State Committee for Affairs of Refugees and Internally Displaced Persons of the Republic of Azerbaijan

Stakeholder Engagement Plan for the Improved Livelihoods for IDPs in Azerbaijan Project (ILIDP)

Financed by the State and Peacebuilding Fund (SPF)

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Acronyms and Abbreviations

AP	-	Affected Person
CA	-	Control Authority
CBOs	-	Community Based Organizations
EHS	-	Environment, Health and Safety
E&S		Environment and Social
ESCP	-	Environmental and Social Commitment Plan
ESF	-	Environmental and Social Framework
ESMF	-	Environmental and Social Management Framework
ESMP	-	Environmental and Social Management Plan
ESP	-	Environmental and Social Policy
ESS	-	Environmental and Social Standard
FGD	-	Focus Group Discussion
FPP	-	Focal Point Person
GBN	-	Gender Based Violence
GoA	-	Government of Azerbaijan
GRC	-	Grievance Redress Committees
GRM	-	Grievance Redress Mechanism
GRS	-	Grievance Redress Service
IBRD	-	International Bank for Reconstruction and Development
IDPs	-	Internally Displaced People
LMP	-	Labor Management Procedures
MoF	-	Ministry of Finance
NGO	-	Non-Government Organization
OP	-	Operational Policy
OIP	-	Other Interested Parties
P-AP	-	Project-Affected Party
PAP	-	Project Affected Person
PIU	-	Project Implementation Unit
SCRI	-	State Committee for Affairs of Refugees and Internally Displaced Persons
SEP	-	Stakeholder Engagement Plan
SEA	-	Sexual Exploitation and Abuse
SEP	-	Stakeholder Engagement Plan
SIA	-	Social Impact Assessment
SMEDA	-	Small and Medium Entrepreneurship Development Agency
ToR	-	Terms of Reference
WB	-	World Bank
WBGRS	-	World Bank's Grievance Redress Service

1 INTRODUCTION/PROJECT DESCRIPTION

1.1 Introduction

As outlined in the World Bank's Environmental and Social Policy (ESP) for investment project financing, the Environmental and Social Standards (ESSs) are applied to projects for assisting Borrowers to avoid, minimize, reduce or mitigate the adverse environmental and social risks and impacts of projects. **ESS10 - Stakeholder Engagement and Information Disclosure[1]** highlights the importance of open and transparent engagement between the Borrower and project stakeholders and that effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Thus, the Bank requires the Borrower to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts.

This SEP is prepared for the ILIDP in consistency with ESS 10 for the purpose of engaging with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation, as outlined in ESS1 - Assessment and Management of Environmental and Social Risks and Impacts; thus, ensuring that the project preparation and implementation is undertaken in the environmentally and socially sustainable manner.

1.2 Project Overview

The Project Development Objective (PDO) is to increase the skills, access to support services and opportunities for income generation of vulnerable IDP households in Azerbaijan. The project will also support Government capacity to prepare and implement livelihood programs targeted to vulnerable IDPs. The main beneficiaries will be IDPs that are currently identified as poor and vulnerable due to their living conditions.

The project is financed with a grant from the State and Peace Building Fund and administered by the World Bank. The State Committee for Affairs of Refugees and IDPs (SCRI) is the grant recipient and the project implementing agency. The State Committee has established a Project Implementation Unit (PIU) for day-to-day management of the project.

Summary of project components activities and targets

To achieve the PDO, the project has three main components linked and mutually reinforcing. Together, the components aim to improve socio-economic opportunities and inclusion of IDPs in the target communities.

Component 1: Skills development

This component will support IDPs who are interested in pursuing business/employment opportunities through a package of technical assistance which will consist of vocational training, business development support and mentoring, and other life skills. The objective of this component is to provide selected IDPs an opportunity to learn a trade and subsequently develop new businesses and obtain jobs in the places they reside. The component will fund a participatory household survey to determine the need and potential demand for various local businesses.

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[1] Source (pp 53-64): http://documents1.worldbank.org/curated/en/383011492423734099/pdf/The-World-Bank-Environmental-and-Social-Framework.pdf

Component 2: Job placement and business development support

This component will fund training, mentoring, business and employment support services to build the capacity of IDPs who successfully completed vocational training and support the sustainability of the newly created businesses and jobs. It aims to support IDPs in their efforts to establish new businesses or work, generate income, employ IDP community members, and deliver goods and services that benefit their communities and society at large. The component will also facilitate meetings between participants, commercial banks and micro-credit agencies, for the purpose of extending support for business growth and ongoing assistance to those who decide to take out loans.

Component 3: Civic engagement, social cohesion, monitoring and operational support

This component will support training for project beneficiaries on access to government services, civic engagement, community participation, establishment of community groups, trust-building and related techniques to support an eventual peaceful and cohesive transition of IDPs to a new living environment. Such support will help to build social cohesion in IDP-concentrated communities that may be undergoing a significant socio-economic transition in the coming months and years. In addition to participants' training, this component includes support to the GoA to design and implement an intensive citizen engagement initiative with project participants, their households, other IDPs and other interested stakeholders (e.g. tracer/beneficiary surveys, beneficiary feedback/grievance mechanisms, joint government-civil society project committee) to allow for an ongoing feedback loop between citizens and government so that IDP support activities are responsive to the changing needs and aspirations of various groups. This component would also include resources for overall project implementation, monitoring and evaluation and communications by the State Committee through the PIU.

1.3   Purpose and Objectives of SEP

The overall objective of this SEP is to establish an organized program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle following the objectives outlined in *ESS10* as follows:
- To establish a systematic approach to stakeholder engagement that will help the Recipient identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties;
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them;
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format stakeholder engagement and Information Disclosure; and
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Recipient to respond to and manage such grievance.

The SEP provides ways to identify potential different stakeholders, including disadvantaged and vulnerable groups, to develop an approach for reaching each of the subgroups, to create a mechanism by which Project Affected Parties (PAPs) and Other Interested Parties (OIPs) can raise concerns, provide feedback, or make complaints, and to minimize and mitigate environmental and social risks related to the proposed project. Overall, SEP serves the following purposes (*ESS10*):

Stakeholder identification and analysis;
- (i)   Planning how the engagement with stakeholders will take place; (iii) disclosure of information;
- (ii) Consultation with stakeholders;
- (iii) Addressing and responding to grievances; and
- (iv) Reporting to stakeholders.

2   REGULATIONS AND REQUIREMENTS

2.1   Relevant National Laws and Regulations of Azerbaijan

2.1.1   Main Legislation Concerning Employment Support

Pertinent to the Stakeholder Engagements, the **Constitution of Azerbaijan** (November 12, 1995), as the fundamental law of the land, among others, establishes the legislative principle for the employment of the citizens of Azerbaijan; thus, provides for the following:
- The Right to civil participation is stipulated in *Article 54.1* - "right of citizens of the Republic of Azerbaijan to participate in the political and civic life without impediments".
- Freedom of Information – The Constitution guarantees the right to information in three aspects:
  - (i)   *Article 39* (Right to live in a healthy environment) – "Everyone has the right to gain information about the true ecological situation and to get compensation for damage done to his/her health and property because of violations of ecological requirements";
  - (ii) *Article 50* (Freedom of Information) – provides that
    - Everyone is free to look for, acquire, transfer, prepare and distribute information;
    - Freedom of mass media is guaranteed. State censorship in mass media, including press is prohibited.
  - (iii) *Article 57 para 1* - which gives citizens the right to petition state bodies.

The Labor Code of the Republic of Azerbaijan (*dated February 1, 1999, № 618-IQ*) is the fundamental legislative act aimed at governing relations between employees and employers, as well as other legal relations derived from such relations between them and relevant national authorities and entities. The Code also stipulates health and safety related requirements and principles. In addition, the work conditions of women and under-aged are established.

The Law of the Republic of Azerbaijan on Employment № 1196-VQ dated June 29, 2018, defines legal, economic and organizational basis of state policy in the employment field, as well as state guarantees to citizens in the field of labor and to unemployed persons in the field of social protection. This update and supersedes the previous law "On Employment", dated July 2, 2001.

Law of the Republic of Azerbaijan No 768-IIQ dated October 5, 2004 on Living Wage (as amended by Law No. 109-IIIQD dated May 12, 2006, and Law No. 260- IIIQD dated March 6, 2007) describes the principles and procedures of setting the living wage in the Azerbaijan Republic and its state support, as well as its increase in consistence with the social and economic development in the country.

Azerbaijan became a member of the ILO in 1992, and **so far, has ratified 60 Conventions, including 7 important Conventions** ("Forced Labour" No.29, "Discrimination (Employment and Occupation)" No.111, "Employment policy" No.122, "Employment service" No.88, "Vocational Rehabilitation and Employment (Disabled Persons)" No.159 Conventions) of this organization.

2.1.2   National Legal Requirements on Citizen Engagement and Disclosure

Law of the Republic of Azerbaijan No 1308-IVQ dated September 30, 2015, on the procedure for considering appeals of citizens. According to the law, any citizen has a right to appeal to state and municipal bodies, and to legal entities owned by state or municipality, in written or oral form and these appeals have different procedure from appeals to Ombudsman or information requests and may not be anonymous.

Law of the Republic of Azerbaijan dated September 30, 2005 on the right to obtain information. This Law establishes the legal framework for ensuring free, unrestricted and equal information access as prescribed by Article 50 of the Constitution, whereby any person is entitled to apply directly or via his /her representative to the information owner and to choose the type and form for obtaining the information.

Law of the Republic of Azerbaijan № 816-IVQ dated November 22, 2013, on public participation.
This law provides the framework and regulates the involvement of citizens in the implementation of state management in accordance with the *Article 49* (Freedom of assembly) of the Constitution. The law stipulates that public participation consists of:
- Participation in various areas of state and public life, the preparation and implementation of the state policy and the adoption of national and local decisions;
- Participation in public control over the activity of central and local executive authorities, local self-government bodies;
- Participation of civil society institutions in the process of consultations of state and local self-government bodies with the public and in the study of public opinion (through Public Councils).

The law considers the following forms of public participation:
- **Public Councils** under central and local executive authorities, local self-government bodies;
- **Public discussions** during the adoption of decisions of public important;
- **Public hearings** on draft legal acts and different issues of state and public life;
- **Study o**f public opinion;
- **Public discussion** of draft legal acts;
- **Written consultations** on the study of opinions of civil society institutions on draft legal acts.

In addition to the described legislative acts, the environmental and socia impact assessment process also should include disclosure and stakeholder engagement activities, as per Azerbaijan legislation.

The **Law on Environmental Impact Assessment (EIA Law, 2018)** covers scope, procedure and responsibilities for Environmental Impact Assessment, as well as public consultation and disclosure requirements during environmental assessment.

According to the Law the Client (Implementing Agency) has to inform the local population and society in the project area through the media and public hearings and inform them of the results of the EIA before committing the intended activity (Article 12.1.4).

The Client should conduct public hearings in accordance with the Law of the Republic of Azerbaijan "On Public Participation" and involve individuals, legal entities, as well as property owners (Article 4.10). Information on the results of the public hearings and discussions should be included in the EIA document (Article 5.3.12).

The law also specifies the responsibilities of municipalities for the public hearing activities (Article 11). Thus, the relevant municipality in the area where the project (or intended activity) is

implemented, must take part in the implementation of the EIA and provide the necessary information required for the preparation of the EIA document. In addition, the municipalities should assist people and legal entities, real estate owners, as well as other stakeholders (non-governmental organizations, citizens' initiative groups and neighborhood committees of municipalities, etc.) to participate in public consultations, if requested by them.

In addition, people and civil society institutions have the right to request the client and the planning organization to hold public hearings on the EIA (13.2.2).

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF) that came into effect on October 1, 2018, includes Environmental and Social Standard (ESS) 10 Stakeholder Engagement and Information Disclosure. This ESS10 recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" that can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation (*ESS10 par 1*).

ESS10 applies to all projects supported by the Bank through Investment Project Financing requiring the Borrower to engage with stakeholders as an inclusive process to be conducted throughout the project life cycle (*ESS10 par 2*). In conformance to the World Bank's ESF, ESS10 prescribes the following ((*ESS10 pars 6-9)*:
- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in the ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

ESS10 par. 21 stress on the need for meaningful consultation "in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them Meaningful consultation will be carried out." *ESS10 par. 21* elucidates "meaningful consultation" as a two-way process, that:
(a) Begins early in the project planning process to gather initial views on the project proposal and inform project design;
(b) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; on an ongoing basis as the nature of issues, impacts and opportunities evolves
(c) Continues on an ongoing basis, as risks and impacts arise;

(d) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;

(e) Considers and responds to feedback;

(f) Supports active and inclusive engagement with project-affected parties;

(g) Is free of external manipulation, interference, coercion, discrimination, and intimidation; and

(h) Is documented and disclosed by the Borrower

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

ESS10 provides the definition of "stakeholder" that refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).

3.1 Project-Affected Parties

Project-Affected Parties (PAPs) are those that are affected or likely to be affected by the project and because of their particular circumstances, may be disadvantaged or vulnerable. This group are likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits (*ESS10 pars. 5&11*)

3.2 Other Interested Parties

Other Interested Parties (OIPs) are those who may have an interest in the project and would have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement (*ESS10 pars. 5&11*). Generally, these are people, social groups and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group includes governmental entities, NGOs and private businesses, who may benefit from the project. It is envisaged that all three components of the Project share the same OIPs as shown below.

3.3 Disadvantaged/vulnerable individuals or groups

Disadvantaged/vulnerable individuals and groups are those who may not have the voice and agency to express their concerns or understand the impacts of project and can thus be excluded from stakeholder engagement or project benefits.

The project will incorporate differentiated measures to ensure that these groups receive project related information, are consulted with, and have the means to participate and express their views and concerns on the project.

4   STAKEHOLDER ENGAGEMENT PROGRAM

The Stakeholder Engagement Plan is an important component of the ESF Document for the ILIA Program which takes into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. This will lay out the steps to engage all types of stakeholders in the project for the purpose of improving the environmental and social sustainability of projects, enhancing project acceptance, and making a significant contribution to successful project design and implementation. The SEP activity types and their frequency are adapted to the three main project stages of project design; construction; post-construction and operation phase.

4.1   Planned Stakeholder Engagement Activities

The table below presents the stakeholder engagement activities envisaged under the project.

Table 1: Planned stakeholder engagement activities

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
1. Detailed Design	Project-Affected Parties: People residing in project area; Disadvantaged/ Vulnerable households	Assistance in filling out documents; Project scope and rationale; Project E&S Standards; Grievance mechanism process	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Mass/Social Media Communication - phone calls Disclosure of written information - Brochures, posters, flyers, website Information board – at the beginning and at the end of project sites; Grievance mechanism	Project launch meetings in Rayons; Monthly meetings in affected municipalities and villages; Communication through mass/ social media (as needed); Information desks with brochures/ posters in affected municipalities (continuous)	SCRI (Environment & Social [ES]Team, Community Liaison Officer);
1. Detailed Design	Other Interested Parties (External) Rayon (including Village representatives)	Project scope, rationale and WB's ESS; Grievance mechanism process	Face-to-face meetings; Joint public/community meetings	Monthly (as needed)	SCRI (E&S team);

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
1. Detailed Design	Other Interested Parties (External) Press and media; NGOs; Businesses and business organizations; Workers' organizations; Academic institutions; National Government Ministries; Local Government Departments; General public	Environmental Impact Assessment Process; Grievance mechanism process; Project scope, rationale and WB's ESS	Public hearings/meetings, trainings/workshops; Mass/Social Media Communication Disclosure of written information – EIA, brochures, posters, flyers, public relations kits, SCRI website; Information boards – at the beginning and at the end of project sites; Grievance mechanism; Project tours for media, local representatives	Project launch meetings; Monthly meetings in affected municipalities and villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (continuous)	SCRI (E&S team)
1. Detailed Design	Other Interested Parties (External) Other Government Departments; Other project developers reliant on or in the vicinity of the Project and their financiers	Project information - scope and rationale and WB's ESS; Coordination activities; Land acquisition process; Environmental Impact Assessment Process; Grievance mechanism process	Face-to-face meetings and FGDs; Invitations to public/ community meetings	As needed	SCRI (E&S team)
1. Detailed Design	Other Interested Parties (Internal) Other Staff; Supervision Consultants;	Project information - scope and rationale and WB's ESS; Training on ESIA and other sub-management plans; Grievance mechanism process	Face-to-face meetings and FGDs; Training/workshops; Invitations to public/community meetings	As needed	SCRI (E&S team)

4.2   Detail on Engagement Methods to be Used

In conformance to *ESS10 B - Engagement during project implementation and external reporting (pars. 23-27)*. Stakeholder engagement will be in place throughout the entire project implementation through a number of possible methods discussed herein,

4.2.1   Public/community meetings

Prior to other ILIA Project related activities, at the time of disclosure of relevant project documentations and this SEP, SCRI will arrange for a project briefing meeting on a national level, involving the stakeholder agencies. As the need arises, the briefing meeting can be held once at the start, and another can be arranged if the need arises or if there are major changes in the project.

4.2.2   Communication materials

ILIDP information will be disclosed to the public via a variety of means of conveying project information and updates via printed materials consisting of brochures, flyers, posters, etc. The communication materials will be produced by the SCRI-PIU and to be made available at SCRI. A "Public Relations Kit" will be designed specifically and be made available both in print and online form. SCRI/PIU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's performance both in Azerbaijani and English. The website can also be utilized to provide information regarding the grievance mechanism for the project.

4.2.3   Mass/social media communication

During the project implementation, a designated Enviornmental and Social Specialist (from SCRI-PIU staff) will be responsible for maintaining close communication with stakeholders, including PAPs, community leaders. The Enviornmental and Social Specialist, as the main Focal Point Person (FPP), will also be tasked for posting relevant information on the dedicated Project website, social media channels (Facebook, etc.) and on information boards throughout the project's lifecycle. In addition, if necessary, the project may arrange for production of video materials (for video-sharing platform, e.g., YouTube) or documentary broadcast on TV/cable TV and which will entail description of the project, advance announcement of the forthcoming public events or commencement of specific Project activities.

4.2.4   Information Desks

During the initiation of the Project, an "Information Desk" in each Rayon will be arranged with Executive Committees to provide local residents with information on stakeholder engagement activities, project interventions, contact details of the Focal Point Person (FPP), etc. The FPP will set up these information desks in Rayon offices where they can meet and share information about the project with PAPs and other stakeholders. The Project brochures and fliers on various project related social and environmental issues will be made available at these information desks.

4.2.5   Implementation of Grievance Redress Mechanism

In compliance with the World Bank's ESS10, a project-specific grievance mechanism will be set up for the Project to handle complaints and issues. Specific for the Project, a GRM brochure or pamphlet will be developed to help local residents become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be installed in each Executive Committee offices, and SCRI-PIU will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. In addition, other channels will be set up by the PIU for people to log in project related grievances such as the SCRI/PIU website, e-mails, Facebook account, and mobile phones of relevant offices. Information on these channels will be displayed broadly, as well as on the locked suggestion/complaint boxes as alternatives.

Grievances will be addressed as follows:
- (i) Contractor's and SE's safeguards staff to initially record the grievance
- (ii) provision contact data of SCRI-PIU hotline for grievances
- (iii) The grievance redress book will contain records of all grievances and updated
- (iv) Provision of summary in a semiannual or quarterly report.

4.2.6 Capacity Building Trainings and Workshops

Capacity Building Trainings and Workshops on a variety of topics and issues may be provided to SCRI-PIU and possibly relevant government or non-government service providers Issues covered will include sensitization to inclusion/exclusion, labor issues, gender, etc.

4.3 Proposed Strategy / Differentiated Measures to Include the Views of and Encourage Participation by Vulnerable Groups

Considering the extra burden and difficulty of Disadvantage and Vulnerable Groups, ESS10 par. 16 specifies that the "SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them."

To this end, the project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. Project workers, especially those working as social specialists for the SCRI-PIU or the consultants hired by SCPI-PIU shall find ways to reach out to these groups and provide the necessary awareness briefings about the impacts of the project.

Focus group discussions (FGD) tailored to the groups' circumstances may also be envisaged as appropriate and information will be provided in the language that can be understood by them. Accordingly, people with restrictions on physical mobility (persons with disabilities, or limited mobilities), who may be affected even indirectly should be provided facilitation to voice out their opinions and their views appropriately considered. Targeted measures to ensure participation in stakeholder engagement will be used, such as organizing consultations at different times convenient for different groups, providing transportation arrangements if needed and reaching out to spatially isolated communities..

4.4 Information Disclosure

The current SCRI website is being used to disclose project documents, including those on social performance in Azerbaijani and English.

All future project-related social and environmental monitoring reports listed in the above sections may be disclosed on the same SCRI webpage, including Project updates, an easy-to-understand guide to the terminology used in the social and environmental reports or documents, and all relevant information as also found in printed materials. The details about the Project Grievance Resolution Mechanism will have a special electronic grievance submission form, which will also be made available on the website. Contact details of the Environmental and Social Specialist (the Focal Point Person in this case) and contact office particulars shall be made available on the website. The project website will be updated for P-APs and other stakeholders.

5 ROLES, RESPONSIBILITIES AND RESOURCES FOR STAKEHOLDER ENGAGEMENT

5.1 Implementation Arrangements

The project will be implemented by SCRI. The already established PIU will be responsible for the day-to-day project management, including environmental and social management and addressing potential environmental and social risks. The PIU will be responsible for engaging with the stakeholders. Once the project is operating, a Monitoring and Evaluation Specialist and Environmental and Social Specialist will also join the PIU to ensure the regular monitoring of the project result framework and adherence with the World Bank's ESF, including implementation of the SEP.

5.2 Timeframe

This Project SEP will be regarded as a living document and needs to be updated and refined throughout the lifecycle of the Project to incorporate and reflect any changes in the project. Any changes in the focus and scope of the SEP will be communicated SCRI-PIU to stakeholders. The crucial project-cycle phases to be considered when implementing SEP are.
- **Design/Plan**: the process of assuring that systems and components of the Project are designed, provided, and maintained to prescribed / agreed requirements in technical terms as well as the World Bank's ESSs relevant for the Project;
- **Implementation**: the process and activities are realized as intended with all the requirements as per the World Banks's ESSs relevant for the Project.

5.3 Roles and Responsibilities

For the implementation of the SEP, the Project SEP Team will include an SCRI-PIU Enviornmental and Social Specialist. The Environmental and Social Specialist will carry responsibility for consistency of Project-supported activities with the ESSs relevant for the Project. The Enviornmental and Social Specialist shall take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the Communications and Community Coordinator/s (possibly two (2) staff) will need to closely coordinate with other key stakeholders. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

6 GRIEVANCE REDRESS MECHANISM

As per ESS10 C – Grievance Mechanism, the Borrower is expected to respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (*ESS10 par. 26*). Further, "Where feasible and suitable for the project, the grievance mechanism[2] will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements (*ESS10 par. 27*). The major considerations are as follows:
(i) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution The mechanism, process or procedure will not prevent access to judicial or administrative remedies The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and

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[2] WB ESF (2018) 100, note 9

(j) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed

ESS10 Annex 1 par 2 provides some detailed GRM requirements which need to be incorporated in the Project as follows:

(a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or in a website;
(b) A log where grievances are registered in writing and maintained as a database;
(c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
(d) Transparency about the grievance procedure, governing structure and decision makers; and
(e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved

6.1   Establishing the Project GRM

The Steps to be followed to address grievance within the SEP framework as per ESS10 requirements:

Step 1 Grievance Redress Commission (GRC): A GRC will be formed by SCRI-PIU at the local level which shall consist, as a minimum, of representatives from the people, through recognized local leaders (e.g., officials of local executive power). The GRC will act as the mediator between aggrieved parties and will make efforts to resolve conflicts through mutual consent. The uptake channels can be delegated to a staff of the CSC who can log in grievances received verbally (personal appearance, or phone), on-paper (documentary or traditional mail), or electronically (e-mail, website, WhatsApp, etc.). Resolution steps will entail inspection, review, assessment of grievance, internal GRC deliberations, discussions with complainant, compromise and arriving at decisions. The contact details of uptake channels shall be made known to the local people. This step will have a time frame of 7-10 days.

Step 2 SCRI-PIU: Recommendations of GRC are sent to the SCRI-PIU. The SCRI-PIU is responsible for addressing the grievances of the PAPs and if necessary, will forward these grievances to appropriate agencies/ offices for taking action. PAPs will be able to contact the SCRI-PIU through phone, email, direct meetings and letters. The contact details of SCRI-PIU (Point of Contact) will be distributed to the P-APs and posted on the main locations in the communities before the commencement of Project implementation. In addition, in case of unresolved issues with the PAPs, the SCRI-PIU may resort to "mediation" as an option (*ESS10 Annex 1 par 3*). This step will have a time frame of 15 days.

Step 3 (Court of law): The court of law will be the last resort. In principle, the Project-Affected Parties can **appeal** to a relevant court anytime they disagree with the activity or inaction of the Project Implementors. However, the Project-specific GRM will be implemented fully and transparently in order facilitate resolution of grievances at the Project as a convenient alternative to escalating complaints to the judicial level. Having said that, PAPs can apply to court if they disagree with the final decision of GRM. This step will have a time frame of 30 days.

In conformance to *ESS10 Annex 1 par 2 (a)*, the GRM will be accessible to the full range of project stakeholders, including project-affected parties, community members, civil society, media, and other interested parties. Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the project. The GRM is intended to address issues and complaints from external stakeholders in an efficient, timely, and cost-effective manner. A separate mechanism will be used for worker grievances.

The SCRI-PIU will be responsible for managing the stakeholder GRM following the roles and responsibilities outlined in the previous section.

6.2 Protocols and Procedures for Serious Grievances

In order to be comprehensive in covering every possible aspect of grievances in the World Bank funded project, certain protocols and procedures for sensitive cases will have to be recognized and readily set up as the need arises. Among the sensitive cases that is brought to light would be those pertaining to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). By definition[3], Sexual Exploitation pertains to "Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another." Sexual Abuse is "The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." While Sexual Harassment "occurs between personnel and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

In the context of a conservative society, social norms may form some barriers for complaints falling under these categories would go unreported. It is essential that emphasis is given on promoting an environment wherein the community, project workers and various stakeholders feel safe to report violations and trust that immediate and decisive action will be taken against perpetrators.

The complaint mechanisms should be safe, gender-sensitive, and appropriate to the context, maintaining neutrality and confidentiality before and during deliberation of matters. GRM functions will be strengthened to ensure timely, impartial, independent and fair investigations for SEA and SH. SCRI will take all measures to build trust for its investigation function, including, where appropriate, engaging an independent third party with experience in handling such cases through channels appropriate for the project.

The protocols and procedures for serious grievances should be based on the following principles:
- All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.
- After reaching a solution to a case, the Grievance Counsellor as the case may be, will follow-up to ensure that the solutions are effective.
- Criminal cases will be referred to the public prosecutor.

6.3 Grievance Logs

As part of *ESS10 Annex 1 par 2* requirement for maintenance of Grievance Logs and Data Base, the SCRI-PIU will maintain a grievance log as part of the SEP implementation, which will contain, at the minimum, the following information:
- Individual reference number;
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously);
- Details of the complaint, feedback, or question/her location and details of his / her complaint;
- Date of the complaint;
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.);
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution;
- Date when proposed resolution was communicated to the complainant (unless anonymous);
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution;

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[3] Regional Toolkit for PSEA/SH and Community-Based Complaint and Referral Mechanisms in the Americas.

- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out; and
- Date when the resolution is implemented (if any).

6.4   Monitoring and Reporting on Grievances

Details of monitoring and reporting are described above. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the SCRI-PIU. To ensure management oversight of grievance handling, an internal audit review will be done spearheaded by PIU management for monitoring the overall process, including verification that agreed resolutions are actually implemented.

6.5   Central point of contact – PIU

The point of contact regarding the stakeholder engagement program (*to be provided and updated by SCRI-PIU*):

Description	Contact details
Name	
Address	
Email	
Telephone	

As part of *ESS10 Annex 1 par 2,* requirement for publicly advertising procedures, any information on the Project and future stakeholder engagement programs will be available on the Project website and will be posted on information boards in the rayon's Executive Power Building. Information can also be obtained from SCRI in Baku City. Recent monthly E&S reports that document the implementation of the Stakeholder Engagement Plan may be disclosed on the Project website.

6.6   World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms of the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. 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 WBGRS, aggrieved persons or with people with complaints may visit:
https://projects.worldbank.org/en/projects-operations/products-andservices/grievance-redress-service .
For information on how to submit complaints to the World Bank Inspection Panel may be obtained at www.inspectionpanel.org.

7   MONITORING AND REPORTING

7.1   Project Monitoring Reports (By Component, As Relevant)

Monitoring and evaluation of the stakeholder engagement process is considered vital to ensure SCRI is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Specialist in charge of monitoring and reporting of SEP from SCRI-PIU will be the Enviornmental and Social Specialist. Monitoring of the stakeholder engagement process

allows the efficacy of the process to be evaluated. Two distinct but related monitoring activities in terms of timing will be implemented:

- **During the engagement activities**: short-term monitoring to allow adjustments/ improvements to be made during engagement; and
- **Following completion of all engagement Stakeholder Engagement activities**: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

Information on the status of implementation of SEP activities, including functioning of the GRM, will be included in all project progress reports. A series of key performance indicators for each stakeholder engagement stage will be developed by SCRI-PIU Environment & Social Team. The indicators, and performance against the indicators will show successful completion of engagement tasks.

7.2 Reporting Back to Stakeholder Groups

Reporting to stakeholder groups and evaluating the stakeholder process is considered vital to ensure that SCRI-PIU can respond to identified issues and change the schedule and nature of engagement activities to make them more effective. It is desirable that all issues must be resolved at all levels and professionally. For a clear and understandable review, everything should be used as informational and in the form of presentation. All interested parties should be informed of all stages and the solution of all problems.

The Project Environmental and Social Specialist will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected areas. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMS' and phone calls will be used to respond to stakeholders whose telephone numbers are available. Key Project updates will be posted on the Project website. Social media (primarily through the Project website (or social media platform) for PAPs and other stakeholders) will also be used to report back to different stakeholders.

8 ANNEXES

Annex 1. Example Grievance Form

Grievance Form			
Grievance reference number (to be completed by GRM Focal Point):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: ☐	By phone: ☐	By email: ☐
Preferred language	☐ Azerbaijani	☐ Russian	☐ other_____
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like Employment services Center or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website ☐	email ☐	By hand ☐
	In person ☐	By telephone ☐	Other (specify) ☐
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of Focal Point person assigned responsibility			
Resolved or referred to GRC1?	☐ Resolved	☐ Referred	If referred, date:
Resolved or referred to GRC2?	☐ Resolved	☐ Referred	If referred, date:
Completion			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1st proposed solution			
2nd proposed solution			
3rd proposed solution			