

# Cambodia Skills for Better Jobs Project (P179159)

## Stakeholder Engagement Plan

June 2023

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## Abbreviations

AP	Affected Person
COC	Codes of Conduct
CERC	Contingent Emergency Response Component
ESCoP	Environmental and Social Code of Practice
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGD	Focus group discussion
GBV	Gender-based violence
ISCs	Industry-School Committees
IP	Indigenous People
JC	Job Center
KII	Key informant interview
LMP	Labor Management Procedures
LMI	Labor Management Information
LMIS	Labor Management Information System
M&E	Monitoring and Evaluation
MLVT	Ministry of Labor and Vocational Training
NEA	National Employment Agency
NGO	Non-Governmental Organization
PD	Project Director
PM	Project Manager
PMU	Project management unit
RGC	Royal Government of Cambodia
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
SH	Sexual harassment
SSCs	Sector skills councils
STD	Sexually Transmitted Diseases
TVET	Technical and Vocational Education and Training
TA	Technical Assistance
ToT	Training of Trainers
TTI	Technical Training Institution
VAC	Violence against children

## 1 Project Description

### 1.1 Overview

1. The Cambodia Skills for Better Jobs Project (the Project) will support building the skills of the upcoming and existing workforce in response to industry needs and to provide labor management information (LMI) and career orientation for better jobs.

2. The primary project beneficiaries are individuals in the upcoming and existing workforce in Cambodia who enroll and/or complete vocational training and seek opportunities for better jobs. Both the upcoming workforce and the existing workforce will have access to the training programs and labor market services supported by the project.

3. In addition, the project will directly benefit, through capacity building activities, (a) managerial staff, teachers, and trainers of the project-financed training institutions with improved knowledge and skills; (b) employers who benefit from upskilled workforce and trainings designed to meet their needs; (c) jobseekers who receive job counselling and career orientation; (d) government officials, job counsellors, staff of sector skills councils (SSCs) involved in service delivery; and (e) labor management information system (LMIS) users. The project will also promote greater inclusion among disadvantaged groups such as women and others.

4. This Stakeholder Engagement Plan (SEP) has been prepared to ensure effective stakeholder engagement in skills development activities. The plan aims to facilitate a meaningful, inclusive, consultative, and engaging approach throughout the project's life cycle. The SEP has been developed in consideration of the project's nature, scale, and potential risks and impacts, which are expected to be moderate. The project will mainly involve non-physical activities, with limited physical activities to be conducted within existing compounds of selected Technical Training Institutions (TTIs) and Job Centers (JCs) during project implementation.

### 1.2 Description of Components

5. The Project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce. The proposed project will comprise four components: (a) skilling-up to respond to industry needs; (b) information and orientation for better jobs; (c) project management; and (d) contingent emergency response component (CERC). More details are available in the Project Information Document: <https://projects.worldbank.org/en/projects-operations/project-detail/P179159>.

#### **Component 1 – Skilling-Up to Respond to Industry Needs**

6. The objective of this component is to provide incentives and strengthen capacity to expand and improve effective collaboration between training providers and industry.

##### **Sub-component 1.1 – Sector-wide improvements in industry engagement and quality – in select sectors**

7. **This sub-component comprises three types of activities at the sector level that all serve to create a more conducive environment for effective collaboration between training providers and industry.** Interventions will target the priority sectors and, within those sectors, priority occupations. The sub-component will: (a) provide Technical Assistance (TA) to strengthen SSCs in their role as facilitators of effective collaboration between industry and training institutions; (b) conduct information campaigns and build capacity among staff of Technical and Vocational Education and Training (TVET) providers and industry on establishing effective partnerships; and (c) to curriculum development by modernizing and developing curricula and standard training packages for priority occupations in the target sectors as well as for basic 21<sup>st</sup> century skills.

### **Sub-component 1.2 – Improvements in industry engagement and quality in select training institutions**

8. **This sub-component will improve the quality and relevance of training provision by promoting industry partnerships of a select number of training institutions, through the results-based financing of industrial-linkages development plans (ILDPs).** To summarize, this sub-component will finance: (a) TA to establish Industry-School Committees (ISCs); (b) TA to support the training institution and firms to develop, implement, and monitor ILDPs; (c) Implementation ILDPs – which include: (c1) civil works in some cases, (c2) equipment; (c3) incentives for various forms of industry partnerships, e.g. joint curriculum development, guest lecturers from industry, for teachers to train from industry, and for internships.

### **Component 2 – Information and Orientation for Better Jobs**

#### **Sub-Component 2.1 – Labor market information system (LMIS)**

9. **This sub-component will finance:** (a) TA to develop an LMIS roadmap, (b) preparation, implementation, and analysis of labor market surveys; (d) TA to training institutions on the TVET MIS; and (e) IT systems. The latter would be carefully reviewed to minimize duplication and ensure sustainability.

#### **Sub-Component 2.2 – Job search support and career orientation**

10. **This sub-component will finance improvements in career orientation activities undertaken by the National Employment Agency (NEA) along with the refurbishment of existing job centers and possibly the purchase of mobile job centers.** This sub-component will finance: (a) TA to revise and strengthen career guidance and job counselling and conduct Training of Trainers (ToT) for Government staff to provide the counselling; and (b) possible rehabilitation of select job centers, including renovations to seven job centers with upgrades to equipment and the purchase of five mobile job centers.

### **Component 3 –Project Management, Monitoring and Evaluation**

11. This component aims to support project implementation and management, capacity building, monitoring and evaluation, and citizen engagement. It will finance the following activities: (a) establishing and operating an effective project management unit (PMU); (b) setting up and maintaining the Project Steering Committee and Technical Working Group; (c) providing capacity building for project staff on operations management, financing management, procurement, environmental and social management and capacity building; (d) conducting stakeholder engagement activities; (e) establishing and maintaining a grievance redress mechanism (GRM); and (d) monitoring and evaluation.

### **Component 4 – Contingent Emergency Response Component (CERC)**

12. This component is designed to provide swift response in an event of an Eligible Crisis or Emergency<sup>1</sup>, by enabling Royal Government of Cambodia (RGC) to request the World Bank to re-allocate uncommitted project funds to support emergency response and reconstruction.

#### **1.3 Purpose of the Stakeholder Engagement Plan**

13. This SEP seeks to ensure effective stakeholder engagement in all stages of the Project, including beneficiaries and other stakeholders, with a specific focus on women and vulnerable groups,

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<sup>1</sup> "Eligible Crisis or Emergency" is defined as "an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or man-made crises or disasters", Paragraph 12, Bank Policy: Investment Project Financing, Projects in Situations of Urgent Need of Assistance or Capacity Constraints. It may include extreme climate event (e.g. flood), nature disasters (e.g. earthquake), public health emergency (e.g. COVID-19), and any natural disaster or man-made crisis.

including indigenous peoples. The plan aims to involve affected people in mitigation measures and continuing monitoring of project activities.

14. To achieve this, the SEP will establish a systematic approach to stakeholder engagement that will identify affected and interested stakeholders, especially unemployed youth. The plan will maintain meaningful two-way communication with stakeholders regarding project risks and benefits, assess stakeholder interest and support, and consider stakeholder views in the design and management of potential environmental and social impacts.

#### 1.3.1 Objectives of the Stakeholder Engagement Plan

15. The objectives of this stakeholder engagement plan are:

- To identify all project stakeholders including their priorities and concerns, and ensure the project has ways to incorporate these;
- Identify strategies for information sharing and communication to stakeholders, including project information on social risks and impacts, as well as consultation of stakeholders in ways that are meaningful and accessible throughout the project cycle;
- To specify procedures and methodologies for stakeholder consultations, documentation of the proceedings and strategies for feedback;
- To establish an accessible, culturally appropriate and responsive grievance mechanism; and
- To develop a strategy for stakeholder participation in the monitoring of project impacts.

16. This SEP is applicable to the whole project. The SEP is a living document and will continue to be updated as the project progresses from pre-civil works to civil works and operation.

#### 1.3.2 Regulatory Foundation of the Stakeholder Engagement Plan

17. This Stakeholder Engagement Plan is consistent with requirements under the Royal Government of Cambodia's Sub-Decree No. 72 on the Environmental Impact Assessment Process (1999) and the Prakas on General Guidelines for Developing Initial and Full Environmental Impact Assessment Reports (2009). It also adheres to and will follow the requirements of the Environmental and Social Standard 10 (ESS 10) on Stakeholder Engagement and Information Disclosure of the World Bank Environmental and Social Framework (ESF).

## 2 Summary of Previous Stakeholder Engagement

18. Because the target TTIs and JCs and sites for new construction have not yet been selected, research for the Social Assessment consisted of a rapid appraisal of social issues and concerns. Most of the meetings had to be with TEVT officials, principals of TTIs and JCs administrators. These meetings allowed for a clearer identification of the stakeholders for this SEP, in particular at the local level.

19. It is important to emphasize that stakeholder identification and consultation will continue to take place after target TTIs, JCs, and construction sites have been selected. The SEP will be updated accordingly to reflect the timing of consultations and the identification of stakeholders, and to determine whether additional environmental and social (E&S) instruments, such as subproject-specific Environmental and Social Management Plans (ESMPs), or the application of existing instruments, such as Environmental and Social Code of Practices (ESCoP), Codes of Conduct (COC), Labor Management Procedures (LMP), and E-waste management plan, are needed for those areas. Any future consultations will also need to consider relevant Covid-19 measures.

20. The Project shall ensure efforts to identify and engage all relevant stakeholders during different stages of project design and implementation, including vulnerable groups such as the poor, indigenous peoples (IPs), and those with disabled family members.

### 3 Project Stakeholders Identification and Analysis

21. Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. The two broad categories of stakeholders in this project are as follows.

#### 3.1 Affected Stakeholders

22. **Affected Stakeholders:** Those who will be likely impacted by the Project positively or negatively. These stakeholders are:

- **Trainees of TTIs selected** who will benefit from improved TVET facilities and training programs, particularly those with disabilities, from socially marginalized groups, or from other vulnerable groups;
- **Workforces accessing to LMIS** who will benefit from the improved job information and orientation service in JCs selected;
- **Employers** who employ the graduates of project-supported training programs;
- **Trainers and administrators of TTIs and JCs** selected who will receive training and mentoring to enhance their skills;
- Workers involved in the new construction and rehabilitation/construction of TTIs and JCs; and
- Nearby communities and residents affected by the new construction and rehabilitation/construction of TTIs and JCs, from noise, traffic, dust, etc., or impacts from workers' camps.

#### 3.2 Interested Stakeholders

23. **Interested Stakeholders:** Those who are not impacted by the Project but who may be interested in the project outcomes and who may have an influence in the project. These stakeholders may include:

- **Development partners** in related fields, such as skills training, employment assistance, poverty reduction, working with indigenous communities, etc.;
- **Local and international NGOs** working in related fields, such as skills training, employment assistance, poverty reduction, working with indigenous communities, etc.;
- Government authorities working in relevant areas;
- **The media;** and
- Local residents who do not benefit directly from the project.

### 4 Stakeholder Engagement Plan

24. Stakeholder engagement is a crucial element of effective project management that enables productive interaction with all potentially affected parties and other interested stakeholders throughout the project cycle. Through stakeholder engagement, project managers can achieve the following objectives:

- Solicit feedback to inform project design, implementation, monitoring, and evaluation;
- Clarify project objectives, scope, and manage expectations;
- Assess and mitigate project environmental and social risks;
- Enhance project outcomes and benefits;
- Disseminate project information and materials; and
- Address project grievances and coordinate resolution efforts.

25. To ensure that all stakeholders are adequately represented and have opportunities to participate, the Project will employ a range of methods and techniques. These may include stakeholder consultations, workshops, surveys, and other participatory approaches. By engaging with stakeholders at every stage of the Project, the project team can effectively manage stakeholder expectations and address concerns, ultimately leading to a more successful project outcome.

#### 4.1 Disclosure of Information

26. Information disclosure is a fundamental aspect of the Project, which aims to make project information accessible and understandable to all interested and affected parties. It is a continuous process that will be carried out throughout the project cycle.

27. To ensure effective disclosure, information will be communicated in a way that is suitable for the various stakeholders and will be available in both English and Khmer as appropriate. For indigenous peoples and communities, information will be disclosed in a language and manner that is accessible to them, as needed.

28. The principles that will guide the disclosure process are transparency, clarity, timeliness, relevance, usefulness, and accessibility. To adhere to these principles, the Project will:

- be transparent in sharing information with stakeholders;
- present information in a straightforward and understandable manner;
- disclose documents as early as possible;
- use disclosure to facilitate consultation and engagement activities;
- provide meaningful and useful information to stakeholders; and
- ensure that information is accessible to all interested parties, including vulnerable groups and communities.

29. By adhering to these principles, the Project will enhance stakeholder engagement, facilitate the flow of information, and ensure that all parties have the necessary information to make informed decisions and contribute to the project's success.

##### 4.1.1 Before WB Project-Appraisal

30. Draft versions of key documents, including the Environmental and Social Management Framework (ESMF), the Environmental and Social Commitment Plan (ESCP), and this Stakeholder Engagement Plan (SEP) were disclosed in June 2023 and consulted on June 23, 2023.

31. The purpose of this disclosure is to ensure transparency and provide meaningful and useful information to stakeholders throughout the project cycle, in accordance with the guiding principles of the SEP. By doing so, the Project seeks to engage stakeholders effectively, solicit feedback, address grievances, and mitigate social and environmental risks to enhance project outcomes and benefits.

##### 4.1.2 During Project Implementation

32. Once the target TTIs and JCs have been identified, the Project will inform the main stakeholders served by these institutions, including trainees, trainers, administrators, employers, and workforces accessing LMIS and job orientation services, about the project's purpose, nature, scale, and relevant components. Provincial and district-level government officials will also be consulted. The information disclosed will also cover potential risks and impacts to the local communities from an environmental and social perspective, with consideration for the disclosure methods outlined in Table 1.

###### 4.1.2.1 Methods for disclosure

33. Table 1 provides types of information to be disclosed, topic of consultations, as the methods and other relevant information.



**Table 1. Methods for Information Disclosure for the Project**

Project Stage	List of Documents	Method of Disclosure	Timetable/ Location	Target Stakeholders	Topic of Consultation	Responsibilities
Prior to World Bank Appraisal	ESCP, ESMF, SEP (including GRM), LMP (including workers' GRM and COC)	MLVT and WB websites National Consultation	June 2023	Affected people and other interested parties as appropriate.	Overall project, ESF documents prepared and potential E&S impacts and mitigation measures	MLVT
Project Implementation	Public Information Booklets Posters Brochures on training opportunities for teachers/staff	Provincial and District consultations Consultations in communities Consultations with teachers, administrators, institute management committees Under Covid-19 restrictions, consultations may need to be by phone or teleconference	After selection of target TTIs and JCs At the provincial, district and village levels	Trainees, trainers, employers and job seekers served by the institutes Institute administrators Teachers Institute management committees	Project activities, opportunities, potential ES impacts and risks, mitigation measures, GRM, etc.	MLVT ES Officer, supported by consultants
	ESCOPs/ ESMPs, Screening Forms, LMP, workers' GRM, COCs, other relevant E&S documents (such as GBV)	Local Consultations Training for Contractors Training for workers Project website Under Covid-19 restrictions, some of these consultations may need to be by phone or teleconference	After design of civil works and selection of contractors At community level In provinces or districts with the contractors At construction site with workers	Local communities where civil works will be carried out Other communities affected by the civil works Contractors Workers Other interested parties	Schedule of construction works, opportunities, potential ES impacts and risks, mitigation measures, GRM, etc.	MLVT ES Officer, assisted by other relevant project staff and consultants
	Monitoring reports	Local consultations and project website	National, provincial and district levels At local Institutes where relevant	MLVT, WB, other interested parties TTIs and JCs administrators	Update on project activities, progress, performance and achievements, etc.	Project Management Unit of MLVT

## 4.2 Stakeholder Consultation

34. Consultation is a two-way process of dialogue between the Project and its stakeholders. It provides the opportunity for the project to get feedback from stakeholders, especially directly affected persons and groups, and in particular from vulnerable groups.

35. Methods of consultation will vary depending on target audience, nature of activities and level of interest of the stakeholder group in project activity. The timing of consultations will also depend upon implementation of various components and sub-components of the project. For example, consultations at the community level and even at the district level can only begin after target TTIs and JCs have been selected.

36. Covid-19 considerations will need to follow government regulations.

37. Some helpful criteria that should guide consultations with local-level stakeholders, in particular affected people, include:

- (i) Face-to-face consultations should be inclusive of all stakeholder groups, such as women, elderly, people with a disability, poor households and other vulnerable persons, including separate sessions by gender and age when appropriate;
- (ii) One-on-one interviews and focus groups should be conducted in a culturally sensitive manner, without external interference or pressure so that interviewees can speak freely; and
- (iii) Notices of meetings and other consultations should be provided sufficiently in advance, if possible, at prominent locations, with the information disclosed sufficiently in advance when applicable.

38. As this SEP is a living document, to be updated regularly to reflect changing conditions in the project, comments and suggestions received from participants should be collected and incorporated into this SEP, other project documents, and in ongoing project implementation as much as possible. Stakeholders should be made aware how their recommendations were incorporated in follow-up meetings and consultations.

### 4.2.1 Consultations with vulnerable stakeholders

39. Given the potential barriers to accessing TVET and job orientation services faced by vulnerable populations, such as those living in poverty or from indigenous communities, special efforts should be made to ensure adequate consultation with these groups. This may include targeted outreach efforts and utilizing communication methods that are accessible and appropriate for these groups. These consultations will aim to gather feedback and address concerns related to the Project's TVET and job orientation components to ensure that they are accessible and beneficial to all members of the community.

#### 4.2.1.1 Indigenous groups/communities

40. When consulting with indigenous communities, cultural appropriateness is crucial for effective communication and engagement. Followings are three important considerations following WB ESS7:

- Language: Use the appropriate language(s) spoken by the IP group/community to ensure clear communication. Interpreters can assist with translation if needed.
- Cultural sensitivity: Respect the cultural norms and values of the minority community and tailor the consultation process accordingly. For example, some communities prioritize group decision-making.
- Inclusiveness: Ensure the consultation process is inclusive and accessible to all members of the IP group/community, including women, youth, elderly, and those with disabilities. Use alternative communication methods, such as visual aids or braille materials, if necessary.

41. The Project should make special arrangements to ensure the involvement of indigenous communities or groups in the stakeholder engagement, especially those who may face barriers in accessing TEVT and job orientation services. The Project should consider arranging for a fluent bilingual member of the group to help translate or engage a translator when communicating with people who are not fluent in Khmer.

42. Indigenous communities may have a higher rate of individuals who face social vulnerability, such as low income, limited education, or disabilities. Therefore, the Project should seek individual face-to-face or online meetings with these individuals, to allow them to speak freely and to understand their particular concerns and needs. Special attention should be given to identifying any barriers that prevent these individuals from accessing TEVT and job orientation services, and explore appropriate ways to address those issues.

#### 4.2.1.2 *Other disadvantaged individuals*

43. To ensure that individuals from disadvantaged backgrounds are included in the project's activities, the project team should work with community leaders to identify those who are at a disadvantage, including those with low income, limited education, disabilities, and other forms of social vulnerability.

44. During the consultations, the project team should pay special attention to identifying any barriers that prevent these individuals from accessing TEVT and job orientation services, and explore potential solutions to address those issues.

### 4.3 *Methods of Consultation*

45. The most appropriate method of consultation will be chosen by the Project, depending on the stakeholders and the types of consultation required.

46. At the community level, the Project should conduct consultations to inform local residents and authorities about the project and its potential impacts, once target TTIs and JCs are selected. This can include focus group discussions, key informant interviews, and face-to-face or online meetings with individuals and groups.

47. To ensure effective communication and participation of vulnerable groups, special attention should be given to the methods of consultation.

#### 4.3.1 *National Consultations*

48. **National Level Consultations** are particularly useful to target government representatives, non-government organizations (NGOs), the media and other interested groups who have an interest in the Project and may also have an ability to influence it.

49. A national consultation was conducted on June 23, 2023, ahead of appraisal, and a summary of the consultation is presented in Annex 2.

#### 4.3.2 *Provincial and District Consultations*

50. Once subprojects have been identified, Provincial and District Level Consultations would be similar to national consultations, but should target local level government representatives, local NGOs, local media, as well other groups and individuals who have an interest in TEVT and job orientation services. They should also include administrators and representatives from TTIs and JCs, as well as local leaders from the communities served by these institutions, as well as the employers of private and public sectors.

51. These consultations can be conducted through general meetings open to the public, as well as meetings with specific groups. Focus group discussions (FGDs) and key informant interviews (KIIs) can also be used to gather more detailed feedback. The project team should aim to communicate the

benefits of TEVT and job orientation services to the workforce and employers and address any concerns or questions they may have.

#### 4.3.3 Community Consultations

52. These consultations will involve potential beneficiaries, community leaders, and other stakeholders in the project once subprojects have been identified. The consultations will be conducted through various methods, including focus group discussions, key informant interviews, brochures and individual meetings. Special attention will be given to vulnerable households, including those who are poor, have a disabled family member, or are single mothers.

53. For communities where there will be construction and rehabilitation/renovation activities, additional consultations will be necessary to explain the potential environmental and social impacts of the construction, workers' camps, and other potential impacts on the community, such as gender-based violence (GBV), sexually transmitted disease (STDs), and Covid-19 prevention. The consultations will also include information on the grievance redress mechanism.

54. For communities of indigenous peoples, consultations should follow the recommendations on cultural appropriateness mentioned above.

#### 4.3.4 TTIs and JCs and Workers

55. Once subprojects have been identified, meetings will be held with the administrators of selected TTIs and JCs for the civil works on the Environmental and Social Codes of Practice (ESCoP) or the ESMP if needed, worker health and safety, workers' rights, child labor, working with IP (if relevant), GBV, Covid-19 prevention, and other environmental and social matters relating to construction/rehabilitation works and relations with neighboring communities.

56. Posters should also be placed at the construction site and any workers' camp on pollution control, traffic safety, worker health and safety, conditions in dealing with local residents, GBV, STDs, Covid-19 prevention, and other relevant environmental and social matters.

57. The Project will strive to ensure that unskilled workers come from the community as much as possible, so as to minimize the influx of labor. Interest in such work should be gauged from the community consultations described in 4.3.3 above. This should include women as well, if the women in the area show an interest in being hired.

#### 4.3.5 Training

58. Teachers and administrators of selected TTIs and JCs should receive training on ICT equipment operation and maintenance, violence against children (VAC) and GBV, including ways to respond to and report any such cases.

59. Construction workers should receive training in worker safety, labor rights, workers' codes of conduct, child labor, HIV/AIDS and STDs, GBV, and Covid-19 prevention and protection. Residents of communities where construction will take place should receive training on community health and safety, HIV/AIDS and STDs, GBV, and the grievance redress process. The training should be held in a culturally sensitive manner, some directed toward particular age groups or in male-only or female-only sessions.

### 4.4 Reporting Back to Stakeholders

60. Consultations with stakeholders will be the main mechanism to inform them of the project and to get their feedback. The method of reporting back to stakeholders will depend on the stakeholders themselves.

- For National-level stakeholders, an email and/or official letter will be sent after workshops on how comments/suggestions were taken into account;

- For local stakeholders, follow-up meetings/consultations will be conducted to let stakeholders know how comments/suggestions were taken into account;
- For Indigenous Peoples, if relevant, ongoing consultations in line with this SEP will ensure that IP views are incorporated and that they are informed of this.

## 5 Consultations Conducted before Project Appraisal

61. The public consultation workshop took place on June 23, 2023 at the National Technical Training Institute (NTTI), Phnom Penh City. The objective of the consultation was to brief participants on the project's objectives, scope, and environmental and social risks and impacts. The agenda included presentations on the project background, World Bank's Environmental and Social Framework and Standards, as well as the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), and Environmental and Social Code of Practice (ESCP).

62. The consultation was conducted in a hybrid format, allowing both physical and virtual participation. A total of 85 participants attended, with 40 participants present physically and the remaining representatives joining virtually from TTIs in the provinces. The participants included representatives from the General Directorate of TVET, Ministries and TTIs under MLVT. The consultation facilitated a discussion session where participants raised questions and made comments regarding various aspects of the project.

63. Some of the key questions and comments raised during the consultation included concerns about the inclusion of facilities for disabled individuals in project buildings, the selection criteria for TTIs, the preparation of safeguards documents during project implementation, the timeline of the project, prevention of child labor during construction and rehabilitation works, and the identification of vulnerable groups in Cambodia.

64. The MLVT officials and safeguards consultant provided responses and clarifications, assuring participants that the project design would consider facilities to support disabled individuals, explaining the criteria for TTI selection, addressing the preparation of safeguards documents during implementation, providing an overview of the project timeline, emphasizing the project's aim to engage vulnerable groups, and discussing measures to prevent child labor.

65. As a result of the successful hybrid public consultation, the participants expressed their support for the project and satisfaction with its inclusive approach. They expressed their hope that the project would commence implementation as planned in early 2024. During the consultation workshop, there were no major concerns regarding the E&S impacts of the proposed project. The participants demonstrated understanding and support for the identification and mitigation measures for the E&S impacts/risks in E&S instruments.

66. To foster continued engagement, participants were invited to join a Telegram Group where they can share questions and suggestions. Additionally, based on the inputs received during the consultation, the safeguards documents, including the ESMF, SEP, and ESCP, will be updated. The revised documents will be redisclosed on the MLVT's website.

67. More details and the minutes of the public consultation workshop can be found in the Annex 2 of this SEP.

## 6 Grievance Redress Mechanism (GRM)

68. The GRM aims to address concerns in a timely and culturally appropriate manner, without any cost to the stakeholders. It allows individuals to submit grievances if they believe that the project has negatively impacted their community, environment, or quality of life. Stakeholders can also submit comments and suggestions. The GRM will handle all complaints and suggestions from project-affected persons (APs) and other stakeholders.

69. The PMU at MLVT will take an overall responsibility to supervise and manage grievances from beneficiaries of the project. Social marketing efforts will communicate the role of the PMU.

70. The PMU will provide a number of formal and informal channels through which comments and/or complaints on the project activities can be received. These include:

- **TVET Website:** Provide a homepage for the Project which provides a Contact Us link which members of the public can submit an email for feedback and/or grievances to the PMU and TTIs and JCs selected.
- **On-site contacts:** A notice board will be posted at each TTI or JC with the name and contact details of the contractor, site engineer and institution responsible staff. These notice boards will be placed in a visible area known to the public and should be presented in the local language (Khmer).

71. Any affected person (AP) will be able to submit a grievance with PMU at MLVT if they believe that activities connected to the implementation of the project, specifically during the construction phase, is resulting to serious impact on the community, the environmental, or on the quality of life. Grievances could include:

- Discrimination on women, indigenous peoples, people with disabilities, and other vulnerable groups;
- Negative impacts on a person or a community (i.e. noise pollution, dust emissions, disruption of classes);
- Dangers to health and safety or to the environment;
- Damage to infrastructure such as road degradation;
- Failure to comply with E&S standards or legal obligations;
- Violence of labor law or labor management procedures;
- Harassment of any nature and improper conduct or unethical behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH), GBV, and VAC; and
- Threat to the peace and security in the public TTI, Job Center, and local community.

## 6.1 Grievance Process

72. The grievance mechanism is designed to ensure that:

- The basic rights and interests of project affected persons (APs) are protected;
- The concerns of APs arising from the project implementation process are adequately addressed; and
- APs are aware of their rights to access grievance procedures free of charge.

73. This GRM will handle all complaints or suggestions from APs and other stakeholders, except for issues related to labor rights and conditions. For labor-related matters, a separate GRM will be set up under the LMP.

### 6.1.1 Stages of the grievance redress mechanism

74. The following steps outlined the procedures on receiving and facilitating the resolution of AP's concerns, complaints and grievances during the implementation phase of the project.

75. **1<sup>st</sup> Level Grievance: Field-Level Resolution.** In case of grievances that are immediate and urgent in the perception of the complainant, the contractor and/or site engineer will provide the most easily accessible or first level contact for quick resolution of grievances. A meeting may be held among the AP, Contractor, officials or community relations officer of TTI and JC, village council chief to discuss the whereabouts of the complaint. Immediate remedial action on the AP is expected from the contractor and/or TTI/JC. The resolution of the complaint should be done within one week. For appeal or complains that not relating to civil works, the AP can skip to the 2<sup>nd</sup> level grievance redress at the PMU of MLVT.

76. **2<sup>nd</sup> Level Grievance:** If no understanding or amicable solution can be reached within seven days from filing the complaint, the AP can elevate the complaint to the E&S officer of the PMU. The

PMU is under the MLVT, which is directly responsible for project implementation management. Resolution of the complaints should be done within 15 days.

77. **3<sup>rd</sup> Level Grievance:** If no understanding or amicable solution can be reached within fifteen days from filing the complaint, the AP can elevate the complaint to the MLVT. The MLVT in consultation with appointed officers/specialists will resolve the complaints within 30 days.

78. If an AP is not satisfied with the solutions provided by the grievance redress agencies mentioned above and believes that their rights have been violated due to non-compliance with relevant laws and regulations by project actors, they have the option to file a case at the provincial court at their own cost, at any stage of the grievance process. The project will no longer be involved in the process, unless there is a judicial order from the court. However, during the litigation, the grievance redress agencies, such as the MLVT or other relevant agencies, will request that the project be allowed to proceed without disruption while the case is being heard.

79. If any party is not satisfied with the ruling of the provincial court, they can appeal to a higher court. The grievance redress agencies will be responsible for implementing the decision of the court. It should be noted that the APs are entitled to seek legal advice and assistance from NGOs or legal aid organizations to file their case in court, if necessary.

## 6.2 Recording Grievances

80. Established and managed by the E&S officer at PMU, a complaints register will be established as part of the project to record any concerns raised by any stakeholder during the implementation of this project. Any serious complaints that require immediate attention (such as a criminal act or that causes harm to persons), will be advised to the World Bank within 24 hours of receiving the complaint. A summary list of complaints received, and their disposition, along with key statistics on the number of complaints and duration taken to close out, must be clearly reported. Grievances will be recorded in a Grievance Logs (see Table 2).

81. Grievances can be submitted anonymously or the aggrieved person can also request their name be kept confidential. Responsibility for the Grievance Log will be with the E&S officer and Directors/Managers in TTIs and JCs selected.

**Table 2. Sample Grievance Logs based on SEP**

Grievance Log							
Names of complainants (or note if complaint made anonymously)	Date Received	Contact Information	Details of grievance	Actions to resolve grievance	Accepted by complainant or not	Date reported	settled, or to next stage

## 6.3 Grievance Redress for GBV, VAC, SEA and Similar Issues

82. Complaints concerning GBV/SH/SEA and similar issues may require a different process, depending on the AP. The AP can first raise the matter anonymously with a person with whom they feel confident with, and then have it taken up either under the project GRM or raised directly with the E&S Officer of PMU.

83. Alternatively, local communities and residents might have their own system, and the project will have to take this into consideration with the TTI and Job Center. This will need to be defined during project implementation, in consultation with stakeholders.



## 7 Implementation of SEP, Monitoring and Reporting

### 7.1 Implementation responsibilities for SEP

84. The Stakeholder Engagement Plan will be the responsibility of the Project Director (PD), Project Manager (PM) and E&S Officer of PMU at MLVT. They will guide the process of stakeholder engagement throughout the preparation and implementation of the Project.

85. The E&S Officer, under the guidance of the PD/PM, and with support of qualified Environmental and Social consultants, will be responsible for:

- Leading, or supervising, consultations, as per the SEP;
- Leading, or supervising, the disclosure of information, as per the SEP;
- Reporting on grievance resolution, as per the SEP;
- Review monthly monitoring reports provided by contractors and/or consultants;
- Regularly reporting to the Project Director.

86. Stakeholder engagement should be periodically evaluated by the Project in line with overall monitoring, and other relevant project documents. The Project will strive to include project stakeholders in monitoring activities.

**Table 3. Staff and Responsibilities for SEP Implementation**

Staff	Responsibility
Project Director	<ul style="list-style-type: none"> <li>• Reviews and approves quarterly reports on stakeholder engagement and grievance redress</li> <li>• Keeps World Bank informed on the implementation of the SEP</li> </ul>
Project Manager	<ul style="list-style-type: none"> <li>• Oversees E&amp;S Officer and the process of stakeholder engagement and grievance redress</li> <li>• Submits quarterly reports to the Project Director</li> </ul>
Environmental and Social Officer (E&S Officer) and Consultants	<ul style="list-style-type: none"> <li>• Implements stakeholder engagement activities as described in the SEP, including consultations, disclosure, training on gender-based violence, community health and safety, etc.</li> <li>• Coordinates with village and commune authorities on the grievance redress mechanism, following up that grievances are recorded and promptly resolved</li> <li>• Coordinates with target TTIs and JCs on E&amp;S matters, including ESCoP, worker rights, the workers' grievance redress mechanism, and the COC for workers, including on appropriate behavior and relations with community and gender-based violence</li> <li>• Takes the lead on issues related to the social inclusion of Indigenous Peoples</li> </ul>
Target TTIs and JCs	<ul style="list-style-type: none"> <li>• Ensure contractors are conducting necessary activities as per the SEP</li> <li>• Keep a record of grievances as per this SEP</li> <li>• Conduct consultations activities in civil works component as per this SEP ahead of construction as well as during (on hiring, safety, timelines, etc.);</li> <li>• Keep a log of grievances for workers, as per the LMP and work to resolve grievances from the community at the first level as part of the GRM in this SEP</li> </ul>

### 7.2 Budget and Sources

87. SEP implementation budget has been incorporated in the overall indicative budget (USD150,000) of ESMF, and will be further updated during project implementation. MLVT will provide adequate fund sources for implementation and monitoring of this SEP during the project implementation stage.



### 7.3 Monitoring and Reporting

88. The objective of monitoring and reporting relating to the SEP, is to oversee its implementation to ensure targeted consultations and disclosure activities are taking place. Monitoring and reporting will be led by the E&S Officer of PMU, under the overall guidance of the Project Director and Project Manager. The involvement of local communities in monitoring activities should be encouraged. Monitoring and reporting will consist of quarterly reports during the implementation of the project, part of overall monitoring as per the ESMF.

89. Some of the issues to be covered in monitoring of stakeholder engagement are:

- Level of understanding of the project and project objectives of key stakeholders;
- Levels of impacts within expected parameters (more/less);
- Community feedback incorporated into project design and planning;
- Adequacy and success of implementation of mitigation measures;
- Main grievances and efficacy of GRM;
- Overall community satisfaction;
- Types of information disclosed;
- Methods used for stakeholder engagement;
- Minutes of consultation meetings;
- Number of staff working on Stakeholder Engagement; and
- Future plans.

## Annex 1: Template for Documentation of Consultations

Title of Consultations:	
<b>Location and Date:</b> [name of the village/place/school and date]	
<b>Objective and agenda:</b> [explain the objectives and agenda of the consultation]	
<b>Participants:</b> [which stakeholders targeted, how stakeholders were invited, number of participants who attended and their gender and if they are ethnic groups. Note information on vulnerable groups]	
<b>Summary of the Consultation:</b> [describe the format/style of the consultation, who facilitated it, the language used, brief summary of information presented]	
<b>Questions/ Comments made and responses:</b>  [summarize the main questions asked and the responses given]	
<b>Follow-up Actions:</b>  [summarize any follow-up actions to be taken as a result of the consultation, by whom and when those actions are to be done]	
<b>Photos</b>	

### **Guiding Questions for the Stakeholder Consultation Workshop**

1. What are your views about the project benefits?
2. Do you have any concerns about the project risks and impacts?
3. What are the environmental risks that can be resulted from the construction and rehabilitation during the implementation of the project? What can we do to mitigate these environmental risks from the construction?
4. What are the social risks resulting from the construction and rehabilitation during the implementation of the project? What can we do to mitigate these social risks from the construction?
5. What can we do to prevent child labor during the construction and rehabilitation?
6. Who are the most vulnerable groups of people in Cambodia? Why?
7. Can these vulnerable groups benefit from the project? Why or why not?
8. How can we ensure that vulnerable students/trainees/job seekers, indigenous students/trainees/job seekers and those with disabilities can benefit from the project?
  - a. Vulnerable students/trainees/job seekers (poor, remote areas)...
  - b. Disabled students/trainees/job seekers....
  - c. IP students/trainees/job seekers....
9. Which disadvantaged groups are less likely to participate in and benefit from TEVT and job orientation programs, and why?
10. Who commits violence against children and women? What can we do to stop violence against them?
11. Do you have any recommendations to ensure that teachers/trainees of TVET institutions from remote areas, or vulnerable backgrounds (women, indigenous people, poor) can benefit from the project's training activities?
12. What will be the impacts of Covid-19 outbreak (if any) on the project? What can we do to mitigate these impacts?
  - a. Students/Trainees ....
  - b. Teachers ...
  - c. TVET institutions ...

## Annex 2: Minutes of the National Consultation on June 23, 2023

<b>Title of Consultations: Public Consultation Work on Project E&amp;S Impacts and Mitigation Measures                      Hosted by H.E. Dr. Hing Sideth, Delegate of Royal Government in Charge as Director General of DGTVET</b>	
<b>Location and Date:</b>	The public consultation was held on 23 June 2023 at NTTI, Phnom Penh City
<b>Objective and agenda:</b>	<ul style="list-style-type: none"> <li>-To brief about project objective and project scope</li> <li>-To get feedbacks and suggestion on the identified potential E&amp;S risks/impacts, including mitigation measures, as well as planned stakeholder consultations, disclosure activities and proposed GRM</li> </ul>
<b>Participants:</b>	<p>The public consultation was run hybrid by attending physically and virtually. There are totally about 85 participants, 40 participants are joining physically. For those, who join virtually, are representatives from TTIs at the provinces.</p> <p>All participants are representatives from General Directorate of TVET, Ministries and representatives from TTIs under MLVT.</p>
<b>Summary of the Consultation:</b>	<p>Contents of presentation are described as below:</p> <ul style="list-style-type: none"> <li>-Purposes of public consultation</li> <li>-Project background (objectives and components)</li> <li>-World Bank's Environmental and Social Framework</li> <li>-World Bank's Environmental and Social Standards</li> <li>-Applicable Standards for the Project</li> <li>-Classification of impacts/risks</li> <li>-Safeguards Documents for the Project</li> <li>-ESMF (objective and its contents)</li> <li>-SEP (objective and its contents)</li> <li>-ESCP (objective and its contents)</li> <li>-Project's impacts and mitigation measures</li> <li>-GRM</li> <li>-Discussion (question and answer)</li> </ul>
<b>Questions/ Comments made and responses:</b>	<p><b>-Ms. Bun Khim (Agile Development Group):</b> Once the project is in the implementation phase, does the project design the building with facilities to support disable people?</p> <p><b>-Ms. Ratha Sophary (Pour un Sourire d'Enfant, PSE):</b> How can Technical Training Institutes under TVET be selected for the project? Are there any selection criteria? Whether it is selected through voluntary, random selected or any requirement?</p> <p><b>-Ms. Ratha Sophary (Pour un Sourire d'Enfant, PSE):</b> Currently, the ESMF has been prepared in place for project preparation stage, how is about safeguards documents to be prepared before or after site</p> <p><b>-Safeguards Consultant:</b> The project has been designed to ensure equal opportunities for vulnerable groups, including people with disabilities. The building design and facilities will be carefully designed to accommodate the needs of people with disabilities and provide them with the necessary support.</p> <p><b>-Safeguards Consultant:</b> Specific criteria will be established during project implementation to select TTIs for participating in the project. A total of 7 public TTIs will be selected for project implementation, as it is a loan project. However, the soft components of the project (e.g. training curriculum and LIMS) will be applicable for all TTIs.</p> <p><b>-Safeguards Consultant:</b> As the TTIs (sub-project sites) have not been identified and selected at project preparation stage, ESMF has been prepared as guiding document. Once the TTIs are selected</p>

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<p>selection (TTIs selection) during the project implementation?</p> <p><b>-Ms. Ratha Sophary (Pour un Sourire d'Enfant, PSE):</b> After TTI is selected, who will prepare the safeguards document to comply with World Bank's ESMF?</p> <p><b>-Ms. Ratha Sophary (Pour un Sourire d'Enfant, PSE):</b> May we know that timeline of the project (duration of the project)?</p> <p><b>-Ms. Chheung Sreyepich (Agile Development Group):</b> I would like to clarify that does the project consider giving opportunities to disable group to attend the class?</p> <p><b>-Safeguards Consultant:</b> What can we do to prevent child labor during the construction and rehabilitation works?</p> <p><b>-Safeguards Consultant:</b> Who are the most vulnerable groups of people in Cambodia? Why?</p>	<p>and identified, site-specific environmental and social management plan (ESMP) will be prepared in order to manage anticipated environment and social impacts/risks during the construction of new buildings. Alternatively, for rehabilitation or renovation works of existing buildings, the environmental and social code of practice (ESCoP) included in the ESMF will be adopted to manage the E&amp;S impacts.</p> <p><b>-Safeguards Consultant:</b> Once the TTIs are selected, the E&amp;S focal person of PMU and TTIs will collaborate to prepare the necessary safeguards documents, with assistance from E&amp;S consultants to be hired by MLVT during project implementation.</p> <p><b>-Safeguards Consultant:</b> The project preparation stage commenced in 2022 and is nearing completion. The appraisal is approaching, signaling that the project implementation can be initiated in early 2024 and will be ended in 2028.</p> <p><b>-Safeguards Consultant:</b> The project will provide inclusive opportunities for people with disabilities to participate in training courses and access job orientation services. It will empower them to become trainers and staff members of the TTI and Job centres. Additionally, the project recognizes the importance of inclusivity for other vulnerable groups such the poor, women, and indigenous people.</p> <p><b>Ms. Ratha Sophary (Pour un Sourire d'Enfant, PSE):</b> Child labor must be prohibited during the construction and rehabilitation work, and this prohibition should be clearly stated in the construction contract with contractor.</p> <p><b>-Ms. Bun Khim (Agile Development Group):</b> As you mentioned earlier, the vulnerable groups identified include the poor, disabled people, indigenous people and women. Among them, the disabled women from the poor households are considered the most vulnerable. We are glad to hear that the project is designed to be inclusive and considerate of these vulnerable groups. We fully support the project and its commitment to social inclusion.</p>
<p><b>Follow-up Actions:</b></p>	<p>-All participants are invited to join the Telegram Group to access full E&amp;S instruments of the project and contribute their questions and suggestions.</p> <p>-The E&amp;S instruments (ESMF, SEP and ESCP) will be updated to incorporate inputs received during this public consultation and will be redisclosed on the MLVT's website.</p>





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Discussion and Consultation

