsibilities for Disclosure</b>
<b>PREPARATION (i.e., prior to project effectiveness)</b>	Project Information Document	Project/PKSF website, and physical informational products	Following approval of the document	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	PKSF-PMU, World Bank
	Environmental and Social Commitment Plan	Project/PKSF website, and physical informational products	Following approval of the document	Partner Organizations and other industry partners contributing to project activities	PKSF-PMU
	Stakeholder Engagement Plan	Project/PKSF 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	PKSF-PMU, Partner Organizations
	Environmental and Social Management Framework	Project/PKSF 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	PKSF-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	PKSF-PMU
	Labor Management Procedures	Project/PKSF 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	PKSF-PMU, Partner Organizations
	Occupational Health and Safety Measures				
	Emergency Action Plan				
	Sexual Exploitation and Abuse/Sexual Harassment Prevention and Response Plan				
	Grievance Redress and Feedback Mechanism	Project/PKSF 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	PKSF-PMU, Partner Organizations
<b>IMPLEMENTATION</b>	Project Appraisal Document	Project/PKSF 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	PKSF-PMU, World Bank
	Annual Work Plan	Project/PKSF website, and physical	Following approval of the	Partner Organizations, industry partners and	PKSF-PMU



Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
	Project Procurement Plan	informational products and in-person consultations as needed	document	master craftsmen	
	Bidding Documents for Procurement	Project/PKSF 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	PKSF-PMU
	Environmental and Social Standards Training and Corresponding Module	Project/PKSF 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	PKSF-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	PKSF-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				
	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/PKSF 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	PKSF-PMU, POs
	Informational Products on	Project/PKSF website, and physical	Following approval of the	All project stakeholders and interested parties,	PKSF-PMU, POs

Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
	Case Management System and Eligibility Criteria	informational products and in-person consultations as needed	document	with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	
	Informational Products on Life Skills, Apprenticeship and Self-Employment Curriculum				
	Employer and Master Craftsmen selection	Project 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	PKSF-PMU, POs, contracted research firm
	Midterm & Impact Evaluation	Project website, public information sessions, as needed, and focus group discussions	Following approval of the document	World Bank	PKSF-PMU, POs & Research Firms
	Incidents and Accidents Report	Project/PKSF website, and physical informational products and in-person consultations as needed	Following resolution of issues presented, or otherwise as needed	World Bank	PKSF-PMU, Partner Organizations
	Grievance Redress and Feedback Reports and/or Resolution				
	Monthly Report from Partner Organizations	Physical informational products and in-person consultations as needed	Following approval of the document	World Bank	PKSF-PMU
	Bi-Yearly and Annual Project Reports (Includes Mid-Term Review and External Audits)	Project/PKSF website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank, POs	PKSF-PMU
	Additional Spot Checks				PKSF-PMU
CLOSURE	Sustainability Plan and Exit Strategy	Project 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	PKSF-PMU
	Impact Evaluation	Project/PKSF website, and physical informational products and in-person consultations as needed	Following approval of the document	Project stakeholders	PKSF-PMU,
	Final Audit	Project/PKSF website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank & other Stakeholders	PKSF-PMU

### 5.3 Proposed 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 consultation, mechanism used, timeline and timeframe, 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 5: Stakeholder Consultations and Corresponding Engagement Mechanisms**

Project Phase	Topics of Consultation	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities
PREPARATION (i.e. prior to project effectiveness)	Stakeholder Engagement Plan (including programmatic scope and rationale, as needed) and Environmental and Social Management Framework	Consultations and targeted focus group discussions	Initial consultative workshop and group-based discussion with targeted stakeholders which has already been reflected in the first draft	All project stakeholders and interested parties for the former. Partner Organizations, industry partners, master craftsmen and target beneficiaries (with separate sessions for identified vulnerable and/or disadvantaged groups)	PKSF, Partner Organizations
	Grievance Redress and Feedback Mechanism (Beta-Testing)	Focus group discussions/Discussion	From approval of first draft to formal launch of mechanism	Partner Organizations, industry partners, master craftsmen and target beneficiaries	PKSF, Partner Organizations
	Identification, Mechanisms for Outreach and Determination of Unique Circumstances of Target Beneficiaries	Focus group discussions	As soon as possible, prior to formal outreach to potential beneficiaries	Partner Organizations, industry partners, support groups, community-based organizations, local administrations, <i>upazila</i> - and <i>union</i> -level politicians, customary leadership and influential figures relevant to, and knowledge and networks with each unique beneficiary group	PKSF, Partner Organizations,
	Stocktaking of Capacities of Partner Organizations	In-depth consultations and administration of questionnaires	As soon as possible, prior to formal outreach to potential beneficiaries	Partner Organizations, industry partners, lending institutions, potential employers and other service providers contributing to project activities (extending unto former beneficiaries for cross-validation of information)	PKSF, Partner Organizations
	Engagement, Consultation with and Selection of Master Craftspersons			Eligible master craftspersons	
	Promotion of Project-Level Labor Force Participation	FGD/Discussion	As soon as possible	Influential actors within the orbit of eligible beneficiary groups with capacity to or interest in advocating for their participation in project activities, and already identified eligible beneficiaries with reservations about their participation	PKSF, Partner Organizations

IMPLEMENTATION	Orientation of Case Managers and Psychosocial Support Specialists to Project Parameters	Focus group discussions and in-depth individual consultations	As soon as possible, prior to formal outreach to potential beneficiaries	Assigned and/or recruited case managers and psychosocial support specialists, line managers and those in senior management within Partner Organizations contributing to project activities	PKSF, Partner Organizations
	Awareness Raising on Project Activities, Prohibitive Forces, Curricular and Financial Needs	Focus group discussions, Community Mobilization	Upon identification of project sites, and taking place at monthly intervals until launch of activities	Target beneficiaries (with separate sessions adapted for identified vulnerable and/or disadvantaged groups)	PKSF, Partner Organizations, community-based facilitators
	Case Management System and Eligibility Criteria	Social media awareness campaigns, print communications and focus group discussions	Upon approval of Project by the Board	Partner Organizations, industry partners, master craftsmen and target beneficiaries (with separate sessions for adapted identified vulnerable and/or disadvantaged groups)	PKSF, Partner Organizations
	Like Skills, Apprenticeship and Self-Employment Curriculum				
	Environmental and Social Standards Training and Corresponding Module	Technical workshops, training of trainers and post-learning assessments	Consultation beginning upon approval of the Environmental and Social Commitment Plan, with training schedule determined by effectiveness	Partner Organizations, industry partners, master craftsmen and project beneficiaries	PKSF, Partner Organizations
	Implementation Arrangements in Response to Covid-19 Training and Corresponding Module				
	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				
	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	Targeted focus group discussions	Initial consultative workshop and group-based discussion with targeted stakeholders upon approval on first draft	All project stakeholders and interested parties for the former. Partner Organizations, industry partners, master craftsmen and target beneficiaries (with separate sessions for identified vulnerable and/or disadvantaged groups)	PKSF-PMU

	Profiling of Potential Eligible Beneficiaries	consultations and counseling	Upon completion of registration of potential eligible beneficiaries for the Project	Potential beneficiaries (with sessions adapted for identified vulnerable and/or disadvantaged groups)	Case Managers and Entrepreneurship Development Officers
	Referral of Non-Eligible Registrants	Short feedback, counseling and referral sessions	Upon completion of screening of all project beneficiaries	Those who expressed interest but were declined participation in project activities	Case Managers
	Psychosocial Support and Counseling Sessions	In-depth individual consultations	Based on arrangement decided upon with each of the target beneficiaries, or as need arises	Target beneficiaries (with sessions adapted for identified vulnerable and/or disadvantaged groups)	Case Managers
	Career Counseling Check-Ins with Case Managers				PKSF, Partner Organizations, assigned Case Managers
	Review of Business Plans and Proposals				
	Solicitation/Provision of Grievance Redress and Feedback	Registration of grievances and/or feedback through paper-based and virtual mechanisms	Contingent on concerns presented by project stakeholders and interested parties	Target beneficiaries, and extending unto other stakeholders and interested parties	PKSF, Partner Organizations, Case Managers and extended Committee
	Grievance Redress and Feedback Reports and/or Resolution	In-depth individual consultations, joint discussions and/or mediation involving relevant parties or townhall meetings for wider arbitration and/or information sharing as needed	Contingent on concerns presented by project stakeholders and interested parties	Those considered relevant to the issue presented, and opened to a broader audience on a case-by-case basis	PKSF, Partner Organizations
	Incidents and Accidents Report	Reporting through hotlines, texting alerts. In-depth individual consultations, joint discussions and/or mediation involving relevant parties or townhall meetings for information sharing	Contingent on concerns presented by project stakeholders and interested parties	Those considered relevant to the issue presented, and opened to a broader audience on a case-by-case basis	PKSF, Partner Organizations
	Monthly Report from Partner	Monthly report based on	After launching the	Partner Organizations/ World Bank	PKSF Partner

	Organizations to PKSf	specific format developed by PKSf-PMU	project		Organizations
	Bi-Yearly and Annual Project Reports	Following project milestone and activities	Contingent on the schedule	World Bank and relevant stakeholders	PKSf, Partner Organizations
	Mid-Term Review	In-depth or targeted verbal or written questionnaires, focus group discussions, structured or unstructured interviews, and polls and surveys as needed. Annual project townhalls and targeted focus group discussions beneficiaries to disseminate outcomes	Based on ToR	Partner Organizations, industry partners, master craftsmen and target beneficiaries (with separate sessions for identified vulnerable and/or disadvantaged groups)	Independent Firm, PKSf, POs PKSf, Partner Organizations,
<b>CLOSURE</b>	Individual Sustainability Plan and Exit Strategy	Oversight after program completion through in-depth consultations and targeted focus group discussions	Consultations to be completed within six months from completion of activities	Partner Organizations, industry partners, master craftsmen and target beneficiaries (with separate sessions for identified vulnerable and/or disadvantaged groups)	PKSf, Partner Organizations
	Overarching Sustainability Plan	In-depth or targeted verbal or written questionnaires, focus group discussions, structured or unstructured interviews, and polls and surveys as needed. Annual project townhalls and targeted focus group discussions beneficiaries to disseminate outcomes	Consultations to be completed within six months from completion of activities	All relevant stakeholders	Independent Firm, PKSf, POs
	Impact Evaluation				

## **5.4 Proposed Mechanism for Feedback Loops and Future Communication**

In principle, feedback and other communications are recorded, reviewed and reported back, regarding their integration into project design and delivery or any other action undertaken, to stakeholders as such:

- Comments are received verbally or in writing at the implementation level, with the Environmental and Social Specialist responsible for consolidating and bringing them to the attention of the Project Coordinator.
- Unless a meeting is required to be held to address comments shared, the Social Specialist responds to them in the same or equivalent manner as it was received.
- In the event the matter needs to be escalated, the Specialist produces a summary of comments to stakeholders at every level. And, in any case, a written record of all communication is retained and maintained, and uploaded in the project website as needed.

## **6. Grievance Redress and Feedback Mechanism**

The purpose of this GRM is to record and address any complaint that may arise during the life cycle of the RAISE project (Component 1 and 2) period effectively and efficiently. This GRM is designed to address concerns and complaints raised by the vulnerable urban youths, vulnerable groups and other stakeholders promptly and transparently with no impacts (cost, discrimination) for any reports made by the migrants, vulnerable groups and other stakeholders. This GRM has been planned so that the targeted youths and other stakeholders can report issues without being threatened, which is easily accessible, quick and impartial; delivering decisions by the GRC to the complainant in an unbiased manner. Considering the overall need for the total project period, the PKSf PMU will establish a GRM to address complaints and grievances by the beneficiaries (especially women and other vulnerable groups). The Grievance Redress Committee (GRC) of PKSf PMU will help to resolve issues/conflicts amicably and quickly, saving the targeted youths and other aggrieved persons resorting to expensive, time-consuming legal actions. The GRC and the PMU of PKSf will, however, not bar anyone and other stakeholders to go to the courts of law. The PKSf PMU will ensure that an effective and transparent mechanism is designed and established at the earliest opportunity for the beneficiaries and other stakeholders to be able to lodge complaints and grievances. Necessary sign posting/billboard would be placed at various places, to be decided by the PKSf PMU (where people gather) for sharing detailed information of the GRCs established for the Component 1 and 2 of RAISE Project. The GRM will also be available online so that grievances can be submitted without the need for physical interaction, especially during the time of COVID-19 crisis.

### **6.1 Justification on Cultural and Contextual Appropriateness of Project-Specific Grievance Redress and Feedback Mechanism**

The Project extends the customary Grievance Redress Mechanism to receive and respond to non-grievance related feedbacks alike, thus building a Grievance Redress and Feedback Mechanism. Reasons include:

- First, past experiences of the *Palli Karma-Shahayak Foundation* indicates that reporting grievances appears more high stakes, and may easily deter vulnerable beneficiaries from sharing their concerns. Identifying the mechanism as a means to provide feedback instead reduces sentiments of risks adopted associated with registering grievances. In so doing, this mechanism mitigates some of the concerns surrounding project beneficiaries downplaying their own grievances and not reporting them. Once registered, even as a feedback, the Project Management Unit can make a determination regarding the nature of the concern presented to mete appropriate corrective measures.

- Second, instituting a Feedback Mechanism also enables soliciting more generic insights on project planning, implementation and evaluation through beneficiary satisfaction surveys, spot checks and process evaluations, and introduces corrective measures through a feedback loop. In light of the pandemic, which severely restricts standard monitoring and evaluation procedures, empowering beneficiaries and field staff to provide online feedback mitigates some of the health and safety concerns associated with travel and enables activities to run smoothly despite lockdown and barriers to physical interactions. In the longer term, this mechanism can be extended to and simplify monitoring and reporting processes for other PKSF-implemented initiatives, thus freeing up resources that can be dedicated towards other critical activities.

## 6.2 Receipt to Remedial of Grievance Redress and Feedback Mechanism

The Program Officer, Case Management and Program Officer, Management Information Systems within the Project Management Unit will responsible for the overarching management of the Grievance Redress and Feedback Mechanism. They will receive guidance from the Project Coordinator, Deputy Project Coordinators and Program Manager (whoever is responsible for oversight over the Partner Organization wherein the grievance is emerging from) and technical assistance from the Social and Environmental Specialist. This Grievance Redress Committee at the PMU level (GRC-PMU) will be supplemented by corresponding structures within project sites to ensure efficient and effective uptake of grievances prior to escalating it upwards.

Based on this, a Grievance Redress Committee will be formed within each Partner Organization, responsible for each of the project sites. It will be headed by its senior representative, as identified in line Environmental and Social Commitment Plan. The Committee consists of the Focal Point for Monitoring, Evaluation and Reporting as well as Environmental and Social Standards. This focal point shall oversee appropriate recording and redressing of grievances, and the assigned Case Manager, who will serve as the first line of contact upon receipt of a complaint or feedback and provides context on concerns raised by any of the direct beneficiaries during the previous phase. This Committee will be required to convene within three working days of any grievance arising. The complaints can either be lodged directly with the GRC, through SMS or email which will be provided in every Partner organization upon their selection.

Below are the steps associated with processing grievances and feedback, from receipt to remedial:

- **Uptake of Grievances:** In which case the complainant is not able to, or does not desire to, address grievances or feedback with Environmental and Social Focal Point or assigned community-based representative, they can file a **paper-based Grievance** and Feedback Report at the offices of the Partner Organization, call the project hotline, or file an online complaint. An acknowledgement of receipt of the statement should be made to the complainant within **two business days**, during which the assigned Environmental and Social Focal Point will be asked to take action on this. During this period, the grievance is logged, and in which case the complainant is a direct project beneficiary, the log is also shared within the beneficiary profile within the Management Information System for the project.
- **Verification and Action:** The Environmental and Social Focal Point is provided ten business days to investigate the nature of the concern and consult the complainant and involved parties on the nature of the grievances and redress sought. Once the concern is resolved through fact finding and mediation, or does not merit additional investigation, the complainant is informed as such within the end of ten business days. A formal notification accompanies this communication within two business days. The log indicates the case as being resolved at this time.
- **Convening of Grievance Redress Committee:** When no satisfactory resolution can be reached or that the complainant is not satisfied with the outcome, the case is escalated to the Grievance Redress Committee. The complainant or the Environmental



and Social Focal Point is required to file for an escalation within ten business days of formal communication. The Committee is required to declare its decision and corresponding rationale in presence of the complainant or an assigned representative within five business days of convening. If the redress provided is satisfactory, the case can be logged as being resolved and a formal written or online communication is made to the complainant within two business days of the hearing.

- **Convening of Project Management Unit:** In the event of further engagement required, the Grievance Redress Committee schedules a hearing with relevant staff at the Project Management Unit within ten business days from its declaration with the complainant. The Project Management Unit is required to convene within ten business days of receiving the request during which any additional investigation into the issue is conducted. The complainant is updated every five business days on the status of processing the concern. Alongside identified representatives from the Project Management Unit, the hearing consists of senior representative from the Partner Organization, Environmental and Social Focal Point, complainant and other involved parties. A formal decision on the hearing is communicated within three business days. Legal recourses and public hearings are proposed in the event in which the complainant is dissatisfied with the outcome of the case itself.
- **Monitoring, Evaluation and Recording of Feedback:** Upon conclusion of the case itself, a report is filed which summarizes its key points of conversation and contention, possible alternatives to provided remedial actions, commonalities with other comparable cases within the Project, lessons learnt and proposed modifications to prevent or leverage negative or positive consequences respectively. This case report needs to be completed by the Environmental and Social Focal Point within the Partner Organization, in conjunction with the Case Manager, and Monitoring, Evaluation and Reporting Specialist for the Project, within five business days. Once approved, it is logged by the IT and MIS Specialist into the GRM MIS database, and is shared with the World Bank as requested, and applied towards the bi-yearly Progress Report.

### 6.3 Communication and Advocacy on Grievance Redress and Feedback Mechanism

The Project promotes successful understanding and usage of this tool through awareness raising and advocacy campaigns targeting each of the unique stakeholder groups as part of its overarching stakeholder engagement. This includes:

- **Adequate Information on Registration and Processing of Grievances and Feedback:** Users are informed on what qualifies as and how to submit grievances and feedback. This is achieved through producing physical information materials, and making grievance and/or feedback forms accessible to all beneficiaries during the aforementioned session itself. It also extends to publishing contact details of staff receiving and processing grievances and/or feedbacks in public interfaces relevant to the project. Any information related to Grievance Redress and Feedback Mechanism is made available in Bangla.
- **Participatory Development of Grievance Redress and Feedback Mechanism:** The reporting to remedial process is intended to be as user-friendly as possible so as maximize effective and efficient usage of the mechanism itself. Therefore, consultations and focus group discussions seek to learn about potential caseload and available resources, preferences for remedies and exchange of information. Once a mechanism has been developed, it is beta-tested with key user groups in order to enhance design and delivery processes of the Grievance Redress and Feedback Structure.

### 6.4 Monitoring, Evaluation and Reporting on Processing of Grievances and Feedback

This mechanism consists of strong record keeping practices and streamlined monitoring and evaluation procedures in order to enhance accountability of project performance and adopt corrective measures as needed:

- **Logging and Registration:** All grievances and feedbacks are logged and all inquiries, suggestions, outcomes and responses are recorded and categorized, using an online database at the backend of the Grievance Redress and Feedback Mechanism.

- **Internal Reporting on Performance:** 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. This report reflects the number and nature of submissions received; causes of, issues raised and observable trends in grievances and feedbacks; justification for remedial action and provision of redress; time taken and user satisfaction; compliance with business standards and actionable measures to prevent or limit future recurrences.
- **External Reporting on Performance:** This report shall be made public, any changes pending, to enhance visibility of project activities, and engagement with stakeholders and interested parties. Specific cases may also be highlighted there on a case-by-case basis. A specific indicator on Grievance Redress and Feedback Mechanism may also be included into the Results Framework for the project to demonstrate the effectiveness of the structure and overarching beneficiary satisfaction with support and services delivered by the Project.

### **Relevant Contact Information for Grievance Redress and Feedback Mechanism**

Mr. Md. Abul Kashem  
 General Manager (Program)  
 Palli Karma-Sahayak Foundation (PKSF)  
 E-4/B, Agargaon Administrative Area,  
 Sher-e-Bangla Nagar, Dhaka-1207  
 Bangladesh  
 Phone: +8801844481317  
 Email: [blkashem@yahoo.com](mailto:blkashem@yahoo.com)

### **6.5 World Bank Grievance Redress Service**

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to the project-level GRM or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS) can be found at: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

For information on how to submit complaints to the World Bank Inspection Panel, please visit: [www.inspectionpanel.org](http://www.inspectionpanel.org)

## **7. Monitoring, Evaluation and Reporting**

Under the guidance of the Project Coordinator, Deputy Project Coordinators, Program Managers and other staffs of PKSF PMU will be responsible for monitoring, supervision, evaluation and reporting overall activities of the project. Mention that every Program Managers will be assigned for looking after day to day activities of the Partner Organization of this project.

### **7.2 Reporting Arrangements with Stakeholder Groups**

In collaboration with Implementing Partner Organizations, the Project Management Unit will conduct relevant stakeholder's consultation e.g. workshops, seminars meeting etc. and will prepare reports on the basis of recommendations of the consultation.

### 7.3 Results Monitoring and Evaluation Framework

The quantity and quality, including timeliness, completeness and appropriateness of stakeholder mapping and engagement, and grievance redress and feedback mechanism is assessed using the indicative structure below. Each of these indicators is disaggregated to identify attention accorded to groups identified as being vulnerable and/or disadvantaged for the purpose of this Project. Target indicators are to be included at a later stage during the program management cycle.

**Table 6: Monitoring, Evaluation and Reporting of Stakeholder Engagement Processes**

Key Elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
Stakeholders' access to project information, consultations, public information and dissemination materials	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, attendance registers, receipt of mobility stipends	PKSF, Partner Organizations	Number of Interviews and surveys held, number of beneficiary and stakeholder organization covered
Project beneficiaries' awareness of project activities, their entitlements and responsibilities	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist	PKSF, Partner Organizations	Number of survey and beneficiary covered. Sample beneficiary tested for awareness
Acceptability and appropriateness of consultation and engagement approaches	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PKSF, Partner Organizations	Number of concerns raised by beneficiaries, comparison between expected and actual beneficiary engaged
Community facilitators' engagement with target beneficiaries	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PKSF, Partner Organizations	Number of engagement and number of beneficiaries covered
Public awareness of GRM channels and their reliability	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist	PKSF, Partner Organizations	Random sampling public response of awareness
Acceptability and appropriateness of GRM mechanisms	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PKSF, Partner Organizations	Number of complaints received and average days to solve the same
Reporting, processing and resolution of grievances	Periodic (maintained throughout project implementation)	Review of case reports, interviews, survey, score cards, spot checks, process evaluations	PKSF, Partner Organizations	Number of complaints received and average days to solve the same

## 8. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

### 8.1 Management Functions and Responsibilities

The Project Management Units established within PKSF is responsible for the implementation of activities listed. They receive monthly reporting on services delivered by the Partner Organizations, which reflects also on the performance of stakeholder engagement activities, alongside monthly stocktaking of Grievance Redress and Feedback, and Accidents and Incidents Report. These materials are compiled into the bi-yearly Progress Report mandated by the Environmental and Social Commitment Plan. The World Bank Task Team for the Project provides oversight on these, and may request any of the monthly reports as needed.

## 8.2 Financial and Human Resources

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 Project Management Unit, and adjusted as needed.

**Table 7: Tentative Budget to Implement Stakeholder Engagement**

Ser	Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times/Month	Total Cost (USD)
1	Staff/ Consultant Salaries (1 x Environment Specialist, 1X Social Development Specialist etc)				Paid from Project Consulting Service Budget
2	Training on Stakeholder Engagement and GRC issues	3 times	7,000		21,000
3	Information Desk Officer	1	300	36	18,000
4	Stakeholder/Community/ Sensitization meeting	Lump Sum			30,000
5	Meeting with Govt Officials	3 meeting/yr	2,000		18,000
6	Meeting with PMU, Welfare offices	3 meeting/yr	2,000		18,000
7	Surveys (including satisfaction surveys) for report preparation	1 /yr	5,000		15,000
8	Travel Expenses	Lump sum	10,000/yr	Three yrs	30,000
9	Communication Materials	Lump Sum	10,000		10,000
10	GRM Guidebook	Lump Sum	4,000		4,000
11	Suggestions Box	40	100		4,000
12	GRM/GRC expenses	Lump Sum	20,000		20,000
13	GRM MIS Database	Lump sum	20,000		20,000
14	Honorarium for committees	Lump sum	20,000		20,000
15	Contingency (10%)				22,800
<b>Total (Less Serial 1) (Rounded)</b>					<b>250,000</b>



**RECOVERY AND ADVANCEMENT OF INFORMAL SECTOR  
EMPLOYMENT (RAISE)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**Wage Earners' Welfare Board (WEWB)  
Ministry of Expatriates' Welfare and Overseas Employment**

**Aug, 2020**

## ABBREVIATION

AP	Affected People
BCC	Behavior Change Communication
COVID-19	Coronavirus Disease 2019
DP	Development Partner
ECA	Environmental Conservation Act
ECR	Environmental Conservation Rule
ESMF/P	Environmental and Social Management Framework/Plan
E&S	Environment and Social
EHS	Environmental Health and Safety
ESF	Environmental and Social Framework
ESMF	Environment and Social Management Framework
ESIA	Environment and Social Impact Assessment
ESP	Essential Services Package
ESS	Environment and Social Standards
GBV	Gender-based Violence
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
HCD	Human Capital Development
HNP	Health, Nutrition and Population
IA	Implementing Agency
IDA	International Development Association
IEC	Information, education and communication
IPC	Infection Prevention Control
LGD	Local Government Division
LGI	Local Government Institution
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation

MFI	Micro-Finance Institution
MICS	Multiple Indicator Cluster Survey
MEWOE	Ministry of Expatriates' Welfare and Overseas Employment
NCD	Non Communicable Disease
O&M	Operation and Maintenance
OOP	Out-of-Pocket
PAI	Project Area of Influence
PAPs	Project Affected Persons
PD	Project Director
PDO	Project Development Objective
PKSF	Palli Karma Sahayak Foundation
PI/MU	Program Implementation/Management Unit
PPE	Personal Protective Equipment
PPR	Public Procurement Rule
SEP	Stakeholder Engagement Plan
WEWB	Wage Earners' Welfare Board



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## INTRODUCTION AND PROJECT DESCRIPTION

### INTRODUCTION

Stakeholder engagement and communication is an important tool for ensuring transparency, accountability and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with the World Bank funded 'Recovery and Advancement of Informal Sector Employment (RAISE)' Project's Component 3 (Recovery and reintegration support for returning migrants). This Stakeholder Engagement Plan (SEP) is to be implemented by the Wage Earners' Welfare Board (WEWB) of Ministry of Expatriates' Welfare and Overseas Employment (MEWOE)—the Implementing Agency (IA) of the Project' Component 3.

The SEP outlines in detail the commitment of the Government of Bangladesh (GoB) as regards to engaging the stakeholders of the project. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

### PROJECT DESCRIPTION

To accelerate economic transformation, the GoB has emphasized labor intensive job creation in the modern sector, but there are programming gaps for boosting employment for low income urban youth, to enhance coverage of labor market programs for post-COVID recovery and assisting returnee migrants who have been forced to deport due to COVID-19 pandemic. Globally, labor market interventions have proven to be a popular instrument in COVID response and recovery. Focusing only supply-side interventions, wage subsidies account for 60 percent of the global COVID-response labor market portfolio, with programs being implemented in Jamaica, Kosovo, Malaysia and Thailand. The Project intends to provide apprenticeship opportunities to low income urban youth as well as provide psychosocial support, referral services and stipend to returnee migrants who were forced to leave their country of employment due to COVID-19 pandemic. The pressure of returnee migrants are manifold—loss of remittance, uncertainty of securing the lost job overseas, lack of employment opportunity in the local market which is already burdened with the rise of unemployment, social integration of the returnees etc.

The project has following components: (of which WEWB is responsible for Component 3 and this SEP covers Component 3 aspects only)

- **Component 1** builds the system that will help workers identify their aspirations, strengths, and constraints (e.g. human capital, or financial). The systems established under Component 1 would be of use in a) screening potential beneficiaries for services provided

under Component 2; b) case management of beneficiaries enrolled in Component 2 programs including M&E and tracking employment status of beneficiaries six months after completion; and c) providing information on services offered outside the supported project, depending on the results of the profiling. Component 1 would be open to all interested members of the labor market, aged 15 to 34 and under class 8 education, and the emphasis would be on services for members of low-income urban and peri-urban living households.

- **Component 2** addresses the specific needs of improving the employability and productivity of youth from low income urban and peri-urban households through a package of services, including imparting essential life skills; on-the-job-learning opportunities through informal apprenticeships; access to seed capital, and coaching and mentoring. These services would be designed to enable beneficiaries to acquire aptitude and experience for entering informal wage employment or self-employment once they complete the program.

- **Component 3** This component would be supporting the Government of Bangladesh's (GoB) ongoing measures to provide psychosocial support, orientation program, referral services to other training and job placement services, stipends to those who joins such services, provision of Welfare Offices in various districts to provide these supports and creation and maintenance of a digital database to track and monitor the migrants.

- **Component 4** This component will support the establishment and operation of Project Management Units (PMU) at PKSf. This component will also support the establishment and operation of Project Implementation Units (PIUs) in the Partner Organization (POs) that will be implementing the economic inclusion programming under Component 2. Each PO will be competitively selected by PKSf based on a set of criteria, including past performance; capacity to deliver all four elements of the economic inclusion package, and administration of the case management system.

- **Component 5** would be a Contingent Emergency Response Component (CERC). This is a provisional zero amount component to allow for rapid reallocation of loan proceeds from other project components during an emergency.

## PROJECT LOCATION AND BENEFICIARIES

The Project will be implemented in the 30 Welfare Offices that will be set up in the Ministry's District Employment and Manpower Offices (DEMO) that will be augmented by 5 Welfare Offices each to provide project related support to the returnee migrants.

The project beneficiaries are returnee migrants who had to be deported from overseas due to COVID-19 pandemic. The target beneficiaries are likely to face constraints to productive economic activity that would be addressed through the project's Component 3 interventions and follow-on support through referral services and stipends.

### **Selection of Migrant Beneficiaries:**

Any return migrant worker that has returned to Bangladesh since February 2020 will be eligible.

Eligibility verification will be:

Return migrants that have been registered by the systems developed under the GoB repatriation program, or registered into the returnee database will have their recent return status automatically verified.

Return migrants that are not included in the database or systems (such as due to coming back before the systems were online, or on their own resources) will need to provide proof of their last return, such as their contract, re-entry documentation from Bangladesh SB during immigration, and/or flight details.

Return migrants would be informed about the program during their reentry into Bangladesh, and/or through social mobilization, and public communication campaigns in high migration districts.

## **ENVIRONMENT AND SOCIAL IMPACT SUMMARY**

The project's impacts on the environment and the society are summarized below:

### **Environmental Impacts**

The Project's Component 3 would provide orientation services, psychosocial support and referral services, a one-time stipend to returnee migrants who would join the referral services as well as provision of an integrated returnee migrants' database. With the information at hand at the moment, these activities will not be environmentally degrading will leave minimum environmental footprint. Since potential type of activities are not likely to cause any environmental impact the Environmental risk will be Low.

### **Social Impacts**

The present COVID-19 crisis has rendered the earning of returnee migrants to spiral below a livable level causing social tension and potential social instability. Selection and inclusion of returnee migrants (including their minority groups and the disabled)—who may lack networking and who may potentially be left out of the community engagement/outreach programs will also be a major challenge. Therefore, differentiated measures need to be undertaken to include all of these segment who may face disproportionate risk of exclusion.

Given the COVID-19 pandemic, without proper protocol enforcement beneficiaries undergoing psychosocial, referral and orientation program support may be exposed to the virus. Ensuring protocol enforcement may pose challenges as well since some of the intended beneficiaries may be reluctant to follow the same.

Though the GBV risk assessment for the project has been estimated to be Low, the female returnee migrants may nonetheless be subject to Gender-Based Violence (GBV) in the hands of the beneficiary selectors and Welfare Officers where they will be provided with Project benefits and support. The social risk is likely to be Moderate.

## **PURPOSE OF STAKEHOLDER ENGAGEMENT PLAN**

The purpose of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout project lifecycle. The SEP outlines the ways in which various stakeholders will be identified and includes a mechanism by which they can raise concerns, provide positive or negative feedback, or make complaints about the project activities. This will begin very early in the project cycle and will be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders. The SEP will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. It will also provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design. The SEP is a living document and will be updated throughout project implementation based on the feedback and information received through continued consultation conducted throughout the life of the project.

## LEGAL REGULATIONS AND REQUIREMENTS

### KEY NATIONAL LEGAL PROVISIONS

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

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

**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.** Citizen's freedom of thought and conscience is guaranteed; 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 the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.

**Article 59. Local Government.** Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law; everybody 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 administration and the work of public officers and the maintenance of public order; the preparation and implementation of plans relating to public services and economic development.

**Article 6o. 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 Labor Law, 2006 (Amended in 2013) and Labor 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 Labor Law of Bangladesh 2006 bans children under the age of 14 from working. Chapter III of the Act 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.

## **WORLD BANK REQUIREMENTS**

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. As per ESS10 the process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

## PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES AND LESSONS LEARNED

### PREVIOUS CONSULTATION AND ENGAGEMENT

A number of stakeholder meetings were undertaken at various times and venues, the summary of which is appended below. It is to be noted that COVID-19 pandemic didn't allow face to face consultation.

**Table 1: Previous Public Consultations**

Activity	Who	Date and Venue	Main observations
KIIs and FGDs on safe migration	<p>GoB: Manikganj DEMO staff, Expat Welfare Desk at Shahjalal International Airport, Airport Police,</p> <p>Bangladesh Korea TTC, Prabashi Kalyan Bank, BMET, BOESL, MoEWOE</p> <p>Civil society INGOs/NGOs: BRAC, OKUP, SDC, RMRRU, WARBE Development Foundation</p> <p>Private Sector: BAIRA management and member firms</p> <p>Beneficiaries: Aspirant migrants, forced returnees, voluntary returnees, current migrants on break</p> <p>Media: Daily Star/New Age</p>	October 15-23, 2018, Dhaka, Manikganj	<p>Recognition that migrants face many challenges at their destination</p> <p>More can be done to protecting migrants, including by increasing their skills and targeting higher wage occupations, or destinations that pay higher wages</p> <p>Conflicting views about the extent of liability of recruitment agencies, and division of responsibilities between migrants, host and sending country governments, and recruiters</p> <p>Many services are centralized in Dhaka so difficult to reach aspirant migrants, or migrant families at their hometowns</p> <p>Costs of migration are incredibly high (despite GoB commitments to supporting fair recruitment), which leads to high debt burdens</p> <p>Perception among some quarters that there is oligopolistic behavior by recruitment firms</p>
Jobs and migration policy forum	GoB: MoE, MoEWOE, BMET, FID, Finance Division, PKSf	June 22, 2020, Dhaka	Better information could help aspirant migrants make better decisions
<i>(Inclusive Jobs for Youth high-level</i>	Civil society: BRAC, BIGD,		Information measures would also need to be held at community level, and include information on

Activity	Who	Date and Venue	Main observations
policy forum)	RMRRU, Dhaka University, SANEM, Moner Bondhu  DPs: KOICA, ILO, IOM, SDC		formal processes to reduce exploitation, and also on costs-benefits  Diversifying destinations and occupations can reduce exposure to exploitative situations  GoB is already offering many services to migrants  GoB has commitments to fair recruitment practices  Government-to-Government programs, like Korea EPS, are good public system that reduces costs, protects worker rights, ensures minimum wages and labor protection, and facilitates return/reintegration
Safe migration workshop  (Towards Safer and More Productive Migration in South Asia)	GoB: BOESL, WEWB, MoEWOE, BMET  Civil society: BRAC, Migrant Forum Asia, South Asian Trade Union Council, South Asian Forum of Employers  DPs: ADB, EC, ILO	Dec 5-6, 2019, Bangkok	Currently no way to track migrants when they come back  Multilateral platforms like Abu Dhabi Dialogue and Colombo Process important for fair recruitment  Trade unions and employer groups in destination countries important stakeholders for migrant safety at destination  New technologies can help improve government service delivery  Supporting migrants when they return is critical, but completely ignored  Returning migrants may need additional services that are not currently provided, e.g. trauma counseling in the case of sexual/physical exploitation of female migrants

## **SALIENT ISSUES FROM ENGAGEMENT**

Previous stakeholder meetings yielded a number of inputs for the Project:

Given the outbreak of COVID-19 and the resulting loss of earning, returnee migrants are in desperate need of training and employment assistance immediately. They lack network, country or industry specific experience and also add to the ever increasing unemployment due to COVID pandemic.

A database to track migrants' whereabouts and needs and aspirations is critical and should be interoperable with other similar MIS platforms

Besides job placement and technical support, returnee migrants need psychosocial counseling as well as counseling to address trauma for GBV victims.

Cost of migration and the cost of return are extremely high putting pressure on both the migrants and their family members.

Aspiring migrants need better information to make better decisions which also need to be provided at community level, with information on formal processes to reduce exploitation, and also on costs-benefits.

## STAKEHOLDER IDENTIFICATION AND ANALYSIS

The first step in preparing a SEP is mapping the Project stakeholders. This analysis is central to the designing of the SEP, particularly in developing the Project's approach to consultation and communication. This involves identifying relevant Project stakeholders or groups of stakeholders, characterizing the key stakeholder issues and concerns, and mapping the Project stakeholders to determine the appropriate level of engagement for each stakeholder or stakeholder group. This section describes the outputs from the stakeholder mapping process.

### STAKEHOLDER CATEGORY, IDENTIFICATION AND ANALYSIS

For the purposes of effective and tailored engagement, stakeholders of the proposed project have been divided into the following core categories:

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

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

**Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status (women, elderly, children, female headed household, people with disabilities, indigenous peoples, ethnic/religious/gender minorities, LGBT community), and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

A general list of stakeholder groups identified is presented in Table 2 below.

**Table 2: Potential Stakeholders Group and Interested Parties**

STAKEHOLDER GROUP	INTEREST/CAUSE IN ENGAGEMENT
<b>International level</b>	
International Development Association (IDA)	Is financing the project.
<b>National level (Interested Parties)</b>	
Wage Earner Welfare Board (WEWB) of Ministry of Expatriate Welfare and Overseas Employment	Implementing Agency
Bureau of Manpower, Employment and Training (BMET)	They host the District Employment and Manpower Offices where Welfare offices will be setup
Different government Agencies like City Corporations, Representatives from District Administration etc.	Would be responsible to support WEWB for the successful implementation of the Project. Support/consent from all these agencies is required during the project implementation at different stages.
Mass media (Print and Electronic)	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure.
Prospective employers of beneficiaries	They will provide employment opportunities for the project beneficiaries and have a say in project design and content making
Civil Society Organizations (CSOs) and Women's organizations in the area	Different CSOs and women's organizations will be highly interested with the project as during the implementation and operational stages, there would be specific programs to redress GBV issues and scope of employment of local women, vulnerable migrants in project activities.
Prabashi Kalyan Bank (PKB) and Bangladesh Overseas Employment Services Limited (BOESL)	These organizations will support access to finance and support for remigration
Researchers (Migration Study), Academia, Think Tanks	Can be involved in understanding migration issues related to COVID-19
<b>Local Level</b>	
Project Beneficiaries (affected people)	Migrants who have involuntarily returned to Bangladesh in the face

	of the COVID-19 crisis
Project Beneficiaries (Vulnerable people)	Women, single women/ mothers, people with disability, small ethnic community people among the migrants
Project employees and Project's consultants, trainers, Welfare Officers	They will directly affect the training/ Psychosocial support/ employment of the project beneficiaries

Component-3 stakeholders, methods, tools and techniques for stakeholder engagement is given at Annex A. Component-3 related identification and specific needs assessment of the vulnerable groups and means of consultation appended at the table below:



**Table 3. Vulnerable or disadvantaged stakeholders and their needs**

<b>Project component</b>	<b>Vulnerable Groups and Individuals</b>	<b>Characteristics/ Needs</b>	<b>Preferred means of notification/ consultation</b>	<b>Additional Resources Required</b>
Component 3: Reintegration of returning migrants	Returnee migrants who have no connection/network and lack local job experience	These returnee migrants lack local job experience, lack networking, lack financial strength who have left everything back to their host countries due to COVID-19 situation.	Investments in an integrated information and management system would enhance the use of the unique smartcard ID to enable tracking of aspirant and deployed migrants. Development a returnee database, would provide an opportunity to include them in project benefit. The returnee database would allow tracing of returnees to provide any additional health support under COVID-19 (or public health services, such as contact tracing); provide referrals for reintegration support, as well as building a sustainable system that could provide necessary services in the event of any future shocks.	Development of a database to track and register the returnee migrants will be required to track and include this group
Component 3: Reintegration of returning migrants	Undereducated and young female migrants	These vulnerable groups of migrants mostly were engaged in informal household maids/ housekeepers and may have faced violence and other traumatic experiences. Further, their lack of network, lack of experiences in the local market and social norms make them more vulnerable than other returnees.	In addition to above, special care must be taken into consideration while consulting with these vulnerable groups given their lack of motivation in coming in public for consultation. Female officers/ staffs must be assigned for such activities. If required, commuting fees and a secured place of consultation only for these returnees to be ensured.	Do

## STAKEHOLDER MAPPING

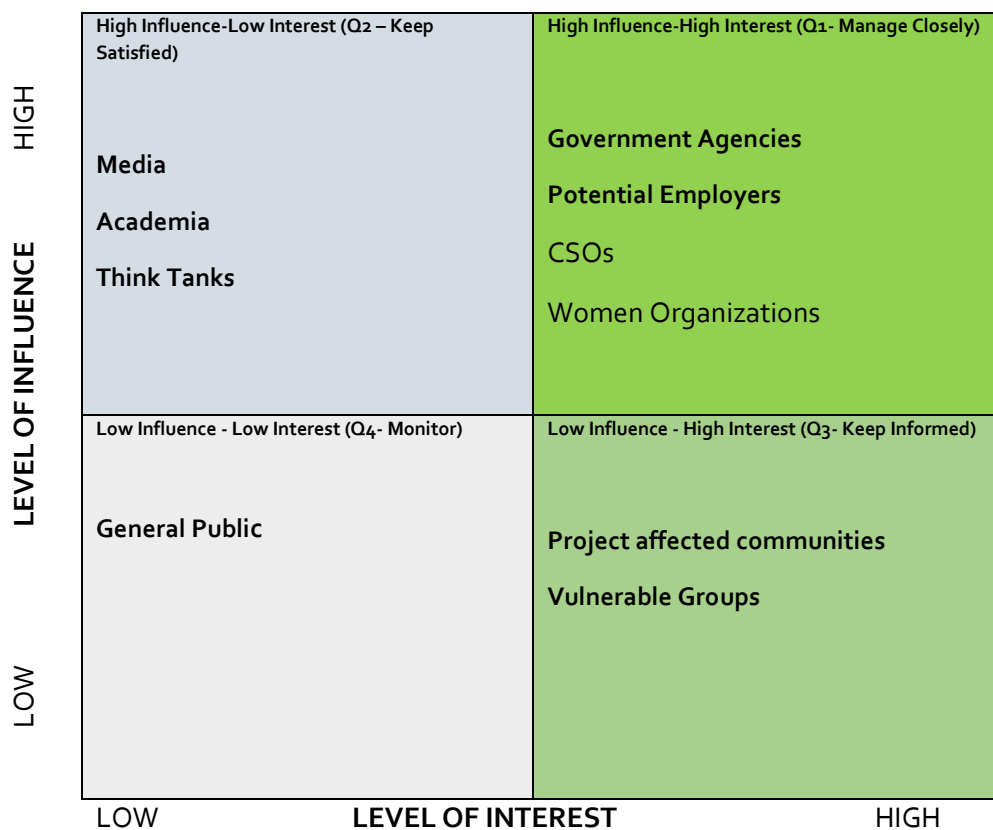
Stakeholder-mapping illustrated in the figure below was undertaken to identify the level of engagement required for each group of stakeholders based on their level of interest and level of impact. The mapping description is as follows:

The stakeholders that appear in the top right quadrant are those that need to be managed closely (i.e. the stakeholders that need to be proactively engaged on a regular basis and engagement efforts should be focused on this group). This is because these are the stakeholders that are most interested in the Project and have the potential to impact its outcome (i.e. the ability of the Project to go ahead).

The stakeholders that appear in next quadrants (i.e. in Q2 and Q3) need to be kept informed – i.e. provided information and consulted on issues of interest to the stakeholders.

The final stakeholders (i.e. in Q4) need to be monitored – i.e. informed of key Project aspects. It is important to track if their level of interest or impact changes.

The stakeholder list as well as stakeholder analysis and mapping will continue to be revised and updated during the consultation during the planning phase, based on the ongoing receipt of comments and input from local, national and international stakeholders directed to the Project.



## STAKEHOLDER ENGAGEMENT METHOD

### ENGAGEMENT METHODS AND TOOLS IN LIGHT OF COVID-19 OUTBREAK

With the outbreak and spread of COVID-19, people have been mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events have been adopted. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

WHO has issued technical guidance in dealing with COVID-19, including: (i) **Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response**; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

Given the COVID-19 pandemic situation, managing public consultation and stakeholder engagement in the Project needs to adhere to national requirements and any updated guidance issued by WHO. The alternative ways of managing consultations and stakeholder engagement will be in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

With growing concern about the risk of virus spread, there was an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for stakeholder consultation amidst COVID-19 outbreak:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.
- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines.

- Assess the level of ICT penetration among key stakeholder groups, *if feasible*, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, specific channels of communication that will be used while conducting further stakeholder consultation and engagement activities need additional considerations. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings; If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;
- Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected beneficiary household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, small group meetings ensuring social distancing and use of PPEs will be ensured.

## DESCRIPTION OF INFORMATION DISCLOSURE METHOD

As a standard practice, the Project materials (ESMF, SEP etc) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PMU in a formal manner. PMU will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development.

The ESMF, and SEP will be made available for public review in accordance with the World Bank and standard international requirements. The SEP will be released in the public domain simultaneously with the ESMF and ESMP reports and will be available for stakeholder review.

Distribution of the disclosure materials will be through making them available online for the moment given COVID-19 situation. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

Basing on the improvement of situation, free copies may be available at PMUs office locations.

The SEP will remain in the public domain for the entire project life cycle. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

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

**Table 4: Stakeholder Engagement and Disclosure Methods**

(Note: Preferably online/ digital method will be followed till COVID-19 situation improves)

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
<b>Beneficiaries directly benefited by project schemes</b>	ESMF, SEP;  Public Grievance Procedure;  Regular updates on Project development.  Any other ES instruments (site specific ES assessment etc) if prepared during implementation	Online notices.  Electronic publications and press releases on the Project website.  Dissemination of hard copies at designated public locations.  Press releases in the local media.  Consultation meetings.  Information leaflets and brochures.  Separate focus group meetings with vulnerable groups, as appropriate.
<b>Non-governmental and community-based organizations</b>	ESMF, SEP;  Public Grievance Procedure;  Regular updates on Project development.	Public notices.  Electronic publications and press releases on the project website.  Dissemination of hard copies at designated public locations.

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
		Press releases in the local media. Consultation meetings. Information leaflets and brochures.
<b>Government authorities and agencies</b>	ESMF, SEP; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESMF, ESMP, and SEP at PMU offices Project status reports. Meetings and round tables.
<b>Related Welfare Offices, employers and enterprises</b>	SEP; Public Grievance Procedure; Updates on Project development and tender/procurement announcements.	Electronic publications and press releases on the Project website. Information leaflets and brochures. Procurement notifications.
<b>Project Employees including workers, trainers etc</b>	Employee Grievance Procedure including GRM for the Labor Force; Updates on Project development.	Staff handbook. Email updates covering the Project staff and personnel. Regular meetings with the staff. Posts on information boards in the offices and on site. Reports, leaflets.

## PLANNED STAKEHOLDER ENGAGEMENT STRATEGY

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

*It so to be noted that preferably digital, internet, social media etc will be followed where face to face interaction can be avoided till COVID-19 situation improves. Other face to face interaction should be applicable for post COVID-19 period, unless necessary.*

**Table 5: Stakeholder Engagement Strategy**

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation (Project design, ESMF/ESCP/SEP Disclosure)	Project Affected People: Vulnerable beneficiaries	ESMF, ESIA, ESCP, SEP; Project scope and rationale; Project E&S principles; Grievance mechanism process	Online meetings, separate meetings for women and the vulnerable group;  Face-to-face meetings, if applicable maintaining COVID protocol  Mass/social media communication (as needed)  Disclosure of written information: brochures, posters, flyers, website Information boards or desks  Grievance mechanism  Local newspaper	Quarterly meetings at Welfare Offices and as various components are executed and put to operation, continuous communication through mass/social media and routine interactions	PMU
	Other Interested Parties	ESMF, ESMP, ESIA, ESCP, SEP disclosures;  Project scope, rationale and E&S principles  Grievance mechanism process	Online meeting and Face-to-face meetings if possible  Joint public/community meetings with PAPs	Quarterly meetings in PMU and Welfare Offices	PMU
	Other Interested Parties  Press and media  Local NGOs, Different Government Departments having link with project implementation namely District Administration District Police, Municipal,	ESMF, ESMP, ESIA, ESCP, and SEP disclosures  Grievance mechanism  Project scope, rationale and E&S principles	Online meeting and Public meetings, if possible  trainings/workshops (separate meetings specifically for women and vulnerable people as needed)  Mass/social media communication  Disclosure of written information:	Project launch meetings with relevant stakeholders  Meetings as needed;  Communication through mass/social media (as needed)  Information desks with	PMU



Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	DoE etc.  General public Migrants etc.		Brochures, posters, flyers, website  Information boards  Grievance mechanism  Notice board for employment recruitment	brochures/posters in Welfare Offices	
	Other Interested Parties  Other Government Departments from which permissions/clearances are required;	Legal compliance issues  Project information scope and rationale and E&S principles  Coordination activities  Grievance mechanism process  ESMF/ESMP/ESIA/ESCP/SEP disclosures	Online meeting, Face-to-face meetings if protocol can be ensured,  Invitations to public/community meetings  Submission of required reports	Disclosure meetings  Reports as required	PMU
STAGE 2: Implementation Phase	Project Affected People /Returnee migrants	Grievance mechanism  Health and safety impacts (EMF, community H&S, community concerns)  Employment opportunities  Project status	Online meeting, Public meetings if possible, trainings/workshops  Separate meetings as needed for women and vulnerable group  Individual outreach to PAPs as needed  Disclosure of written information: brochures, posters, flyers, website	Quarterly meetings  Communication through mass/social media as needed  Notice boards updated weekly  Routine interactions	PMU

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			Information boards; Notice board(s) at Welfare Offices Grievance mechanism Local monthly newsletter	Brochures in local offices	
	Other Interested Parties	Project scope, rationale and E&S principles  Grievance mechanism  Project status	Online meeting, Face-to-face meetings  Joint public/community meetings with PAPs	As needed	PMU
	Other Interested Parties Press and media Various Government Departments General public, migrants	Project information - scope and rationale and E&S principles, Project status  Health and safety impacts Employment opportunities Environmental concerns GBV related consultation, Grievance mechanism process	Public meetings, open houses, trainings/workshops  Disclosure of written information: brochures, posters, flyers, website, Information boards Notice board(s) at Welfare Offices  Grievance mechanism  GBV related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, WASH sector NGOs, NGOs specifically working on GBV matter, local leadership, Religious leaders, village elders including women representatives, Headmasters of the	Same as for PAPs/ at regular intervals throughout the project period to educate and raise awareness amongst the population about the pitfalls of GBV and making them capable of arresting GBV in respective community.	PMU

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			local schools and Madrassas.		

## REVIEW OF COMMENTS

The comments received from the stakeholder engagement activities will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:

- Comments are received from stakeholders orally or in the written form at the project level. Due to COVID-19 outbreak, comments will be received through means *preferably* not engaging physical interactions (telephone, email etc)
- The Social and Environmental Specialist / responsible officer would summarize the comments and bring to the notice of the PMU
- The Social and Environmental Specialist on his behalf the PMU would respond to the comments by oral/ written/digital means at the project level
- The PMU may also organize the meeting with respective stakeholders
- If it's not solved by PMU, then it will be addressed by Project Steering Committee (PSC)
- The Social and Environmental Specialist will share the summary of the comments to stakeholders in every level
- A written record of all these will be kept and maintained and uploaded in the relevant website for easy access of all.

## **GRIEVANCE REDRESS MECHANISM (GRM)**

The purpose of this GRM is to record and address any complaint that may arise during the life cycle of the RAISE project (Component 3) period effectively and efficiently. This GRM is designed to address concerns and complaints raised by the returnee migrants, vulnerable groups and other stakeholders promptly and transparently with no impacts (cost, discrimination) for any reports made by the migrants, vulnerable groups and other stakeholders. This GRM has been planned so that the migrants and other stakeholders can report issues without being threatened, which is easily accessible, quick and impartial; delivering decisions by the GRC to the complainant in an unbiased manner. Considering the overall need for the total project period, the WEWB PMU will establish a GRM to address complaints and grievances by the returnee migrants (especially returnee women and other vulnerable groups). The Grievance Redress Committee (GRC) of WEWB PMU will help to resolve issues/conflicts amicably and quickly, saving the migrants and other aggrieved persons resorting to expensive, time-consuming legal actions. The GRC and the PMU of WEWB will, however, not bar any returnee migrants and other stakeholders to go to the courts of law. The WEWB PMU will ensure that an effective and transparent mechanism is designed and established at the earliest opportunity for the beneficiaries and other stakeholders to be able to lodge complaints and grievances. Necessary sign posting/billboard would be placed at various places, to be decided by the WEWB PMU (where people gather) for sharing detailed information of the GRCs established for the Component 3 of RAISE Project. The GRM will also be available online so that grievances can be submitted without the need for physical interaction, especially during the time of COVID-19 crisis.

### **DETAILS OF GRM STRUCTURE**

Grievance Redress Committee (GRC) for Component 3 of RAISE Project will be formed in PMU of WEWB. Prior to the start of project activities, WEWB PMU officials will confirm establishment of such committees, with the understanding that they will have to meet when complaints are received. As a minimum the composition of the GRC will be as follows:

- PMU senior representative - GRC Chair and Convener
- One PMU staff - GRC Committee Secretary
- Social and Environmental Specialist in PMU - GRC Committee member
- One representative of Affected People (AP) - GRC Committee member

### **STEPS TO A SOLUTION**

**Step 1:** The complainant will be advised to settle the complaint through the GRC. The GRC will endeavor to solve the problem within a week. The problem and solution will be recorded in the Grievance Log kept with the GRC.

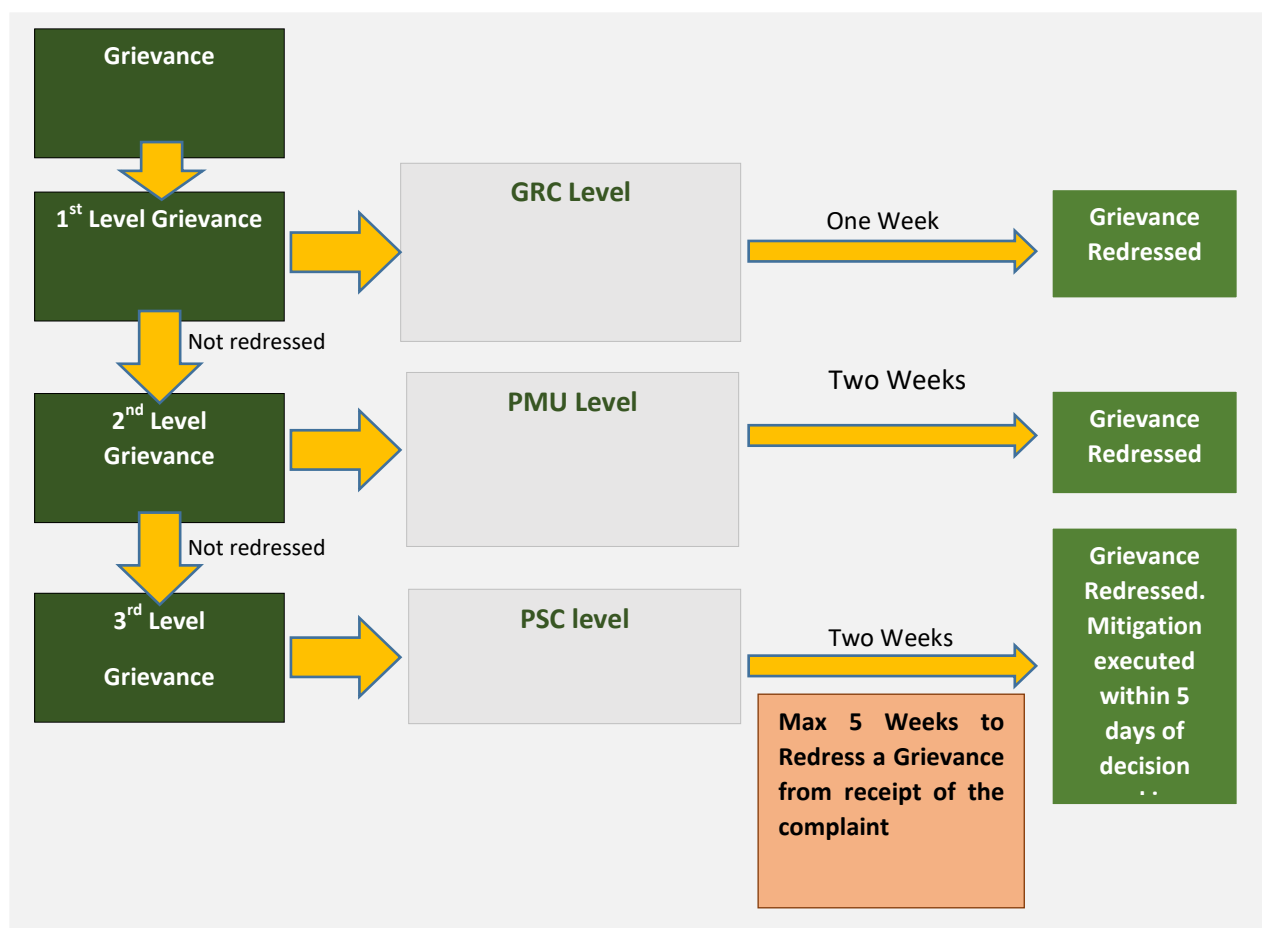
**Step 2:** Should the complaint not be addressed within a week; the Complainant will take the matter to the Project Director at the PMU, either via digital means or of situation permits by physical presence. The complaint will be recorded and the Project Director will solve the same within two weeks. The problem and solution will be recorded in the Grievance Log kept with the GRC.

**Step 3:** If Step 2 fails to resolve the issue, the Project Steering Committee (PSC) will be involved centrally to solve the issue in question within two weeks and the complainant will be informed of the timeline to solve the issue. The problem and solution will be recorded in the Grievance Log kept with the GRC.

The complainant will not be barred to seek legal remedies.

#### **PUBLICATION OF GRM STEPS**

Prior to the beginning of project activities, PMU or its representatives will publicize the establishments of the grievance redress steps and the process, and advertise all via contact information and the grievance redress steps posted at every PO Office involved, their websites, as well as at busy public places of project area. The poster(s) will be in the local language(s) and posted before start of project activities. The PMU's representative will check at least monthly to ensure that the posters are prominently displayed and provide clear contact instructions and numbers. This procedure and monitoring will be reported in the semi-annual monitoring report submitted to the WB.



### The Structure of Grievance Mechanism

Any grievance filed with the GRC, must be reported in the Annual report to the WEWB PMU who will then submit a consolidated report to WB. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRC will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. PMU will maintain the following three Grievance Registers:

**Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (8) Complainants' story and expectation with evidence, and (9) Previous records of similar grievances.

**Resolution Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

**Closing Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

The WEWB PMU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank. The PMU will also prepare periodic reports on the grievance resolution process and publish these on the IAs website.

Any Gender Based Violence (GBV) 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 GBV<sup>2</sup>. GBV-related complaints will be dealt with strict confidentiality, based on the wishes of the GBV-survivor. Any GBV-survivor will be referred to a GBV Service Provider/ NGO assigned for the project by PMU to manage and respond to GBV cases. They will support GBV survivors in accessing service providers and guiding them through options of lodging a complaint.

## GRM CONTACT INFORMATION AND COMPLAINT LODGE CHANNELS

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the project office in situ, and WEWB PMUs' Offices at the Welfare Offices.

Description	Contact details
Company:	WEWB GRC Office
To:	Project GRC, RAISE Project
Address:	Eskaton Garden Road, Dhaka-1000
E-mail:	
Website:	wewb.gov.bd
Telephone:	02-9334888

Complaints can be raised through personal appearance in the GRC and Welfare offices, through SMS, email and paper mails. All of which will be compiled into a central GRM system by the GRC.

## WB GRIEVANCE REDRESS SERVICE

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to the project-level GRM or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to

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<http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>



the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS) can be found at <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. Information on how to submit complaints to the World Bank Inspection Panel, visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## IMPLEMENTATION OF SEP AND BUDGET

### SEP IMPLEMENTATION ARRANGEMENT

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within PMU and its Welfare Offices. The Project will ensure necessary logistics and budget to implement the SEP. The contact information is given below:

Description	Contact details
Company:	WEWB Office
To:	Project Director, RAISE Project
Address:	Eskaton Garden Road, Dhaka-1000
E-mail:	
Website:	wewb.gov.bd
Telephone:	02-9334888

**Table 6: Role and Responsibilities for SEP Implementation**

ACTOR/STAKEHOLDER/ RESPONSIBLE PERSON	RESPONSIBILITIES
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ACTOR/STAKEHOLDER/ RESPONSIBLE PERSON	RESPONSIBILITIES
Communication/SEP team	<ul style="list-style-type: none"> <li>- Overall planning and implementation of the SEP;</li> <li>- Lead activities on stakeholders' engagement</li> <li>- Management and resolution of grievances;</li> <li>- Guide/coordinate/supervise Welfare Offices</li> <li>- Monitoring and reporting on SEP</li> <li>- Take lead in carrying out the beneficiary satisfaction survey</li> </ul>
WEWB PMU Officials	<ul style="list-style-type: none"> <li>- Visit Welfare Offices for M&amp;E (at least quarterly)</li> </ul>
Social and Environmental Consultant	<ul style="list-style-type: none"> <li>- Supervision/monitoring of SEP and GRM</li> </ul>
Welfare Offices	<ul style="list-style-type: none"> <li>- Report/inform PMU on issues related to the implementation of the SEP / engagement with the stakeholders.</li> <li>- Resolve and convey management/resolution of grievance cases to the project GRM team</li> <li>- Collaborate/inform the local communities and other local level stakeholders on E&amp;S monitoring</li> </ul>
Other interested stakeholders	<ul style="list-style-type: none"> <li>- Participate in the implementation of SEP activities</li> <li>- Monitor/ensure project's compliance with the laws of Bangladesh</li> <li>- Engage with the project's stakeholders on E&amp;S issues</li> </ul>

## BUDGET FOR SEP IMPLEMENTATION

A tentative budget for implementing this SEP for the entire duration of the project is included below. The budget includes all the activities pertaining the project's stakeholder engagement plan and comprises of a range of activities of the project. This budget will be annually reviewed by WEWB PMU and if necessary, will be revised and adjusted. The budget is provided in the table below (all figures are in USD):

**Table 7: SEP Implementation Budget**

Ser	Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times/ Month	Total Cost (USD)
1	Staff/ Consultant Salaries (1 x Social and Environmental Specialist etc)				Paid from Project Consulting Service Budget
2	Training on Stakeholder Engagement and GRC issues	2 times	5,000		10,000
3	Information Desk Officer	1	300	36	18,000
4	Stakeholder/Community/ Sensitization meeting	Lump Sum			20,000
5	Meeting with Govt Officials	3 meeting/yr	10,00		9,000
6	Meeting with PMU, Welfare offices	3 meeting/yr	1,000		9,000
7	Surveys for report preparation	1 /yr	3,000		9,000
8	Travel Expenses	Lump sum	5,000/yr	Three yrs	15,000
9	Communication Materials	Lump Sum	10,000		10,000
10	GRM Guidebook	Lump Sum	2,000		2,000
11	Suggestions Box	20	100		2,000
12	GRM/GRC expenses	Lump Sum			10,000
13	GRM MIS Database	Lump sum	10,000		10,000
14	Honorarium for committees	Lump sum	10,000		10,000

15	Contingency (10%)				13,400
Total (Less Serial 1) (Rounded)					150,000

## MONITORING AND REPORTING

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 include involving 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 scientific findings and involve them in participatory discussions of external and monitoring and evaluation missions.

The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. The communication officer will work on a reporting matrix in this regard.

**Table 8: Monitoring Requirements**

Key elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
<b>Stakeholders' access to project information and consultations</b>	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey	WEWB PMU together with external monitor	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 implementation)	Interviews, observations, survey	Do	Number of survey and beneficiary covered. Sample beneficiary tested for awareness
<b>Acceptability and appropriateness of consultation and engagement approaches</b>	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	Do	Number of concerns raised by beneficiaries, comparison between expected and actual beneficiary engaged
<b>Community</b>	Periodic (during project implementation)	Interviews,	Do	Number of engagement and

Key elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
<b>facilitators' engagement with target beneficiaries</b>	implementation)	observations, survey, score-card as relevant		number of beneficiaries covered
<b>Public awareness of GRM channels and their reliability</b>	Periodic (during project implementation)	Spot checks, interviews, observations	Do	Random sampling public response of awareness
<b>Accessibility and readability of public information dissemination materials</b>	Periodic (during project implementation)	Spot checks, interviews, desk-review	Do	Results of spot checks and reviews, number of places materials are placed with public access
<b>Tones in social media and broader public perceptions (including NGOs)</b>	Periodic (during project implementation)	Social media monitoring, interviews, observations	Do	Number of positive reviews and negative reviews by public, beneficiaries and influences
<b>Rate of grievances and complaints (reported and unreported)</b>	Periodic (during project implementation)	Desk review, interviews, survey	Do	Number of complaints received and average days to solve the same

## REPORTING BACK TO STAKEHOLDERS

The PMU will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs should be always carried through network based or, if possible, face-to-face meeting or direct interactions, for the other stakeholders' group. 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. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations GRM in relation to the labor force working under them.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

*Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);*

*Frequency of public engagement activities;*

*Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process;*

*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;*

*Amount of Project's charitable investments in the local communities in the Project Area of Influence.*

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 WEWB website, social media accounts, communication materials, etc.







## Annex A. Methods, Tools and Techniques for Stakeholder Engagement (Subject to COVID-19 Situation)

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
<b>Information Provision</b>				
<b>Distribution of printed public materials: leaflets, brochures, fact sheets</b>	Used to convey information on the Project and regular updates on its progress to local and national stakeholders.	<p>Printed materials present illustrative and written information on Project activities, facilities, technologies and design solutions, as well as impact mitigation measures.</p> <p>Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects.</p> <p>Information may be presented both in Bangla for local and national stakeholders. Some could also be printed in Braille targeting the blind.</p>	<p>Online publication.</p> <p>If COVID-19 situation permits, distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in various areas to meet the elderly and the disabled.</p> <p>Placement at the offices of Welfare Offices and NGOs, libraries and other public venues.</p>	<ul style="list-style-type: none"> <li>• Beneficiaries directly benefited by scheme</li> <li>• Local government institutions</li> <li>• Vulnerable groups and the disadvantaged</li> <li>• Press and Media</li> <li>• NGOs</li> <li>• Government Organizations</li> <li>• Welfare offices</li> </ul>
<b>Distribution of printed public materials: newsletters/ updates</b>	A newsletter or an updated circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	<p>Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.</p> <p>Printed materials should be available in two languages – Bangla and English for the local and national audience.</p>	<p>Circulation of the newsletter or update sheet with a specified frequency in the Project Area, as well as to any other stakeholders that expressed their interest in receiving these periodicals.</p> <p>Means of distribution – post, emailing, electronic subscription, delivery in person.</p>	<ul style="list-style-type: none"> <li>• As above</li> </ul>

Welfare Offices				
<b>Printed advertisements in the media</b>	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	<p>Notification of forthcoming public events or commencement of specific Project activities.</p> <p>General description of the Project and its benefits to the community.</p> <p>Advertisements should be available in two languages – Bangla and English for the local and national audience.</p>	Placement of paid information in local, and national print media, including those intended for general reader and specialized audience	<ul style="list-style-type: none"> <li>As above</li> </ul>
<b>Radio or television entries</b>	Short radio programs, video materials or documentary broadcast on local TV.	<p>Description of the Project, Project development updates, solutions for impact mitigation.</p> <p>Advance announcement of the forthcoming public events or commencement of specific Project activities.</p> <p>Communication will be in Bangla.</p>	Collaboration with media producers that operate in the region and can reach local and national audiences.	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>
<b>Visual presentations</b>	Visually convey Project information to affected communities and other interested audiences.	<p>Description of the Project and related solutions/impact management measures.</p> <p>Updates on Project development.</p>	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	<ul style="list-style-type: none"> <li>Beneficiaries directly benefited by scheme</li> <li>Local government institutions</li> <li>Vulnerable groups and the disadvantaged</li> <li>Press and Media</li> <li>NGOs</li> <li>Government Organizations</li> </ul>

				<ul style="list-style-type: none"> <li>Welfare Offices</li> </ul>
<b>Notice boards</b>	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, Welfare Offices, post offices, shop, local administrations.	<ul style="list-style-type: none"> <li>As above</li> </ul>
		Noticeboard information will be in Bangla.		
<b>Websites</b>  <b>Including dedicated social media platforms</b>	<p>All the project activities, documentation, notice, project updates will be published in the project websites.</p> <p>These platforms will upload completed, ongoing and planned project activities to encourage the target population to participate more actively.</p>	<p>All contents mentioned above will be displayed in the project websites.</p> <p>Website should be available in two languages – Bangla and English for the local and national audience.</p>	<p>Through websites and social media platforms</p> <p>WEWB can use their already operational websites keeping provision of specific portal within it or develop a dedicated website.</p>	<ul style="list-style-type: none"> <li>For all types of stakeholders having access to internet facility.</li> </ul>

Information Feedback				
<b>Information repositories accompanied by a feedback mechanism</b>	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials, ESMF/ /SEP and other safeguard documentation, environmental and social action plans.	Deposition of materials in publicly available places (Welfare Offices, local administrations, etc.) for the duration of a disclosure period or permanently. Audience is also given free access to a register for comments and suggestions.	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>
<b>Internet/Digital Media</b>	<p>Launch of Project webpage (on WEWB websites) to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public.</p> <p>Webpage should have a built-in feature that allows viewers to leave comments or ask questions about the Project.</p>	<p>Information about Project Management Unit, Project development updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.</p> <p>Website should be available in two languages – Bangla and English for the local and national audience.</p>	<p>A link to the Project webpage should be specified on the printed materials distributed to stakeholders.</p> <p>Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. especially due to COVID-19 related restrictions.</p> <p>Limitation: Not all parties/stakeholders have access to the internet, especially in remote areas and in communities.</p>	<ul style="list-style-type: none"> <li>For all types of stakeholders having access to internet facility.</li> </ul>
<b>Surveys, Interviews and Questionnaires</b>	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	<p>Description of the proposed Project and related solutions/impact management measures.</p> <p>Questions targeting stakeholder</p>	<p>Soliciting participation in surveys/ interviews with specific stakeholder groups or community-wide.</p> <p>Administering questionnaires as part of</p>	<ul style="list-style-type: none"> <li>Beneficiaries directly benefited by scheme</li> </ul>

		<p>perception of the Project, associated impacts and benefits, concerns and suggestions.</p> <p>Materials will be in Bangla.</p>	the household visits.	
<b>Feedback &amp; Suggestion Box</b>	<p>A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project.</p> <p>Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.</p>	<p>Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.</p> <p>Feedback and suggestions expected to be in Bangla.</p>	<p>Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community.</p> <p>Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.</p>	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>
<b>Consultations &amp; Participation</b>				
<b>Public hearings</b>	<p>Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.</p>	<p>Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions &amp; Answers session with the audience.</p> <p>Hearings will be conducted in Bangla.</p>	<p>Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media.</p> <p>Targeted invitations are sent out to stakeholders.</p> <p>Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of</p>	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>

comments and suggestions that is made available during the disclosure period.			
<b>Household visits</b>	Household-level visits can be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from vulnerable community members that includes the disabled, elderly and the minority ethnic communities who may be unable to attend the formal hearing events.	<p>Description of the Project and related solutions/impact management measures.</p> <p>Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.</p> <p>Consultations will be in Bangla.</p>	<p>Project's designated staff should conduct visits with a specified periodicity.</p> <p>Limitation: logistical challenges in reaching households in various locations. Restrictions to COVID-19 affected households.</p> <ul style="list-style-type: none"> <li>• Beneficiaries directly benefited by scheme</li> </ul>
<b>Focus Group Discussions and Round Table Workshops</b>	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	<p>Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.</p> <p>Discussions to be held in Bangla.</p>	<p>Announcements of the forthcoming meetings are widely circulated to participants in advance.</p> <p>Targeted invitations are sent out to stakeholders.</p> <ul style="list-style-type: none"> <li>• Beneficiaries directly benefited by scheme</li> <li>• Local government institutions</li> <li>• Vulnerable groups and the disadvantaged</li> <li>• Press and Media</li> <li>• NGOs</li> <li>• Government Organizations</li> <li>• Welfare Offices</li> </ul>

