REPUBLIC OF IRAQ

MINISTRY OF YOUTH AND SPORT (MoYS)

Mosul - Youth Inclusion Through Cultural And Creative Industries (P178770)

STAKEHOLDERS ENGAGEMENT PLAN (SEP)

JULY 2022

Abbreviations and Acronyms

COVID-19	Corona Virus Disease
E&S	Environmental and Social
ESF	Environment and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GM	Grievance Mechanism
GoI	Government of Iraq
LMP	Labor Management Procedures
MOP	Ministry of Planning
MoYS	Ministry of Youth and Sports
NGOs	Non-Governmental Organizations
PAPs	Project Affected Parties
PMU	Project Management Unit
SEA/H	Sexual Exploitation and Abuse /Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
WHO	World Health Organization

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1. Introduction and Project Description

While Iraq is gradually recovering from years of conflict, thousands of vulnerable families across the country remain displaced and in acute need of protection and livelihoods support. As of 31 August 2021, according to the International Organization for Migration (IOM),1,191,470 IDPs and 4,884,612 IDP returnees resided across all 18 governorates of Iraq. The Nineveh province, of which the historic city of Mosul is the capital, was one of the most affected by the conflict and the city itself was the most severely damaged. As of December 2020, the total number of returnees in Nineveh Governorate stood at 1.89 million individuals out of 4.83 million nationwide (about 39% of all returns). This is the largest returnee population compared to other governorates, living in severe conditions that worsened due to the COVID-19 outbreak and ensuing lockdown.

Forcibly displaced, returnees and host community youth and women have seen their social and economic vulnerabilities exacerbated in the aftermath of the conflict and because of the pandemic. Many youths and women lack the skills necessary to find a job or start businesses, which is a key challenge for re-integration into a fragile, post-conflict economy.

Due to lower barriers of entry, the Cultural Creative Industries (CCI) play a critical role in development and foster the socio-economic inclusion of vulnerable groups. As per UNESCO definition, the CCI sector includes organized activities that have, as their main objective, the production or reproduction, the promotion, distribution or commercialization of goods, services and activities of content derived from cultural, artistic or heritage origins. In Iraq, it is estimated based on anecdotal evidence that the CCI sector is heavily dependent on youth. Being part of a creative ecosystem often encourages connections between groups that normally would not interact, thus building commonalities, innovation and valuing diversity. CCI has strong linkages with intangible heritage, bring creators together within a defined spatial dimension, reinforce local knowledge and skills, build-up creative networks and can attract innovators. The dynamic also helps to broaden social networks, increase social capital and strengthen a sense of identity. Moreover, it helps integrate marginalized communities, such as displaced people and refugees. The CCI sector currently provides nearly 30 million jobs worldwide and employs more people aged 15–29 than any other sector. Nearly half of the people working in the cultural and creative industries are women, opening new opportunities to address gender inequalities[1].

Nineveh is well-known for its ancient sites and cultural assets, it was home to businesses producing ceramics, paint, leather and wool goods and textiles. Its capital Mosul is known for its cultural diversity, significant heritage resources including its vicinity to World Heritage Sites and the legacy of vibrant cultural and creative industries. The potential of cultural and creative industries sector lies in its capacity to create economic activities and employment opportunities for the youth and women in Mosul. Moreover, the fact of reintegrating the local culture into the fabric of the society engaging youth and women in local cultural initiatives will also contribute to building back the sense of identity, reestablish communities and build community resilience.

The project will support community initiatives and engagement through the creative and cultural industries, aiming at enhancing social trust, social cohesion, or peaceful coexistence between the displaced, returnees, and host community, therefore reducing the risks of conflict and instability which are particularly high in areas liberated from ISIS where internal displacement is still present, such as Mosul. The fact of reintegrating the local culture into the fabric of the society engaging youth and women in local cultural initiatives will also contribute to building back the sense of identity, reestablishing communities, and building community   resilience.

[1] https://en.unesco.org/creativity/sites/creativity/files/global_report_fact_sheet_en.pdf

The proposed project is structured around 3 main components:

Component 1: Supporting youth skills development for increased employability and entrepreneurship (approx. US$ 580,000)

The objective of this component is to promote skills development for at least 2,000 young, disadvantaged women and men in Mosul through soft skills and vocational trainings. Beneficiaries will include the forcibly displaced, returnees, and host community youth of Mosul. The MoYS will benefit from the extensive available data on poor households owned by the Ministry of Labor and Social Affairs (MoLSA) to efficiently target the host community vulnerable youth located in Mosul. In addition to optimizing the achievement of the proposed project's objectives, this inter-ministerial coordination will support national-led efforts towards sustainable economic empowerment of the poor segments of the population

Sub-component 1.1: Life skills training and psychosocial support

This sub-component will provide life psychosocial skills training to the targeted vulnerable youth and women in Mosul. The training activities will be implemented by the MoYS Project Management Unit (PMU) with the support of a contracted local service provider. The sub-component will build on the successful achievements of the two previous Japanese Social Development Fund (JSDF) pilots, in which training was the flagship activity. However, unlike the previous pilots, the proposed project will test and tailor soft-skills trainings to mixed groups of conflict- and displacement-affected young population, returnees and host community youth, to enhance the peacebuilding dimension of the activities.

To reflect the specific context of the Nineveh governorate, the type of soft-skills training will be adjusted to emphasize even more on emotional coping skills (managing stress, feelings, and moods) and social, interpersonal and inter-group relationship skills, as opposed to the more traditional employability focus. In addition, the trainings will include a mixed set of engaging activities such as leadership, decision-making, communications training, arts, cultural heritage and sports, community-based events, and group based psychosocial support to protect or promote beneficiaries' mental health and psychosocial wellbeing

The life and psychosocial skills training will be developed coherently with the joint curriculum that will be recommended by PROSPECTS partners, building on partners training modules and tools – including those delivered by NGOs previously contracted by the MoYS under the Promoting the Inclusion of Conflict-Affected Iraqi Youth (P161654) pilot project – while being specific and responsive to the needs of Mosul. A review, assessment and consolidation of relevant life skills trainings previously delivered by ILO, UNICEF, the MoYS and MoLSA through other Bank-financed projects, will help informing the proposed project's life and psychosocial skills curriculum.

Sub-component 1.2: Vocational trainings specific to the cultural and creative industries sector

The vocational trainings will prepare the youth to entrepreneurship opportunities with a focus on a range of local occupations in the cultural and creative industries sector, ranging from visual arts, crafts and intangible cultural heritage (e.g., handicraft, cobbling, tailoring, jewelry, culinary traditions, management of heritage sites, etc.) to design and creative services such as housing-related industries (e.g., furniture, lighting, or home textile). The vocational training curriculum will be informed by a rapid market and needs assessment that will be carried out at the inception phase of the project

Following the successful completion of this sub-component, participants will be eligible to apply to the micro-entrepreneurship activities or youth-led community development initiatives (component 2).

Component 2: Fostering youth engagement to revive the local cultural and creative economy and community cohesiveness (approx. US$ 2,050,000)

This component aims to support 2,000 youth who have benefitted from skills development in engaging (i) in micro-entrepreneurship (completion of component 1.1. and 1.2. is a prerequisite), or (ii) in youth-driven cultural community initiatives (completion of component 1.1 is a prerequisite).

Sub-component 2.2: Start-up support for developing youth micro-entrepreneurship in the CCI sector

The start-up support will be provided in a form of matching grant where at least 1,000 eligible beneficiaries would be required to match a minimum percentage of the grant value with in-kind and/ or financial contribution so as to create a greater sense of ownership, therefore increasing the chances of micro-entrepreneurship success with sustained results beyond the project

Prior to benefit from the micro-entrepreneurship support, beneficiaries would have been required to: (i) complete the soft skills and vocational trainings under component 1; and (ii) prepare and submit a business plan for the micro-entrepreneurship activity, while ensuring it proposes to support a socially and environmentally sustainable, and economically viable business activity. The start-up support will be granted according to the feasibility and prospects for successful implementation of the micro-entrepreneurship proposal. Moreover, proposals that would bring two or more young candidates together would be prioritized and encouraged as it will lead to cost-efficiency, contribute to mutual learning and teamwork, therefore increasing the survival rate of the business activity. A gender- and disability-sensitive lens will be applied to ensure differentiated needs of vulnerable young men, women and the disabled are taken into account.

Sub-component 2.2: Civic engagement through local cultural community initiatives

Young participants would be eligible provided that they participated in the soft skills trainings (component 1.1), following which they will be trained in how to design and implement local cultural community projects. Each group will then be required to complete a small sub-project supporting an activity serving the community's needs. The same youth should participate in the implementation of the activity, while ensuring it brings different social groups together. Activities will place an emphasis on empowering cultural heritage and in reviving Mosul's cultural identity and pride in the aftermath of the devastating conflict and important loss of the city's memory. Activities promoting cultural heritage could include cultural exhibitions and events targeting youth and women in the various occupations related to the intangible cultural heritage (handicraft, culinary traditions, history and management of heritage sites, etc.), small rehabilitation works, cleaning of streets located near cultural heritage sites, awareness raising forums in relation to cultural heritage, etc.

Component 3: Project Management (approx. US$ 520,000)

This component will support the following activities: (i) project management for the coordination and implementation of activities including some operating costs; (ii) project monitoring and evaluation (M&E) activities; (iii) preparation of the final evaluation report including lessons learned; (iv) environmental and social risk management; (v) participatory evaluations; and (vi) annual audits

2. Brief Summary of Previous Stakeholder Engagement Activities

In accordance with WB's ESF framework, stakeholder consultation was conducted during the preparation of the project. Stakeholder consultation aims to involve, inform, and consult the stakeholders in the planning, management, and decision-making activities of the Project.

The stakeholder consultation process has the following objectives:
- To inform stakeholders about the proposed Project and its objectives; assess their interest and support and consider their views in the project design and environmental and social performance.
- To foster collaboration between project staff and local communities to minimize and mitigate Environmental and Social (E&S) risks related to proposed Project activities.
- To provide mechanisms for stakeholders to raise concerns and provide feedback or make complaints about the Project and any activities related to the Project.
- To identify if stakeholders foresee any positive or negative E&S impacts from the Project, and if so, how the impacts can be addressed.
- To integrate opinions and concerns into alternative arrangement and mitigation measures.

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

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

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

During the project preparation, a consultation was conducted by MoYS. The recipients extended the invite to stakeholders from NGO representatives', administrative staff, members of different ministries including ministry of labor affairs, ministry of industry and minerals, ministry of migration and several representatives of different humanitarian, cultural and charity volunteer group members in Nineveh province. The total number of participants reached 23 people (see details in Annex 1). The consultation session also followed the guidelines of the WB's technical note on conducting consultations during times of constraints of this SEP) and took place on April 27, 2022 from 10:00 to 12:00. Stakeholders received a summary of the project ahead of the meeting and clarifications on what was expected from the participants. Further to the consultation, a survey composed of 9 questions (See Annex 2) was sent to the attendees and to other stakeholders.
Stakeholders were invited to share their thoughts, questions and concerns regarding the current project design and the associated environmental and social risks during a 2.0-hour session. Below is a summary of the main points raised by the stakeholders during the consultation session held on (April 27, 2022).

1.   Representatives raised the fact that it is important to include all of Ninevah province in this project and not to limit the participation to Mosul. Also participants in the consultation influenced that local project directorates from the Ninevah province should be available on the ground .

2.   Representatives proposed that widows and orphans should be included in the project program as they are considered to be one of the most venerable groups that need to be included.

3.   Representatives highlighted about the Ninawa religion and etheric diversity and suggested that the project should take into consideration this important aspect and include all.

4.   Participants made it clear that Mosul has past experience in reviving and nourishing industries and handcrafts, and Mosul is in need for such projects.

5.   Representatives raised pointed that the risks of this project could be resulted from (i) Financial support delay, routine administration processes and importation unexpected delays, (ii) Insufficient financial resources to purchase and develop laboratory equipment, (iii) The security situation in the country and the impact of the COVID-19 pandemic may affect the implementation of the practical training programs.

6.   To increase the women's contribution in such project, they suggested (i) to offer job opportunities to several female graduates such as technicians and coordinator; support various female students and researchers, (ii) Women's participation in training workshops and energy management workshops.

7.   Representatives pointed out that Some of the refugee camps residents in Ninawa   can be identified as vulnerable in the project scope. The project needs to make sure proper targeting, and identification of project beneficiaries.

3. Stakeholder identification and analysis

3.1 Methodology

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

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

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.

- *Inclusiveness and sensitivity*: stakeholders' identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women and people with disabilities.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.2 Affected parties and other interested parties.

The key stakeholders identified by the Project need to be informed and consulted about the project. MoYS has identified some stakeholders to date and will be identifying others during project implementation. They are categorized into the following:

Individuals, groups, or communities that:

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

- forcibly displaced and returnees' representatives.

- Ninevah youth (Male and female)

- Nienevah local community .

- Or may has an interest in the project (other interested parties)such as :

- Youth centers in different districts.
- Representatives of different humanitarian and NGO establishments in Ninawa province.
- Ministerial representation such as the ministry of labor and the ministry of industry and minerals and ministry of culture and tourism
- Ninevah Government representation
- NGOs,
- ILO.
- UNICEF

Beneficiaries representing Ninevah MoYS will be positively affected by the project as project compounds aim to develop the province youth skills and capabilities to start works and businesses for a number of the youth society. Other stakeholders such as local government, UNICEF and ILO will also be positively impacted by the project implementation as those parties will make their programs and plans to support the social sectors in province. It will also provide them with independent data and information for future programs.

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

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

- Government agencies and ministries, including the Ministry of youth and sport (MoYS); Ministry of industries and minerals, Ministry of Planning (MOP), and (Ministry of Health (MoH) , Ministry of migration and displacement , Ministry of culture and tourism …

- Donors and development partners and project sponsors (i.e. the World Bank)

- Civil society, NGOs, professional groups and associations; on the regional, national and local levels located outside the project's direct area of Influence.

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

3.3 Disadvantaged / vulnerable individuals or groups.

It is particularly important to understand whether disadvantaged or vulnerable individuals or groups, may be further disadvantaged as a result of the Project. These groups often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness-raising and stakeholder engagement with disadvantaged or vulnerable individuals, in particular, be adapted to take into account such groups or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full

understanding of project activities and benefits. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, dependence on other individuals or natural resources, etc. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision-making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

· Poor households, people living in poverty, especially extreme poverty
· People who do not know how to read or write
· NGOs work with vulnerable groups
· Refugees in camps
· Homeless people and those living in informal settlements or urban slums
· Unemployed people
· Women and female-headed households
· Persons with disabilities (PWD)
· Disadvantaged or persecuted ethnic, racial, gender, and religious groups, and sexual minorities
· Low-income migrant workers, internally displaced persons, asylum seekers, populations in conflict settings or those affected by humanitarian emergencies, vulnerable migrants in irregular situations
· Hard to reach population groups such as people living in rural areas with limited access to communication channels

Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate.

3.4 Summary of project stakeholder needs

A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, considering the current COVID-19 situation:

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

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

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

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

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

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

provided by stakeholders.

Stakeholder group	Language needs	Preferred notification/ engagement/consultation methods/approaches	Specific needs (daytime meetings, accessibility)	Topics to be discussed
Administrative and technical staff of MoYS	Arabic/English	Email, SMS, phone calls, individual one-on-one interview, focus group etc.	During working hours Virtual Meetings	Project objectives, Implementation mechanisms, E&S implications
Youth (Male and Female)	Arabic/English	Direct Contact/ email	Meeting during official hours	Same as above+ possible channels for contribution
Local and International donors, NGOs, ILO, UNICEF	English	Email, phone calls, newspapers, interviews et.	No specific need	Same as above
Vulnerable groups (forcibly displaced and returnees' representatives, Refugees in camps, homeless, PWD, etc.) .	Arabic	Phone calls, direct visit (if possible),	Up to their preferences	Project objectives, Implementation mechanisms, E&S implications

4. Stakeholder Engagement Program

4.1 Purpose and timing of stakeholder engagement program

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

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

- Identify and liaise with the relevant disadvantaged and vulnerable groups agencies representatives including local authorities and inform them about the project and its specific implemented components, thereby gaining acceptance and support to ensure an enabling environment for project implementation.
- Strengthen links with the local actors by initiating and sustaining dialogue to receive their support in gaining project acceptance and facilitation of access, communicating project goals and rules within their

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

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

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

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

4.2 Proposed strategy for information disclosure

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

Table : Proposed strategy for information disclosure

Project stage	List of information to be disclosed.	Methods proposed.	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Project appraisal stage	Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP) and GBV Action Plan	By email , social media, Electronic publications and MOYS websites	During Project preparation before project appraisal and throughout implementation (when updated)	All stakeholders that were invited to the consultations (when there is an update they will be informed) and all Project actors.	MoYS

Project stage	List of information to be disclosed.	Methods proposed.	Timetable: Locations/ dates	Target stakeholders	Responsibilities
	SEP and its grievance mechanism	Same as above	During preparation (Before disclosure) and throughout implementation when updated	All Identified Stakeholders (when there is an update they will be informed)	MoYS
Implementation stage		Same as above	When there is a need and per the findings of the Grievance Mechanism (GM)	All previous stakeholders and any new ones identified as relevant.	MoYS

4.3 Proposed strategy for consultation

As per the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings", A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following issues shall be taken into consideration by the PMU and the MOYS for selecting channels of communication, in light of the current COVID-19 situation:

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

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

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

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

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

- Each of the proposed channels of engagement should clearly specify how feedback and suggestions

can be provided by stakeholders.

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

Table: Project's groups and engagement method

	Group title	Method of Engagement
1	**Project beneficiaries**	- Feedback mechanism through hotline (00964 7704395744) - Feedback mechanism through email (http://www.moys.gov.iq) - Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP) - Focused group discussions and individual interviews.
2	**Other interested parties**	- Formal meetings with stakeholders - Regular meetings with the stakeholders - Feedback mechanism through hotline (00964 7704395744) - Feedback mechanism through email (http://www.moys.gov.iq) - Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP)
3	**Vulnerable groups**	- Feedback mechanism through hotline (00964 7704395744) - Feedback mechanism through email (http://www.moys.gov.iq) - Feedback mechanism through the available GM channels (refer to section 6: "*Grievance Mechanism*" of the SEP) - Focused group discussions and individual interviews.

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

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

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

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

- Number of participants and categories of participants.

- A list of relevant documentation disclosed to participants.

- Summary of main points and concerns raised by stakeholders.

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

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

- Specific measures adopted to reach out to vulnerable groups.

4.4 Proposed strategy to incorporate the view of vulnerable groups.

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals disabled and unemployed or groups on infectious diseases and medical treatments in particular, be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities, marginalized groups, poor students and IDPs), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. The GRM will be culturally appropriate and accessible for PAPs, considering their customary dispute settlement mechanism.

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

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

- Women-only consultation sessions.

- in addition to digital media, Diversification of outreach methods such as through the radio or poster campaigns to reach these groups; and

- Collaboration with Universities notably for the involvement of students.

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

4.5 Timelines

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

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

4.6 Review of Comments

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

4.7 Future Phases of Project

All stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanisms. The Project Implementing Unite (PMU) Will prepare quarterly reports regarding environmental and social impacts, grievances and project achievement and will present these to stakeholders. These reports will be disclosed on MOYS websites and will be accessible to the public.

5. Resources and Responsibilities for implementing stakeholder engagement activities.

5.1 Resources, Management functions and responsibilities

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

The Grievance mechanism will be managed by Project PMU's E&S specialists in collaboration with the GM coordinator at MOYS who will be assigned for this specific task.

The budget for the SEP is part of Project budget. The contact email is: **bushra_altaii@yahoo.com** The main contact person is Bushra AL Taii (MoYS).

6. Grievance Mechanism

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

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

Specification:

The GM at central level will be integrated within the existing complaining system(s) at the MOYS, and will use available resources and assets, to the extent possible. But will, at the same time, ensure that the system has the following key features in place, as a minimum:

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

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

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

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

- **Vulnerability-responsive:** MOYS will put in place all measures that would facilitate grievances lodging from vulnerable groups, including, people with disabilities, women, and elderly in particular, minorities, poor student whom, based on their circumstances, been impacted by any of the Project's

activities. These measures will take into account the special needs, protect privacy, and provide safe and secure channels. By so doing, the GM will build on existing grievance structures, coordinate with social service providers, and provide GBV SEA/SH complainants with all possible means of protection starting from point of complaining until resolution. The GM will also provide adequate advice/ procedural assistance for referral to traditional justice mechanisms, whenever needed.

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

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

The Proposed GM System

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

- Letters to the PMU and/or relevant PMTs (00964 7704395744 , bushra_altaii@yahoo.com)
- Phone calls to PMU using telephone 00964 7704395744
- contacting them via a link on https://www.google.com/url?sa=i&url=https%3A%2F%2Fmoys.gov.iq
- In-person feedback to sites and documented in GRM uptake form
- Grievance boxes allocated at the MoYS office and sub-project sties.

The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress. All complaints/concerns and feedback will be documented in a grievance log. MoYS will ensure that the GM is culturally appropriate and accessible for Project Affected Parties (PAPs). All staff and operators who will be

handling the GM will receive the necessary training for effective handling of complaints including on any potential SEA/SH related complaints, complaints from the elderly or other vulnerable groups and grievances regarding the conduct of security personnel.

Grievance Management Process
The Project undertakes to respond to all grievances within 30 calendar days of submission (see the detail in table below) – and more quickly in cases where there is high risk of escalation.

Roles and responsibilities of the GM coordinator.

Adhere to the designed community friendly grievance redress mechanism with clear and timely bound tiers and responsibilities to ensure dissemination on the local level. Develop quarterly grievance and redress report to be shared with World Bank.
Conducting field visits to ensure that the established grievance redress mechanisms are functioning properly and that the individual projects are implemented in a socially sustainable manner;
Reach out to local communities, including PAPs (If any), to raise awareness about the project and the implementation schedule.
Coordinate and provide support to the GM focal points who will be an assigned member of the PMU with a suitable training to handle complains according to the GM approved and mechanism and
Consolidate all Grievances received from the different project location, PMTs and reflect in the project report.

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

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

Step 1: Uptake
A range of channels will be made available for submission of feedback, including a free of charge phone line, regular mail, an email account, and a Facebook page. In addition, hard copies of GM uptake forms will be

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

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

Step 2: Sorting and Processing

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

Step 3: Acknowledgment and Follow up

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

High-Level Feedback

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

- Incidents that caused or may potentially cause significant or great harm to the environment, workers, communities, or natural resources, including issues of gender-based violence;
- Incidents which entail failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies;
- Incidents for which failure to address may potentially cause significant impacts that are complex and/or costly to reverse; and
- Incidents that may result in fatality or some level of lasting damage or injury.
- This type of feedback will be acknowledged, and an investigation will be launched by the PMU/PMT and any other relevant stakeholders within 24 hours during workdays and within 48 hours if the feedback was received over the weekend. It should be noted that some types of incidents, including accidents and fatalities need to be reported to the World Bank. This guidance is provided in the Environment & Social Incident Response Procedures.

Standard- Level Feedback

If the identity of the aggrieved person is known and the grievance is classified as 'standard', the

acknowledgement of grievance will be within 3 business days. At the 20 business-day mark, if a complaint/question is still pending, the GM focal point for the PMTs and the PMU will provide an update to the non-anonymous GM user, inform them if there will be delays in resolving their case, and provide the date for which they will be able to provide a response

Step 4: Verification, Investigation and Action

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

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

Step 5: Providing Responses to GM Users

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

Step 6: Closure and Reporting

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

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

- Nature of the feedback
- Aggregate information on the GM users (including demographic – student, parent, gender, etc.)
- Information on where the feedback was received and in what format.

- Information on the status of complaints and queries (resolved, under review, etc.).
- Information on how complaints and queries were resolved.
- Information on unresolved complaints/queries and why they are not yet resolved.
- recommendations for improving the GM. These recommendations should be based on the monitoring of the GM, specifically the extent of the GM's functionality and the types of feedback that have emerged.

Procedure for Appeal

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

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

World Bank Grievance System

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

Confidentiality

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

Gender sensitive GM

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

6. Monitoring and Reporting

7.1 Involvement of stakeholders in monitoring activities

Not applicable.

7.2 Reporting back to stakeholder groups

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

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

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

List of Annexes

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

Annex 1: Contact No. of the people that assisted with the Stakeholders Consultations (note: IDS of the participants have been hidden).

	Name of Stakeholder	Job title	Contact details
1		MoYS project Manager	MoYS –Baghdad ,Iraq
2		MoYS Assistant Project Manager	MoYS Baghdad ,Iraq
3		MoYS Financial Manager	MoYS baghdad ,Iraq
4		MoYS Project Coordinator	00964 7704395744
5		MoYS Techology and Info specialist	MoYS Baghdad , Iraq
6		MoYS Evaluation specailist	MoYS , Baghdad ,Iraq
7		Al Kat Al Arabi Establishment NGO	Dalyaalma3mary96@gmail.com
8		Majanin Group NGO	Allhybyb55@gmail.com
9		GILGAMISH Devlopment NGO	ghumanitarian@gmail.com
10			
11		Iraqi creative house NGO	CEO@muthaberon.org

12	███████	TOLAY Victums support Org NGO	maheraliask24@gmail.com
13	██████████	BAYTANA house for Culture and arts NGO	Saraahmad50@gmail.com
14	█████	Baghdad Women Association NGO	Mahmoodazzo1982@gmail.com
15	████████████	Muthabroon for development association NGO	Ahmad.alnajam1991@gmail.com
16	█████████	Mosul Heratage NGO	Ayoobthanoon1992@gmal.com
17	█████████	TATAWA MAANA Group NGO	Admin2@volunterwithus.org
18	██████████ RASEEF Al Waraq Cultural Group NGO		salhalwark@gmail.com
19	████████		abnaaalhadbaa@gmail.com
20	███████████ International Group for Humaintrain Links NGO		Mawahib.shaibani@gmail.com
21	████████ DIJLA AL KAEER Charity Org NGO		dijlata_alkair@yahoo.com
22	████████ TAQADOM CO		ptciraq@gmail.com

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

Your participation in this study is completely voluntary. There is no foreseeable liability associated with this survey. However, if you feel uncomfortable answering any questions, you can withdraw from the survey at any point. It is particularly important for us to learn your opinions.

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

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

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

5- What groups do you identify as vulnerable in the project scope?

6- What do you propose in order to increase the woman's contribution to such a project?

7- What is your preferred communication channel (telephone, email, website, Facebook, WhatsApp?)

8- What is your preferred language of communication?

9- Do you have any special issues that you would like to be informed about?