

**Ministry of Digital Development, Innovations and  
Aerospace Industry of the Republic of Kazakhstan**

**Kazakhstan Digital Acceleration for an Inclusive  
Economy (DARE) Project (P179204)**

**Draft**

**STAKEHOLDER ENGAGEMENT PLAN**

**October 2023**

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## ACRONYMS AND ABBREVIATIONS

APDC	Agency for Protection and Development of Competition
AM	Accountability Mechanism
BPO	Business Process Outsourcing
CPF	Country Partnership Framework
CWCs	Civil Work Contractors
DARE	Kazakhstan Digital Acceleration for an Inclusive Economy project
DP	Development Partner
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESMF	Environmental and Social Management Framework
ESMP	Environment and Social Management Plan
ESS	Environmental and Social Standard
FM	Financial Management
GBV	Gender-Based Violence
GM	Grievance Mechanism
GFP	Grievance Focal Point
GoKZ	Government of Kazakhstan
GRC	Grievance Redress Commission
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
ICT	Information and Communication Technologies
ISP	Internet Service Provider
IT	Information Technology
ITES	IT enabled services
MDDIAI	Ministry of Digital Development, Innovations and Aerospace Industry
M&E	Monitoring and Evaluation
MNE	Ministry of National Economy
MNO	Mobile Network Operator
NBS	National Bureau of Statistics
NGO	Nongovernmental Organization
NSDS	National Sustainable Development Strategy
OIPs	Other Interested Parties
PAD	Project Appraisal Document
PAPs	Project-affected Parties
PDO	Project Development Objectives
PIU	Project Implementation Unit
POM	Project Operational Manual
PPL	Public Procurement Law
PPP	Public-Private Partnership
PwD	Persons with disabilities
SMEs	Small and Medium Enterprises
PPG	Project Procurement Strategy for Development
RAP	Resettlement Action Plan
RCM	Residents and Community Members
RFB	Request for Bids
RPF	Resettlement Policy Framework
RFP	Request for Proposals
SMEs	Small and Medium Enterprises
SEP	Stakeholder Engagement Plan
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment

SOE	State-owned enterprise
TC	Telecommunicatoins Committee
TOR	Terms of Reference
WB	The World Bank

## 1. INTRODUCTION

### 1.1. Project Background

The proposed Project will directly contribute to the Government of Kazakhstan’s (GoKZ) objectives to eliminate digital inequality’ and improve broadband quality to ensure 100 Megabits per second (Mbps) internet connectivity for all households at affordable prices, and indirectly to accelerating economic diversification as underpinned by resilient and affordable broadband infrastructure. The Project will also finance critical regulatory reforms to promote private sector investments in the telecom sector and strengthen foundational enablers to spur growth of new private-sector digital markets, such as cloud and data infrastructure.

The PIU will be housed by the Republican State Institution “Telecommunications Committee of MDDIAI” (Telecommunications Committee, TC) under the Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan and will be responsible for the overall coordination of the the Kazakhstan Digital Acceleration for an Inclusive Economy (DARE) Project

### 1.2. Project components and activities

**The project development objective** is to support equitable access to high-quality and climate resilient broadband infrastructure in selected unserved and underserved areas of Kazakhstan.

DARE Project contributes to the Government of Kazakhstan’s long-term GRID objectives, including accelerating economic diversification underpinned by climate resilient and affordable digital infrastructure. The project will also finance critical regulatory reforms to promote private sector investments in the telecom sector and strengthen foundational enablers to spur growth of new digital markets, such as cloud and data infrastructure. DARE consists of the following three components:

#### **Component 1: Resilient Digital Infrastructure (US\$90 million)**

This component aims to finance the rollout of high-quality resilient digital infrastructure in four unserved and underserved regions of Kazakhstan (Akmola, Turkestan, West Kazakhstan and East Kazakhstan), connecting households, public institutions, businesses, and mobile towers to broadband. The component will seek to mobilize private capital for infrastructure investments towards deploying climate-friendly and future-proof digital connectivity infrastructure, leveraging catalytic public funding in the form of *matching grants* to be provided to qualified internet service providers (ISPs) and mobile network operators (MNOs) towards two types of infrastructure Projects:

- (1) **Equitable access to digital infrastructure (US\$70 million)** – deploying backhaul and access networks to households, businesses and public institutions in selected areas and equipping schools in such areas with relevant IT equipment and internal wiring. Matching grants will be provided to qualified ISPs.
- (2) **Improving 5G readiness of mobile infrastructure (US\$20 million)** – deploying resilient, climate-friendly, and future-proof backhaul infrastructure to underserved mobile towers<sup>1</sup> that could be shared by more than one operator. Matching grants will be provided to qualified MNOs.

Broadband infrastructure built under this Component will be subject to quality standards, including compliance with requirements for disaster response and energy efficiency. The regions of Kazakhstan targeted under the Component are characterized by medium or high levels of climate shocks and hazards described in paragraph 4, such as floods, landslides, extreme heat and earthquakes.

#### **Component 2: Enabling Environment for Digital Economy (US\$5 million)**

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<sup>1</sup> Mobile towers connected via radio links and without wire connectivity

This component aims to support telecommunications investments under Component 1 through improving Kazakhstan’s regulatory environment as well as to lay the grounds for development of cloud and data infrastructure market. Component will finance technical assistance (TA) activities to improve the telecom sector’s regulatory effectiveness and reduce market-entry barriers, while refining the regulatory framework to be more climate-informed. It will also aim to strengthen the data protection regulatory framework to grow Kazakhstan’s data and cloud industries. Specific activities include the following:

- a) *Strengthening the Telecom Committee* to improve regulatory effectiveness through revisions to the Committee’s mandate, functions, structure, and processes;
- b) *Improving telecom wholesale market regulation*, including an analysis of relevant wholesale markets, a review of the currently imposed obligations, including price controls, and an estimation of costs for relevant wholesale products/services (based on a long-run incremental cost (LRIC) model or other relevant methodologies);
- c) *Facilitating passive infrastructure sharing*, more specifically: (a) sharing cable duct infrastructure in urban areas for fiber optic deployments by alternative operators, and (b) facilitating access to the underutilized fiber optic infrastructure owned by the electricity sector to commercialize it at the segment of electricity distribution system operators (including distribution poles), and at the level of the transmission systems operators (including optical ground-wire);
- d) *Enhancing crisis preparedness of the telecom sector*, including conducting a detailed risks assessment and developing a crisis management plan for the telecom sector nationwide, including to ensure mobilization and emergency response to climate and disaster risks;
- e) *Strengthening data protection regulation* to the level of protection equivalent to that of the EU, supporting the GoKZ in pursuing an adequacy determination from the EU; and
- f) *Developing guidelines and national protocols for greening digital infrastructure*, including reducing/adapting to potential environmental impact and leveraging renewable energy resources (such as solar energy), e.g., through development of e-waste management plans, guidelines on embedding climate resilience for connectivity and data infrastructure. Suitable renewable energy generation options for greening digital infrastructure will be identified as part of this activity.

### **Component 3: Project Management and Implementation Support (US\$5 million)**

This component will finance support to the Borrower’s Project management and implementation of Project-associated activities, including procurement, financial management (FM), monitoring and evaluation (M&E), Project communications, as well as environmental and social safeguards and citizen engagement. It will cover the operating costs of the Project Implementation Unit (PIU). This component will also help strengthen the technical and functional capacity of the PIU, including the recruitment of expert consultants in key areas and the facilitation of on-the-job learning and competency transfer, including in disaster and climate risk management skills. It will also support independent audits, M&E (including collecting gender disaggregated data) and quality assurance to ensure compliance with best procurement and FM practices.

**Table 1. Project Components and Tentative Budget Allocations**

<b>Components</b>	<b>Allocated Financing (US\$ million)</b>
<b>Component 1: Resilient Digital Infrastructure</b>	<b>90</b>
<b>Component 2: Enabling Environment for Digital Economy</b>	<b>5</b>
<b>Component 3: Project Management</b>	<b>5</b>
<b>TOTAL</b>	<b>100</b>

### **1.3. Project Location**

Project location for the project activities under the component 1 is territory of Kazakhstan. At the project's inception the rollout of high-quality resilient digital infrastructure will begin in four unserved and underserved regions of Kazakhstan, including Akmola, Turkestan, West Kazakhstan and East Kazakhstan) by connecting households, public institutions, businesses, and mobile towers to broadband. The project also targets through technical assistance (TA) activities to improve the telecom sector's regulatory effectiveness of GoKz and reduce market-entry barriers, while refining the regulatory framework to be more climate-informed. It will also aim to strengthen the data protection regulatory framework to grow Kazakhstan's data and cloud industries. Therefore, the initial stakeholder engagement public meetings will include stakeholders in above-mentioned four target areas.

### **1.4. Current Stage of the Project**

The DARE project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the Telecommunication Committee should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation

The Telecommunication Committee is preparing a draft Environmental and Social Management Framework (ESMF), which has set out the principles, rules, guidelines, and procedures to assess environmental and social risks and impacts, and mitigation measures as required by ESF. Along with a comprehensive ESMF, a Stakeholder Engagement Plan (SEP) and Labor Management Procedure are being prepared. The Telecommunication Committee has already prepared Environmental and Social Commitment Plan (ESCP).

### **1.5. Environmental and social risk management**

The project's overall E&S risk rating classified as moderate for both environmental and social risks. Five of the ten ESS are relevant for this project including ESS1 (Assessment and Management of Environmental and Social Risks and Impacts); ESS2 (Labor and Working Conditions); ESS3 (Resource Efficiency and Pollution Prevention and Management); ESS4 (Community Health and Safety); and ESS10 (Stakeholder Engagement and Information Disclosure).

The project's main environmental and social risks are associated with the activities proposed under Component 1 that will deploy backhaul and access networks to households, businesses and public institutions in selected areas and equipping schools with relevant IT equipment and internal wiring, as well as deploying resilient, climate-friendly, and future-proof backhaul infrastructure to underserved mobile towers. The risks and impacts expected to be temporary and mitigable and are typical of those associated with small/medium scale construction works. As the exact project locations not known before project appraisal, the implementing agency is developing an Environmental and Social Management Framework (ESMF). The ESMF, once acceptable to the WB, will be shared with all stakeholders and disclosed nationally and on the WB's external website.

At this point, project activities are not expected to require the involuntary acquisition of land. Should the need for land acquisition, however, emerge during preparation, a Resettlement Policy Framework (RPF) will be developed to enable the project to appropriately identify, address and mitigate adverse socioeconomic impacts that may occur due to the implementation of subprojects that involve the involuntary acquisition of land and the subsequent resettlement of affected families. Beyond land acquisition, other social risks include: involvement of all sections of society and provide universal accessibility, protection of personal data and the fundamental rights and freedoms of persons that are



Kazakhstan Digital Acceleration for an Inclusive Economy (DARE) Project (P179204) – Stakeholder Engagement Plan related to that data, and implementing meaningful and effective stakeholder engagement, public and beneficiary outreach.

## 2. OBJECTIVES OF STAKEHOLDER ENGAGEMENT PLAN

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

This Stakeholder Engagement Plan (SEP) is prepared by the Telecommunication Committee for the (DARE) Project in accordance with the World Bank Environmental and Social Standard on Stakeholder Engagement and Information Disclosure (ESS10).

The involvement of the local population particularly relevant stakeholders is essential to the success of the project to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. The project stakeholder engagement is key to communicating timely information of project services and scope to all stakeholders and reaching out to disadvantaged and vulnerable groups.

The SEP is a useful tool for managing communications between the project and its stakeholders, including the beneficiaries.

The detailed objectives of the SEP can be summarized as follows:

1. Outline the stakeholder engagement requirements of the Republic of Kazakhstan legislation and World Bank's E&S Standards.
2. Provide guidance for stakeholder engagement, including the timing and methods of engagement with stakeholders throughout the life cycle of the project.
3. Identify key stakeholders that are affected, and/or able to influence the project.
4. Describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured.
5. Identify effective ways and methods to disseminate project information through different venues accessible to the different types of stakeholders. as per needs of the Stakeholders.
6. Guide Implementing Agencies (IAs), contractor and the supervision consultant building mutually respectful, beneficial, and lasting relationship with stakeholders.
7. Establish project-level grievance redress mechanism(s).
8. Define roles and responsibilities for the implementation of the SEP.

### 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

#### 3.1. Methodology

In order to meet best practice approaches, the Telecommunication Committee will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the DARE project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

#### 3.2. Affected parties and other interested parties

Affected parties include local communities, community members, and other parties that may be subject to direct impact from the Project. The Project has moderate ratings for both environmental risk and social risk. Given the focus of the Project on technical assistance, provision of matching grants, and strengthening Kazakhstan's regulatory environment as well as to lay the grounds for development of cloud and data infrastructure market, there are limited actual impacts or potential risks to the physical environment, health, security, cultural practices, well-being, or livelihoods to the population living in selected areas. As such, the Project affected parties are few and to be updated accordingly during project preparation and identification as needed. Specific project affected parties may include, households, businesses and public institutions in identified sub-project areas and schools where equipping with relevant IT equipment and internal wiring is planned.

Project stakeholders can be classified into four groups – direct beneficiaries/affected people (internet providers, social public institutions, residents, residents of targeted rural areas, and other vulnerable subgroups); enablers (ministries/agencies who make policies and strategies); service providers such as regulating bodies, state funds, holdings, contractors, consultants, etc.; and other interested parties – NGOs, associations, networks. Given that the proposed project will be nationwide and comprise a variety of activities and various actors/ agencies, the project's interface with the stakeholders, in general, and the direct beneficiaries will be under the overall realm of the Citizen Engagement. The proposed stakeholder engagement activities will have to cover four broad areas: (i) information dissemination to enable fuller awareness creation about the project activities; (ii) responding to queries and facilitation of services; (iii) grievance mechanism (GM); and (iv) beneficiary feedback. This SEP preliminary identified different stakeholders and provide an approach towards reaching each of the subgroups, including impediments, if any, to reaching out to stakeholders as well as reflecting/building the capacity of the client in engaging with stakeholders.

The list of potential Project-affected parties is presented in Table 2, with details on the nature of their interest, methods to consult with these stakeholders and the timing of consultation.

**Table 2. Potential Project-affected parties<sup>2</sup>**

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
<b>Project affected parties</b>			
Households	<p>They are interested in:</p> <ul style="list-style-type: none"> <li>- Project’s outputs and outcomes including improved access to high-speed, affordable broadband internet</li> <li>- The timing of the deliverables and benefits to the identified stakeholders.</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures.</li> </ul>	<p>Focus group discussions Formal meetings Bulletin and notice boards Information leaflets Outreach activities</p> <p>Social media and TC/MDDIAI website</p>	<p>During Project preparation: Planned in October 2023 in selected regions</p> <p>During Project implementation: Every 6 months throughout implementation, including prior to launch of key activities such as matching grants, inputs on diagnostics, and survey</p>
Public institutions	<p>They are interested in:</p> <ul style="list-style-type: none"> <li>- Project’s outputs and outcomes including improved access to high-speed, affordable broadband internet</li> <li>- The timing of the deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures.</li> </ul>	<p>Consultations Correspondence including emails, letters</p> <p>Bulletin and notice boards Social media and TC/MDDIAI website</p>	<p>During Project preparation: Planned in October 2023</p> <p>During Project implementation: Periodically, Including prior to launch of key activities related to high-speed, affordable broadband internet</p>
Schools	<p>They are interested in:</p> <ul style="list-style-type: none"> <li>- Project’s outputs and outcomes including improved access to high-speed, affordable broadband internet</li> <li>- The timing of the deliverables and benefits</li> <li>- Factors that may affect access to Project initiatives and options for equitable access.</li> <li>- Project risks and mitigation measures.</li> </ul>	<p>Focus group discussions Consultations Correspondence including emails, letters Students and teacher’s satisfaction survey Bulletin and notice boards Social media and TC/MDDIAI website</p>	<p>During Project preparation: Planned in October 2023</p> <p>During Project implementation: Periodically, Including prior to launch of key activities related to high-speed, affordable broadband internet</p>
Private sector actors – local businesses	<p>They are interested in:</p> <ul style="list-style-type: none"> <li>- Project’s outputs and outcomes including improved</li> </ul>	<p>Focus group discussions Consultations</p>	<p>During Project preparation: Planned in October 2023</p>

<sup>2</sup> The table is to be revised based on the meeting with the Telecommunication Agency and feasibility study findings

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
	access to high-speed, affordable broadband internet - The timing of the deliverables and benefits - Factors that may affect access to Project initiatives and options for equitable access. - Project risks and mitigation measures.	Correspondence including emails, letters Bulletin and notice boards Social media and TC/MDDIAI website	During Project implementation: Periodically, Including prior to launch of key activities related to high-speed, affordable broadband internet
Internet Service Providers (ISPs) and Mobile Network Operators (MNOs)	Opportunities to collaborate on the expansion of their footprint and subscriber base and on improving 5G readiness of their mobile infrastructure in <b>rural</b> areas	Focus group discussions Structured agenda Correspondence Formal meetings Social media and TC/MDDIAI website	During Project preparation: Planned in October 2023 During Project implementation: Periodically, Including prior to launch of key activities related to high-speed, affordable broadband internet.

Project stakeholders also include parties (termed other interested parties) that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and could affect the Project and the process of its implementation in some way. These include regional stakeholders and government ministries with an interest in the Project’s targeted sectors and activities (such as matching grants and technical assistance). Additional stakeholders at regions may include local municipalities, the Maslikhat, local self-government institutions in Project-supported areas that provide various services and support to local communities. Other regional stakeholders and partners will be defined during the feasibility study period. The list of other interested parties is provided in Table 3.

**Table 3.** List of other interested parties<sup>3</sup>

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
Government officials in Ministries, Departments and Agencies with interest in Project’s targeted sectors	Project implementation, outputs, and outcomes. Risks and mitigation strategies	Correspondence Formal meetings Structured agenda	- During Project preparation: - Planned in September 2023 - During Project implementation: - Prior to launch of activities of potential interest
Local municipalities, the Maslikhat, local self-government institutions in Project-supported areas	Technical assistance, and collaboration with other key regional actors, to develop micro-credentials	One-on-one interview Structured agenda	- During Project implementation: - Prior to launch of

<sup>3</sup> This table is to be revised per findings of the feasibility study

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
	and certification, research, and data exchanges.		relevant technical assistance activities

### 3.3. Disadvantaged and vulnerable individuals or groups

Within the Project, vulnerable and disadvantaged individuals or groups may include but are not limited to single parent households, youth at risk, unemployed youth, women, the poor and those with disabilities and their caretakers. The PIUs will coordinate where possible with groups and organizations representing the rights of disadvantaged groups to facilitate the participation of their member in consultations to ensure their full understanding of Project activities and benefits. Table 4 identifies potential disadvantaged and vulnerable individuals and groups and analyses their interest in the Project, methods to consult and the timing of consultations.

**Table 4.** List of disadvantaged and vulnerable individuals and groups

Stakeholder	Nature of Interest	Method to Consult	Timing of Consultation
People with Disabilities and their caregivers	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access.	Community consultations	<ul style="list-style-type: none"> <li>- During Project preparation:</li> <li>- Planned in October 2023</li> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>
Single parent households	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access.	Community consultations	<ul style="list-style-type: none"> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>
Women	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access.	Community consultations Focus group	<ul style="list-style-type: none"> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>
People on low incomes	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access..	Outreach activities	<ul style="list-style-type: none"> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>
Unemployed youth	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access..	Outreach activities Focus groups Notice/bulletin boards	<ul style="list-style-type: none"> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>
Youth at risk	Project information of relevance to this sub-group and issues of access to project outputs – high-speed broadband access.	Outreach activities Correspondence to youth organizations working with these groups.	<ul style="list-style-type: none"> <li>- During Project implementation:</li> <li>- Prior to launch of key Project activities</li> </ul>

## 4. REGULATORY FRAMEWORK

### 4.1. Relevant National Laws and Regulations

The key national legislation for consultations and stakeholder engagement is the regulations relating to access to information, any legal requirements related to public consultations plus existing channels for grievances.

**Environmental Code** (dated January 2, 2021 No. 400-VI ZRK.) governs the relations on protection, restoration and conservation of the environment, use and reproduction of natural resources when conducting the economic and other activities related to the use of natural resources and environmental impact within the Republic of Kazakhstan. Participants in the relationship are individuals and legal entities and state agencies of the country. Article 13 of the Environmental Code proclaims the right of citizens to live in a favorable environment and protection from negative environmental impacts. Citizens also have the right to receive environmental information, as well as to participate in the development, adoption and implementation of decisions concerning the impact on the environment. The latter is provided by public discussion of draft environmentally important decisions and public environmental reviews. Public representative bodies must take into account citizens' comments and suggestions.

**Labor Code** (dated November 23, 2015 No. 414-V ZRK). The purpose of legislation is to regulate labor relations and other relations directly related to labor, aimed at protecting the rights and interests of the parties to labor relations, establishing minimum guarantees of rights and freedoms in the sphere of labor, are to create the necessary legal conditions aimed at achieving a balance of interests of the parties to labor relations, social stability, and public harmony.

**The Administrative Procedural Code** (dated June 29, 2020, No. 350-VI). This Code regulates public relations related to filing and consideration of appeals by individuals and legal entities in order to exercise and protect their rights, freedoms and legitimate interests. The Code contains legal provisions on information channels established for citizens to submit their applications, applications and complaints. Appeals are considered within fifteen working days from the date of receipt of the appeal. The period of consideration of an appeal may be extended on the basis of a grounded decision of the head of the administrative body or his/her deputy for a reasonable period of time, which should not exceed two months, owing to the need to establish actual circumstances that are important for proper consideration of the administrative case subject to notification of the applicant within three working days from the date of extension of such period.

**The Law on Access to Information** (dated November 16, 2015 No. 401-V ZRK.) is underpinned by Article 18 of the Constitution, which states that government agencies, public associations, officials and the media are required to provide every citizen with the opportunity to obtain and familiarize himself/herself with documents and sources of information that affect her or his rights and interests, unless otherwise provided for by law.

## 5. SUMMARY OF STAKEHOLDER CONSULTATIONS DURING PROJECT PREPARATION

During the project preparation public consultation meetings were conducted on October 30, 2023, through in-person and virtual meetings with stakeholders. The Telecommunications Committee teams met with stakeholders from the public institutions, private sector - businesses, Internet Service Provider, Mobile Operators, other government ministries, national training agencies, and civil society organizations.

Consultations were held in the Telecommunications Committee of the Republic of Kazakhstan. The details of the venue, date, type of participated stakeholders, number of both female and male participants and raised concerns will be reflected in the final SEP to be submitted to the World Bank for review and getting no-objections.

The main objective of the meetings was to discuss and gather input and feedback on the Project scope, components, implementation arrangements, stakeholders' innovative and transformative initiatives and activities in progress and planned, collaboration and partnership arrangements between private sector and Ministry, resources required for innovation, challenges, constraints and potential risks and mitigation strategies.

A summary of the main recommendations received and integrated into the Stakeholder Engagement Plan provided in the Annex.

### 5.1. Summary of Project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- i. **Structured Agenda:** This engagement method will be used to discuss specific components or sub-components of the Project during the consultation. The use of a focused agenda ensures that the MDDIAI and PIUs collect the required information as defined in the structured agenda. This engagement type also ensures that the relevant target stakeholders are included in the consultation. This method will be used for both Project affected parties and other interested parties.
- ii. **Focus Group Meetings/ Discussions:** This method assembles stakeholders with the same interests or common characteristics into a meeting to discuss specific topics or Project components in a focused manner. For example, focus group meetings and discussions may be used to explore issues that are relevant to specific groups or sub-groups– such as youth, single parents, women, students, and people with disabilities.
- iii. **Community consultations:** These consultations are convened to identify and discuss stakeholder concerns and to disclose project information to Project-affected parties and to a lesser extent to other interested parties and disadvantaged and vulnerable individuals or groups. These consultations, wherever feasible, will make use of local languages and be accessible (location, time, open invitation) to reach a broad range of groups and individuals within communities. Participation of both men and women would be encouraged.
- iv. **Formal meetings:** These meetings are held to identify and discuss specific stakeholder concerns and disclose Project information. Participation in these meetings will depend on the issues under consideration and should include adequate representation of women as well as other marginalized and vulnerable people where possible.
- v. **One-on-one interviews:** The interviews will be organized to provide Project-affected



parties, other-interested parties, and vulnerable individuals an opportunity to raise concerns or feedback on the Project.

- vi. **Site visits:** This method allows for on-site meetings with users who use or live in proximity to the sites that will be impacted by Project financed civil works.

## 5.2. Stakeholder engagement plan

The Telecommunications Committee through its PIU will engage stakeholders at different points during the Project cycle. The objectives of the stakeholders' consultations during Project implementation include: (i) to inform stakeholders of the proposed Project; (ii) to gather stakeholders' input and feedback on the implementation of activities; (iii) to identify or clarify project -affected parties; and (iv) to build broad based ownership of the Project and its outcomes.

Following the identification and analysis of the project stakeholders, the project will design and implement a comprehensive plan for stakeholder engagement, as outlined in table 5. The table presented below describes the three stages of engagement and the relevant activities and targeted stakeholders that outlines the time period, messages to convey, the methods to be used, the target stakeholders, and the responsibility for engagement during different Project phases.

**Table 5.** Stakeholder engagement plan

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method(s) used	Location/ frequency	Responsibility
<b>Preparation; Detailed Design and Pre-Implementation phase</b>	Project Affected Parties (PAPs)	<p>Project information disclosure i.e., Project scope and rationale</p> <p>Project E&amp;S principles.</p> <p>Receive feedback on the project’s potential impact, expectations, and concerns</p> <p>Receive Feedback on specific needs (capacity needs, future staff, trainings)</p> <p>Grievance Mechanism (GM) provision</p> <p>SEP disclosure.</p> <p>Introduction of project activities, information about project’s timetable.</p>	<p>Formal meetings</p> <p>(Formal and/ or bilateral)</p> <p>Official letters (correspondence)</p> <p>Email</p> <p>TC/MDDIAI website</p>	<p>Focus group discussions</p> <p>Formal meetings</p> <p>Bulletin and notice boards</p> <p>Information leaflets</p> <p>Outreach activities</p>	Telecommunications Committee. (TC), consultants
<b>Implementation Phase</b>	Project Affected Parties (PAPs)	<p>Project Status</p> <p>Update on project-specific activities (time, date, venue)</p> <p>Disclose project GM</p> <p>E&amp;S aspects</p> <p>Reports; including a number of grievances received within the reporting period (monthly, quarterly, or annually) and the number of those resolved</p> <p>Satisfaction with project activities</p>	<p>Formal meetings</p> <p>(Formal and/ or bilateral)</p> <p>Official letters (correspondence)</p> <p>Emails</p> <p>Satisfaction surveys</p> <p>Social Media, TC/MDDIAI website</p>	<p>Semiannual meetings with all Stakeholders (in person or via Zoom)</p> <p>Ministry and TC website</p> <p>Reports to be submitted on monthly basis or periodically (as agreed) throughout the implementation phase</p> <p>Disclosure of project information to public to take place according to MoF citizen</p>	<p>PIU under the TC</p> <p>Specialist on PR and Social Safeguards Specialist</p>

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method(s) used	Location/ frequency	Responsibility
				budget calendar  Feedback and satisfaction with project activities including capacity building trainings to take place at the end of each activity/ Feedback to be used for future activities	
	Other Interested Parties (OIPs)	GM mechanism	Public announcements in accordance with official recruitment and/ or procurements guidelines	Official newspapers, TC website and social media platforms (Facebook)  Stakeholders' websites Recruitment websites	PIU under the TC  Specialist on PR and Social Safeguards Specialist
<b>Post Implementation Phase</b>	<b>Project Affected Parties (PAPs)</b>  Other Ministries are indirectly affected by the project.	Project's outcomes, overall progress, and major achievements  Satisfaction with SEP activities and Grievance mechanism process.  Satisfaction with project activities	Formal meetings  Reports (including the Number of public grievances received within the reporting period and number of those resolved within the prescribed timeline	In-person or via Zoom (bilateral or group)  Six months after project stability	PIU under the TC  Specialist on PR and Social Safeguards Specialist

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method(s) used	Location/frequency	Responsibility
	Other Interested Parties (OIPs)	Project activities, outcomes, GRM process including a number of received grievances and number of resolved ones,	Formal meetings Mass/Social Media Communication	Press releases Disclosure of project information in accordance with MoF citizen budget calendar and World Bank requirements	PIU under the TC Specialist on PR and Social Safeguards Specialist

### 5.3. Proposed plan to incorporate the views of vulnerable groups

The SEP recognizes that the inputs from vulnerable groups are important for this Project throughout the life cycle. To access these viewpoints requires strategies to get attendance from women, female-headed households, the disabled, the poor, students with disabilities, among others, who may be less able to participate in stakeholder engagement activities. They must be invited and given an equal opportunity to participate in stakeholder engagement activities for the MDDIAI's DARE project, in line with the requirements of the ESS10. The following will be undertaken to ensure their participation:

- i. **Special Group Discussions:** Such discussions will be held with vulnerable individuals in communities where Project activities and components are being undertaken to ensure they can participate. These group discussions will depend on the presence of vulnerable groups and individuals in the community.
- ii. **Organization and location:** Meetings will be held in central locations which are easily accessible by members and at times which will not limit the attendance of certain groups as they interfere with economic and household activities. Meetings should also be announced with advance notice and enough information provided to raise awareness of meetings and allow stakeholders to plan to attend.
- iii. **Language: All information will be shared culturally appropriately.** Meetings will be undertaken in the language(s) (for example Kazakh and Russian) understood by the stakeholders and interpretation should be provided as needed.

The factors which could limit full participation of stakeholders and mitigation measures are highlighted in Table 6.

**Table 6.** Potential factors limiting full participation of stakeholders and mitigation measures

Factors	Vulnerable population	Mitigation measure
Access to technology	Individuals with no internet access, or unreliable access	Rely on dissemination of project information via radio and community newspapers, make hard copies of key documents available from community-based locations, and offer opportunities for one-on-one consultation via phone or WhatsApp
Disability	Impaired hearing or vision, limited literacy	Ensure availability of different channels to disseminate information and obtain feedback (oral, written, virtual).
Language	Kazakh and Russian is spoken in informal settings	Where virtual consultation is provided, ensure local languages are accounted for as appropriate. For in-person, ensure local

Factors	Vulnerable population	Mitigation measure
		languages are included in presentation, where appropriate.
Time	Individuals requiring more time to prepare to attend event, for example single parents, stakeholders with non-traditional work hours	Not applicable for virtual consultation. For in person, provide on-site care for children during the consultation. Design consultations occur in remote communities rather than in major urban centers.
Transport	Individuals with limited access to a private vehicle and/or located in remote communities	Not applicable for virtual consultation. For in-person, consider a monetary allocation for participants to secure their attendance. If several stakeholders are from a particular vicinity a single means of transport can be contracted.
Location	For individuals with limited mobility or capacity to travel to primary urban centers.	Not applicable for virtual consultation. The design of consultation events should ensure communities in remote locations are reached through several consultation methods, including but not limited to radio, hard copy brochures, in-person community events.
Financial	Individuals who are employed and poor with limited disposable income have financial constraints affecting their participation in consultations.	Convene meetings in locations accessible to stakeholder groups and consider financial constraints which may affect attendance. Provide incentive such as refreshments.

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information, facilities and services and other challenges they face at home, at workplaces and in their communities. Special attention will be paid to engage with women, disable persons and unemployed youth. The details of strategies that will be adopted to effectively engage and communicate to vulnerable group will be considered during project implementation.

#### 5.4. Proposed strategy for document disclosure

Throughout project implementation, stakeholders including the public will be informed on milestones and attainment of key results indicators. The information will include disclosure of the Project's environmental and social performance (as defined in the ESS instruments, i.e., the applicable Environmental and Social Standards; the implementation of the SEP (ESS10), and the status of the Grievance Mechanism. The reporting on these will be presented on a semi- and annual basis in line with the reporting requirements of the ESCP. However, reporting may increase to coincide with heightened activities (such as equipping of schools with internet access and minor civil works for fiber cable installation in sub-project areas) when the impacts of the Project on the Project affected parties and other interested parties will be higher. During these periods, disclosure, and dissemination of information on future activities of the Project may be provided on a quarterly basis. The information to be disclosed, the format, timetable and target stakeholders is outlined in Table 7. The information will be disclosed in local languages (Kazakh and Russian).

**Table 7.** Document disclosure strategy

<b>Project Stage</b>	<b>Information to be disclosed</b>	<b>Method proposed for Disclosure</b>	<b>Timetable: Locations /dates</b>	<b>Target Stakeholders</b>	<b>Responsibility</b>
<b>Preparation</b>	Stakeholder Engagement Plan with Grievance Mechanism	Public consultations Websites	Before Project Appraisal. Disclosed on Government website	All	MDDIAI Telecommunications Committee
	Environmental and Social Commitment Plan	Public consultations Websites	Before Project Appraisal Disclosed on Government website	All	MDDIAI Telecommunications Committee
	Environmental and Social Management Framework	Consultations	Finalized by effectiveness	Government, Civil service organizations	MDDIAI Telecommunications Committee
	Stakeholder Engagement Plan with GRM	Public consultations and disclosed on Governments, Telecommunications Committee and World Bank website	Updated as necessary with ongoing disclosure	All Stakeholders	PIU
<b>Implementation</b>	Labour Management Procedure	Government and Telecommunications Committee websites Meetings	Finalized by effectiveness	All stakeholders	PIU
	Stakeholder Engagement Plan (updates) with GRM	Public consultations and disclosed on Governments, Telecommunications Committee and World Bank website	Updated as necessary with ongoing disclosure	All Stakeholders	PIU
	Updates on Project development	Press releases Project website Community consultations	At a minimum quarterly.	All stakeholders	PIU

### 5.5. Reporting back to stakeholders

Stakeholders will be kept informed as the Project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

## 6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 6.1. Roles and Responsibilities

The PIU under Telecommunications Committee will be responsible for carrying out stakeholder engagement activities, while working closely together with other entities, such as local government units, media outlets, etc. The stakeholder engagement activities will be documented through progress reports, to be shared with the World Bank as established in the Loan Agreement. The nature of the project requires partnership and coordination mechanisms between national and local stakeholders.

**Table 8.** Responsibilities of key actors/stakeholders in SEP Implementation

Actor	Stakeholder Responsibilities
PIU with support of Telecommunications Committee and MDDIAI	<ul style="list-style-type: none"> <li>• Planning and implementation of the SEP and other relevant plans.</li> <li>• Leading stakeholder engagement and public consultations activities.</li> <li>• Management and resolution of grievances.</li> <li>• Coordination/supervision of contractors (if any) on Environmental and Social Commitment Plan (ESCP) and SEP activities.</li> <li>• Monitoring of and reporting on social performance to the Government and the World Bank.</li> </ul>
Telecommunications Committee territorial departments	<ul style="list-style-type: none"> <li>• Inform PIU of any issues related to their engagement with stakeholders.</li> <li>• Inform about complaints to the PIU Grievance Mechanism Focal Point.</li> <li>• Transmit and resolve complaints caused by the project interventions in close collaboration with and as directed by PIU and by participating in the local Grievance Resolution Committee.</li> <li>• Informational support to the implementation of various plans (e.g. SEP, Labor Management Plan, etc.).</li> </ul>
Project-affected parties	<ul style="list-style-type: none"> <li>• Invited to engage and ask questions about the Project at public consultations meetings and through discussions where it is of interest or of relevance to them.</li> <li>• Lodge their grievances using the Grievance Mechanism defined in the SEP.</li> <li>• Help the Project to define mitigation measures;</li> </ul>
Other project stakeholders	<ul style="list-style-type: none"> <li>• Engage with PIU regarding project design.</li> <li>• Raise concerns to help the project to be inclusive.</li> </ul>

### 6.2. Stakeholder Engagement Methods to be used

#### **Public/community meetings**

PIU under the Telecommunications Committee will organize project launch meeting on a national level as well as organize meetings in each sub-project area (or group of sub-project areas if located in the same district) for mahalla leaders, PAPs, and other interested parties. Meetings will be open house events where PIU will present information and people will be invited to make comments and express any concerns. In locations where the project will make specific broadband network construction investment, a range of consultations with different stakeholders such as local government officials and NGOs. Maslihat level meetings will also be conducted with men and women (including vulnerable households) to better understand needs, expectations, and concerns of these population groups in relation to the project. The feedback received at these meetings will be documented along with measures that the project will take to address the feedback received. Meetings in each of the district/city will also be organized before and after the broadband network construction.

#### **Communication materials**

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, social media, MDDIAI/TC website, etc. A public relations kit will be

designed specifically and distributed both in print and online form. PIU under the TC will also update project website regularly (at least on a quarterly basis) with key project updates and reports on the project's performance both in Kazakh or Russian. The website will also provide information about the conducted stakeholder engagement activities and grievance mechanism for the project.

### **Mass/social media communication**

Stakeholder engagement specialist of the PIU will be engaged on the Project during the project implementation in order to remain in close communication with stakeholders including PAPs, mahalla leaders. Stakeholder engagement specialist will also be responsible for posting relevant information on the project's and MDDIAI/TC websites, social media channels (Facebook, Telegram, etc.) and on information boards throughout the project's lifecycle. Social media channels will be used as much as possible to disseminate information as rates of social media use (especially Telegram channels) appear to be high across users of different age and background in project-affected communities.

### **Information Desks**

Information Desks in each region and district will provide local residents with information on stakeholder engagement activities, project interventions, contact details of the Focal point, etc. The focal point, in turn, will set up these information desks, either in their offices or other easily accessible places where they can meet and share information about the project with PAPs and other stakeholders. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

### **Citizen/Beneficiary feedback survey**

Beneficiary feedback survey examining citizen's experience and feedback about the project will be carried out twice during the project's lifecycle: once around the mid-implementation phase, and once towards the end of the project's implementation.

### **Training, workshops**

Training on a variety of social issues will be provided to PIU, ISPs, MNOs and possibly other relevant government or non-government service providers. Issues covered will include sensitization to inclusion/exclusion, labor issues, gender-based violence risks.

## **6.3. Resources for Stakeholder Engagement**

PIU under the Telecommunications Committee will be responsible for carrying out stakeholder engagement activities for the project. The stakeholder engagement activities will be documented as part of the project progress reporting requirements, and as indicated in the Environmental and Social Commitment Plan (ESCP). The costs to be covered under Project Budget lines under component 3: Project Management and Implementation Support.

PIU under the Telecommunications Committee will mobilize human and material resources to implement the SEP and manage the Grievance Redress Mechanism (GM). PIU will take responsibility for leading all the aspects of the stakeholder engagement plan. The PIU Social Safeguards specialist will be supported as needed by the Public Relations (PR) Department of the TC.

A provisional budget for implementing the SEP over the five-year Project duration is provided in Table 9 for the DARE project. Financing of the Project launch, human resources to implement the SEP, and training of Project staff and contractors on environmental and social issues and on gender-based violence (SEA/SH) are not included in this budget as these costs are covered within the general Project Management costs of Component 3.



The tentative budget for the SEP implementation is 145,000 USD and detailed table is included below.

**Table 9:** Budget table for the implementation of SEP (USD)

Category	Quantity	Unit costs, USD	Number of years	Total
<b>Consultations</b>				
<b>Information production and dissemination</b> - Social Media - Website - Project brochures, information sheets and press release, - Project materials – Billboard, posters, bulletin, including design - Project Briefs and information notes/ TV and Radio - Outreach meetings sensitizations sessions -				
<b>Beneficiary satisfaction surveys</b> - Mid-project perception survey - End-of-project perception survey				
<b>Grievance Mechanism implementation</b> - GRM boxes - GM communication materials				
<b>Contingency</b>				
<b>TOTAL SEP BUDGET</b>				

Further, the Telecommunications Committee will utilize its website and electronic mediums to reach key stakeholders across the region, thereby limiting the need for paper-based communication tools.

#### 6.4. Management functions and responsibilities

The Borrower for the project will be the Republic of Kazakhstan. The Project Implementation Unit (PIU) will be housed in Telecommunications Committee under Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan (MDDIAI) and will be responsible for the overall coordination of the DARE Project. The head of the PIU, reporting to director of Telecommunications Committee who will also coordinate procurement and supervision of activities, environmental and social safeguards management, as well as monitoring and evaluation (M&E) and consolidation of the Project reports, while serving as the main counterpart for the WB.

The stakeholder engagement activities will be documented through tools and forms to be prepared during Project launch and tailored if required during implementation.

#### 6.5. Disclosure of the SEP

The Telecommunications Committee website will be used to disclose project documents including this final SEP, project updates and information, and project GM in Kazakh or Russian language. Where the use of internet options are not available, conventional methods will be used for informing vulnerable groups and engaging them.

The following mechanisms will be used to disclose information to vulnerable groups:

1. Utilize social media and conventional media outlets for any announcement concerning the project. This includes the official Facebook pages of the ministries and official newspapers.
2. Publish all information about the project including the GM process in the Kazakh or Russian language.
3. If public gatherings including workshops or meetings are to be held, the meetings should take place in suitable locations that women can easily access which also have suitable access for handicapped or people with disabilities (if any). These meetings are often more convenient to be held at public venues or in women civil society organizations (if any).

## **7. GRIEVANCE MECHANISM**

### **7.1. Description of Grievance Mechanism**

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects.
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

The PIU will operationalize a project-specific GM to address all citizen, including unemployed women, youth and disabled people’s complaints and requests related to the project and trainings.

Day-to-day implementation of the GM and reporting to the World Bank will be the responsibility of the PIU. The PIU Social Safeguards Specialist will be the Grievance Focal Point (GFP) for GM at the PIU level. The system and requirements (including staffing) for the grievance redress chain of action – from registration, sorting, and processing, and acknowledgment and follow-up, to verification and action, and finally feedback – are incorporated in the GM. The more sensitive grievances such as Gender-Based Violence (GBV) including Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) are described in section 7.4 separately. To ensure management oversight of grievance handling, the PIU M&E will be responsible for monitoring the overall process, including verification that agreed resolutions are implemented.

The GM will be accessible to the full range of project stakeholders, including government agencies, private sector, civil society, media, and other interested parties. Stakeholders can use the GM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the project preparation grant.

Concerns and complaints may be raised orally or in writing, via short message service, email, phone call, online form, in person. The email addresses and phone numbers specified in the below subsections will be displayed at the MDDIAI and its buildings, and at the post-secondary institutions’ sites. Stakeholders may also contact the PIU to make inquiries, recommendations, suggestions, or requests for Project information. To benefit all parties, the GRM is designed to expeditiously acknowledge complaints and concerns and resolve disputes.

For this Project, as a part of the ESS2 – Labour and Working Conditions, a Labour Management Procedures (LMP) is required, there is a separate GRM for the specific labour related issues of the Project, and this will be included in the LMP. The GRM described in this section is in accordance with ESS10- Stakeholder Engagement.

The Project has other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. The World Bank and the Borrowers do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

### **7.2. The Telecommunications Committee’s GM implementation structure**

To report an issue about the impacts or potential impacts of any aspect of this Project implemented by the Telecommunications Committee any individual or group may file a complaint to the Committee’s GM or to the Ethics Committee. The Commission has an online GM capture form available at <https://www.gov.kz/memleket/entities/mdai?lang=ru>. The Phone numbers and email for the Ethics committee are, Telephone: 8 (7172) 61-33-24; Email: moap@mdai.gov.kz

The PIU functions under the umbrella of the Telecommunications Committee and will utilize existing mechanisms of the Committee. The PIU’s Social Safeguards Specialist will work alongside the Ethics Committee to address Project complaints. A breakdown of the steps, description of process and the corresponding periods and responsibilities for the Telecommunications Committee’s GM is provided in Table 10.

**Table 10.** Description of the Telecommunications Committee GM

<b>Step</b>	<b>Description of Process</b>	<b>Time Frame</b>	<b>Responsibility</b>
GM implementation structure	<p>Procedure for considering complaints is regulated by the Administrative Procedure Code of the Republic of Kazakhstan. At the same time, complaints can be submitted to the authorized body - the Ministry of Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan through the online reception.</p> <p>On website in the online reception section, an appeal/complaint, ask any question or make an appointment for a personal appointment with a government official.</p>	20 days	TC / MDDIAI
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> <li>• Telephone hotline/Short Message Service (SMS) line: <b>1414</b> <b>8 (7172) 61-33-24</b> <b>8 (7172) 64-91-58</b></li> <li>• Online complaint form: <b>eotinish.kz</b></li> <li>• E-mail: <b>moap@mdai.gov.kz</b></li> <li>• Letter to Grievance focal points at PIUs</li> <li>• Complaint form to be lodged via any of the above channels</li> <li>• Walk-ins may register a complaint in a grievance logbook at a PIU or suggestion box at office of Borrower</li> </ul>	20 days	PIU / TC / MDDIAI
Sorting, processing	Any complaint received is forwarded to PR or Social Safeguards Specialist, logged in, and categorized according to the following complaint types:	Upon receipt of complaint	Local grievance focal points

Step	Description of Process	Time Frame	Responsibility
	<ul style="list-style-type: none"> <li>- Message;</li> <li>- Proposal;</li> <li>- Response;</li> <li>- Statement;</li> <li>- Request;</li> <li>- Complaint.</li> </ul>		
Acknowledgment and follow-up	After submitting an appeal on the eGov portal or on eotinish.kz, the applicant signs the appeal with an electronic digital signature. The system registers the request automatically on the day the request is received.	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by PR or Social Safeguards Specialist. A proposed resolution is formulated and communicated to the complainant by the authorized body itself MDDIAI.	Within 10 working days	Complaint Committee
Monitoring and evaluation	Monitoring of citizens' appeals is carried out by the authorized body itself MDDIAI. In addition, the Prosecutor General's Office of the Republic of Kazakhstan monitors the proper satisfaction of citizens' requests / complaints.	Constant	PIU / TC / MDDIAI
Provision of feedback	Feedback on complaint satisfaction is provided in the eotinish.kz system	Constant	PIU / TC / MDDIAI
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows: <ul style="list-style-type: none"> <li>- Training of GRM committees on procedures to manage complaints</li> <li>- training on gender-based violence (GBV) for Project Implementing Unit (PIU), MNO and IPOs staff.</li> </ul>	Within 3 months of creation of PIU Subsequent training for new hires during onboarding	PIU / TC

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

### **7.3. Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)**

The GM system will include special pathways for the SEA/SH complaints and grievances. Channels to accept and respond to SEA/SH grievances ensures high confidentiality and will be communicated to the project’s affected parties during the consultation meetings and throughout project implementation.

Training will also be provided by a GBV expert for the E&S officer on detection of cases of gender-based violence and handling of inquiries, complaints, and grievances related to GBV.

Once Social Safeguards Specialist is hired, his/ her email address and telephone number will be communicated to the project’s affected parties during consultations and through different stakeholder engagement methods. The Social Safeguards Specialist be will responsible for managing this type of complaint with high priority, seriousness, data protection, and privacy through channeling the complaint to the Head of PIU and following up on it.

The following sexual harassment and sexual abuse grievance procedures mechanism will be followed:

- I. Accept the grievance/ complaint through the GM available channels, including anonymous grievances;
- II. Provide the complainant with the option of anonymity;
- III. Upon agreement from the victim directed to the Telecommunications Committee and other respective ministries (Ministry of Employment, Ministry of Justice, Ministry of Internal Affairs, etc);
- IV. Follow up with the complainant, if they have provided their consent, to ensure just and proper care is provided to them and obtain feedback from relevant ministries regarding the case for filing and closure;

### **7.4. Labor Management Grievance Mechanism**

The Telecommunications Committee shall provide clear grievance mechanisms for partners, workers, employees, and contractors including consultants and experts who will be employed or engaged in connection with the Project. PIU under the Telecommunications Committee will inform the project workers about the available tools to lodge grievances such as telephone numbers and email. The PIU Social Safeguards Specialist will receive, and handle complaints related to workers’ grievances. The PIU Social Safeguards Specialist will be responsible for managing and sorting complaints related to project workers and project employees (contracted and long-term employees) and for recording and tracking the resolution of grievances in the complaints log.

The project worker’s grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline
- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- an assigned staff/office/department to receive, record, and track the resolution of grievances.

The project worker’s grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed. The Telecommunications Committee and PIU will monitor the registration and resolution of grievances, and report these in the progress reports

## 7.5. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may submit complaints to existing project-level grievance mechanisms or the Bank'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 Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and after Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

A complaint may be submitted in English, Kazakh or Russian, although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

- By email: [grievances@worldbank.org](mailto:grievances@worldbank.org)
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA
- Through the World Bank Country Office in Astana: Samal 12, Astana Tower, Astana, 010000, Republic of Kazakhstan,
- Email: [astana\\_office@worldbank.org](mailto:astana_office@worldbank.org). Telephone: +7-7172-691440.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 8. MONITORING AND REPORTING

### 8.1. Reporting back to stakeholders

Details on the progress of the Project will be reported to stakeholders. The minutes of stakeholder meetings will record the PIUs commitment to each stakeholder group and form the basis for reporting back on action items and progress on Project progress pertinent to the stakeholder group.

### 8.2. Monitoring and evaluation

Monitoring and evaluation are essential to ensure successful implementation of this SEP. The SEP will be periodically reviewed and revised, as needed, to adjust the required activities to be relevant and effective and to incorporate any lessons learned. Any major changes to Project related activities and schedules will be duly reflected in an updated SEP. The PIU must formally notify the World Bank of all changes to the SEP and disclose the revised SEP. The Project will maintain data summarizing public consultations, details on disclosure and grievances lodged throughout the Project life cycle. This will be available for public review on request. The PIU will be guided by data and privacy guidelines to maintain the confidentiality of grievances, especially those of a SEA/SH nature. Stakeholder engagement will be periodically evaluated by the PIU using SEP results indicators. These results indicators will be developed and agreed upon during Project launch. Progress on the SEP results indicators will be reported in the semi-annual Project progress report.

### 8.3. Reporting

To effectively implement this SEP requires documents for consultations, and for monitoring and reporting. During Project launch the PIUs will develop templates for consultation minutes, forms to log, and acknowledge grievances, and a checklist to confirm that meaningful consultations are undertaken. Additional tools will be developed by the PIUs during Project launch as needed.

Various levels of reporting will be undertaken during the Project life cycle:

- i. **Incident reporting.** The Loan Agreement mandates notifying the World Bank of any grievances or issues affecting the normal implementation of the project. The PIU will inform the Bank immediately of any complaint of grievance which would directly affect Project implementation or poses a reputational, environmental, or social risk.
- ii. **Monthly reporting.** The Environmental and Social Safeguards Specialists assigned to the PIU will prepare monthly reports on stakeholder engagement, complaints, and grievances. These reports for the attention of the Project Manager will cover the following areas:
  - Stakeholder engagement activities conducted.
  - Public outreach activities and meetings with stakeholders and feedback received.
  - Entries to the grievance register.
  - New stakeholder groups (where relevant).
  - Stakeholder engagement activities planned for the next month.
  - Status of implementation of associated corrective/preventative actions.

These monthly summary reports will provide a mechanism for assessing the number and the nature of complaints, requests for information, as well as the Project's ability to respond in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year will be conveyed to key stakeholders in quarterly progress reports. SEP specific result Indicators will be monitored by the Environmental and Social Safeguards Specialists. These include:



- Project stakeholders’ level of understanding of the Project,
  - Numbers of grievances received within a given reporting period (e.g., monthly, quarterly, or annually).
  - Level of involvement of project-affected parties, other interested parties, and vulnerable groups in stakeholder consultations.
  - Frequency and type of public engagement activities and number of attendees (disaggregated by gender where possible); and
  - Number and type of media materials published/broadcast/distributed on various communication outlets.
- iii. **Semi-annual and annual reporting:** The PIU will prepare reports in satisfaction of the commitment of ESCP. These reports will include a summary of SEP results, public consultation issues, grievances, and resolutions.

## 9. ANNEXES

These can include:

- Records of meetings or consultations (see table 1)
- Grievance submission form, etc.

**Table 1. Template to Capture Consultation Minutes**

<b>Stakeholder (Group or Individual)</b>	<b>Dates of Consultations</b>	<b>Summary of Feedback</b>	<b>Response of Project Implementation Team</b>	<b>Follow-up Action(s)/Next Steps</b>	<b>Timetable/ Date to Complete Follow-up Action(s)</b>