



Republic of Serbia

Republic Geodetic Authority

**Second Real Estate Management Project
(P500611)**

**Stakeholder Engagement Plan (SEP)
for
Real Estate Management Project – 2**

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List of Abbreviations

E&S	Environmental and Social
ESCP	The Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESF	World Bank’s Environment and Social Framework
ESSs	Environmental and Social Standards
GM	Grievance (redress) Mechanism
GRS	Grievance Redress Service
ISREC	RGA Cadastral information system
MASPRO	Information system for property mass valuation
M&E	Monitoring and evaluation
NALED	National Alliance for Local Development
NGO	Non-Governmental Organization
NSDI	National Geospatial Infrastructure
OIP	Other Involved Parties
PAPs	Project-affected persons
PIU	Project Implementation Unit
REMP	Real Estate Management Project
REMP2	Real Estate Management Project 2
REMPAF	Real Estate Management Project Additional Financing
RGA	Republic Geodetic Authority
SKGO	Standing Conference of Towns and Municipalities
WB	The World Bank

1. Introduction

1.1. Project Description

The Real Estate Management Project – 2 aims to improve the efficiency, transparency, accessibility and reliability of Serbia’s real property management systems.

The Real Estate Management Project – (REMP 2) is continuation of already ongoing REMP 1 which has been implemented under WB safeguard policy. The REMP 2 comprises the following components:

Component A: Implementation of the Property Mass Valuation System. This component will finance the rollout of mass valuation models for residential properties for the majority of Serbia’s population. The models will improve the efficiency and transparency of the property market by providing guidance to market participants, valuers, and banks on the prices likely to be achieved when properties are offered for sale. They will also be made available for municipalities to use should they decide to adopt them for levying the annual property tax. Additionally, Component A will finance the development of an information system for mass valuation that will be interoperable with other key information systems maintained by RGA (i.e., the Building Register and other systems as described in Component B), as well as the creation of a residential property index that includes all types of residential property. Furthermore, a Building Register module will be developed for integration with ISREC through the use of very high-resolution satellite imagery. Support will also be provided for quality assurance and quality control for all data produced under Component A.

Component B: Integration of Information Systems and NSDI Services Development. This component will finance the further digital transformation of RGA and the advancement of Serbia’s NSDI in line with national and international best practice and standards. The component will support (i) ISREC’s upgrade and the completion of national implementation; (ii) the establishment of an infrastructure cadaster; (iii) the upgrade and further development of the Digital Archive System; (iv) the implementation of a system for land consolidation; (v) a study for the development of a 3D cadaster; (vi) further development of Serbia’s Risk Register; (vii) development of mobile applications; (viii) improvement of data quality and completeness; (ix) expansion of GeoSrbija via the development of additional data layers; and (x) integration of all services under one distribution platform. The component’s NSDI activities will be implemented based on the Action Plan and Business Models produced during REMP in line with the UN-endorsed Integrated Geospatial Information Framework (IGIF). The development of new applications and e-services to increase the usability and the benefits of Serbia’s NSDI will also leverage new technologies such as Artificial Intelligence (AI), as well as the supply of hardware and other equipment and the hiring of consultants.

Component C: Institutional Improvement, RGA Sustainability, and Project Management. This component will support continued policy dialogue at RGA concerning its adoption of, and

transition to, a self-financing institutional model to ensure the long-term sustainability of project investments, particularly for those concerning the development and national implementation of ISREC. Under REMP, several business models were developed for RGA's consideration, and the component will provide technical advice to RGA as it considers the implications of a sustainable transformation model for the existing legal framework overseeing RGA's current operational model, and whether any amendments to the legal framework would need to be made. Support to the development of a roadmap for RGA's institutional transition will also be provided as well as its implementation. This includes the implementation of a Portfolio Management Plan developed in 2024 in cooperation with the Swedish International Development Cooperation Agency (Sida) and the further implementation of several International Organization for Standardization (ISO) standards to ensure RGA's full compliance with international standards for land administration and associated IT systems. The component will also support Project Implementation Unit (PIU) operations and Monitoring and Evaluation (M&E) activities. It will also finance capacity building programs and the implementation of public awareness campaigns and customer satisfaction surveys. The PIU for REMP will be maintained for the implementation of REMP 2, with adjustments to staffing as needed. Specialized training will also be organized under this component for RGA management and technical staff, as well as other NSDI stakeholders including government institutions, local authorities, and other relevant entities. Similarly, the capacity building programs will be designed and implemented for real estate registration and valuation institutions, including RGA, municipal authorities and Serbia's Tax Administration.

The environmental risk of the project is assessed as low, while the social risk is moderate. Moderate risk rate for social aspect of the project is primarily driven by potential privacy and data security concerns and digital divide arising from the introduction of E-Gov to real estate information.

The platform for property valuation will manage sensitive data pertaining to properties and their owners, thereby raising concerns regarding privacy and cybersecurity. However, robust data privacy and security measures will be incorporated into the project design in compliance with national regulations and industry best practices.

To prevent potential digital divide concerns, the project will adopt best practices from the previous REMP. This includes; i) implementing comprehensive data collection on digital access and use, ii) providing support adapted to different age groups and iii) ensuring accessibility for people with disabilities. In this context, the SEP will serve as an instrument for ongoing communication and engagement of all interested or affected parties, thus preventing potential concerns. The SEP will be conducted throughout the duration of the project to ensure transparency and encourage active stakeholder engagement.

The Real Estate Management Project – 2 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 implementing agencies 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.

1.2. National Legislation and ESS Requirements

The national legislation and World Bank Environmental and Social Standards (ESS) requirements that apply to stakeholder engagement shall be reviewed in this section.

1.2.1 National Legislation for Stakeholder Engagement

The commitments and requirements of the of Serbia to citizen engagement are not residing under a single self-standing law or regulation. However, the recognition of importance of citizen engagement is infused in the legal system and clearly recognized by mandatory procedures provided under individual laws.

Some of the key laws governing the stakeholder and citizen engagement activities include but are not limited to:

- The Constitution of the Republic of Serbia (2006) proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, and commitment to European principles and values. The Article 74 proclaims the right to healthy environment and grants the right to timely and comprehensive information on the state of the environment.
- The Law on free access to information of public interest (2004) states that governmental agencies, social associations and officials are required to provide each person with the possibility of receiving and becoming acquainted with documents of public interest, except in cases anticipated by law. The Law shall govern the rights of access to information of public importance held by public authorities, with a view to exercising and protecting the public interest to know and attaining a free democratic order and an open society. By virtue of this Law access to information shall be granted to all stakeholders, including every natural person or legal entity upon written request unless otherwise regulated by the Law. Within 15 days of receipt of a request at the latest, the authority shall inform the applicant whether the requested information is held, and grant him/her access to the document containing the requested information or issue or send to the applicant a copy of the document, as the case may be.
- Law on Public Information and Media (2014) stipulates that public information is free and is not subject to censorship, that the public has the right and the interest to be informed on issues of public interest, that monopoly in the media is not allowed, that information on the media is public.
- The Law on Environmental Impact Assessment (2004 as amended in 2009) provides categorization of industries and projects and identifies types of environmental assessment required against respective categories of industries or projects and provides procedures for disclosure, presentation and consultation requirements, and sets these as mandatory with a disclosure of a minimum of 20 days.
- The Republic of Serbia ratified the Aarhus Convention on Access to information, public participation in decision making and access to justice in environmental matters and it

links environmental and human rights and is based on the belief that it is a basic right of present and future generations to live in an environment adequate to health and wellbeing. The convention is focused on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice.

- Planning and Building Act (2009 as amended in 2020) proclaims two types of engagement and disclosure instruments for all spatial and urban plans. Early public insight and Public Insight are mechanisms through which interested stakeholders may acquire information on the basic concept and the proposition of the planning document. Documents are made available to the public during a disclosure window of 15-30 days followed by public consultations.

1.2.2. International Legislation for Stakeholder Engagement Human rights

The Universal Declaration of Human Rights is a declaration that defines and guarantees the fundamental rights and freedoms of women, men, and children. The Declaration also provides general definitions of economic, social, and cultural rights, as well as civil and political rights. Article 1 of the Declaration states that "All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood." and all articles address the fundamental, cultural, economic, political, and social rights of people all over the world. The Declaration, together with the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the Optional Protocols, constitute International Human Rights Law.

1.2.3. World Bank Requirements

Environmental and Social Standard (ESS) 10 of the WB's Environmental and Social Framework (ESF) recognizes 'the importance of open and transparent engagement between the borrower and project stakeholders as an essential element of good international practice'. The general requirements set by the ESS are summarized below:

- "Borrowers shall engage with stakeholders throughout the project life cycle by initiating engagement as early as possible in the project development process and within a timeframe that allows for meaningful consultation with stakeholders on project design. The nature, scope and frequency of stakeholder engagement shall be proportionate to the nature and scale of the project and its potential risks and impacts."
- "The borrowers shall engage in meaningful consultations with all stakeholders. The Borrowers shall provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination and intimidation."
- "The stakeholder engagement process shall, as set out in more detail in this ESS, include the following: (i) stakeholder identification and analysis; (ii) planning how engagement with stakeholders shall take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) handling and responding to grievances; and (vi) reporting to stakeholders."
- "As part of the environmental and social assessment, the borrower shall maintain and disclose a documented record of stakeholder engagement, including a description of stakeholders

consulted, a summary of feedback received, and a brief explanation of how the feedback was taken into account or why it was not (World Bank, 2017: 98)".

According to ESS10, the Borrower should propose and implement a grievance redress mechanism (GRM) to receive and resolve in a timely manner the concerns and grievances of project affected parties regarding the environmental and social performance of the project. The scope, scale and type of the GRM shall be proportionate to the nature and scale of the potential risks and impacts of the project.

2. Objective/Description of SEP

The main goal of this Stakeholder Engagement Plan (SEP) is to establish a structured approach for involving stakeholders in the project. This involves sharing information with the public, seeking their input, and ensuring their concerns are addressed. The SEP lays out how the project team will communicate with stakeholders and provides a platform for them to express their opinions, give feedback, or voice any complaints related to the project. By creating this plan as part of the World Bank Environment and Social Framework commitments, the project aims to engage relevant stakeholders effectively throughout the project lifecycle, ensuring their feedback, suggestions, and priorities are considered in decision-making and project activities. In particular SEP will contribute to the achievement of the following objectives:

- (i) Establishing a structured approach to stakeholder engagement,
- (ii) Assessing stakeholder interest, impact, and support for the project, and ensuring that stakeholder perspectives are integrated into project design and environmental and social performance considerations.
- (iii) Facilitating timely dissemination of technically and culturally appropriate project information regarding environmental and social risks in a comprehensible and accessible format.
- (iv) Coordinating tailored communication, outreach, and engagement initiatives to identify disadvantaged and vulnerable individuals or groups, thereby ensuring their involvement in the project.
- (v) Establishing an accessible and inclusive mechanism for the communication of suggestions and grievances to project-affected persons (PAPs) and enabling implementing agencies to promptly address and manage them.

3. Stakeholder engagement process

3.1. Stakeholder identification and analysis

The process of stakeholder identification is crucial in effectively managing stakeholder engagement in a project, aiming to prevent any single stakeholder group from dominating the consultation process. It should commence early in the project life cycle, considering the dynamics between stakeholders and the associated risks and opportunities. In ESS 10, stakeholders are categorized into three groups:

- **Project Affected Parties:** These are individuals or groups directly impacted or likely to be impacted by the project, encompassing factors such as physical surroundings, health, safety, cultural practices, well-being, or income sources.
- **Other Relevant Parties (ORP):** This group includes individuals or groups associated with the project due to public interest or factors such as location, characteristics, and impacts. Examples include legislators, government officials, private sector entities, scientific community, academics, trade unions, women's organizations, NGOs, and cultural groups.
- **Vulnerable/Disadvantaged Persons/Groups:** This category consists of individuals or groups facing special circumstances that increase their susceptibility to adverse project impacts or limit their ability to benefit from the project. They may require special measures or assistance for inclusion in the consultation process.

The frequency and engagement methods for each stakeholder group are determined based on the extent of the project's impact on them, their impact on the project, and culturally acceptable participation methods. Generally, deeper engagement is warranted for stakeholder groups with greater impact or interest in the project.

Furthermore, citizens currently utilizing unregistered buildings or residences within the project scope are not directly or indirectly affected by the project initially. However, they may be influenced by actions taken by central and local governments based on project outputs.

3.2. Methodology

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

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole 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.

3.3. Affected parties and other interested parties¹

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Real estate owners-Citizens,
- Real estate owners- Public and Private Institutions and Organizations,
- Financial Institutions (Banks, Insurance companies and their associations),
- Real estate agencies
- Licensed Surveying and Cadastral Engineers
- Courts, Notaries and Lawyers owing to project outputs,
- Administration of Cities and Municipalities
- Communal companies
- Government of Republic of Serbia (Ministry of Finance, Ministry of Construction, Ministry of Labor, Ministry of Justice, Ministry of Environment, and other ministries to the lesser extent)

The projects' stakeholders also include parties other than the directly affected communities, who may be interested in project outcome including:

- NGOs that are supporting local development (SKGO and NALED)
- NGOs that are protecting economic and legal interest of the population and economy in the area related to immovable property ownership.
- Public Institutions and Organizations that are involved in NSDI,
- Investors and Investment brokers
- Architecture offices and urban planners
- UN agencies (UNDP, WFO, UN Women)
- Coordination body for Gender Equality
- Office for information technologies and eGovernment

3.4. Disadvantaged/vulnerable individuals or groups²

Of particular importance is to understand whether adverse project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, or they are likely to be excluded/unable to access Project benefits. Although the project mainly focuses on increase of efficiency and support to professional users of the information vulnerable individuals or groups could indirectly receive benefits if project outputs are designed to promote adequate response of direct beneficiaries. Stakeholders that represent indirect beneficiaries e.g. vulnerable groups and individuals include:

- People with disabilities
- People receiving (or in need but not receiving) social support;
- People that live in remote technologically and economically deprived areas;
- Nonintegrated Roma people;
- Women living in extreme patriarchal environment;
- Single-headed households;
- Displaced people occupying others property (migrants, squatters, other displaced people)
- People digitally excluded or at risk from digital exclusion (mostly elderly people);

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, meetings with World Bank staff and consultants were made in order to establish relevance of the project to population and national economy. During the same period separate meetings with purpose to better define project activities and their impact were held with banks, insurance companies, Office for information technologies and eGovernment, Real estate agencies.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Engagement will be directly proportional to the level of interest and impact, and the greater the scope of a project's impact on a stakeholder group, or the greater the scope of a particular stakeholder's impact on a project increment, the greater the need to engage with that stakeholder group. Engagement with such stakeholder groups should be deepened in terms of the frequency and intensity of the engagement method used. In the table below key project activities are scrutinised for the level of interest and expected impact on the stakeholder groups identified in the chapter 3 of this document.

Table 1 - Level of interest and impact for the stakeholder Groups for Project

Components	Stakeholder Category	Stakeholders	Level of Interest	Level of Impact
Component A: Implementation of the Property Mass Valuation System Expected topics: - Integration of Business Register in the system, Creation of TAX related services and their implementation - Creation of TAX related services	Project-Affected Parties	Real estate owners-Citizens, Real estate owners- Public and Private Institutions and Organizations, Financial Institutions (Banks, Insurance companies and their associations), Real estate agencies Administration of Cities and Municipalities Government of Republic of Serbia (Ministry of Finance)	High	High
	Other Involved Parties	NGOs that are supporting local development (SKGO and NALED) NGOs that are protecting economic and legal interest of the population and economy in the area related to immovable property ownership. Public Institutions and Organizations that are involved in NSDI, Investors and Investment brokers, Architecture offices and urban planners, UN agencies (UNDP, WFO, UN Women), NGOs that are supporting vulnerable groups	Moderate	Low
	Vulnerable/Disadvantaged	People with disabilities, People	Moderate	High

	Persons/Groups	receiving social support, People that live in remote technologically and economically deprived areas; Non-integrated Roma people; People digitally excluded or at risk from digital exclusion, single-household owners, migrants, squatters and other displaced people, Women living in extreme patriarchal environment;		
Component B: Integration of Information Systems and the NSDI Services Development Expected topics: - Accessibility to the e-services - Service relevance	Project-Affected Parties	Real estate owners-Citizens, Real estate owners- Public and Private Institutions and Organizations, Financial Institutions (Banks, Insurance companies and their associations), Real estate agencies, Licensed Surveying and Cadastral Engineers Courts, Notaries and Lawyers owing to project outputs, Administration of Cities and Municipalities, Communal companies Government of Republic of Serbia (Ministry of Finance, Ministry of Construction, Ministry of Labour, Ministry of Justice, Ministry of Environment, and other ministries to the lesser extent)	Moderate	Moderate
	Other Involved Parties	NGOs that are supporting local development (SKGO and NALED); NGOs that are protecting economic and legal interest of the population and economy in the area related to immovable property ownership; Public Institutions and Organizations that are involved in NSDI; Investors and Investment brokers; Architecture offices and urban planners; UN agencies (UNDP, WFO, UN Women), NGOs that are supporting vulnerable groups)	Moderate	Moderate
	Vulnerable/Disadvantaged Persons/Groups	People with disabilities, People receiving social support, People that live in remote technologically and economically deprived areas; Non-integrated Roma people; People digitally excluded or at risk from digital exclusion, single-household owners, migrants, squatters and other displaced people, Women living in extreme patriarchal environment;	Low	Moderate
Component B: Integration of Information Systems	Project-Affected Parties	Real estate owners-Citizens, Real estate owners- Public and Private Institutions and Organizations,	Moderate	Moderate

and the NSDI Services Development Expected topics: - Implementation of the developed information system (ISREC) - Impact of the land consolidation system improvements		Financial Institutions (Banks, Insurance companies and their associations), Real estate agencies, Licensed Surveying and Cadastral Engineers Courts, Notaries and Lawyers owing to project outputs, Administration of Cities and Municipalities, Communal companies Government of Republic of Serbia (Ministry of Finance, Ministry of Construction, Ministry of Labour, Ministry of Justice, Ministry of Environment, Ministry of Agriculture)		
	Other Involved Parties	NGOs that are supporting local development (SKGO and NALED) Public Institutions, Investors and Investment brokers, NGOs that are supporting vulnerable groups	Moderate	Moderate
	Vulnerable/Disadvantaged Persons/Groups	People with disabilities, People receiving social support, People that live in remote technologically and economically deprived areas; Non-integrated Roma people; People digitally excluded or at risk from digital exclusion, single-household owners, migrants, squatters and other displaced people, Women living in extreme patriarchal environment;	Moderate	Moderate
Component C: Institutional Improvement, RGA Sustainability, and Project Management Expected topics: - How RGA can improve service delivery to better serve professional users and citizens (with emphasis on reducing inequality)	Project-Affected Parties	Real estate owners-Citizens, Real estate owners- Public and Private Institutions and Organizations, Financial Institutions (Banks, Insurance companies and their associations), Real estate agencies, Administration of Cities and Municipalities, Government of Republic of Serbia (Ministry of Finance)	High	High
	Other Involved Parties	NGOs that are supporting local development (SKGO and NALED) NGOs that are protecting economic and legal interest of the population and economy in the area related to immovable property ownership, Public Institutions and Organizations that are involved in NSDI, Investors and Investment brokers, Architecture offices and urban planners, UN agencies (UNDP, WFO, UN Women), NGOs that are supporting vulnerable groups)	Moderate	Moderate
	Vulnerable/Disadvantaged Persons/Groups	People with disabilities, People receiving social support, People that live	Low	Low

		in remote technologically and economically deprived areas; Non-integrated Roma people; People digitally excluded or at risk from digital exclusion, single-household owners, migrants, squatters and other displaced people, Women living in extreme patriarchal environment;		
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Some of the stakeholder engagement methods to be used during the implementation phase of the project, which aim to ensure that project stakeholders maintain their engagement with the project and increase the positive social impact of the project, are described below.

Since situation regarding Covid-19, it became obvious that large scale face-to-face meetings could be more efficiently organised via online meetings. During the online meetings, participants shall be given the opportunity to share their opinions/problems and ask questions. Following the meetings, presentations and any other material used during the meeting shall be shared on the official website of the Project.

Depending on the PIU and RGA shall organize online meetings to engage and inform stakeholders. If epidemiological situation allows a face-to-face meetings with stakeholders could be organised especially if the important consultation meetings are needed.

- **Official Meetings:** Official meetings shall consist of internal meetings to be held within RGA and meetings with different governmental institutions, relevant NGOs, and organizations that will participate in the preparation and implementation phases of the project. Most of these meetings shall be conducted through digital platforms.
- **Opening and Closing Meetings:** Multi-stakeholder meetings shall be organized at both the beginning and end of the project lifecycle to announce and disseminate project activities and results. In order to engage more people and make meetings more efficient meetings could be held on digital platforms.
- **Disclosure Meetings:** Disclosure meetings shall be organized to share with stakeholders the ESF documents developed for the Project (SEP, Environmental and Social Commitment Plan (ESCP) and other relevant implementation documents). Most of these meetings shall be conducted via digital platforms. Announcements of these meetings shall be made via emails, official websites of the relevant government authorities, social media, and newspapers. Feedback on shared documents shall be collected through official correspondence, online feedback forms and email to enhance the effectiveness of the digital meetings. RGA documents shall be prepared specifically for the project and updated accordingly if there are any changes in the project or sub-projects.
- **Consultation Meetings:** Consultation meetings shall be organized to inform project stakeholders about the scope and timeline of sub-project activities. These meetings shall be

organized in coordination with RGA. Consultation meetings with most affected stakeholders should include representatives of Non-governmental Organizations (NGOs) for individuals with disabilities or any other stakeholders identified for the duration of the Project. In addition, the meetings shall be carried out to inform building residents, local population (including vulnerable individuals), representatives of the local administration, etc. Minutes of the meeting and a list of participants shall be recorded.

- **Digital Communication Tools:** RGA and Project website, social media accounts, national/local television channels and radio stations shall be used to inform stakeholders about important developments related to the Project. Press releases shall also be shared with the press.

- **Grievance Redress Mechanism:** According to the World Bank's ESS10 requirements, an appropriate grievance redress mechanism (GM) shall be established and implemented for the Project. Chapter 6 of this document describes the mechanism in detail. In order for this mechanism to function properly and in a timely manner, a GM contact person shall be assigned as part of the project team to manage the whole process. This contact person shall also be responsible for reporting on the grievance redressing process of the project for monitoring purposes. He/she shall also be responsible for coordinating the grievance mechanism, ensuring its smooth functioning within the project and providing channels for project stakeholders to provide feedback and/or raise concerns regarding project activities.

All information on the project shall be made available on the websites of the Project and WB and through RGA social media accounts that will serve as a media tool/channel for communication with stakeholders. Within the scope of the project, brochures, booklets and/or posters to inform stakeholders about project activities shall be prepared.

The PIU shall be responsible for the sharing, delivery and announcement of project/sub-project documents, communication materials, and GM.

Dynamics of the stakeholder engagement and utilisation of proposed tools is provided in the table below.

Table 2 - An Overview of Stakeholder Programme

Project stage	Subject of Consultation /Message to be delivered	List of information to be disclosed	Method used	Target Stakeholder	Frequency	Responsible party
Preparation	• Informing stakeholders about the	• Project concept, E&S principles and	• Opening meeting • Public announcements • Non-technical project	• Project-Affected Parties	Before the start of component	• PIU

	<p>scope and the needs of the project</p> <ul style="list-style-type: none"> • Consulting stakeholders on the following matters • project design, • environmental and social risks and impacts, • recommended mitigation measures, • GRMs • Requesting feedback 	<p>obligations</p> <ul style="list-style-type: none"> • ESF documents (ESCP, SEP) 	<p>abstracts/presentations</p> <p>Electronic publications</p> <ul style="list-style-type: none"> • Social media • Printed media • Consultation meetings (online/face-to-face) • Digital communication tools • Grievance Redress Mechanism • Posters, brochures, leaflets, etc. • SMS 	<ul style="list-style-type: none"> • Other Involved Parties • Disadvantaged/Vulnerable Groups/Individuals 	<p>activities</p> <p>For the duration of the project</p>	
Implementation & Structure	<ul style="list-style-type: none"> • Informing stakeholders on the scope of the project and ongoing activities • ESF documents (ESMF, ESMPs, SEPs, etc.) • GRMs • Requesting feedback 	<ul style="list-style-type: none"> • SEPs • GRM procedure • Regular updates on project development 	<ul style="list-style-type: none"> • Public announcements • Non-technical project abstracts/presentations <p>Electronic publications</p> <ul style="list-style-type: none"> • Social media • Printed media • Consultation meetings (online/face-to-face) • Digital communication tools • Grievance Redress Mechanism • Posters, brochures, leaflets, etc. • SMS 	<ul style="list-style-type: none"> • Project-Affected Parties • Other Involved Parties • Disadvantaged/Vulnerable Groups/Individuals 	<p>Before the start of the project implementation and as needed for the duration of the project</p>	<ul style="list-style-type: none"> • PIU • RGA
Operation	<ul style="list-style-type: none"> • GRMs • Receiving feedback 	<ul style="list-style-type: none"> • Project outputs • Grievance redressal 	<ul style="list-style-type: none"> • Closing meeting • Consultation meetings • Informative meetings • Digital Communication Tools/Social media • Posters, brochures, leaflets, etc. • SMS 	<ul style="list-style-type: none"> • Project-Affected Parties • Other Involved Parties • Disadvantaged/Vulnerable Groups/Individuals 	<p>After the project activities are completed</p>	<ul style="list-style-type: none"> • PIU

4.3. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation and possible revisions of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress. Flow of the information in will be in accordance with the Chapter 7 Monitoring and reporting.

To close the feedback loop the Project has adopted and incorporated into the project activities perception surveys. These will provide the Project with actionable information gap and will enhance the data informed decision-making. The perceptions survey will be take a community-based protection approach identifying challenges and solutions. To effectively manage stakeholder relationships and expected outcomes of Project activities both positive and negative feedback will be taken into account.

Comments and feedback received from participants received in any form shall be taken into account during the design and implementation of project activities. In the case that stakeholders made direct influence on the project activities, special section will be created in the Project yearly report.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The PIU will be in charge of stakeholder engagement activities.

The budget for the SEP is 129,200€ and is included in component C of the project.

Table 3 – SEP budget breakdown

Budget Category	Quantity	Unit Costs	Times	Total Costs	Remarks
1. Estimated staff salaries* and related expenses					
1a. Portion of the M&E consultant salary	2 days per month	180€	60 months	21,600€	Included into M&E consultant salary. + 2 part time employees from RGA – salaries not included
2. Events					
2a. organization of focus groups	1	1500€	3	4,500€	included into the communication budget
3. Communication campaigns					
3a. posters, flyers	1	500€	10	5,000€	included into the communication budget
3b. social media campaign	10 Post boosts	250€	10	2,500€	included into the communication budget
4. Trainings					
4a. training on social/environmental issues for PIU and RGA staff	1	300€	2	600€	included into the communication budget
5. Beneficiary surveys					

5a. beginning perception survey	1	30,000€	1	30,000€	
5b. mid-project perception survey	1	30,000€	1	30,000€	
5c. end-of-project perception survey	1	30,000€	1	30,000€	
6. Grievance Mechanism					
6c. GM communication materials	1	500€	10	5,000€	included into the communication budget
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				129,200€	

Note: *Salary costs can be indicative.

5.2. Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are PIU and RGA Sector for Development and Innovation (Communication department). Stakeholder engagement activities will be carried by the team organized for that purpose. For administrative and organizational purposes PIU will delegate portion of the M&E consultant time. RGA will delegate one member of the Communication department and the employee nominated by the RGA Director for Gender equality issues.

The stakeholder engagement activities will be documented twice per year as a part of the project Monitoring & Evaluation reports. The stakeholder activities section report will be supported through: minutes of the meeting from relevant events, list of communication activities, list of relevant trainings and when applicable findings from the focus groups and surveys as described chapter 7 Monitoring & Reporting.

6. Grievance Mechanism

Grievance Mechanism (GM) is a mechanism that provides channels for stakeholders to provide feedback and raise grievances about project activities and ensures that issues affecting the project are identified and resolved. By increasing transparency and accountability, GM aims to reduce the risk of project impact on citizens/beneficiaries and acts as an important feedback and learning mechanism to improve project impact.

The project shall be managed by the PIU, like the Real estate Management Project Additional Financing (REMPAF) currently financed by the World Bank. The Project shall use the same communication channels and grievance mechanism as the REMPAF, ensuring transparency and accountability and meeting the requirements of ESS-10 and WB ESF. GM shall also serve the project staff, including the PIU.

6.1. GRM on Project Level

REMPAF has a website where all relevant information for the Project is shared for consultation and information. In addition, REMPAF is able to collect project-specific concerns and grievances through this website and an e-mail address. Within the scope of the GM REMPAF grievance

submission form will be improved to allow anonymity. Following improvements, stakeholders shall be provided with the right to make suggestions and share grievances anonymously in accordance with the principle of confidentiality. Information on the communication channels of the Project is given below:

Website: to be redesigned – address will be provided at the beginning of implementation

Mail address: address will be provided at the beginning of implementation.

Grievance form: to be redesigned – address will be provided at the beginning of implementation.

Tel: 0700 500 500

The GM shall be accessible to a wide range of project stakeholders who are likely to be directly or indirectly affected by the project. The GM to be established in this project can be used to communicate grievances, feedback, questions, suggestions or satisfaction with the overall management and implementation of the project, as well as issues related to the sub-projects funded and supported by the project.

6.2. GRM on RGA Level

Republic Geodetic Authority (RGA) as a key implementing agency for the REMP2 and supervisor of the PIU work, has its own communication center, which also addresses land registry and cadastre activities. Applicants can submit their requests (suggestions, grievances, satisfaction, information requests or notifications and questions related to environment, urban planning, land registry, cadaster and housing). Communication channels are provided below.

Website: <https://www.rgz.gov.rs/>

Contact

form: <https://www.rgz.gov.rs/%D0%BA%D0%BE%D0%BD%D1%82%D0%B0%D0%BA%D1%82>

Mail address: info.centar@rgz.gov.rs

Tel: 0700 500 500

6.3. World Bank Grievance Redress System

Communities and individuals who believe they have been adversely affected by a World Bank (WB)-supported project can submit their grievances to existing project-level grievance mechanisms or to the World Bank's Grievance Redress Service (GRS). The GRS ensures that grievances received are promptly reviewed to address concerns about the project. Project-affected communities and persons may submit grievances to the independent Inspection Panel

of WB, which determines whether damage has occurred or may occur as a result of the WB's failure to comply with its policies and procedures. Grievances may be submitted at any time after concerns have been brought directly to the attention of the World Bank and Bank Management has been given an opportunity to respond. For information on how to submit grievances to the World Bank's institutional Grievance Redress Service (GRS), please visit (<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>).

Project-affected communities or individuals can also submit their grievances to the World Bank's Independent Inspection Panel (IIP). This panel determines whether the individuals or communities submitting the grievance have suffered damages as a result of violations of one or more of the World Bank's performance criteria. The Panel can communicate its concerns about the grievances received directly to the World Bank. At this stage, the World Bank shall have the opportunity to respond to grievances.

6.4. Description of GM on Project Level

Table 4 – Grievance Mechanism Processes

Step	Description of Process	TimeFrame	Responsibility
GM implementation structure	GM structure is based on the central electronic point of submitting and handling grievances.	Throughout the project lifecycle	RGA Management
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • RGA Information center • PIU Greavance Form • e-mail to PIU • e-mail to RGA • Complaint form to be lodged via any of the above channels. 	Throughout the project lifecycle	RGA Information Center PIU
Sorting, processing	Any complaint received is forwarded toPIU,loggedon the Project server, and categorized according to the following complaint types: <ul style="list-style-type: none"> - Complaint on the service - Complaint on the project activity (with subfolders based on the Project Components) - Complaint on the lack of information - Other Complaints 	Upon receipt of complaint	PIU

Step	Description of Process	TimeFrame	Responsibility
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by <ul style="list-style-type: none"> - Written confirmation of the receipt on the copy of the grievance form - e-mail 	Within 2 days of receipt	Local grievance focal points or, PIU or RGA Information Center
Verification, investigation, action	A proposed resolution is formulated by PIU and RGA Legal department and communicated to the complainant by mail or email.	Within 10 working days	Complaint Committee composed of representatives from the PIU, RGA Legal Department. Depending on the type of complaint the Complaint Committee can be enlarged with the representative of the other relevant RGA Department
Monitoring and evaluation	Data on complaints are collected in by PIU and reported to RGA Management and WB every 6 months	30 days after the end of the half year period	PIU
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by PIU	15 days after the complaint resolution	PIU
Training	Training will be organised for the: <ul style="list-style-type: none"> - RGA Information Center - Local grievance focal points 	One month after the project start-up	PIU

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.

6.5. Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

While the risk from project activities and in the context of Serbia is low, the GM for workers shall include addressing disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway shall be established and updated in line with the

country's existing procedures. The GM for project staff shall also be used to address SEA/SH related issues and shall have mechanisms in place for safe and ethical documentation of SEA/SH issues and confidential reporting. In addition, the GM shall have processes in place to promptly inform both the PIU and the World Bank of any SEA/SH grievance with the consent of the aggrieved.

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

7. Monitoring and Reporting

7.1. Summary of how SEP implementation will be monitored and reported

The SEP will be periodically revised and updated as necessary in the course of project implementation.

Stakeholder engagement activities shall be monitored periodically and reported on twice per year within project Monitoring&Evaluation reports. The documentation on stakeholder participation activities shall be kept within Project archives. The monitoring report will consist of:

1. Information on consultation activities shall be reported to the Bank within the scope of Project Progress Reports including the following elements:
 - Numbers, type of consultation,
 - Number of participants, type of participants
 - Critical issues on the agenda discussed during the meetings,
 - Number of grievances received (disaggregated data: gender, grievance category, status)
2. summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions

7.2. Reporting back to stakeholder groups

Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders through the project website where SEP and/or revised SEP will be published together with the semi-annual summaries and public reports on public grievances, enquiries, and related incidents.

Exceptionally summaries and public reports on public grievances, enquiries, and related incidents may be conveyed to the stakeholders directly in writing if particular stakeholder group is influenced in any manner by the corrective/preventive actions carried by the Project.

Endnotes

¹For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (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 impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

²It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.