DIRECTORATE OF PRIMARY EDUCATION

MINISTRY OF PRIMARY AND MASS EDUCATION

STAKEHOLDER ENGAGEMENT PLAN

July 16, 2020

Bangladesh COVID-19 School Sector Response Project

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1. Introduction

An outbreak of Coronavirus disease (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019. As of Jun 23, 2020, near 10 million cases in almost all the countries in the world have been recorded with a death toll near 475,000. At the same time, almost 120,000 cases have been identified in Bangladesh, including over 1,500 deaths. The World Health Organization (WHO) on 11 March, 2020 declared the rapidly spreading Coronavirus outbreak a pandemic, acknowledging what has seemed clear for some time—the virus will likely spread to all countries on the globe.

The outbreak has caused great loss of life, significant disruptions in global supply chains, travel and associated industries, financial markets, higher commodity prices and lack of availability of basic essentials, and economic losses in both developed and developing countries. Economic activity has fallen in the past few months and is expected to remain depressed for months. The outbreak is taking place at a time when global economic activity is facing uncertainty and governments have limited policy space to act. The length and severity of impacts of the COVID-19 outbreak will depend on the projected length and location(s) of the outbreak, as well as on whether there are concerted, fast track response to support developing countries where health systems are often weak. With proactive containment measures, the loss of life and economic impact of the outbreak could be mitigated.

Besides critical supply shortage of life essentials and supply chain disruptions, one of the hardest hit sectors is the education sector. Schools and other academic institutions have been closed for months disrupting academic progress of millions of school going children. This closure for prolonged period has given rise to a number of present and potential issues:

Increase in dropout rate due to COVID-19's severe impact on household income, especially for girls and poor/disadvantaged households. Increase in school drop-out will most likely also be linked to increased incidence of early marriage, adolescent fertility and child labor.

Potential learning loss due to long period of disengagement from school disrupting planned activities of the school year and may result into complete year gap at the worst. Keeping children motivated with learning and maintaining engagement with lessons, especially among families with less educated parents, is also a challenge to ensure learning continues during this crisis.

Increase in learning inequality that will emanate from lack of poor families access to computers, internet etc. where the wealthy families will be better suited to sustain their children's learning at home. This means that when schooling restarts, disadvantaged children will find themselves even further behind their peers causing greater student heterogeneity within classrooms.

Lack of teacher engagement and development due to prolonged absence and disengagement from teaching and on-going professional training that may affect their quality of teaching and motivation.

Student health and safety may also suffer due to discontinuation of School Feeding Program. As schools close, children who rely on these programs may go hungry and malnourished. Students' mental health may also suffer, due to isolation during social distancing and the traumatic effects of the crisis on families.

Escalation of crime and Gender Based Violence (GBV) since for many students, especially those living in poor area, schools provide a haven from violence and other external threats, as well as access to services such as psychosocial support. With the closure of schools, children may be more exposed to gender-based and other violence, including in the home.

Stress and trauma caused by economic loss due to pandemic and shutdown that are likely to affect mental health of parents and teachers and may cause psychosocial issues during and post pandemic.

2. Project Description

The proposed COVID-19 School Sector Response Project (SSRP) has been planned to address the issues mentioned above. The Project will implement *Response, Recovery* and *Resilience* measures to address the impact of COVID-19 due to school closure. The Project will be in the form of a Technical Assistance (TA) that will develop remote learning resources/contents, communication campaigns, school re-opening plan, school sanitization plan, re-enrollment activities at pre-primary and primary level, learning loss assessment and recovery lesson plan, contents/manual/standards for teachers' professional development and tools to ensure mental health issues post-shutdown. This TA will also focus on integrating remote learning, continued content development and standard operating procedures for education service-delivery during emergencies and periods of extended school closures. Monitoring and evaluation (M&E) capabilities of the implementing agency will also be developed through the TA. Directorate of Primary Education (DPE) under the Ministry of Primary and Mass Education (MOPME) implement the project in collaboration with Secondary and Higher Education Division (SHED) of Ministry of Education (MOE). The Project will comprise of the following four components:

> **Component 1: Technical Assistance for Immediate *Response* Interventions.** The *Response* component would focus on protecting, preventing, and mitigating while schools are closed as well as taking initiative to work towards recovery phase. Under this component the Project will develop remote learning resources/contents; dissemination plan and technical expertise which operationalize all four remote learning platforms (TV, Radio, Mobile and Internet); develop and implement communication campaigns and create a school re-opening plan.

> **Component 2: Technical Assistance for Medium Term *Recovery* Strategies.** The objective of the *Recovery* component is to focus on comprehensive recovery strategies for students, teachers, and schools once schools reopen while preparing to work towards building resilience. Under this component the Project will develop and implement a school sanitization plan prior to school reopening; ensure maximum re-enrollment at pre-primary and primary level; develop learning loss assessment and recovery lesson plan; create contents/manual/standards for teachers' professional development; and develop tools to ensure mental health issues post-shutdown.

> **Component 3: Building System *Resilience* for the Long Term.** The *Resilience* component would focus on enabling the system to be better prepared to react and recover from future shocks. Under this component the Project will develop content and low cost learning package; ensure a sustainability plan for the remote learning platform; develop strategies and standard operating procedures (SOP) for education service-delivery during emergencies and periods of extended school closures. The subcomponent would also support creation of an emergency delivery unit with representation government, private sector, NGOs engaged in education delivery to face any kind of emergency or launch a national effort that requires extended coordination.

> **Component 4: Project Management, Results Monitoring and Communication.** The objective of this component is to support project management and build results monitoring and evaluation (M&E) capability and support project operating costs.

The project is being prepared under Paragraph 12 of World Bank (WB) Investment Project Financing (IPF) Policy—Emergency Procedure (*Situation of Urgent Need of Assistance and/or Capacity Contraints*) and the Bank's Environment and Social Framework (ESF) will be applicable. As per the Environmental and Social Standard (ESS) As per ESS 10-Stakeholders Engagement and Information Disclosure, the IA should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

3. Objectives of the Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a plan for stakeholder engagement, including public information disclosure and consultation, throughout the entire duration of the proposed project. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. Soliciting feedback of the general population is essential for the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social (E&S) risks related to the proposed project activities. Stakeholder engagement is necessary for designing project interventions of remote lessons delivery, school reopening plan, reenrollment, communication campaign and school disinfection work before opening. In essence the stakeholder engagement for this Project will give attention to:

> *General awareness raising and stakeholder engagement activities more specifically, involvement of all relevant stakeholders, including the local population, students and parents of school going children, NGOs involved in education, implementation partners and Government officials.*

> *Culturally appropriate, and adapted awareness raising activities that are particularly important to properly sensitize the communities (especially those living in remote and poor areas without access to technology) and ensure an adequate mechanism for grievance redress under the project.*

> *Awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups, adapted to take into account their particular sensitivities, concerns and to ensure a full understanding of project activities and benefits.*

4. Stakeholder identification and analysis

Project stakeholders are defined as individuals, groups or other entities who:

(i)   are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as '*affected parties*'); and

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

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

4.1 Methodology

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

- *Openness and life-cycle approach*: public consultations for the project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation process. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, in particular female students from poor households, students from poor and inaccessible areas, students with disabilities, cultural sensitivities of diverse ethnic groups, parents of students.
- *Reduction of Human Contacts*: under this special circumstance, the project will endeavor to reduce large human gathering during stakeholder engagement exercise, especially when consulting with communities. Various alternative means (like getting online feedback, web meeting, email, small gathering etc.) may be used to ensure meaningful consultation, while minimizing the exposure risk of COVID-19 among participants. Face to face interaction may only be done after the pandemic is over and in limited scale during the pandemic.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[1] , and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

4.2 Affected parties

Affected Parties for the Project will include pre-primary, primary and junior secondary level students and their parents and teachers. Specifically, the following individuals and groups fall within this category:

- Students at pre-primary, primary and junior secondary level students affected by prolonged school closures

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[1] *Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.*

- Parents of the students mentioned above
- Teachers, headmasters, administrators in those school that have closed due to the pandemic
- Suppliers of essentials for the school operations, including food, learning materials etc.

4.3 Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Officials of Government agencies, directly and indirectly linked with project, either local or central
- National and international NGOs engaged in education
- Traditional media
- Participants/ influencers of social media
- Other national & international NGOs
- Development partners
- Individuals interested in education
- The public at large

4.4 Disadvantaged / vulnerable individuals or groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), access to technology and other educational material, dependence on other individuals or natural resources, especially those living in remote, insecure or inaccessible areas, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups, when they are involved or engaged with project activities specifically, may include and are not limited to the following:

- Preprimary, primary and junior secondary level students and their parents living in poor areas
- Students without access to technology for remote learning opportunities
- Female students susceptible to drop out and early marriage
- Students exposed to violence, drugs and other illegal activities
- Small ethnic minority students meeting the criteria of ESS7

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

5. Stakeholder Engagement Program

5.1. Summary of stakeholder engagement done during project preparation

Given the emergency nature of this operation and the transmission dynamics of COVID-19, consultations have been limited to telephone interviews, e-mails, etc. In particular, the Project team had discussions with a number of key government agencies including MOPME, Secondary and Higher Education Division (SHED) of MOE, DPE, Asian Development Bank (ADB), Japan International Cooperation Agency (JICA), UNESCO, UNICEF, Canadian International Development Agency (CIDA), Campaign for Popular Education (CAMPE) etc. about project design and related issues. The project also had discussions with the Local Education Group (LEG) comprising of government officials, NGOs, CSOs and Development Partners. The outcome of the Consultations are summarized below:

Ser	Discussion Topic	Response
	ADB	
1	Needs for integration with PEDP4 and SEDP for the sustainability of the support.	Efforts will be coordinated with PEDP4 and SEDP and GPE efforts are to be sustained under GOB's two programs.
2	The Project may integrate existing e-learning programs/initiatives during implementation.	The project shall build upon the existing and also develop new materials, while learning and scaling up good practices.
	JICA	
3	Capacity building of local administrators and local service delivery who are able to provide feedback on what works	Sub-component 1.3 puts emphasis on the preparedness of the local level officials, teachers, and headmasters. Under component 2.1 (ii) the document talks about increasing the capacity of local level authorities and school authorities
4	Clearly stating the target may help readers. Secondary level technical and madrassa not included?	The Project will focus only on general education (up to Grade 10). Some subject content will however benefit madrasah as those are common for all students.
5	For technical and madrassa education, does MoPME plan to have a separate strategy?	It was also noted that TMED is in the process of being supported under a separate project. This scheme will include the technical and Madrasa institutions in Secondary in addition to the general schools.
6	It would be great if UNCIEF could coordinate to identify what in the government plan are not covered by the GPE grant, so that other DPs may think of complementary support.	We agree, as the demands to realize the GOB Plan is enormous compared to available funding at this moment.
	UNESCO	
7	We echo the comments from DPs to engage CSO and NGOs for delivering the services quickly at community level.	The service delivery will be further consulted with the GoB as the WB conducts in Technical Appraisal.
	UNICEF	
8	Well written and articulated problem statements, established the ToC and then described the essential components	Thank you, the team appreciates your comment.
9	The project proposal maintains the emphasis of the GPE on most marginalized and girls	Yes, this is a priority focus, this will have to be at the center of project implementation.

Ser	Discussion Topic	Response
10	Teacher and schools figure under ref.9 including the footnote should be reviewed as per ASPR 2019; -	Done.
11	Missing the examination under ref.12: not only the first terminal examination, children also will miss the second terminal examination in schools	As this is yet to happen, the team did not want to be preemptive
12	The project activities sketched for PPE to Secondary but without the Madrassa and technical stream.	Yes, this was agreed with both Ministries in a high level meeting.
13	Since the DPE would be the major sharer in the project supported by GPE, should the finance flow from DPE to DSHE?	The Implementation Arrangement was agreed in a high level meeting with both Ministries.
14	A separate PIU should not work in isolate rather function under regular coordination mechanism of the PEDP4 and SEDP.	The Implementation Arrangement specifies that GPE efforts will be sustained and integrated into the two Programs.
15	Should the DG, DPE implement the project having link with the other Directorate (DSHE)? Is it cleared from both the Ministries?	The IA will be further consulted during the Bank's technical appraisal.
	Canada International Development Agency (CIDA)	
16.	If indigenous learners are included, there could an additional immediate outcome in the "theory of change" and indicator in "result framework" and "M& E plan"; " number of indigenous children provided with learning packages/ materials"	This is covered by the Intermediate Indicator which tracks number of hard-to-reach children
17.	The TA can cover the development and operationalization of the coordination (and feedback) mechanism at the cluster level	The PIU is also expected to collected feedback as part of it bi-annual progress report
18	Reviewing and updating primary curriculum and high –stake primary examination (PECE) is time consuming and purely a technical task. Will the scope of the TA (proposed to be provided) cover this?	To meet the immediate needs of the lost academic year, there needs to be an examination of the transition options available. NCTB with TA support is expected to carry this out.
19.	Comment on RF indicators	EOP targets are not based through analysis of the scope of grant, timeline of activities and realistic results. **KPI 2** – GoB target is 90%, which is for 2 years, while Grant is implemented for 18 months. **OI 1** –this is for complete set of content for a subject of a grade for the entire academic year. **IO 4** – this was planned for all primary schools but then given the scope of the grant and timeline, adjusted the number accordingly.
	Campaign for Popular Education (CAMPE)	
20	Implementing NGOs and national education coalition i.e. CAMPE could play an important role in researching the marginalized segment of the society, raising awareness and strengthening the advocacy	Thank you and Agreed

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

The project PIU will engage with various stakeholders on an ongoing basis taking the risk of virus spread into account, both during and post COVID-19 pandemic. The details will be prepared during the update of this SEP. It should always be borne in mind that mass gatherings of consultation meeting and the proposed communication campaign under Component 1 can contribute to the transmission of respiratory pathogens, such as the virus causing the current outbreaks of COVID-19 as a result in a large number of people being in close contact. Various alternative means may be used to ensure meaningful consultation. In addition, miking/ broadcasting system in mosques (especially in rural areas where IT systems are lacking), schools or community radio system can be used for information disclosure purpose. Further, the World Health Organization's (WHO) mass gathering guidance can be sought (Key Planning Recommendations for Mass Gatherings in the context of the current COVID-19 outbreak, Feb 14, 2020 (*available at: https://apps.who.int/iris/bitstream/handle/10665/331004/WHO-2019-nCoV-POEmassgathering-2020.1-eng.pdf*).

5.3. Stakeholder Engagement Plan and Strategy for Information Disclosure

PROJECT STAGE	TOPIC OF CONSULTATION / MESSAGE	METHOD USED	TARGET STAKEHOLDERS	RESPONSIBILITIES
Preparation	• *Need of the project* • Planned activities including details of Technical Assistance • E&S principles, risk and impact, management/ESMF • Grievance Redress mechanisms (GRM)	• *Phone, email, letters* • *Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.)*	*Project Interested Parties*	Environment and Social Specialist PIU
	• *Need of the project* • Planned activities including distance learning , reenrollment, communication campaign • E&S risk and impact, management/ESMF • Grievance Redress mechanisms (GRM)	• *Outreach activities that are situation appropriate* • *Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.)*	• *Project affected parties* • *Local communities* • *Vulnerable groups*	Environment and Social Specialist PIU
Implementation	• *Project scope and ongoing activities* • *ESMF and other instruments* • *SEP* • *GRM* • *Health and safety Environmental concerns* • *Communication campaign, disinfection plans, school reopening and reenrollment*	• *Online Training and workshops* • *Disclosure of information through Brochures, flyers, website, etc.* • *Information desks at PIU office* • *Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.)*	*Project Interested Parties*	Environment and Social Specialist PIU
	• *Project scope and ongoing activities* • *ESMF and other instruments*	• *Public meetings in municipalities/villages* • *Brochures, posters*	• *Project affected parties* • *Local communities* • *Vulnerable groups*	Environment and Social Specialist PIU

PROJECT STAGE	TOPIC OF CONSULTATION / MESSAGE	METHOD USED	TARGET STAKEHOLDERS	RESPONSIBILITIES
	• *SEP* • *GRM* • *Health and safety Environmental concerns* • *Communication campaign, disinfection plans, school reopening and reenrollment*	• *Information desks in local government offices and PIU offices* • *Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, radio, tv etc.)*		

6. Resources and Responsibilities for implementing stakeholder engagement activities

6.1. Resources

The Implementing Agencies (IA) will be in charge of stakeholder engagement activities through its Project Implementation Unit (PIU). The contact point for the stakeholder engagement will be the Project Director (PD). The Project has budgetary provisions for SEP implementation and the E&S experts to be hired as a part of the PIU will monitor it. Project's Component 4 (Project Management, Results Monitoring and Communication) can be used to fund the stakeholder management activities. The budget for the SEP (and the implementation of other environment and social activities such as ESMF, LMP) is approximately USD 150,000.

6.2. Management functions and responsibilities

The IA will be responsible for carrying out stakeholder engagement activities, while working closely together with other entities, such as local government units, media outlets, NGOs, development partners, school administrations etc. The stakeholder engagement activities will be documented through quarterly progress reports, to be shared with the World Bank.

7. Grievance Mechanism

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

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

7.1 GRM Description and Structure

The IA will have in place text message-based and phone-based platforms for stakeholder engagement that will be used as the GRM for the project. The IA will also develop a guideline for grievance redress system with clearly defined roles and responsibilities (Grievance Redress Committee) and timelines, which will be adhered to under the project. A quarterly report on project related grievances will be shared with the World Bank team.

The Levels of GRM: There will be two tiers for redressing any issues and grievances related to the Project.

> **Tier 1 (GRC)**: A Grievance Redress Committee (GRC) will be established at Project Level through PIU as below:
> Project Director – Convener
> Deputy Project Director of MOPME - Secretary
> Social/ Environmental Specialist- Member
> An external Monitor-Member
> A representative from Project affected people/ community - Member

> Complaints will primarily be received and addressed by the GRC.

> **Tier 2 (Project Steering Committee, PSC):** The PSC is chaired by the Secretary Ministry of Primary and Mass Education (MoPME) and Co-Chaired by the Secretary, Secondary and Higher Education Division (SHED) of Ministry of Education (MoE). The PSC will review unresolved grievances escalated from the GRC. The team will review the grievance and all documentation gathered throughout the investigation carried out at the GRC level and determine whether further actions are required to resolve the grievance. Based on additional information collected, including meeting with the complainant and/or the representative(s), if required and/or requested, the PSC will give the final decision based on their review. If the Complainant is still not satisfied with the resolution given by the PSC then she/he can seek legal recourse.

7.2 Grievance Resolution Process

Steps of GRM The basic steps to be followed in the GRM are:

> **Step 1- Submission of grievances:** The submission of grievances will be available through multiple channel (email, letter, hotline, toll free number, IA website). Anonymous grievance may also be submitted. The process will be shared via IA website, social, print and electronic media. Given the nature of the COVID-19 virus, *face to face communication for grievance submission may not be encouraged* till the situation subsides. The registration and receipt of grievance will be made within 24 hours of complaint lodging.

> **Step 2 - Assigning responsibility and providing the initial response:** All the grievances received will be logged, both electronically and on paper documents. Each record will be given a number which will be intimated to the one submitting the grievance within 24 hours. Assignment of responsibility will be done within two (2) days of complaint lodging. Within two (2) days of the assignment, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.

> **Step 3 - Investigating the grievance:** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. Depending on the nature of the complaint, the process can include site visits,

document reviews, a meeting with the complainant (if known and willing to engage, may not be face to face given COVID-19 transmission characteristics), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

Step 4 - Communication of the Response and Complainant Response: This step involves providing complainants with a proposed resolution within Twenty One (21) days of the complaint receipt. If the complainant is satisfied with the resolution, the minutes of the meeting will be written and published on the PIU website being cognizant of the confidentiality issues. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

Step 5 - Grievance closure/ Appeal Process: If a person who submits a grievance is not satisfied with the resolution at the first tier, he or she may request it be elevated to the second tier and a resolution will be provided within seven (07) days of receipt of complaints at second tier. If they are not satisfied with the resolution, they may pursue legal remedies in court or pursue other avenues. Throughout the entire process, GRC will maintain detailed record of all deliberations, investigations, findings, and actions, and will maintain a summary log that tracks the overall process.

7.3 Handling Gender-Based Violence (GBV) Related Issues

World Bank Group's 'Technical Note on SEA/H for HNP COVID Response Operations,' Inter-Agency Standing Committee's 'Interim Technical Note: Protection From Sexual Exploitation and Abuse (PSEA) during COVID-19 Response,' 'The COVID-19 Outbreak and Gender: Key Advocacy Points from Asia and the Pacific', 'UN Women, 2020 and the COVID-19 resources to address gender-based violence risks', will be used as a guide towards the design and implementation of measures.

- Communication campaign related to specific issues women face during the pandemic, including safeguarding and responding to GBV and child abuse.
- Publicly post or otherwise disseminate messages clearly prohibiting GBV during community interactions. Key messages to be disseminated will focus on : i) No sexual or other favors can be requested during provision of employment support; ii) All types of project workers are prohibited from engaging in sexual exploitation and abuse; iii) Any case or suspicion of sexual exploitation and abuse can be reported to the GRM.
- Prepare and implement and train all workers in regard to GBV prevention and child protection protocols during community engagement activities. First respondents to be trained on basic skills to respond to disclosures of GBV, in a compassionate and non-judgmental manner and know to whom they can make referrals to.
- Ensure GBV psychosocial support services are identified and are ready to support victims.
- GRM to have procedures to handle allegations of GBV/SEA/SH violations and to immediately notify the Implementing Agency and the World Bank of any GBV complaints, with the consent of the survivor.

The Table below presents the recommended time frames for addressing grievance or disputes:

Table: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance and acknowledgment of receipt	within 24 hours
2	Assign responsibility	Within 2 Days
3	Communication of Timeline	within 4 Days
4	Informing about proposed solution – GRC	within 21 Days
5	Resolution at second tier – PSC	within 7 Days after complaint is received
6	Grievance taken to court by complainant	-

It should be noted that if future/further assessment indicates that there is the likelihood that project activities would increase the risk level of GBV, then a GBV action plan will be prepared and the Implementing Agency (IA) would recruit GBV specialists/ consultants as well as provide training to existing staff on GBV on a regular basis. The IA will also consider the feasibility to engage a GBV service provider, if deem fit.

Semiannual summary reporting on grievance cases and its resolution will be uploaded on the IA's website for public disclosure.

8. Monitoring and Reporting

8.1. Reporting back to stakeholder groups

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

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will be monitored by the project on a regular basis, including the following parameters:
  - Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;
  - Frequency of public engagement activities;
  - Number of public grievances received monthly, quarterly, and annually) and number of those resolved within the prescribed timeline;
  - Number of press materials published/broadcasted in the local, regional, and national media]