REPUBLIC OF IRAQ

MINISTRY OF LABOR AND SOCIAL AFFAIRS (MoLSA)

Iraq Social Safety Net Strengthening Project
(P178824)

STAKEHOLDERS ENGAGEMENT PLAN (SEP)

JUNE 2022

Abbreviations and Acronyms

COVID-19	Corona Virus Disease
E&S	Environmental and Social
ESF	Environment and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
GoI	Government of Iraq
LMP	Labor Management Procedures
MOP	Ministry of Planning
MoLSA	Ministry of Labor and Social Affairs
NGO	Non-Governmental Organization
PAPs	Project Affected Parties
PMU	Project Management Unit
SEA/H	Sexual Exploitation and Abuse /Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
WHO	World Health Organization
CTP	Cash Transfer Program
SSN	Social Safety Nets
PDS	Public Distribution System
SPC	Social Protection Commission
WFP	World Food Program
MIS	Management Information System

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1. Introduction and Project Description

Poverty and vulnerability in Iraq are compounded by the lack of effective and efficient social protection systems. Existing Social Safety Nets (SSN) in Iraq include (i) a universal Public Distribution System (PDS) led by the Ministry of Trade (MOT); (ii) a poverty-targeted Cash Transfer Program (CTP) led by the Ministry of Labor and Social Affairs (MOLSA); and (iii) other social protection programs that provide assistance to specific categories of vulnerable populations (i.e., disabled and unemployed), but which are relatively of small scale and limited outreach. In fact, the building blocks of social protection systems (i.e.: social registry, grievance redress, case management, and monitoring and evaluation systems) are underdeveloped and deficient, which constraints and limits the capacity of the government to reach and protect those in need and deliver quality services across its programs.

> **Establishing and strengthening social protection systems is critical to improve effectiveness and efficiency, but also strengthens the government's preparedness for future shocks**. While the social programs pursue a cycle that is based on integrated systems to support the different functions like registration, eligibility assessment, enrollment, implementation and monitoring, a social registry is arguably the most important building block of resilient SSNs. The social registry has the potential to consolidate the demand for public services, thereby constituting the gateway for all government's social programs, consolidating potential enrolment applications and unifying administrative processes.

The establishment of systems, particularly the Social Registry[1], was a key reform action in the recently adopted Government of Iraq (GOI) White Paper. The White Paper, which incorporates a number of important reforms and initiatives linked to social protection, mentions the social registry as a priority as follows: "Standardize the databases of the beneficiary groups, define the key priorities for the support, and identify the main gaps in the support systems that are currently adopted to ensure their effectiveness. In addition to the social registry, the White Paper calls for the reform of the PDS, as it entails large costs and inefficiencies associated with its universality, thereby diverting resources away from the poor. The White Paper also proposes improvements to the CTP, particularly its coverage and outreach to the poor.

In the past decade, the World Bank has been supporting the GOI to strengthen its SSN. The Bank has played a key role in the articulation of a strategic roadmap for social protection reform in 2013, and the passing of the Social Protection Law 11/ 2014 which governs the current system. This law shifted

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[1] The social registry standardizes the databases of the beneficiary groups, defines the key priorities for the support, and identifies the main gaps in the support systems that are currently adopted to ensure their effectiveness. Social Registry is a social program that pursues a cycle that is based on integrated systems to support the different functions of registration, eligibility assessment, enrollment, implementation, and monitoring, a social registry is arguably the most important building block of resilient SSNs. The social registry has the potential to consolidate the demand for public services, thereby constituting the gateway for all government's social programs, consolidating potential enrolment applications, and unifying administrative processes.

social assistance targeting from categorical to poverty-based and established the Social Protection Commission (SPC) within the MOLSA to oversee managing CTP. The Bank has also supported advancing the systems building agenda, with emphasis on MOLSA's social registry as a key constituent of a national unified registry, as well as important delivery systems and functions such as case management, GRM and M&E. Over the past two years, and with financing from the I3RF (Iraq Social Protection Support Program – SPSP), the team worked with MOLSA and the SPC on assessing existing ICT systems and infrastructure, cleaning the existing databases, as well as building the capacity of IT team in enhancing the cyber security and installation of servers. This milestone allowed the Ministry to secure its databases and manage its programs more effectively.

The GOI has also benefited from the support of development agencies in the area of social protection and employment. The World Food Program (WFP) has worked with the MOT on the PDS reform that focuses on the digitization of the card and review of delivery chain including targeting. In 2021, WFP initiated technical work around the establishment of a national single registry based on the PDS database. The single registry is expected to integrate relevant government databases, including MOLSA's Social Registry in progress. Relatedly, UNICEF has been working with the MOLSA, and particularly the The authority of the care of people with disabilities and special needs , on improving the existing Management Information System (MIS). UNICEF is also supporting the ministry with activities related to incentivized cash transfer including case management and referrals, grievance redress mechanisms, and services. Finally, the International Labor Organization (ILO) is supporting the General Directorate of Labor and Vocational Training at MOLSA to build an employment platform and improve current services and infrastructure.

Complementing the above-described work and building on the progress made towards the achievement of intended social protection reforms, the World Bank is seeking additional resources to further advance the strengthening of the government's social safety net system by contributing to the Single Registry establishment, and developing the CTP systems, at the center of which is the social registry, which constitutes an integral part of the national single registry.
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The project seeks to:

(i) Strengthen the Ministry of Labor and Social Affairs (MOLSA) capacity to deliver effective and efficient SSN programs; and

(ii) Support the Ministry to further develop its social registry as an integral component of the national single registry.

The proposed project is structured into two main components:

Component 1- Support to strengthen the building blocks of MOLSA's programs with a focus on the CTP and the development of MOLSA's social registry ($4 million):

The Component will have two Subcomponents, namely:

Subcomponent 1.1: Further support for the development of MOLSA's Social Registry ($1.9 million):

This Subcomponent will focus on development of MOLSA systems integrator and the urgently needed upgrades for MOLSA's information systems namely: the People with Special Needs database, the Small Loans and Vocational Training Database and the Private Pension System Database. The improvement will focus on the:

(i) data quality and cybersecurity enforcement,

(ii) the development of a system integrator that connects multiple electronic MOLSA databases with the required software and hardware, based on the integration system's assessment and requirements.

(iii) the SPC data center MIS improvement and cybersecurity requirements the development of a System Integrator that connects multiple electronic MOLSA's databases.

Subcomponent 1.2: Consolidating key functions across the delivery chain of the CTP ($2.1 million):

With a view to improving the effectiveness and efficiency of CTP, the Subcomponent will seek to upgrade the delivery systems supporting theCTP. Efforts under this Subcomponent will be coordinated with work underway by UNICEF and the International Labor Organization (ILO) within the Ministry. More specifically, this Subcomponent will support upgrading the key functions across the delivery chain through financing the:

1. Urgent upgrades of the Information and Communication System (ICS) in 20 to 25 Branch Units (BUs) at district level in two of the Southern Governorates to be confirmed in coordination with SPC and UNICEF.

2. automating data collection in the field and enabling data input and exchange with the main server/database at the MOLSA HQ with the aim to consolidating the process of data collection and assessment of eligibility, as well as periodic recertification/reassessment and improving/facilitating the role of social workers by providing them with the necessary tools to perform their role in the field through digitization of CTP applicants' data collection to be done through tablets for SWs; and ICT capacity building for SWs.

3. Upgrade the SPC IT communication systems through the investment in the networking and connectivity in SPC center and governorates branch units. The project will provide 20-25 Branch Units (BUs) with ICT infrastructure and technical training that are necessary to register households and assess their eligibility in the field, including inter alia households that work in agriculture and are vulnerable to the impact of floods and drought, households in chronic poverty and those vulnerable to shocks.

Component 2- Project Management and Monitoring ($0.2 million):

This component will finance the establishment of a Project Management Unit (PMU) at MOLSA. The PMU will be established within MOLSA to execute the project. The PMU will report directly to the Office of the Minister of MOLSA or the deputy minister in charge. The PMU will mainly draw upon resources from MOLSA and the SPC and will hire consultants with relevant experience working on World Bank projects, precisely in the areas of fiduciary, procurement, and safeguards. More specifically, the Subcomponent will finance: i) the recruitment of temporary experts to work on the project (procurement, finance, environment and safeguard, etc.); ii) procurement of necessary equipment and software to ensure smooth implementation; Computers, printers, connection; iii) external audit; and, iv) workshops, travel, communication and others operation costs.

The WB will provide technical assistance to MOLSA to support the establishment of integrate MOLSA systems, share experience in areas of registries integrations and options of integration, supporting MOLSA to revise the legal framework regulating the SPC in a way that better reflects the roles, accountability lines, and delivery chain under the developed system of SSN. The component will also support technical capacity building to the different ministry teams in the areas of systems building and social work.

The project will be implemented by the MOLSA through the SPC. A Project Management Unit (PMU) has been established within the MOLSA to execute the project and will report directly to the Office of the Minister of MOLSA. The PMU will mainly draw upon human resources from MOLSA and the SPC, as well as hire consultants as needed and as per the ESCP.

2. Brief Summary of Previous Stakeholder Engagement Activities

In accordance with WB's ESF framework, stakeholder consultation was conducted during the preparation of the project and in preparation of this SEP. Stakeholder consultation aims to involve, inform, and consult the public by and after project effectiveness and will continue during project implementation, the outcomes will then be reflected in the updated versions of the SEP
The stakeholder consultation process has the following objectives:
- To inform stakeholders about the proposed Project and its objectives; assess their interest and support and consider their views in the project design and environmental and social performance.
- To foster collaboration between project staff and local communities to minimize and mitigate Environmental and Social (E&S) risks related to proposed Project activities.
- To provide mechanisms for stakeholders to raise concerns and provide feedback or make complaints about the Project and any activities related to the Project.
- To identify if stakeholders foresee any positive or negative E&S impacts from the Project, and if so, how the impacts can be addressed.
- To integrate opinions and concerns into alternative arrangement and mitigation measures.

According to ESS10, project stakeholders are defined as individuals, groups, or other entities who:

I.   Are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as 'project-affected parties'); and

II.   May have an interest in the Project ('other interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

During the project preparation, a consultation was conducted by MoLSA. The recipients extended the invite to stakeholders from different departments and sections of the ministry representatives', and administrative staff, , . The total number of participants reached 19------- persons (see details in Annex 1). The consultation session also followed the guidelines of the WB's technical note on conducting consultations during times of constraints of this SEP) and took place between 26 – 31 May 2022 also an online consultation was held on 31st of May 2022 with different ministry representatives and stakeholders from 9:00 11:00 PM Stakeholders received a summary of the project ahead of the consultation and clarifications on what was expected from the participants. Further to the consultation, a survey composed of 9 questions (See Annex 2) was sent to the attendees a.

Stakeholders were invited to share their thoughts, questions and concerns regarding the current project and the associated environmental and social risks during the 2-hour session. Below is a summary of the main points raised by the stakeholders during the consultation held on May 31, 2022.

1. Representatives raised the fact that it is important to include all different departments and sectors who are related to the social protection program as this new support will provide a unified access to all and will easy up the works and digitize it. Representatives proposed that widows, divorced women and orphans should be included in the project program as they are considered to be one of   the most vunerable groups that need to be included.

2. Representatives highlighted about the need to include this program in all governates and provinces in Iraq.

3. Participants made it clear that this program will develop the ministry's work and will have a positive effect on the capacity building of the employees.

4. Representatives raised pointed out that the risks of this project could result from (i) Financial support delay, routine administration processes and unexpected importation delays, (ii) Insufficient financial resources to purchase and develop equipment and

software to ensure smooth implementation; Computers, printers, connection, (iii) The security situation in the country and the impact of the COVID-19 pandemic may affect the implementation of the practical training programs.

3. Stakeholder identification and analysis

3.1 Methodology

This section outlines the key stakeholders who will be informed and consulted about the project.

To meet the best practice approach, the Project applies the following principles of stakeholder engagement during the preparation of the Project, as well as across the lifetime of the Project:

- *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 stakeholders' feedback, and for analyzing and addressing comments and concerns.

- *Inclusiveness and sensitivity*: stakeholders' identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders 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, in particular women and people with disabilities.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence 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; and

- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as 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.

3.2 Affected parties and other interested parties.

The key stakeholders identified by the Project need to be informed and consulted about the project. They include individuals, groups, or communities that:

- Are affected or likely to be affected by the project (project-affected parties); and

- May have an interest in the project (other interested parties).

MoLSA has identified some stakeholders to date and will be identifying others during project implementation. They are categorized into the following:

- Representatives of different departments and sections of the MoLSA.
- Department branches in the different provinces.
- Ministerial representation such as the ministry of interior, planning and finance
- Baghdad Government representation
- NGOs,
- Unemployed and disability society members
- UNICEF
- ILO
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Beneficiaries representing different departments of MoLSA will be positively affected by the project as project compounds aim to develop their skills and capabilities to carry out their works as well as it will provide the new tools and modern technology that will help in speeding up the works and making them more accurate. Other stakeholders such as Baghdad government, UNICEF and ILO will be positively impacted by the project implementation as those parties will make their programs and plans to support the social sectors in Iraq more achievable and will reach to the targeted sectors. It will also provide them with independent data and information for future programs. Meanwhile unemployed and disabled society members will benefit from the project by providing means and registration technology which can help them register their cases and up date their information and status.

It is to be noted that as the recipients identify additional stakeholders throughout project implementation, this SEP, which is a living document, will accordingly be updated and recipients will ensure that they are consulted upon in an inclusive manner as per the core principles of ESS10.

The projects' stakeholders also include parties other than the directly affected. These include:

- Government agencies and ministries, donors and development partners and project sponsors (i.e. the World Bank)

- Civil society, NGOs, professional groups and associations; on the regional, national and local levels

- Government officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities.

3.3 Disadvantaged / vulnerable individuals or groups.

It is particularly important to understand whether disadvantaged or vulnerable individuals or groups, may be further disadvantaged as a result of the Project. These groups often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness-raising and stakeholder engagement with disadvantaged or vulnerable individuals, in particular, 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. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, dependence on other individuals or natural resources, etc. 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 to the overall process are commensurate to those of the other stakeholders.
Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Poor households, people living in poverty, especially extreme poverty

- People who do not know how to read or write

- NGOs work with vulnerable groups

- Refugees in camps

- Homeless people and those living in informal settlements or urban slums

- Unemployed people

- Women and female-headed households

- Persons with disabilities

- Disadvantaged or persecuted ethnic, racial, gender, and religious groups, and sexual minorities

- Low-income migrant workers, internally displaced persons, asylum seekers, populations in conflict settings or those affected by humanitarian emergencies, vulnerable migrants in irregular situations

- Hard to reach population groups such as people living in rural areas with limited access to communication channels

Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate. A description of the methods of engagement that will be undertaken by the Project is provided in section 4.3.

3.4 Summary of project stakeholder needs

A precautionary approach will be taken to the consultation process to prevent infection and/or

contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, considering the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;

- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;

- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;

- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;

- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;

- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

Stakeholder group	Language needs	Preferred notification/ engagement/consultation methods/approaches	Specific needs (daytime meetings, accessibility)	Topics to be discussed
Administrative and technical staff of MoLSA	Arabic/ English	Email, SMS, phone calls, individual one-on-one interview, focus group etc.	During working hours Virtual Meetings	Project objectives, Implementation mechanisms, E&S implications
Different Agencies and volunteer groups	Arabic/ English	Direct Contact/ email	Meeting during official hours	Same as above+ possible channels for contribution
Local and International donors	English	Email, phone calls, newspapers, interviews et.	No specific need	Same as above

Other groups include vulnerable	Arabic	Phone calls, direct visit (if possible),	Up to their preferences	Project objectives, Implementation mechanisms, E&S implications

4. Stakeholder Engagement Program

4.1 Purpose and timing of stakeholder engagement program

This section provides details on stakeholder engagement activities for each specific stakeholder group with relevant information and opportunities to voice their views on topics that matter to them. The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances.

Some of the special measures to be taken to ensure the engagement of disadvantaged and vulnerable groups are:

- Identify and liaise with the relevant disadvantaged and vulnerable groups agencies representatives including local authorities and inform them about the project and its specific implemented components, thereby gaining acceptance and support to ensure an enabling environment for project implementation.

- Strengthen links with the local actors by initiating and sustaining dialogue to receive their support in gaining project acceptance and facilitation of access, communicating project goals and rules within their communities or relevant audiences including the targeted beneficiaries and any other stakeholders.

- Identify vulnerable groups of beneficiaries with physical impediments or socio-cultural barriers that prevent them from benefiting from the Project, and support them with differentiated measures, such as outreach home visits if possible.

The main goal of the stakeholders' consultations is to improve the design of the project by adding some concrete propositions that are relevant to it and help ameliorate its outcome and help achieve project sustainability by engaging stakeholder in E&S risk management.

The COVID-19 pandemic and the sequent lockdowns with the Government of Iraq (GOI) restricting gatherings, have limited the Project's ability to engage more stakeholders interested groups in the consultation process. This preliminary SEP will be disclosed prior to Project appraisal and will be updated as necessary. This process will be the starting point of an iterative process to develop a more comprehensive stakeholder engagement strategy and plan. As the SEP is a living document, it will be updated periodically and as necessary.

The recipients are planning to hold consultation meetings throughout the Project with the possibility of adding relevant stakeholders according to the needs of the project. Additional identified stakeholders will accordingly be reflected in an updated SEP.

4.2 Proposed strategy for information disclosure

This section describes the information that will be disclosed, its formats and the types of methods that will be used to communicate this information to each of the stakeholder groups.

Table : Proposed strategy for information disclosure

Project stage	List of information to be disclosed.	Methods proposed.	Timetable: Locations/ dates	Target stakeholders	Percentage reached.	Responsibilities
Project life cycle	Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP) and GBV Action Plan Regular	By email and Website and through virtual meetings as COVID-19 mobility restrictions allow	During Project preparation before project effectiveness and throughout implementation (when updated)	All stakeholders that were invited to the consultations (when there is an update they will be informed) and all Project actors.		MOLSA
	SEP and its grievance redress mechanism	Virtual meeting due to COVID-19 restrictions	During preparation (Before disclosure) and throughout implementation when updated	All Identified Stakeholders (when there is an update they will be informed)		MoLSA
Following up on the demands of the stakeholders and their implementation		By virtual meeting	When there is a need and per the findings of the Grievance Mechanism (GM)	All previous stakeholders and any new ones identified as relevant.		MoLSA

4.3 Proposed strategy for consultation

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As per the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-

supported operations when there are constraints on conducting public meetings" (March 20, 2020), A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following issues shall be taken into consideration by the PMU and the MOLSA for selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops, and community meetings.

- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels.

- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders.

- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions.

- Where direct engagement with project-affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context-specific combination of email messages, mail, online platforms, and dedicated phone lines with knowledgeable operators;

- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

- In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the different stakeholders as elaborated below:

Project beneficiaries

- Feedback mechanism through hotline (00964 7707135248)

- Feedback mechanism through email (https://www.molsa.gov.iq)

- Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP)

Other interested parties

- Formal meetings with stakeholders

- Regular meetings with the stakeholders

- Feedback mechanism through hotline (00964 7707135248)

- Feedback mechanism through email (https://www.molsa.gov.iq)

- Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP)

Vulnerable groups

- Feedback mechanism through hotline (00964 7707135248)

- Feedback mechanism through email (https://www.molsa.gov.iq)

- Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP)

The MOLSA PMU will be documenting stakeholder engagement activities (and updating the SEP whenever required) and ensuring the dissemination of the documented activities on the Ministry's website. The documentation will take place by including the following:

Date and location of each meeting, with a copy of the notification to stakeholders.

The purpose of the engagement (for example, to inform stakeholders of an intended project or to gather their views on potential environmental and social impacts of an intended activity).

The modality of engagement and consultation (for example, face-to-face meetings such as town halls or workshops, focus groups, written consultations, or online consultations).

Number of participants and categories of participants.

A list of relevant documentation disclosed to participants.

Summary of main points and concerns raised by stakeholders.

Summary of how stakeholder concerns were addressed and taken into account.

Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions.

Specific measures adopted to reach out to vulnerable groups.

4.4 Proposed strategy to incorporate the view of vulnerable groups.

It 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 with disadvantaged or vulnerable individuals or disabled and unemployed in particular, 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. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities, marginalized groups, and IDPs), dependence on other individuals or natural resources, etc. Engagement with the 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 to the overall process are commensurate to those of the other stakeholders. The GRM will be culturally appropriate and accessible for PAPs, considering their customary dispute settlement mechanism.

The project foresees to carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information and other challenges they are faced with. The details of strategies that will be adopted to effectively engage and communicate with

vulnerable groups will be considered during project implementation and will be integrated in the updated SEP.

As stated above, considering the specific scope of the Project, vulnerable/disadvantaged groups and to ensure those groups are adequately involved in the project, specific engagement methods will be applied. Since the mentioned groups are cross-cutting throughout all different stakeholder groups the envisioned methods are being applied throughout consultations with any of the listed stakeholders. Those methods include:

- Women-only consultation sessions.
- in addition to digital media, Diversification of outreach methods such as through the radio or poster campaigns to reach these groups; and
- Collaboration with Universities notably for the involvement of students.

4. The above groups might reach out via different channels, inter alia, diversification of outreach methods beyond digital media such as the use of printed awareness flyers (delivered at the level of health facilities), outreach campaigns through television, radio and billboard advertisement, collaboration with organizations and outreach through NGOs, etc.

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4.5 Timelines

The timeline for implementation of all phases of the project is 24 months. During the implementation stages, consultative meetings will be held with stakeholders and vulnerable groups covering all activities associated with the project lifecycle.

The SEP will be published on the MoLSA's website for the entire period of project development. MOLSA-PMU will continue to review the SEP throughout project implementation and update it as needed. The implementation of SEP will be reflected in the progress reports, to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project including any feedback received from them that support successful project implementation. The methods of engagement will also be revised periodically and as needed to maintain their effectiveness and relevance to the project's evolving environment.

4.6 Review of Comments

As explained in more details above, communication and feedback from stakeholders will be taken into consideration at each stage of this project. The stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance (Environmntal assessment reporting , social status participation, minutes of meetings) and implementation of the stakeholder engagement plan and grievance mechanism. The Project Management Unit (PMU) plans to have several meetings with stakeholders of the areas covered by the survey post implementation to receive reviews and comments. Outcomes from PMU meetings will be reflected in progress reports and the future updated SEP . Due to COVID- 19 and the government restrictions

on gatherings, and based on the targeted stakeholder group, different means of communication will be considered to report to communicate with them as outlined in Table above.

4.7 Future Phases of Project

All 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 mechanisms. The Project Implementing Unite (PMU) Will prepare biannual reports regarding environmental and social impacts, grievances and project achievement and will present these to stakeholders. These reports will be disclosed on MOLSA websites and will be accessible to the public.

5. Resources and Responsibilities for implementing stakeholder engagement activities.

5.1 Resources, Management functions and responsibilities

MoLSA, in particular; the Project Management Unit (PMU) Coordinator and the Environmental & Social specialists will oversee the stakeholders' engagement activities as outlined in this SEP.

The Grievance mechanism will be managed by Project PMU's E&S specialists in collaboration with the GM coordinator at MoLSA.

The budget for the SEP is part of the Project budget. The contact emails are:
zamzam199000@gmail.com
ahmednajam283@gmail.com

6. Grievance Mechanism

According to provisions and requirements of the WB's ESS10 (Stakeholder engagement and information disclosure), MoLSA will put in place a functioning, accessible, and inclusive Grievance Mechanism (GM) that is proportionate to the potential social risks and impacts of the Project. Nevertheless, the key purpose of this GM is to provide an avenue for complaints and suggestions regarding Project's components. Some of potential complaints might includes exclusion of specific groups due to religion, ethnicity, etc., from reaching the project benefit or access to

The implementation of this procedure will result in the reduction of social risks, generate systemic change to reduce the volume of grievances and enhance the quality of the relationship between the Project and its stakeholders.

Specification:

The GM at central level will be integrated within the existing complaining system(s) at the MOLSA,

and will use available resources and assets, to the extent possible. But will, at the same time, ensure that the system has the following key features in place, as a minimum:

- **Decentralized**: MOLSA will put in place a decentralized GM for processing Project-related complaints in local areas. This will be done by delegating power to the local directorates and partner agencies/ universities to act upon certain types of grievances/appeals. (1) Cases will be primarily resolved at the local level; and (2) Cases which are not resolved at local level will be resolved at the central level.

- **Multiple-channel**: MOLSA will activate different channels for submitting a complaint. This will include installing complaint boxes in prominent places in all Project offices, online grievance portal, and free hotlines, as well as allowing online submission of grievances and appeals by using social media platforms, whenever possible.

- **Standardized:** MOLSA will put in place a standardized process for receiving grievances/ appeals through assigning clear responsibilities to the PMU /Environmntal and social specialist that have been assigned to the project from the existing staff . The existing staff will be trained on the SEP and GRM. In case of receiving any SEA/SH complaints, they should be carefully handled following the key principles of confidentiality and survivor's consent.

- **Culture-sensitive:** MOLSA will handle grievances in a culturally appropriate manner, being district, objective, sensitive, and responsive to the PAPs. The GRM will allow for anonymous complaints to be raised and addressed. The mechanism will also facilitate lodging complaints in a simplified format and language, suitable for local cultures. Moreover, to manage the risks related to labor and/or GBV SEA/SH MOLSA will assign female staff for receiving and processing grievances from women, where separation between men and women is the norm in the beneficiary community. Include provision to ensure confidentiality as well as protocols for referring cases to specialized agencies (e.g., cases related to gender-based violence, child neglect/abuse, etc.)

- **Vulnerability-responsive:** MOLSA will put in place all measures that would facilitate grievances lodging from vulnerable groups, including, people with disabilities, women, and elderly in particular, minorities, poor student whom, based on their circumstances, been impacted by any of the Project's activities. These measures will take into account special needs, protect privacy, and provide safe and secure channels. By so doing, the GM will build on existing grievance structures, coordinate with social service providers, and provide GBV SEA/SH complainants with all possible means of protection starting from point of complaining until resolution. The GM will also provide adequate advice/ procedural assistance whenever needed.

- **Outreach and Communication:** MOLSA will designate necessary staff at the local level, to receive, acknowledge, sort, refer, and report on grievances/appeals. Communication material will be developed, which will include brochures and social media channels. The material will not only describe grievance and appeals procedures, but also eligibility to the

Project, and selection criteria, as well as required documentation.

- **Complainant Satisfaction:** The GM will design and make available a questionnaire to assess the level of satisfaction with responses. This is to be administered in line with best management practices. The level of satisfaction will also be surveyed and measured annually. On the hand, the GRM will allow complainants who were not satisfied with responses, to resort to a second appellate level.

The Proposed GM System

The proposed GM for the Project aims to promptly, efficiently, and accurately resolve issues that could come across implementation of Project's activities. The design of the GM system will provide means for collecting supportive documents and evidence, investigating the problem, and supporting the final decision. Complainants would commonly approach this GM for many reasons, including those related to incomplete or no service, vague procedures, inappropriate/ unfair treatment by the staff, and harm (environmental and/or social) to individuals or groups as a result of carrying out the Project's interventions. Users of the system include all stakeholder categories. It would enable all affected parties submit their grievances directly, or indirectly through an intermediate. MOLSA shall maintain, throughout the Project implementation, and publicize the availability of grievance mechanisms, and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Bank. The complainants should be given the possibility to remain anonymous if they do not wish to reveal their identity. Enquiries or complaints can be raised through different channels: The main GRM uptake channels are summarized in the table below.

- Letters to the PMU and/or relevant PMUs
- Phone calls to PMU using telephone 00964 7707135248, 00964 7710253595
- contacting them via a link on: https://www.molsa.gov.iq
- In-person feedback to sites and documented in GRM uptake form
- Grievance boxes allocated at the MOLSA office and sub-project sites.

The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress. All complaints/concerns and feedback will be documented in a grievance log. MOLSA will ensure that the GM is culturally appropriate and accessible for Project Affected Parties (PAPs). All staff and operators who will be handling the GM will receive the necessary training for effective handling of complaints including on any potential SEA/SH related complaints, complaints from the elderly or other vulnerable groups and grievances regarding the conduct of security personnel.

Grievance Management Process

The Project undertakes to respond to all grievances within 30 calendar days of submission – and more quickly in cases where there is high risk of escalation.

Roles and responsibilities of the GRM coordinator

Adhere to the designed community friendly grievance redress mechanism with clear and timely bound tiers and responsibilities to ensure dissemination on the local level. Develop quarterly grievance and redress report to be shared with World Bank.

Conducting field visits to ensure that the established grievance redress mechanisms are functioning properly and that the individual projects are implemented in a socially sustainable manner.

Reach out to local communities, including PAPs (If any), to raise awareness about the project and the implementation schedule.

Coordinate and provide support to the GRM focal points who will be an assigned member of the PMU with a suitable training to handle complains according to the GRM approved mechanism and Consolidate all Grievances received from the different project location, PMUs and reflect in the project report.

GM process is described in the sections below. The table below provides a visual overview of the steps and associated timelines.

•Step 1 (Day 1)	Uptake
•Step 2 (Day 2)	Sorting and Processing
•Step 3 (Day 3-6)	Acknowledgment and follow up
•Step 4 (Day 7-10)	Verification, Investigation and Action by PMU
•Step 5 (Day 11-30)	Providing Responses to GM Users
•Step 6 (Quarterly	Reporting

Step 1: Uptake

A range of channels will be made available for submission of feedback, including a free of charge phone line, regular mail, an email account, and a Facebook page. In addition, hard copies of GM

uptake forms will be available at different project sites. To submit feedback through the phone line, GM users can call between Sunday-Thursday from 10 AM to 2 PM.

Queries, suggestions and complaints must be specific and concise to the extent possible, and contain basic information including: the name of the subproject, the location, the timeline of the issue/incident, persons involved, and contact details for non-anonymous GRM users, and details of the incident/issue.

Step 2: Sorting and Processing

Grievance Log will be maintained by the PMU focal point if s/he is the first point of contact with the GRM user. a summary of the feedback received, date that it was received, location (where relevant), channel through which it was received (in-person, letter, telephone, etc.), whether an acknowledgement has been provided to the non-anonymous GRM user that the issue is under consideration and/or has been escalated, whether the feedback is anonymous (this would include cases in which the person providing the feedback has expressed a preference for anonymity), whether the issue was resolved and if so, whether a final response has been provided to the non-anonymous user of the GRM , whether the issue is pending and if so, whether it has been escalated to the PMU GRM.

Step 3: Acknowledgment and Follow up

If the identity of the GRM user is known, then receipt of the feedback will be acknowledged within 3 business days. At the 20 business-day mark, if a complaint/question is still pending, the GRM focal point will provide an update to the non-anonymous GRM user, inform them if there will be delays in resolving their case, and provide the date for which they will be able to provide a response. The Grievance should be classified as follows:

High-Level Feedback

Feedback received to be categorized as 'high' level instances will include issues that meet the following criteria:

- Incidents that caused or may potentially cause significant or great harm to the environment, workers, communities, or natural resources, including issues of gender-based violence;
- Incidents which entail failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies;
- Incidents for which failure to address may potentially cause significant impacts that are complex and/or costly to reverse; and
- Incidents that may result in fatality or some level of lasting damage or injury.
- This type of feedback will be acknowledged, and an investigation will be launched by the PMU and any other relevant stakeholders within 24 hours during workdays and within 48

hours if the feedback was received over the weekend. It should be noted that some types of incidents, including accidents and fatalities, need to be reported to the World Bank. This guidance is provided in the Environment & Social Incident Response Procedures.

Standard- Level Feedback

If the identity of the aggrieved person is known and the grievance is classified as 'standard', the acknowledgement of grievance will be within 3 business days. At the 20 business-day mark, if a complaint/question is still pending, the GRM focal point for the PMUs and the PMU will provide an update to the non-anonymous GRM user, inform them if there will be delays in resolving their case, and provide the date for which they will be able to provide a response-

Step 4: Verification, Investigation and Action

Verification and investigation involve gathering information about the complaint to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. This process normally includes site visits, document reviews, a meeting with the GRM user (if known and willing to engage), liaising with the PMU safeguards specialist(s) and meetings with other individuals and/or entities who can assist with resolving the issue. For complaints related to the misuse of funds, it may also require meetings with suppliers and contractors.

Potential actions include responding to a query or comment, providing GRM users with a status update by the 20-working day mark. Feedback that cannot be resolved at the PMU level should be referred to the PMU level for further investigation of the timelines and standards established for the GM.

Step 5: Providing Responses to GM Users

This step entails informing GM users and the public at large about the results of the investigation and the actions taken. It is integral to enhance the GRM's visibility among beneficiaries and increases users' trust in the system (making it more likely that they will provide feedback). The GM focal points of the PMUs can provide feedback by contacting the GRM user directly (if his or her identity is known) within a 30-day period of receipt. information included in the written response should include setting out/summary of the feedback, detailing how the investigation was conducted, summarizing the facts, outlining the findings appropriate resolution along with the rationale for such resolution. resolutions may include an explanation, apology, reconsideration, reimbursement, restitution– all are possible remedies.

Step 6: Closure and Reporting

The overall accountability concerning the management of the Grievance Mechanism Procedure lies with the PMU. The E&S Specialist is responsible for overseeing the implementation, monitoring and treatment of grievances. The GM coordinator will determine if the grievance has been close to the satisfaction of the claimant. Once it has been closed, the information will be entered in the grievances register and the grievance can be closed.

GRM focal points for all PMUs will report to the PMU GM coordinator on a monthly basis. Continuous communication should be maintained between the GRM focal point within the PMU and the PMU GM coordinator in order to obtain, document and follow up the resolution of all grievances. The PMU GM coordinator will make consolidated reports available to the World Bank on a quarterly basis and on request. The reports should provide an overview of feedback received that is related to project implementation. Additional information should include:

- Nature of the feedback
- Aggregate information on the GM users (including demographic – student, parent, gender, etc.)
- Information on where the feedback was received and in what format.
- Information on the status of complaints and queries (resolved, under review, etc.).
- Information on how complaints and queries were resolved.
- Information on unresolved complaints/queries and why they are not yet resolved.
- recommendations for improving the GM. These recommendations should be based on the monitoring of the GM, specifically the extent of the GM's functionality and the types of feedback that have emerged.

Procedure for Appeal

Aggrieved people who are dissatisfied with the outcome of their complaint can appeal the decision by resubmitting their complaint to the GM coordinator/ focal point within 30 working-days of receiving a response to the original submitted grievance. Subsequently, the GM coordinator/ focal point and other relevant personnel have 30 working-days to investigate and address the issue. Additionally, the GRM coordinator/ focal point has 10 working-days to prepare a comprehensive response, including the findings of the investigation and the rationale of the determination. Accordingly, within a maximum of 40 working days, the appeal case should be closed.

Lastly, if the aggrieved person is still not satisfied with the solution provided, they have the option to go to court.

World Bank Grievance System

Communities and individuals that are adversely affected by a World Bank (WB) supported project may also submit complaints to the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received

are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

Confidentiality

Individuals who submit their comments or grievances have the right to request that their name be kept confidential, though this may mean that the PMU/PMU is unable to provide feedback on how the grievance is to be addressed. However, an anonymous complaint can receive a code and should be investigated appropriately and treated courteously.

Gender sensitive GM

The project grievance mechanism is gender sensitive. It is a standard of good practice that aims to provide a separate female contact point for complaints to be received from women. In cases of increased risk of discrimination, harassment, or assault, the GM ensures that women subject to physical or sexual abuse or harassment, can file confidential complaints.

7. Monitoring and Reporting

7.1 Involvement of stakeholders in monitoring activities
Not applicable.

7.2 Reporting back to stakeholder groups

The SEP will be reviewed and updated periodically as essential in the course of project implementation in order to guarantee that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. In addition, the current SEP will evolve into an operational action plan.. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/ preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. 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. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

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

  - Number of consultation sessions taking place; (%) of session completed.
  - Number of grievances received within a reporting period; (%) of calls received.
  - Number of project-internal grievance resolved within a reporting period, (%) of calls resolved.

List of Annexes

Annex 1:   Contact No. of identified Stakeholders
Annex 2:   Survey that will be sent to the identified stakeholders for future consultations

Annex 1: Contact No. of the people that assisted the Stakeholders Consultations

	Name of Stakeholder	Job title	Contact details
1	Thikra Abdul Rahed	MoLSA GM	MOLSA
2	Ahmed Khalf AL Majdi	Assistant mng	MoLSA
3	Zianab Ali Khalf	MoLSA –Minister office	MOLSA
4	Dr.Ahmed Najam	MoLSA –Social Expert	Ahmednajm283@gmail.com
5	Dr.Rasool Jabar	MoLSA –Social Expert	Zamzam199000@gmail.com
6	Hazim Talib	MoLSA- Financial dept	MoLSA
7	Marwa Mohamed Salim Yohamed	MoLSA –Legal dept , Social Protection	Hrhlayakg@gmail.com
8	Hutham Al Badish	MoLSA – Financial Mng	Hhdhamgg@gmail.com
9	Mohaned Seek sabaa	MoLSA –Assist mng , legal dept	077235803091
10	Alla Jabil Gadban	MoLSA – Social Protection dept	llag110268@gmail.com
11	Heam Khadim Omran	MoLSA – Women dept	Heam67kadim@gmail.com
12	Ibtisam Abdul Jabbar	MoLSA-Information technology dept	Basbosa1181969@gmail.com
13	Abbas Kader Mohamed	MoLSA – Social Specialist	Abashather@gmail.com

14	Ban Mazin Mohamed	MOLSA-Information technology dept	Lanoshamoh2015@gmail.com
15	Ahmed Hatem Abdul Kareem	MOLSA	Ahmed.aljassas76@gmail.com
16	Ahmed Noori Kazal	MoLSA – Resafa Man dept	Ahmdalhmdanalhmdan8@gmail.com
17	Akram Abd Ali	MoLSA-Information technology dept	Alieboyryakran@gmail.com
18	Salam Abdul Hussain Abbas	MoLSA – Disability Dept	Slamfoxer197761@gmail.com
19	Sarmad basim hazim	MOlSA . Disability dept	07707835851
20	Abbas Abid Kalaf	MoLSA – training dept	Abbasabodi7@gmail.com
21	Sarmad ali hussain	Assist eng . Disability dept	Mazmoz52@gmail.com
22	Noor Kasim Jasim	MoLSA – Training dept	Noorqa927@gmail.com
23			

Annex 2: Survey sent to the identified stakeholders for consultations.

Your participation in this study is completely voluntary. There is no foreseeable liability associated with this survey. However, if you feel uncomfortable answering any questions, you can withdraw from the survey at any point. You can also fill in the form without putting any of your personal information on it. It is particularly important for us to learn your opinions.

It will take approximately [Five] minutes to complete the questionnaire which has 9 questions.

Description	Contact details
Agency:	
Person answering the Survey	
Position	
E-mail:	
Telephone No.	

1- In your opinion, does this project answer the needs of the MoLSA?
☐ Strongly disagree ☐ Disagree ☐ Not relevant ☐ Agree ☐ Strongly agree
2- How would you rate the project on a scale from 1 to 5?
☐ Excellent ☐ Very good ☐ Good ☐ Fair ☐ Poor
3- What can be done in order to amplify the positive impact of the project?
4- What in your opinion are the risks of this project?

5- What groups do you identify as vulnerable in the project scope?
6- What do you propose in order to increase the woman's contribution to such a project?
7- What is your preferred communication channel (telephone, email, website, Facebook, WhatsApp?)
8- What is your preferred language of communication?
9- Do you have any special issues that you would like to be informed about?