Bangladesh Enhancing Investments and Benefits for Early Years (BEIBEY) (P178133)

Stakeholder Engagement Plan (SEP)

Bangladesh

Implemented by:

Local Government Division (LGD)

Department of Women Affairs (DWA)

May 2023

Acronyms

BEIBEY	Bangladesh Enhancing Investments and Benefits for Early Years
CPF	Country Partnership Framework
ECCE	Early Childhood Care and Education
ECD	Early Childhood Development
ECE	Early Childhood Education
FLFP	Female Labor Force Participation
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
GoB	Government of Bangladesh
IPV	Intimate Partner Violence
LGD	Local Government Division
LGI	Local Government Institution
MCBP	Mother and Child Benefit Program
MoHFW	Ministry of Health and Family Welfare
MoPME	Ministry of Primary and Mass Education
MoWCA	Ministry of Women and Children Affairs
PMU	Project Management Unit
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
WB	World Bank

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1. Introduction and Project Description

1.1 Introduction

1. Stakeholder's engagement and communication are important tools to ensure transparency, accountability, and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with Bangladesh Enhancing Investments and Benefits for Early Years (BEIBEY) Project. This Stakeholder Engagement Plan (SEP) is prepared by Local Government Division (LGD) under Ministry of Local Government, Rural Development and Cooperatives, and Department of Women Affairs (DWA), Ministry of Women and Children Affairs (MoWCA), Government of Bangladesh (GoB).

2. Given the context of the COVID-19 pandemic (and any updated information on further outbreaks), public consultation and stakeholder engagement management in the project will be conducted in compliance with national requirements and any updated guidance issued by WHO and the World Bank.

3. The project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10: Stakeholders Engagement and Information Disclosure, the implementing agencies 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.

The SEP is intended to support the project in delivering efficient and effective engagement and communication with stakeholders of the investment program so that their views and concerns are reflected in the project, and they are fully informed about the project activities. Timely and two-way information sharing, and communication can help mobilize and maintain stakeholder support for the project and advance the overall project goals.

4. The SEP outlines in detail the commitment of LGD and DWA with regards to engaging the stakeholders of the BEIBEY project. It also details the project Grievance Redress Mechanism (GRM) and future plan of action, keeping in mind the COVID-19 context, as a way of engagement with the stakeholders and to resolve any potential cases of grievances arising out of implementation of the project.

1.2 Project Description

5. The proposed project is in line with the World Bank's Country Partnership Framework (CPF)[1], whose primary objective is to address constraints to growth and competitiveness. Social inclusion is one of the three focus areas and activities centered on consolidating gains in equity and access to health and education, access to clean drinking water and sanitation, and expanding pro-poor coverage of social protection. Moreover, the ongoing Systematic Country Diagnostic (SCD) identifies inclusive and resilient human capital as a foundational priority to propel the country's transformation towards Upper Middle-Income Country (UMIC) status and investing in early years is a starting point to tackle poverty and boost shared prosperity.

6. The proposed project will directly benefit up to six million pregnant women, mothers, and young children (aged 0-4 years) through direct cash transfer support as a part of the MCBP (Mother and Child Benefit Programmme), and indirectly to many more through community engagement and parental support sessions. Furthermore, the project will also benefit

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[1] World Bank (2016). Bangladesh Country Partnership Framework (Report No. 103723-BD)

participating LGIs by enhancing their capacities, strengthening systems, and raising awareness about ECD issues through community networks. The ECD awareness created by this project will benefit the larger population – including fathers and families with older children. Parent counseling sessions will be provided through the project by a community-level para-social worker network and will cover topics including care during pregnancy; dietary diversity and feeding practices; health, hygiene, and safety, and early stimulation and learning through play activities. Moreover, financial resources and capacity support will be provided to (i) scale up MCBP coverage; (ii) strengthen MCBP institutional and coordination capacity; and (iii) strengthen the local level delivery system for improved delivery system for improved coordination of multi-sector services and community engagement.

7. The proposed interventions address issues that are aligned with sectoral strategies and priorities of several line ministries, including the Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Local Government, Rural Development and Co-operatives (MoLDRDC), and the Ministry of Primary and Mass Education (MoPME). The proposed project will support interventions that address demand-side constraints for health, nutrition and early learning services through information, incentives and behavior change counseling. In addition, by strengthening coordination and monitoring at the local level, the proposed project will support engagement with government and NGO service providers to assure adequate supply is in place, services are delivered through proper sequencing, logistical arrangements are sufficient, and quality of service is sustained. The proposed activities would also coordinate with relevant initiatives supported by active and pipeline World Bank projects to achieve synergies that either enhance the impact of individual interventions or are complementary.

1.3 Project Objectives

8. The proposed Project Development Objective is to (i) provide consumption support for vulnerable households with pregnant women and/or mothers of children under 4 years; (ii) increase utilization to services that contribute to early childhood development, and (iii) strengthen local delivery platforms.

1.4 Project Components

9. The project will support early childhood development through the provision of cash transfers and information, linkages, and counseling on services focused on maternal and child health and nutrition and early learning. The proposed project comprises of 3 components: component 1 will be implemented by DWA and component 2 will be implemented by LGD. The relevant activities under the components are given below:

10. The project will support early childhood development (ECD) through the provision of cash transfers and information, linkages, and counseling on services focused on maternal and child health and nutrition and early learning. Financial resources and capacity support will be provided to (i) scale up MCBP coverage; (ii) strengthen MCBP institutional and coordination capacity, and (iii) strengthen the local level delivery system for improved coordination of multisector services and community engagement.

11. Component 1 will support the Government's ongoing implementation of the Mother and Child Benefit Programme (MCBP), an unconditional cash transfer provided to eligible pregnant women and mothers of young children from vulnerable households. Financing will be provided to reimburse MCBP cash transfer expenditures against the achievement of annual performance

targets to ensure that critical actions on program, systems, and institutional strengthening are implemented timely and deliver concrete results in support of the PDO.

12. Furthermore, component 1 also comprises upgrading the MCBP MIS, establishing a Monitoring and Evaluation (M&E) unit, technical assistance and capacity building, financing Union Women and Child Development Assistants (UWCDA) at the local level, and incremental operational expenses. The component will support improvements to the MCBP through updated implementation guidelines, based on findings from a planned assessment that will be carried out by the International Food Policy Research Institute (IFPRI), and shock responsiveness through identifying measures for program scale up as well as access to food and other services. Furthermore, the program will test anticipatory actions in disaster-prone areas to understand household adaptive capacity through early warnings. Strategies will also be adopted from COVID-19 learnings, such as the use of technology to reach beneficiaries with key health, nutrition, and safety messages.

13. Component 2 will enhance local delivery of ECD services by strengthening Local Government Institution (LGI) capacity to provide information and linkages to programs and services appropriate to the needs of households with pregnant women or mothers of young children. To focus on high priority areas, this component will be implemented in selected locations of Bangladesh with high poverty, poor ECD outcomes, poor sanitation, distorted perceptions of GBV and areas vulnerable to climate shocks, excluding locations with Displaced Rohingya Population (DRPs).

14. Under sub-component 2.1, performance-based grants (PBGs) will be provided to Union Parishads (UP) based on their achievement of agreed targets related to institutional and service performance. Utilization of PBG proceeds will be demand-driven and benefit women and children of the community. UPs will be guided on potential activities to invest in that would support children's nurturing care and promote ECD and will be defined by a list of eligible and ineligible expenditures, including a negative list of activities that may cause potential environmental and/or social impact. Some of these activities may involve minor refurbishments to the community-based child-friendly spaces (such as providing adequate lighting and painting) and there will be some procurement of equipment such as computers which will need to be disposed of as e-waste at the end of its useful life as well as other limited quantities waste at the service center level

15. Sub-component 2.2 will support the establishment and management of a Community Support Network (CSN) that will serve as the frontline workforce at the union level regularly interacting with beneficiaries and the community. Establishing a strengthened and coordinated platform at the local level would offer increased access for all pregnant women and mothers in the community to key services that are fundamental for the ECD agenda. The CSN will provide parenting support sessions to all caregivers to support their knowledge and awareness so that their children can be healthy, receive early stimulation and learning opportunities, and be nurtured and protected from stress. The sessions would cover topics on child nutrition and cognitive development, including care during pregnancy; dietary diversity and feeding practices; immunizations; health, hygiene, and safety; precautionary and adaptive measures to respond to shocks, and early stimulation and learning through play activities.

1.5 Project Location

16. Component 1 of the project will be implemented nationwide as MCBP is an existing government program that operates across the country. Component 2 will be implemented in selected areas of Bangladesh ranked by priority. To focus on high priority areas, this component will be implemented in selected locations of Bangladesh with high poverty, poor ECD outcomes, poor sanitation, and distorted perceptions of GBV.

1.6 Summary of potential social and environmental risks and impacts of the projects

Environmental Risks and Impacts

17. The project may support some minor refurbishment activities that complement broader ECD goals at the union level with no adverse livelihood-related impacts expected. However, based on the nature of proposed activities, it is expected that the E&S impacts will be localized and minor such as causing noise, dust, both solid, liquid and limited electronic wastes that will come from the minor refurbishment works to the community-based child-friendly spaces (such as providing adequate lighting and painting), which will need to be addressed at service delivery point level through mitigation measures and related guidelines incorporated in the Project Operation Manual (POM).

18. **Social Risks and Impacts**
- SEA/SH risk of 'Moderate' stemming from IAs office staff, consultant, contractors, labors potential for assault /abuse of female beneficiaries and female staff involved in the project.
- Community health and safety concerns such as incidents associated with SEA/SH and COVID-19, etc. and its management.
- Social risks related to the exclusion of intended beneficiaries, especially the vulnerable.
- Labor management risk (including the involvement of community volunteers and the selection procedures).

19. **Potential social benefits and opportunities of the program**
- The proposed project will directly benefit pregnant women, mothers, and young children (aged 0-4) through awareness building and parental support session through community engagement.
- Increased utilization of ECD services by vulnerable households.
- Enhanced local government and community capacity to support households to access ECD services.
- Increased awareness of parents and communities on child development.
- Women empowered to make decision.
- The project will induce improved management efficiency, reduced monitoring costs and positive environmental impacts.

1.7 Objectives of the Stakeholder Engagement Plan (SEP)

20. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. 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 the project and any activities related to the project. The involvement of the local population is essential to the success of the project to ensure smooth collaboration between the project

staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally appropriate, and adaptive awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

21. **The SEP:**

   ✓ Identify stakeholders and maintain a constructive relationship with them to enable stakeholders view to consider in project design and E&S performance.
   ✓ Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project.
   ✓ Begins early during the project planning process to gather initial views of various stakeholder groups on the project proposal and design.
   ✓ Encourages stakeholder feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
   ✓ Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.
   ✓ Considers and responds to feedback.
   ✓ Supports active and inclusive engagement with project affected parties/ project beneficiary group mainly the residential and industrial customers,
   ✓ Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.

22. In addition, the SEP of the proposed project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the World Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

1.8 World Bank requirements for stakeholder engagement

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

24. As defined by the ESF and ESS 10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. According to ESS 10, Stakeholder engagement is most effective when initiated at an early stage of the project

development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project. LGD and DWA will ensure the following engagement procedures:

- LGD and DWA will engage with stakeholders throughout the project life cycle, commencing engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- LGD and DWA will engage in meaningful consultations with all stakeholders and will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultations with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- LGD and DWA will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.

25. LGD and DWA has prepared this draft SEP based on the nature and scale of the project and its potential risks and impacts. Stakeholders have been identified and if any new stakeholders are identified during project preparation and implementation, the SEP will be updated to include them. This SEP will be disclosed for public review and comment before the project is placed for the World Bank appraisal. According to ESS10, this SEP has also developed a grievance redress mechanism that allows project-affected parties, and others to raise concerns and provide feedback related to the environmental and social performance of the project together with component related activities other than safeguard issues and to have those concerns addressed in a timely manner.

2. Stakeholder identification and analysis

26. Project stakeholders are defined as individuals, groups, or other entities who:
   ✓ Are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as 'affected parties'); and
   ✓ 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.

27. 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. Community representatives including workers may provide helpful insight into the local norms and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison links between the Project and targeted communities and their established networks. 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. Stakeholder identification process will abide by government of Bangladesh, the World Bank and WHO recommended COVID guidelines during that time.

2.1 Methodology

28. To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

29. **Transparency and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in a transparent manner, free of external manipulation, interference, coercion, or intimidation. Additional stakeholders will be identified throughout the project cycle and based on the newly identified stakeholders; the SEP will be updated, if required.

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

31. **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all periods 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 include vulnerable groups, in particular women, youth, elderly, and the cultural sensitivities of diverse ethnic groups.

32. **Flexibility:** If social distancing requirements by the government or the WHO inhibit traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication.

2.2 Stakeholder Categorization

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

34. **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.

35. **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.

36. **Vulnerable Groups**: Persons who may be disproportionately impacted or further disadvantaged by the project impacts as compared with any other groups due to their vulnerable status, which may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

37. Engagement with all identified stakeholders will help ensure their valuable feedback and allow for a successful implementation of the project through the contribution of their expertise, networks, and agendas. Access to the local knowledge and experience through the active involvement of stakeholders is crucial for the success of the project.

2.2.1 Affected parties

38. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the project. The affected parties include groups such as pregnant women and children, persons with disabilities, economically disadvantages groups, and minority groups who are part of the primary beneficiary group. The project recognizes the sensitivity involved when engaging with these groups and steps will be taken to ensure that the nuances of their circumstances are considered in outreach and awareness activities. Furthermore, special care will be taken to ensure that they are able to voice their grievances. Specifically, the following individuals and groups fall within this category:
   - ✓ Vulnerable households with pregnant women and/or mothers of children under 4 years
   - ✓ Male member of households
   - ✓ Communities in the vicinity of the project's planned activities
   - ✓ MCBP beneficiaries receiving cash transfer support
   - ✓ Different local government bodies
   - ✓ Community workers
   - ✓ The local population and local communes
   - ✓ Residents, business entities, and individual entrepreneurs in the project area that can benefit from the employment, training, and business opportunities
   - ✓ Government officials, including Municipal Administration in the project area, village administrations, environmental protection authorities
   - ✓ Consultants
   - ✓ Contractors
   - ✓ Local Leadership

2.2.2 Other interested parties

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

   - ✓ Different health care service providers
   - ✓ Government of Bangladesh – government officials at the national level, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities
   - ✓ Mass media and associated interest groups, including local, regional, and national printed and broadcasting media, digital/web-based entities, and their associations.
   - ✓ Civil society groups and NGOs on the regional, national, and local levels, which pursue environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's Direct Area of Influence.
   - ✓ Local Labor involved during project implementation stage.

2.2.3 Disadvantaged/vulnerable individuals or groups

40. Vulnerable individuals and/or groups are affected parties and all reasonable efforts will be made to ensure their awareness and inputs as specified in paragraph 36.

41. If beneficiaries belonging to IPs/tribal/ethnic are identified in the project intervention areas, they will be consulted, and all project related information will be made accessible to them, so that they can benefit from the project. They will be communicated with in a culturally appropriate way and in the stakeholder engagement process.

42. IAs have conducted 2 consultation meetings in December 2022 with different stakeholders including pregnant women, potential community workers, schoolteachers and students, local government, NGOs etc. One consultation was conducted in Dimla upzila of Nilphamari district where 18 female and 11 men participated. The other consultation was conducted in Bakshigonj, Jamalpur district where 14 females participated. IAs disclosed the draft SEP with the stakeholders and feedbacks of the participants have been incorporated with the SEP. The following were the key takeaways from the meetings:
   ✓ All the participants are in favor of the project
   ✓ Local people are interested to participate in the community support network that will be established by the project including being engaged as community workers.
   ✓ Local health and care giving service providers are interested to engage with the project
   ✓ Pregnant women requested maternal support from the project free of cost
   ✓ Participants expressed the need to understand more about childhood development issues.

Stakeholder Analysis:

43. Stakeholder analysis is the process of identifying the stakeholder groups that are likely to affect or be affected by the project activities and sorting them according to their impact on the project and the impact the project activities will have on them. Stakeholder analysis is an ongoing process, which may evolve as new stakeholders are introduced to the project. The preliminary stakeholder analysis has identified the various interests of stakeholder groups and the influence these groups may have on the project. The analysis also shaped the design of stakeholder consultation activities and which stakeholders to engage and when.

Table 1 : Stakeholder Analysis

Stakeholder Group	Key Characteristics	Stakeholder Interest	Preferred Means of Communication	Specific Needs
Pregnant women, mother, and young children including minority populations and persons with disabilities	Key primary beneficiary requiring ECD services closer to their village/ union	Quality ECD services including antenatal care, birth registration, vaccination, preprimary education, parental counselling etc.	Newspaper, Community meetings, brochure, Public Information Campaign, Interpersonal Communication	Timings based on community convenience and female moderators for female beneficiaries.

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Community groups including elderly population and public at large	Key beneficiary group	Awareness activities	Consultation meetings, , Public Information Campaign, Interpersonal Communication	Timings based on community convenience
Representatives at local governing institutions e.g., UP, members Village leaders, and Traditional Leaders	Key beneficiary group and influencers of public opinion and facilitators of other developmental resources to villages	Ensuring key	Official communication, leaflets/ booklets, meetings/ workshops	Timings based on community convenience
NGOs/ CBOs; Media and Academia	Will have a role in creating awareness and accountability including E&S and GRM and supporting information disclosure	Activities undertaken as agreed and having a positive impact on delivery of services to target population including poor and vulnerable population.	Meetings/ workshops	Official working hours

3. Stakeholder Engagement Program

3.1 Summary COVID-19 needs, methods, tools and techniques for stakeholder engagement

44. A precautionary approach will be taken in 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:

   ✓ Public gatherings will happen while abiding by the government of Bangladesh, the World Bank and WHO recommended guidelines.
   ✓ If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings, deploying adequate safety measures such as masks, social distancing, and sanitization. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels.
   ✓ 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.

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

✓ Focus Group Meetings/Discussions.
✓ Community consultations.
✓ Formal meetings.
✓ One-on-one interviews
✓ Site visits.
✓ During COVID-19 restrictions, digital/ IT based interactions/ FGD in small groups through VTC/ other means to be arranged
✓ Workshop with experts.
✓ Surveys, polls etc.
✓ Interviewing stakeholders and relevant organizations
✓ Mass/social media communication (as needed)
✓ Disclosure of written information: brochures, posters, flyers, website Information boards or desks at various sites where project work is ongoing.
✓ Grievance redress mechanism

46. The current website of LGD (www.lgd.gov.bd) and DWA (www.dwa.gov.bd) are being used to disclose project documents, including those on environmental and social performance in both Bengali and English. Interventions supported by component 2 will disclose all the project activities. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the DWA and LGD's website. An easy-to understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Contact details of the Outreach Team will also be made available on the website. Both IAs will update and maintain the website regularly.

3.4 Stakeholder engagement plan

Table 2 : Stakeholder engagement plan

Target Stakeholders	Information to be disclosed	Proposed engagement & disclosure method	Timing of Engagement	Responsibilities
Pregnant women and children at large	• Project scope • Key project objectives • Broad set of project activities E&S documents such as SEP,	Local/ National Newspapers, Community meetings, brochures, website, Surveys	Preparation and implementation phase	IAs, SPA, SPS, UWCDA, and communication specialist

Target Stakeholders	Information to be disclosed	Proposed engagement & disclosure method	Timing of Engagement	Responsibilities
	ESCP, LMP etc.			
Representatives at local governing institutions e.g., Union Parishad, Upazilas, and Traditional Leaders	• Project Information • Key project objectives and • components • Broad set of project activities • E & S documents – LMP, SEP, ESCP etc.	Official communication, Meetings/ workshops	Design Phase, Implementation Phase and Completion stage	IAs, SPA, SPS, communication specialist and communication firm
Community Members including elderly population, persons with disabilities and male members of the household	• Scope of community support • Awareness activities	Brochure, consultation meetings, FGD, establishment of community support network	Throughout the implementation phase	IAs, SPA, SPS, communication specialist and communication firm
ECD Service providers	• Project Information • Key project objectives and components • Broad set of project activities • E & S documents – LMP, SEP • ESCP etc.	Local/ National News Papers meetings/ workshops	Design Phase Implementation Phase Completion stage	IAs, SPA, SPS, communication specialist and communication firm
NGOs/ CBOs; Media and Academia	• Project Information • Key project objectives and components • Broad set of project activities E & S documents – LMP, SEP, ESCP, etc.	Local/ National News Papers meetings/ workshops	Design Phase Implementation Phase Completion stage	IAs, SPA, SPS, communication specialist and communication firm
Key officials of other line departments/ institutions involved in provision of associated services e.g., relevant	• Project Information • Key project objectives and components • Broad set of project activities	Official communication, meetings/ workshops	Design Phase Implementation Phase Completion stage	IAs, SPA, SPS, communication specialist and communication firm

Target Stakeholders	Information to be disclosed	Proposed engagement & disclosure method	Timing of Engagement	Responsibilities
ministries, departments etc.	• E & S documents – ESMF, SEP, • ESCP etc.			
	•			
Elderly population and persons with disability	• Project Information • Key project objectives and components • Broad set of project activities • E & S documents – LMP, SEP ESCP etc.	Official communication, meetings/ workshops	Design Phase Implementation Phase Completion stage	IAs, SPA, SPS, communication specialist and communication firm

3.5. Proposed strategy to incorporate the view of vulnerable groups

47. The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information, medical facilities and services and other challenges they face at home, at workplaces and in their communities. The project will inherently benefit vulnerable groups by increasing and improving the access opportunities to the health services in the project area. However, the project will pay special attention to address any potential barriers to the most vulnerable groups to meaningfully participate the in the project including using local languages for some of the community engagement activities with local ethnic groups.

3.6. Reporting back to stakeholders and closing the feedback loop

48. 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 redress mechanism.

49. **Review of Comments:** The comments will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:
    ✓ Comments received from stakeholders orally or in the written form at the project level.
    ✓ Responsible officer would summarize the comments and inform the Project Director (PD).
    ✓ The E&S Specialist and communication specialist on behalf of PD would respond to the comments by oral or written means at the project level (If the comments are in the written form, then the answer will be also in the written form).
    ✓ The PD may also himself organize the meeting with respective stakeholders.
    ✓ The Responsible Officer will share the summary of the comments to stakeholders on every level.
    ✓ A written record of all these will be kept, maintained, and uploaded on the website for easy public access.

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

50. The IAs will oversee stakeholder engagement activities. To ensure successful SEP implementation, a series of capacity building activities are necessary for which the project has to provide adequate funding. A tentative budget of USD 196 million is estimated for implementation of the SEP which will be finalized before project effectiveness. The budget will include the salary of one E&S specialist, communication specialist, engagement of communication firm, printing information brochure, meeting cost and GRM.

4.2. Management functions and responsibilities:

PIU and PMU:

51. The PIU of DWA is already formed and PMU of LGD will be established which will include an Environmental and Social Specialist, and a communication specialist, to implement the SEP.

52. The communication firm will help design the outreach and awareness activities. The main activities of the IAs regarding environmental and social safeguards are:
   ✓ Supervision and monitoring of the progress of activities of the consultants and contractors for the implementation of SEP.
   ✓ Conduct consultations with the community people and housing societies and inform them about the project impacts, benefits, and mitigation measures.
   ✓ Responsible for modifications to the SEP when unforeseen changes are observed during implementation.
   ✓ Submit necessary monitoring reports on SEP implementation.
   ✓ Ensure disclosure of the project activities among the stakeholders.
   ✓ External communications with other government, semi-government and non-government organizations, universities, research institutes in the country on the matters of mutual interest related to environmental management and filming of activities to be carried out under the project development.

Communication Firm and Communication Specialist:

53. The project will engage a firm to design the outreach and awareness campaign strategy for community-based mobilization and communication to enhance the awareness of the ECD services and their benefits to the beneficiary groups and communities where they live.

54. The communication specialist and LGIs will be responsible for carrying out the stakeholder engagement activities. The stakeholder engagement activities will be documented through meeting minutes, working papers and reports, and made available for all stakeholders to be informed and provide feedback. A key feature of the community-based component is the mobilization of key actors at the community level, including village leaders and influential family members such as fathers, grandmothers, and mothers-in-law. Issues affecting nutrition and early childhood care will be periodically discussed with these groups as a means of bringing women's issues to the forefront of community discussions. This mechanism therefore creates a unique opportunity to channel women's voices all the way up to the level where communal plans and budgets are conceived, elaborated, and implemented.

55. The entities responsible for carrying out stakeholder engagement activities are:

Responsibilities / Stakeholder Engagement Activities	Responsible Entities
- Organize regular meetings with stakeholders - Mass/social media communication (as needed) - Training/Workshop - Disclosure of written information: brochures, posters, flyers, website - Information boards or desks in project areas. - Grievance redress mechanism - Reporting on ESCP/SEP / GRM to the WB & other interested parties.	- PMU (Including E&S Specialist and Communication Specialist) and PIU - LGI

56.   The Stakeholder engagement activities will be documented by the entities responsible for implementing them and then consolidated at the PIU and PMU.

5. Grievance Redress Mechanism

57. The main objective of a Grievance Redress Mechanism (GRM) is to assist and resolve 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 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.

5.1. Description of GRM

58. Component 1 will finance government's existing MCBP program under DWA. DWA has well-functioning local and project level GRM, including an existing hotline for GBV (including SEA/SH) grievances which will be utilized by this project. If any stakeholder or beneficiary has any grievance in the project activities can complain following a systematic procedure of GRM. The complaints will be recorded and addressed in upazila or district level or even to national level through the cabinet division's GRM. All the grievances will be recorded through MCBP MIS for component 1.
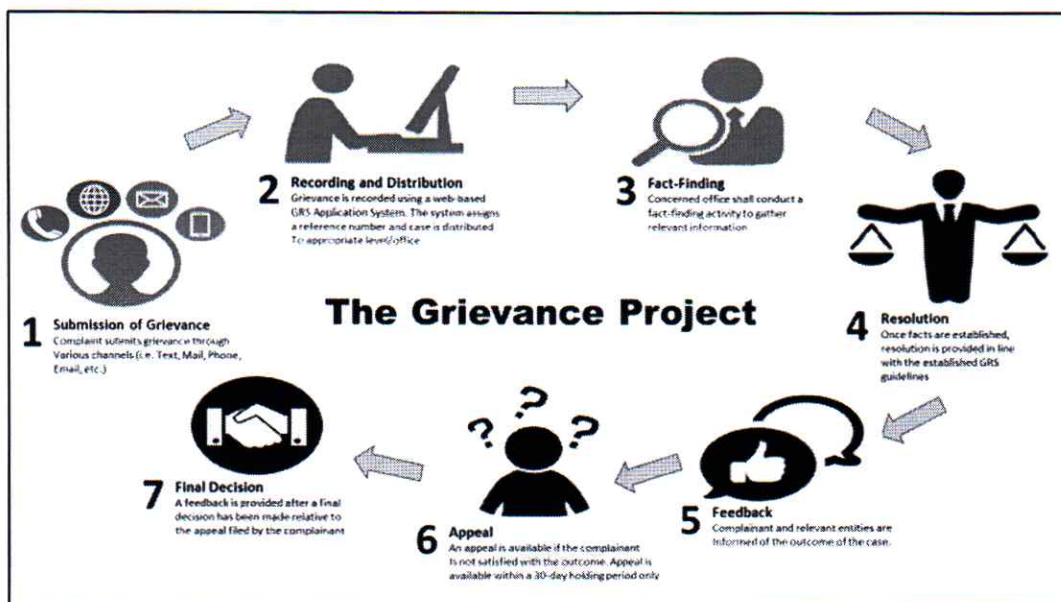
Figure: Grievance mechanism for component 1

59. Considering the overall need of GRM for the whole project period and nature of the LGD local level project activities, a separate GRM will be formed at local level by LGD. LGD has a well-functioning GRM at the institution level, which will be used for the project level grievances. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law. It is essential that an effective and transparent mechanism is designed and established at the earliest opportunity for all members of the community to be able to lodge complaints and grievances. Necessary sign posting/billboard would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The GRM would also be made available online so that grievances could be submitted without the need for physical interaction, especially if COVID-19 restrictions are applicable.

5.1.1 Formation and Operation of the GRC

60. Local Grievance redress committees (GRCs) will be formed in each upazila. Prior to the start of project activities, LGD officials will meet with elected members to request the establishment of such committees, with the understanding that they will have to meet when complaints are received. As a minimum the composition of the GRC will be as follows:

1. Social Protection Supervisor - GRC Chair and convener
2. Social Protection Assistant- Secretary
3. Female member of concerned UP(s) - GRC Committee member
4. Male member of concern UP-GRC Committee member
5. Representative from area where grievance was filed- GRC Committee member

61. The GRC would only be convened if direct communication between the aggrieved parties cannot solve the issue quickly. Once the complaint reaches the GRC, the GRC has two weeks to render a decision, based on discussion with all parties involved. The GRC will be used as the third step when filing a complaint.

62. **Grievance Redress Officer (LGD):**
Officer Name : Md. Kamal Hossain
Designation : Joint Secretary
Hotline : 16256
Mobile No. : 01716148479
e-Mail : kamal_6801@yahoo.com

63. **Grievance Redress Officer (DWA):**
Officer Name : Rubina Ghani
Designation : Program Director, Mother and Child Benefit Program, DWA
Mobile No: 01712580496
Hotline : 109 for SEA/SH grievances,
e-Mail : rubinaghani89@gmail.com

64. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse. It is important to have multiple and widely known ways to register grievances. Anonymous grievances can be raised and addressed. Several uptake channels under consideration by the project include:
   - ✓ Toll-free telephone hotline
   - ✓ E-mail

65. Having an effective GRM in place will also serve the objectives of:
   - ✓ Reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and
   - ✓ Serving as important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes
66. Once a complaint has been received, by all channels, it should be recorded in the complaints logbook or grievance excel-sheet/grievance database.

   5.1.2 Steps to a Solution

67. **Step 1:** The complainant will be advised to first attempt to settle the complaint through direct communication either orally or in writing to SPSC. If the discussion between officer & the Complainant/Community is successful, the IA with the help of consultant will be responsible for undertaking corrective measures within 4 days and recording the decision and filing via the consultant.

68. **Step 2:** If the complaint is not addressed within 4 days; the next level would be notified to aggrieved person. SPSC will then communicate project level GRC, and a solution will be discussed with the complainant within 7 days. If more time is required, PD will communicate directly with the complainant describing the reasons of the delay.

69. **Step 3:** If Step 2 fails to resolve the issue within one week of the receipt of the complaint, the central GRC should be formed, and a formal hearing undertaken. At this point a decision must be rendered within 2 weeks or the complainants concerns will be deemed correct and immediate mitigate actions will be required and fully executed within 5 days of the end of the 2-week period.

70. All decisions will be recorded by the GRC, and sent to the respective PD.

5.1.3 Publicizing the Grievance Redress Steps and the Committee

71. Prior to the start of the project activities, the PMU at LGD will publicize the establishments of the grievance redress steps and the process and advertise all via contact information and the grievance redress steps posted at local UP office, as well as at busy public places. The poster(s) containing the information regarding grievance redress steps will be in the local language(s) and posted 30 days prior to the start of the project activities. The IA representative will check at least once monthly to ensure that the posters are prominently displayed and provide clear contact instructions and phone numbers. This procedure and monitoring will be reported in the bi-annual monitoring report submitted to the WB.

72. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

73. Any grievance filed with the GRC, must be reported in the half yearly progress report.

74. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. IAs will maintain the following three Grievance Registers:

75. **Intake Register**: (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

76. **Resolution Register**: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

77. **Closing Register**: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

78. **Sexual Exploitation and Abuse and Sexual Harassment:** As with all projects, there is a risk that IAs office staff, consultant, contractors, labors may assault /abuse female beneficiaries and female staff involved in the project. SEA/SH instances include explicit, sexual, and inappropriate language, unwanted physical touch, forced labor in exchange for sexual favors and other forms of assault and harassment. The SEA/SH risk for the project is 'Moderate.' The project GRM will be sensitized to receive SEA/SH cases. DWA has a dedicated hotline number to receive SEA/SH related grievances. E&S specialist at LGD PMU will also be trained accordingly to be the SEA/SH grievance related focal person and receive SEA/SH related grievances of the project. If the GRM receives a case on SEA/SH related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. Once a complaint has been received, by any channel, it should be recorded in the complaints logbook or grievance excel-sheet/grievance database.

5.1.4 GRM Monitoring and Reporting

79. The everyday implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Director of the PIU and PMU respectively. The team members of the project at every level will be responsible for implementing the agreed resolutions and monitoring the overall process.

6. Monitoring and Reporting
6.1. Involvement of stakeholders in monitoring activities

80. The ESCP will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation. The consultations, with the help of the communication specialist and E&S specialist, will assess whether capacity building and training programs will be required to enable affected parties and local representatives participate in monitoring. The Project will establish a monitoring system that is participatory, which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate scientific findings and involve them in participatory discussions of external and monitoring and evaluation missions. Monitoring and evaluation will be adjusted accordingly based on restrictions due to COVID-19.

6.2. Reporting back to stakeholder groups

81. The SEP will be periodically revised and updated as necessary during project implementation 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.

82. Bi-annual 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 bi-annual 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.

83. The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations.

84. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

✓ Publication of a standalone annual report on project's interaction with the stakeholders.
✓ Several key performance indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

- Number of consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually).
- Frequency of public engagement activities.
- Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI).
- Number of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline.
- Type of public grievances received.
- Number of press materials published/broadcasted in the local, regional, and national media.

85. The outcomes/feedback from these 'reporting back' measures will be compiled and shared/disclosed with the stakeholders' and the public using proper media, such as IAs website, social media accounts, communication materials, etc.

6.3 Reporting to the World Bank

86.   The project director with the support of social and environment specialist will share the progress and results of the stakeholder engagement activities to the World Bank bi-annually where Stakeholder related activities will be described broadly. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

Annex - A: Sample 'Grievance Form' and Grievance Mechanism of the Project

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

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