



## **Government of the People's Republic of Bangladesh**

**Ministry of Health and Family Welfare (MoHFW)**

**and**

**Ministry of Local Government, Rural Development and Cooperatives (MoLGRDC)**

## **Bangladesh Urban Health, Nutrition and Population Project**

**World Bank Project No. P171144**

# **Stakeholder Engagement Plan** **(SEP)**

**June 2023**

## Executive Summary

The preparation of the Stakeholder Engagement Plan (SEP) for **Bangladesh Urban Health, Nutrition and Population Project** started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project's implementation strategy.

This Stakeholder Engagement Plan (SEP) is prepared and will be followed throughout the project life cycle. The SEP will be considered a living document and will be revised as necessary if changing project context requires so with clearance from the World Bank (Bank). Both in person and virtual consultations were carried out to develop this SEP. The SEP identifies the “project affected parties”, “other interested parties” and the “vulnerable and disadvantaged groups” specific to IAs of the project and includes the relevant provisions to engage all the stakeholders from the inception to the project to all through the project cycle, till completion and post-construction/operational phase. The purpose of this SEP is to identify the potential stakeholders, detail how stakeholders will be engaged throughout the course of the project and methods that will be used as part of the process. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project design and implementation approach. Timely and two-way information sharing, and communication will be resorted for mobilization and maintaining stakeholders' support for the project and advance the overall project goals.

The SEP has been prepared to comply with the requirements of the World Bank Environmental and Social Framework (ESF) on Stakeholder Engagement and Information Disclosure (ESS-10), which applies to this project and cross-cutting to all ten standards of the ESF. The Project Coordination Unit (PCU) will establish and operate GRM to receive, register and attend project-specific grievances that may potentially rise in the project cycle. The GRM will be of two tiers; community level PCU level with a Grievance Redress Committee (GRC) at each level. Members of the GRCs will include women and affected persons (beneficiaries and likely affected persons). Training will be provided to the staffs who will work on managing the grievances. The GRMs will also be equipped to deal with labor and SEA/SH related grievances. Any SEA/SH related complaints will be handled following a survivor-centric approach with confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence.

Information on the GRM will be widely disseminated among the communities and affected persons and wider stakeholders including at site levels. The GRM will be accessible to all and all grievances will be resolved within a settled time period not exceeding 14 days. All proceedings of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by IAs. All E&S related documents and information of the program and sub-projects will be disclosed in English and the local languages by the implementing agencies on their website and hard copies will be made available at project office throughout the project life cycle.

The mechanism of information disclosure dissemination will be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language i.e., *Bangla*) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the communities and stakeholders; grievance mechanism) that can be kept in the offices of local government and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons of the following:

- Timeline and progress of the program and sub-project by components;
- Information on beneficiary participation;
- Information of involuntary displacement, compensation and entitlements;
- E&S risks and impacts

Information disclosure procedures are mandated to provide citizen centric information as well as all documentation necessary for addressing any queries. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

## Abbreviations

BoO	Bill of Quantities
CoC	Code of Conduct
CHS	Community Health and Safety
COVID-19	Novel coronavirus disease
DDFP	Deputy Director Family Planning
DGHS	Directorate General of Health Services
EHS	Environment, Health and Safety
EPI	Expanded Program on Immunization
ESMP	Environmental and Social Management Plan
ESSs	Environment and Social Standards
GBV	Gender Based Violence
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HNP	Health, Nutrition and Population
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HNP	Health, Nutrition and Population
HORMP	Human and Occupational Resources Management Procedures
HSD	Health Services Division
ICT	Information and Communications Technology
IEDCR	Institute of Epidemiology and Disease Control Research
ILO	International Labor Organization
MoHFW	Ministry of Health and Family Welfare
MoLGRD&C	Ministry of Local Government, Rural Development and Cooperatives
NCD	Non-Communicable Diseases
NGO	Non-Government Organization
NID	National Identification Card
OH&S	Occupational Health and Safety
OHS	Occupational Health Safety
OHSP	Occupational Health & Safety Plan
PCU	Project Coordination Unit
PIC	Project Implementation Committee
PMU	Project Management Unit
PPE	Personal Protective Equipment
WB	World Bank
WHO	World Health Organization

## Table of Content

Abbreviations .....	4
Chapter 1: Introduction and Project Description.....	6
1.1 Introduction.....	6
1.2 Project description and components .....	6
1.3 Potential environmental and social impacts .....	7
1.4 Objectives of the Stakeholder Engagement Plan (SEP).....	8
1.5 World Bank requirements for stakeholder engagement .....	9
Chapter 2: Stakeholder Identification and engagement process .....	9
2.1 Introduction .....	<b>Error! Bookmark not defined.</b>
2.2 Stakeholder identification and analysis .....	13
2.3 Stakeholder Engagement Process .....	16
2.4 Engagement Methods and Tools in light of Covid-19 outbreak .....	<b>Error! Bookmark not defined.</b>
2.5 Planned Stakeholder Engagement Strategy .....	18
2.6 Description of Information disclosure Method.....	21
Chapter 3: Grievance Redress Mechanism .....	22
3.1 Introduction .....	<b>Error! Bookmark not defined.</b>
3.2 Grievance Redress Committees (GRC).....	<b>Error! Bookmark not defined.</b>
3.2.1 Composition of Local Level GRC .....	<b>Error! Bookmark not defined.</b>
3.2.2 Composition of project level GRC.....	<b>Error! Bookmark not defined.</b>
Chapter 4: Implementation of the SEP and Budget.....	28
4.1 Implementation Arrangements of the SEP .....	28
4.2 Budget for SEP Implementation .....	30
Chapter 5: Monitoring and Reporting.....	32

## List of Tables

Table 2.1: Stakeholder Engagement Plan (SEP) and Techniques.....	16
Table 2.2 : Stakeholder Engagement Strategy .....	18
Table 2.3: Stakeholder Engagement and Disclosure Methods.....	22
Table 3.1: GRC membership at local level.....	<b>Error! Bookmark not defined.</b>
Table 3.2: GRC membership at project level .....	<b>Error! Bookmark not defined.</b>
Table 4.1: Role and Responsibilities for SEP Implementation .....	30
Table 5.1: Monitoring requirements.....	32

## Chapter 1: Introduction

### 1.1 Introduction

1. This Stakeholder's Engagement Plan (SEP) is prepared for *Bangladesh Urban Health, Nutrition and Population Project* financed by World Bank and implemented by the Ministry of Health and Family Welfare (MoHFW), and the City Corporations of Dhaka South, Dhaka North, Chattogram, and some other selected areas by the Ministry of Local Government, Rural Development and Cooperatives (MoLGRDC). The project aims to improve delivery of primary health, nutrition and population (HNP) and environmental health services for the urban population. The project will target selected areas of the City Corporations of Dhaka South, Dhaka North and Chattogram, each of which present differing contexts, requiring flexibility in strategies and implementation mechanisms. As part of the core requirements, the preparation of the Stakeholder Engagement Plan (SEP) started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project's implementation strategy. In the context of the above, in person consultations with different stakeholders were carried out to develop this SEP.
2. The purpose of this SEP is to support the proposed Project in delivering efficient and effective engagement and communication with stakeholders of the project so that their views and concerns are reflected in the project design and implementation, and that they are fully informed about the project activities. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

### 1.2 Project Description and Components

3. The project will target the areas of the City Corporations of Dhaka South and Dhaka North, Chattogram, and few more selected urban areas, which present differing contexts (notably the relative HNP service delivery capacities of the MoHFW and City Corporations), requiring flexibility in strategies and implementation mechanisms. Within each City Corporation, areas targeted for project support will be determined by a mix of factors, including poverty levels, access to existing HNP services, presence of potential platforms for service improvements, and coordinated targeting with urban development projects.
4. The project has two main components;
  - *component 1 is supporting delivery of urban primary HNP services in targeted urban areas through investments in existing platforms.* Development and expansion of primary health care services will include the use of ICT to improve reporting, monitoring and disease surveillance. The project will support to develop mechanism for management of infectious disease outbreaks in urban areas. Possible areas of interventions will be vector (mosquito) management to deal with disease outbreaks, disease surveillance systems, outbreak response capacities, and diagnosis and treatment services. These services will be delivered through Primary HNP Centers, with at least one female service provider at each Center. The Primary HNP Centers will be fitted with solar panels and will use energy efficient bulbs, as feasible. Investments in solar energy and water supply and sanitation facilities will aim to improve working conditions, security, and the quality and

attractiveness of services, particularly for women and girls. Details of the process are in PAD and in bidding document. Existing government health facilities at the primary level will be renovated, including selected government outdoor dispensaries, family planning clinics, and rooms allocated within national health institutes under the MoHFW. Satellite clinics will be arranged to cover low-income groups particularly around the slum areas while mobile clinics in specially designed trucks will target street dwellers and homeless people.

- *Component 2 will develop systems and capacities for delivering environmental health and preventive services such as mosquito control, outhouse management of medical waste, mitigating effects of air and sound pollution, behavior change communication to promote healthy lifestyles and creating awareness, and community-driven interventions for addressing Non-Communicable Diseases (NCDs). The project will support medical waste management system which requires close collaboration between MoHFW and the City Corporations. To ensure a positive shift in controlling air and sound pollution, the city corporations can play a critical role and this project will help the coordination system of establishing an effective public outreach systems to provide early warning during days expected to have high air pollution levels and areas with high levels of noise exposure.*

### 1.3 Potential Environmental and Social Impacts

5. The proposed project is not envisaged to involve any major civil works, such as new construction or significant rehabilitation of existing buildings in the targeted city corporations. It will, however, involve minor repairs/refurbishments and will be done by the government agencies in accordance with national and local laws and procedures. The environmental and social impact assessment are aligned with the Bank's 10 Environmental and Social Standards in the environmental and social framework (ESF), as following:
6. **Environmental and Social Risk:** The key environmental risk and impact is the generation of medical, solid and liquid wastes from health services and, minor construction related impacts from infrastructure rehabilitation. The healthcare workers, patients, waste handlers, waste-pickers and general population may be exposed to health risks from medical, solid and liquid waste. Based on available information, the medical waste management and practices in the country is up to the expected standards. The project will support improvement in medical waste management, which will need close collaboration between the MoHFW and the relevant City Corporations by engaging contractor. Given that the proposed project activities will potentially increase generation of medical, solid and liquid wastes in health care facilities and the existing insufficient waste management practices, the Environmental risk is rated Substantial. However, risk classification will be reviewed on a regular basis and changed (if necessary), and any change to the classification will be disclosed on the Bank's website. The social risk for the project is rated moderate. The project will bring social benefit by providing better medical and environmental health services to urban poor in selected urban areas. The major social risks of the project relate to inclusion of all stakeholders who come from diverse backgrounds and social strata. The anticipated labor influx is expected to be low in urban setting. Sexual Exploitation & Abuse (SEA) and Sexual Harassment (SH) risk of this project is also assessed as 'low'. The mitigation measures will be ensured through implementation of Labor Management Procedure, enforcement of labor code of conduct and as well as grievance redress mechanisms that will also meet the requirements for labor and SEA/SH grievances. Overall, the expected impacts are predictable, site specific and likely to have minimal adverse impacts which are mitigable with related measures and with the capacity strengthened to address the issues within the Implementing Agencies.

#### 1.4 Objectives of the Stakeholder Engagement Plan (SEP)

7. The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the implementation of the project, starting from the early stage of the project preparation. The SEP outlines the ways in which the project will engage the relevant stakeholders including the marginalized and disadvantaged groups, and provide them with a mechanism through which people can raise concerns and provide feedback.
  
8. The involvement of the stakeholders is essential to the success of the project in order to ensure smooth collaboration with the project staff to minimize and mitigate environmental and social risks related to the proposed project. The project's stakeholder engagement is an inclusive process conducted throughout the project life cycle. It supports the development of strong, constructive and responsive relationships that are important for successful management of environmental and social risks identified in the project. Communicating early, often, and clearly with stakeholders will help the project management to manage expectations and avoid risks, potential conflict, and project delays. In addition, the plan assists in managing stakeholder expectations, which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively with stakeholders to support project interests. The SEP will:
  - 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.
  - Involves interaction with the Project Affected Parties include communities where the project activities will take place, households and communities under the project, members of the public who use the public facilities that will come under project intervention, vulnerable Groups include children in the community, women, female-led households, persons with disability, health care staffs and workers like medical doctors, nurses, cleaners, medical waste handlers and waste pickers etc. Begins early during the project planning process to gather initial views on the project proposal and design.
  - Encourages stakeholder's 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 and Project's Other Interested Parties include Government officials, mass media, various NGOs and suppliers.
  - Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.
  
9. 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 Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

### 1.5 Requirements for Stakeholder Engagement

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. As per ESS10 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) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting back to stakeholders. ESS10 also requires the development and implementation of 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 and to have those concerns addressed in a timely manner.

## Chapter 2: Legislative and Policy Requirements

### National Provision and Citizen Engagement

11. Bangladesh has relevant laws on right to information, information disclosure, transparency, and citizen participation in development decisions. The Constitution of the People's Republic of Bangladesh guarantees freedom of thought and conscience, and freedom of expression and speech, subject to any reasonable restrictions imposed by law. The Right to Information Act 2009 makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. Citizen participation in development decisions is recognized and obliged under the laws on local governments including the zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), paurashavas (2009), city corporations (2009) and hill district councils (1989).
12. The right to information shall ensure that transparency and accountability in all public, autonomous, and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established. The Government of Bangladesh (GoB) 2014 Secretariat Instructions (chapter 8 instructions 262(1) and (2)) mandate provisions for receiving opinions from citizens and to redress grievances in a transparent and neutral manner. The Cabinet Division's Coordination and Reform Unit issued a revised version of the 2015 guidelines on the GoB's grievance redress system in 2018, which provides instructions on a range of issues, such as classification and monitoring of grievances and the responsibilities of various ministries including the Cabinet Division.
13. Key legislative instruments governing citizen rights to information, freedom of expression and speech, citizen participation in development decisions and policy formulation inclusive of gender and social vulnerability are as follows:
  - The Constitution of Bangladesh
  - The Right to Information Act 2009
  - The Zila Parishad Act 2000
  - Local Government (Upazila Parishad) Act 1998

- Local Government (Union Parishad) Act 2009
- Local Government (Paurashava) Act 2009
- The Local Government (City Corporation) Act, 2009
- Hill District Council Acts 1989
- The Five-Year Plans (Bangladesh)
- Bangladesh Secretariat Instructions 2014
- Grievance Redress System Guidelines, 2015

### **Key National, Social, Legal Provisions and Citizen Engagement**

14. Bangladesh has relevant and adequate law/regulation on right to information, information disclosure, transparency during decision making/public hearing etc. Relevant laws and regulations pertaining to these issues are given below:

### **Constitution of the People's Republic of Bangladesh**

15. **Article 36. Freedom of movement.** Subject to any reasonable restrictions imposed by law in the public interest, every citizen shall have the right to move freely throughout Bangladesh, to reside and settle in any place therein and to leave and re-enter Bangladesh.
16. **Article 37. Freedom of assembly.** Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order health.
17. **Article 38. Freedom of association.** Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order;
18. **Article 39. Freedom of thought and conscience, and of speech.**
- (1) Freedom of thought and conscience is guaranteed.
  - (2) Subject to any reasonable restrictions imposed by law in the interests of the security of the State, friendly relations with foreign states, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence-
  - (3) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.
19. **Article 59. Local Government.**
- (1) Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law.
  - (2) Everybody such as is referred to in clause (1) shall, subject to this Constitution and any other law, perform within the appropriate administrative unit such functions as shall be prescribed by Act of Parliament, which may include functions relating to-
    - (a) Administration and the work of public officers.

(b) the maintenance of public order;

20. **Article 60. Powers of local government bodies**

For the purpose of giving full effect to the provisions of article 59 Parliament shall, by law, confer powers on the local government bodies referred to in that article, including power to impose taxes for local purposes, to prepare their budgets and to maintain funds.

21. **The Consumers' Right Protection Act, 2009**

This Act aims at protection of the rights of the consumers, prevention of anti-consumer right practices and related matters connected therewith.

22. **Right to Information Act (RTIA) 2009**

The Act makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. The right to information shall ensure that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established.

23. **Law on Local Government.** Bangladesh is a democratic republic with two spheres of government: national and local. Local government is enshrined in the constitution (Chapter IV Articles 59 and 60) and the main legislative texts include the Acts covering zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), pourashavas (2009), city corporations (2009) and hill district councils (1989). The local government division within the Ministry of Local Government, Rural Development and Cooperatives is responsible for local government, with the exception of the hill district councils, which are under the Ministry of Hill Tract Affairs.

24. **Bangladesh Labour Law, 2006 (Amended in 2013) and Labour Code 2015.** This Law pertains to the occupational rights and safety of workers and the provision of a comfortable work environment and reasonable working conditions.

25. The **Labour** Law of Bangladesh 2006 bans children under the age of 14 from working. Chapter III of the Act<sup>1</sup> under "**Employment of Adolescent Worker**" puts restrictions on employment of children and adolescents as follows:

(1) No child shall be employed or permitted to work in any occupation or establishment.

(2) No adolescent shall be employed or permitted to work in any occupation or establishment, unless:

(a) A certificate of fitness in the form prescribed by rules, and granted to him by a registered medical practitioner is in the custody of the employer; and

(b) He/She carries, while at work, a token containing a reference to such certificate.

---

<sup>1</sup> The Bangladesh Labour Law, 2006; Act No. XLII OF 2006 [11 October, 2006]

## World Bank Requirements

26. The World Bank's ESF came into effect on October 1, 2018. The ESF includes Environmental and Social Standard 10 (ESS10) on "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". ESS10 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. As defined by the ESF and ESS10, 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. Key elements of ESS 10 include:

- ❖ 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.
- ❖ Borrower agency will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- ❖ Borrower will engage in meaningful consultations with all stakeholders. Borrower 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) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- ❖ The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
- ❖ Borrower will develop SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders would be identified, and the SEP would be disclosed for public review and comment as early as possible, before the project is placed for the World Bank appraisal.
- ❖ ESS10 also requires the development and implementation of 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 and to have those concerns addressed in a timely manner.

## Chapter 3: Stakeholder Identification and Engagement Process

27. The World Bank Environmental and Social Framework 2018 defines “stakeholder” as individuals or groups who: (a) are affected or likely to be affected by the Project (project-affected parties); and (b) may have an interest in the Project (other interested parties). Stakeholder identification for the Urban Health project was initiated during the inception stage of the project and initiated by the MoHFW and the MoLGDRC. The stakeholder mapping workshop was undertaken to:
- Confirm the stakeholders and groups who were identified in initial scoping exercises and further revise and update the stakeholder list with input from key stakeholders.
  - A
  - Identify engagement strategy with each stakeholder group and assign responsibility to team members.
28. Mapping project stakeholders marks the first step in preparing the Stakeholder Engagement Plan (SEP), given its contribution to developing the Project’s approach to consultation and communication. Doing so entails identifying relevant Project stakeholders or groups of stakeholders, their key characteristics, specific needs or demands, preferred means of communication and appropriate level of engagement needed for each. In order to ensure effective and tailored engagement, stakeholders of this proposed project have been classified into three overlapping categories:

**Affected peoples** refer to individuals, groups, local communities and other stakeholders that are directly or indirectly affected by the Project, with particular focus being accorded to those directly and/or adversely affected. It also refers to those who are more susceptible to changes associated with project activities, and thus need to be closely engaged in identifying impacts and their signification, as well as in decision-making on mitigation and management measures.

**Other interested parties** predominantly refer to those who are not directly affected by project activities, but are interested owing to its proximity, as in broader local communities where beneficiaries are located, or by virtue of their role in project preparation and implementation.

**Disadvantaged and vulnerable groups**, although somewhat covered under the first category, they experience unique limitations and barriers to participating in consultation process and being minimally represented in stakeholder engagement. By extension, they are disproportionately impacted or further disadvantaged due to their vulnerable status, notably women, elderly, children, low income female-headed households, person with disabilities (PWD), ethnic and religious minority’s communities, LGBTQ+ community, people living in slums etc. Given particular engagement efforts required to enable their equitable representation in consultation and decision-making process for the project, this additional category seeks to explore their constraints, means of receiving information and any additional assistance required.

### 3.1 Stakeholder identification and analysis

29. Project stakeholders are defined as individuals, groups or other entities who:
- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and

- (ii) may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.
- (iii) Specific individuals or groups who because of their socio-economic and cultural characteristics may find themselves disadvantaged or marginalized to participate in the project activities and draw equal benefits and who might require differentiated measures by the project management to address these concerns.

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

- *Openness and life-cycle approach*: public consultations for the project(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*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times 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, youth, elderly, persons with disabilities, displaced persons and those with underlying health issues.
- *Flexibility*: if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication.

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

32. **Affected Parties**: Persons, groups and other entities directly influenced, either positively or adversely, (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.

33. **Affected Parties** include local communities (particularly the frontline health and social workers, law enforcing agencies and those with comorbidities). The following individuals and groups fall within this category:

- Patients
- Health workers and staffs, including medical doctors, nurses, cleaners and other relevant health workers and staffs etc.
- Communities in the vicinity of the project's planned activities and health centers including local medical doctors' association, private health institutions, pharmacists' association, etc.
- Medical waste (solid and liquid) handlers and waste-pickers
- Local population and communities including local/neighborhood associations/clubs, youth groups/associations
- People who opt for Government Health Service Providers in need

- Transgender Community
- People of ethnic minority living in Chittagong Hill Tracts area
- Residents, business entities, and individual entrepreneurs in the area of the project that can benefit from the employment, training and business opportunities
- Local government officials, including city corporation administration (e.g., ward councilors) in the project area, environmental protection authorities and health authorities

34. **Other Interested Parties:** Individuals/groups/entities that may not experience direct impact from the Project but who has interests in the project and could affect the project and the process of its implementation in some way.

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

- Officials of Government agencies, directly and indirectly linked with project
- local and national media
- Participants/ influencers of social media
- Civil society and local Politicians
- Other national and international health organizations
- National & International NGOs
- Hospital administrators
- Businesses and service providers in health sector (hospitals, Pharmacists, etc.)
- Suppliers, contractors and contractors' workforce, etc.

36. **Vulnerable individuals or Groups:** It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups 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, 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.

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

- People who live in slums and do not have access to low-cost healthcare
- Urban Low-income groups
- Transgender and LGBTQ groups/people
- Urban street dwellers without fixed address
- People with disabilities
- Female-headed low-income households

- Elderly (especially those of 60 years and above) people
- Low-income people from ethnic minority living in urban areas
- Waste collectors/ Medical waste collectors

38. **Vulnerable** groups affected by the project will be further reviewed and confirmed all through the project implementation, and will be engaged through dedicated means, as appropriate.

### 3.2 Stakeholder Engagement Process

39. Stakeholder engagement process for this project would start from identification, mapping and analysis. It is **anticipated** that this Stakeholder Engagement process will help clarify the stakeholder identification procedure at project level. **Table 3.1** show the plan and techniques suggested to be used during the engagement process:

Table 3.1: Stakeholder Engagement Plan (SEP) and Techniques

ENGAGEMENT TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
Correspondences (Phone, Emails, Text, instant messaging)	<ul style="list-style-type: none"> <li>• Distribute information to MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North and Chattogram and officials of different government agencies, NGOs, and organizations</li> <li>• Invite stakeholders to meetings and follow-up.</li> </ul>
One-on-one meetings	<ul style="list-style-type: none"> <li>• Seeking views and opinions</li> <li>• Enable stakeholder to speak freely about sensitive issues.</li> <li>• Build personal relationships.</li> <li>• Record meetings</li> </ul>
Formal meetings	<ul style="list-style-type: none"> <li>• Present the Project information to a group of stakeholders.</li> <li>• Allow group to comment – opinions and views.</li> <li>• Build impersonal relation with high level stakeholders.</li> <li>• Disseminate technical information of the project.</li> <li>• Record discussions</li> </ul>
Public meetings/workshop	<ul style="list-style-type: none"> <li>• Present Project information to a large group of stakeholders, especially communities</li> <li>• Discuss about the all-project components.</li> <li>• Allow the group to provide their views and opinions.</li> <li>• Build relationship with the communities, especially those impacted.</li> <li>• Distribute non-technical information.</li> <li>• Facilitate meetings with presentations, PowerPoint, posters etc.</li> <li>• Record discussions, comments, questions.</li> </ul>
Focus group meetings	<ul style="list-style-type: none"> <li>• Present Project information to a group of stakeholders</li> <li>• Allow stakeholders to provide their views on targeted baseline information.</li> <li>• Build relationships with communities.</li> <li>• Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions.</li> <li>• Record responses</li> </ul>
Project on website/Information Centre/information Boards/GRM	<ul style="list-style-type: none"> <li>• Establish Information Board in each project area.</li> <li>• Present project information and progress updates</li> <li>• Disclose E&amp;S documents</li> <li>• Disclose component wise project activities</li> </ul>



ENGAGEMENT TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
Direct communication with affected people	<ul style="list-style-type: none"> <li>● Share information on timing of project activities.</li> <li>● Collect the opinion about the project</li> </ul>
Project information on site	<ul style="list-style-type: none"> <li>● Share information on project activities.</li> <li>● Provide information on construction materials that will be needed to incite potential suppliers</li> </ul>
Project leaflet	<ul style="list-style-type: none"> <li>● Brief project information to provide regular update</li> <li>● Site specific project information in local language</li> </ul>
Surveys	<ul style="list-style-type: none"> <li>● Gather opinions and views from individual stakeholders</li> <li>● Gather baseline data and develop database for monitoring impacts</li> <li>● Record data and analysis</li> </ul>
<b>DURING COVID-19 or similar pandemic-like conditions</b>	
Video Conference/Phone Calls for all appropriate meetings- Focus Group, Interviews, One-One	<ul style="list-style-type: none"> <li>● Share information on project activities and timing of activities</li> <li>● Collect the opinion about the project</li> <li>● Discuss about the all-project components</li> <li>● Allow the group to provide their views and opinions</li> <li>● Build relationship with the communities, especially those impacted</li> <li>● Distribute non-technical information</li> <li>● Record discussions, comments, questions</li> <li>● Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions</li> <li>● Facilitate meetings with presentations, PowerPoint, posters, online polls etc.</li> <li>● All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>
Virtual Workshops (WebEx, Skype, and in low ICT capacity situations, audio meetings)	<ul style="list-style-type: none"> <li>● Virtual registration of participants: Participants can register online through a dedicated platform.</li> <li>● Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.</li> <li>● Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.</li> <li>● Discussion, feedback collection and sharing: Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this. Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.</li> <li>● Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.</li> <li>● All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>
Social media and online channels	<ul style="list-style-type: none"> <li>● Create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders.</li> <li>● Information can be disseminated through digital platform (where available) like Facebook, Twitter, What’s App groups, Project web links/ websites</li> <li>● All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions</li> </ul>

### 3.3 Planned Stakeholder Engagement Strategy

40. Stakeholder engagement strategy will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. Table below presents the stakeholder engagement activities PCU will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

**Table 3.2: Stakeholder Engagement Strategy**

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation (Project design, Scoping, ESMF/HORMP/SEP Disclosure)	Project Affected People: People residing in project area Vulnerable households	ESMF, HORMP, SEP; Project scope and rationale; Project E&S principles; Grievance mechanism process	Public meetings, separate meetings for women and the vulnerable group; Face-to-face meetings Mass/social media communication (as needed) Disclosure of written information: brochures, posters, flyers, website Information boards or desks Grievance mechanism Local newspaper	Quarterly meetings at project sites and as various components are executed and put to operation, continuous communication through mass/social media and routine interactions	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North, Chattogram, other selected areas and PCU
	Other Interested Parties (External) – NGO working in the medical waste management and GBV sectors	ESMF, HORMP, SEP disclosures; Project scope, rationale and E&S principles Grievance mechanism process	Face-to-face meetings Joint public/community meetings with PAPs	Quarterly meetings with affected communities; Disclosure meetings in local and national levels	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North, Chattogram and other selected areas, and respected PCU
	Other Interested Parties (Internal) Press and media Local NGOs, Different Government Departments	ESMF, HORMP and SEP disclosures Grievance mechanism Project scope, rationale and E&S principles	Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable people as needed)	Project launch meetings with relevant stakeholders Meetings in affected locations/	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North,

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	having link with project implementation City corporations, DoE etc. General public, jobseekers etc.		Mass/social media communication Disclosure of written information: Brochures, posters, flyers, website Information boards Grievance mechanism Notice board for employment recruitment	communities as needed; Communication through mass/social media (as needed) Information desks with brochures/posters in affected villages (continuous)	Chattogram and other selected areas and the respective PCU, DoE etc.
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Businessmen, Contractors and suppliers	Legal compliance issues Project information scope and rationale and E&S principles Coordination activities Grievance mechanism process ESMF/HORMP /SEP disclosures	Face-to-face meetings Invitations to public/community meetings Submission of required reports	Disclosure meetings Reports as required	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North, Chattogram and other selected areas and the respective PCU, DoE etc.
STAGE 2: Implementation Phase	Project Affected People, including Vulnerable community	Grievance mechanism Health and safety impacts (ESMP, ESIA community H&S, community concerns) Employment opportunities Project status	Public meetings, open houses, trainings/workshops Separate meetings as needed for women and vulnerable group Individual outreach to PAPs as needed Disclosure of written information: brochures, posters, flyers, website Information boards; Notice board(s) at construction sites Grievance mechanism -Local monthly newsletter	Quarterly meetings during construction phase Communication through mass/social media as needed Notice boards updated weekly Routine interactions Brochures in local offices	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North and Chattogram and PCU
	Other Interested Parties (External)	Project scope, rationale and E&S principles Grievance mechanism	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction phase)	MoLGRDC, MoHFW and the City Corporations of Dhaka

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
		Project status			South, Dhaka North, Chattogram, other selected areas and PCU
	Other Interested Parties (External) Press and media Various Government Departments General public, jobseekers	Project information - scope and rationale and E&S principles, Project status Health and safety impacts Employment opportunities Environmental concerns GBV related consultation, Grievance mechanism process	Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards Notice board(s) at construction sites Grievance mechanism  GBV related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, medical sector NGOs, NGOs specifically working on GBV matter, local leadership, religious leaders, elders including women representatives, teacher of the local schools and Madrassas.	Same as for PAPs/ at regular intervals throughout the project period to educate and raise awareness amongst the population about the pitfalls of GBV and making them capable of arresting GBV in respective community.	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North, Chattogram, other selected areas and PCU
STAGE 3: Operation and maintenance	Project Affected People including vulnerable community	Satisfaction with engagement activities and GRM Grievance mechanism process	Outreach to individual PAPs, MoHFW, MoLGRDC and the City Corporations website, Grievance mechanism, Newsletter	Outreach as needed Meetings in affected people and villages (as needed/ requested)	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North and Chattogram and PCU

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External), Press and media, NGOs linked with on GBV issue, Various Government Departments, local people, etc.	Grievance mechanism process Issues of concern Status and compliance reports	Grievance mechanism MoHFW, MoLGRDC and the City Corporations websites Face-to-face meetings Submission of reports as required	As needed	MoLGRDC, MoHFW and the City Corporations of Dhaka South, Dhaka North and Chattogram and PCU

### 3.4 Description of Information Discloser Method

41. As a standard practice, the Project ESF documents (ESMF, HORMP and SEP etc.) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PCU in a formal manner. PCU will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. The ESMF, HORMP and SEP in English with Bangla translation of the executive summaries will be made available for public review for meaningful engagement with the stakeholders.
42. Distribution of the disclosure materials will also be done by making them available online, with hardcopies at PCU and field offices. This will allow stakeholders to obtain information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. Basing on the improvement of situation, free copies may be available at office locations.
43. The SEP along with the other E&S documents will remain in the public domain for the entire project life cycle. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically.
44. The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table below provides a description of recommended stakeholder engagement and disclosure methods to be implemented during stakeholder engagement process.

Table 3.3: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Project-affected parties	ESMF, SEP and HORMP; Public Grievance Procedure; Regular updates on Project development. Any other ES instruments (site specific ESIA and ESMP etc.), if prepared during implementation	Online notices. Electronic publications (in Bangla and English languages) and press releases on the Project website. Dissemination of hard copies (in Bangla and English languages) at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures (in Bangla and English languages). Separate focus group meetings with vulnerable groups, as appropriate.
Non-governmental and community-based organizations	ESMF, SEP and HORMP; Public Grievance Procedure; Regular updates on Project development.	Public notices (in Bangla and English languages). Electronic publications and press releases on the project website. Dissemination of hard copies at designated public locations. Press releases in the local media (in Bangla and English languages). Consultation meetings. Information leaflets and brochures (in Bangla and English languages)
Government authorities and agencies	ESMF, SEP and HORMP; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESMF, HORMP and SEP at PMU offices Project status reports. Meetings and round tables.
Related businesses and enterprises	SEP; Public Grievance Procedure; Updates on Project development and tender/procurement announcements.	Electronic publications and press releases on the Project website. Information leaflets and brochures. Procurement notifications.

## Chapter 4: Grievance Redress Mechanism

45. The fundamental objective of GRM will be to resolve any project related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish

accountability to the affected people. The GRM will be consistent with the requirements of the World Bank policies to ensure mitigation of stakeholders' concerns, risk management, and maximization of environmental and social benefits. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level. The GRM will be accessible to diverse members of the stakeholders, including women, senior citizens and other vulnerable groups. Culturally-appropriate communication mechanisms will be used at all project sites both to spread awareness regarding the GRM process as well as complaints management. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance management system available with the small ethnic communities and the Grievance Redress Committee (GRC) will include a representative from these communities.

46. The MoHFW maintains a comprehensive grievance redressal mechanism (GRM) that enable a broad range of stakeholders to channel concerns, questions, and complaints and resolution of these issues. The existing GRM will be used for this project and the DGHS will ensure access to and information relating to these GRMs are widely publicized. The DGHS GRM in its current form is a state-of-the-art online platform, together with partially offline processes at the citizens' end which is being promoted through public health facilities across the country. In each of these health facilities, display boards describe the process of submitting grievances over the phone and/or through SMS to a dedicated number 16263. A consolidated view of all registered grievances and suggestions is available at DGHS's web-platform at: <http://app.dghs.gov.bd/complaintbox/>. The DGHS has deployed dedicated staff and implemented standard operating procedures for providing responses to the complainants and initiating appropriate corrective action. The MoLGRD&C is currently using the government's central GRM accessible online and by phone: <https://www.grs.gov.bd/> which also include a detailed user manual as well as GRM guideline and process map on the website. This central GRS will be further strengthened by setting up site-specific grievance redress committees at the city corporations and municipalities under the project with detailed operational procedures for these committees/GRM. The GRM will be brought into effectiveness within a month of project effectiveness.

## SPECIAL GRM FOR SEA/SH RELATED COMPLAINTS

47. All two tiers of the GRM will be sensitized to receive SEA/SH related complaints. PCU, the project unit and the contractor are not equipped to handle complaints or provide relevant services to survivors but will refer any person to relevant service providers, including health facilities, law enforcement's gender unit or others, as relevant using the information on available services. Grievances related to gender-based violence be reported through the project/contractor, the nature of the complaint will be recorded along with the age of the complainant and relation to the project will be recorded. After consultation with the service providers and assessing the complaint, appropriate disciplinary measures will be taken against the perpetrator.
48. Also, the ESA may identify additional mitigation measures related to gender and such measures will be reflected in site-specific ESMPs, including the contractors ESMP or contractors specific Labor Management Plans, and Codes of Conduct for laborers where required. This will include engagement with communities on gender-related risks, grievance and response measures available, as identified in the manual. PCU, with support from consultants, will identify institutions and services provides who are actively engaged in the prevention of gender-based violence, sexual exploitation and workplace sexual harassment to establish a

manual available for all project actors to create awareness and mitigate risks of SEA/SH. The project GRM will also be equipped to receive SEA/SH related complaints with a protocol of survivor centric approach. Survivor centric approach will prioritize the wish of the victim, and take measures accordingly. The project GRM will also be sensitized to receive complaints related to Sexual Orientation and Gender Identity (SOGI) and the SEA/SH Code of Conduct (Coc) will clearly mention mitigation measures of discrimination based on SOGI.

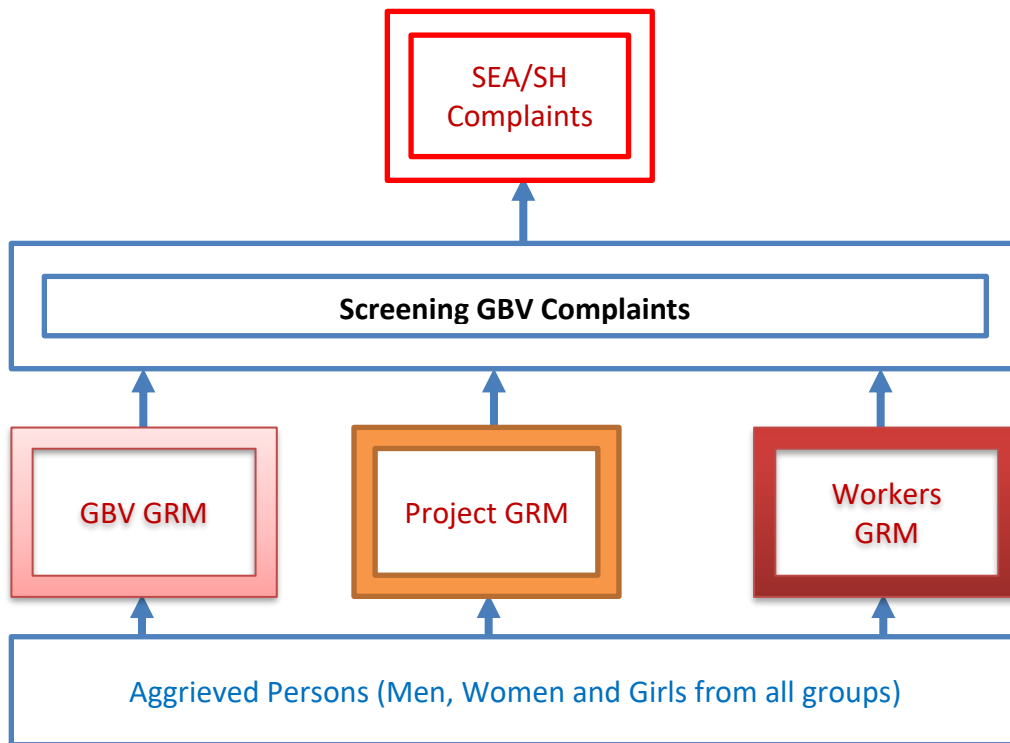


Figure 1: GRM for SEA/SH Complaints

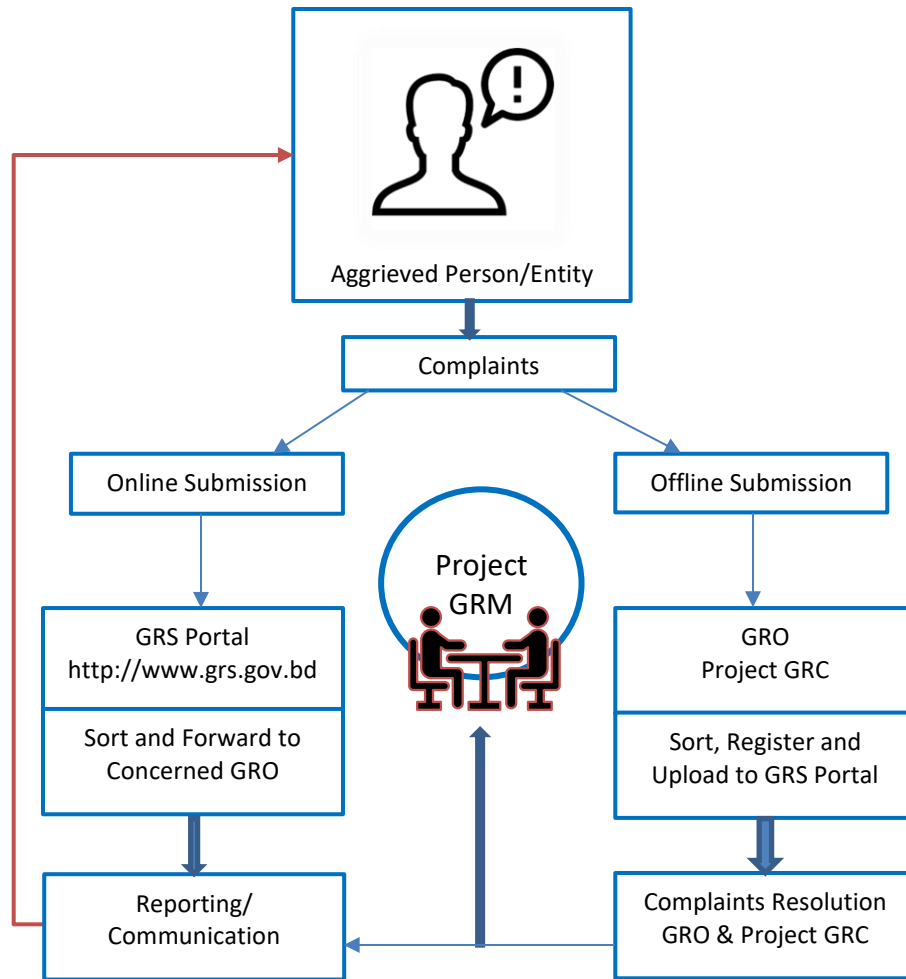
### Communication & Awareness Raising on GRM

49. The final processes and procedures for the GRM will be translated into local language (i.e., Bangla) and disseminated at all project locations. These shall be made available (in handout/leaflet and poster format) to all project locations with the staff on site and in the offices at Upazila, District and City Corporation.
50. Project beneficiaries, affected persons and relevant stakeholders will be informed of the project's grievance mechanism in open meetings at important locations and in FGDs and open meetings. Bangla translations of information brochures will be distributed among the communities and stakeholders. The communities and stakeholders will also be briefed on the scope of the GRC, the procedure for lodging grievances cases and the procedure of grievance resolution at the project level. The GRM approach and procedures will be conducive to the sensitivity of social stigma to the women and girls alleged to be affected. Traditional conflict resolution existing system of the tribal communities will also be accommodated in the project GRM.



## OPERATIONALIZATION OF CENTRAL GRS FOR THE PROJECT

51. All Government offices have been using the Government's web-based Central GRS (<http://www.grs.gov.bd>) following the GRS Guideline 2015 issued by the Cabinet Division of the Ministry of Law, Justice and Parliamentary Affairs. The Central GRS is linked with the MoHFW official website at <http://www.mohfw.gov.bd>. The Central GRS online platform has windows for Frequently Asked Questions, Feedback, Request for Appeal, and Suggestions for Improvement links. It also includes a User Manual, GRM Process map, Citizen Charters, GRM Guidelines and Contact Points. The site is both in Bangla and English languages.
52. Project GRM will also establish and operate Grievance Redress Committee (GRC) at respective locations with the GROs as the key member with applicable responsibility to coordinate and communicate between the Project GRM and the Central GRS. The project GRCs will deal with the project related questions, complaints, and suggestions.
53. Any question, complaint or suggestion can be placed with the Central GRS (<http://www.grs.gov.bd/>) referring the project. Project GRM will also arrange for dedicated phone number to call or send SMS and an email address to ask questions, produce complaints or share suggestions. The centralized National GRS has guidelines (available at <http://www.grs.gov.bd>) for grievance redressal system with clearly defined roles and responsibilities and timelines, which will be followed for design and operation of project GRM.
54. The PCU will develop a Project GRM Manual with clearly defined mandates, roles, and responsibilities of itself, the implementation partners and service providers, channels for producing complaints and grievances, the project GRCs and a road map to mainstream the Central GRS dealing with project specific issues (Figure 3). A GRM Handout will also be produced in national Bangla language, circulated among the stakeholders, and briefed in formal and informal discussion sessions. The GRM Manual and the Handout will separately be developed for two ministries within 3 months of activation of the PCU, and adopted following the approval by MoLGRD&C and MoHFW and concurrence from the World Bank.



**Figure 1 Interlinkage of Project GRM with Central GRS**

## GRIEVANCE MECHANISM STRUCTURE

55. A two-tier grievance redress mechanism has been proposed for the affected people and other stakeholders (Project GRM) under this project to address all grievances/claims and allow the people to go to the upper level or to the courts of law for seeking final judgment. The GRM will be at site/sub-project level and PCU level. A separate GRM for the construction workers (Labor GRM) has also been formulated which will be activated at the construction sites to address complaints/grievances of the laborers. Sample Grievance Registration Form is provided as **Annex 3**

### *Site/Sub-project level*

56. The community level grievance redress committee (GRC) shall have the following members:

- Regional/ Local Officer of HSD, MOHFW - Chair
- Regional/Local Officer -(MoLGRD&C) -Member
- Local Health Official - Member
- An Elected Member of the municipality or City Corporation - Member
- A Female Member of the municipality or City Corporation - Member

- A Representative of the beneficiaries and affected persons in the subprojects-Member

57. The site/sub-project level GRC shall resolve or reach a decision in ten (10) days from the date of lodging the complaint. The chairperson of the GRC shall communicate the committee's decision to the aggrieved persons in writing and maintain a record of all decisions related to each case.

#### **GRIEVANCE MECHANISM PCU (MoHFW & MoLGRD&C) Level Grievance Redress Mechanism**

58. The PCU level GRM should have the following Grievance Redress Committee (GRC) Members: -

- Head of the PCU
- E&S Specialist (consultant or assigned from the organization)
- An elected municipality member or City Corporation member
- A female member of the respective city corporation

59. The PCU level GRC shall resolve or reach a decision in fifteen (15) days from the date the complaint is received. The Chairperson/convener of the GRC shall communicate the committee's decision to the aggrieved persons in writing and maintain a record of all decisions related to each case.

60. Information about the GRM will be publicized as part of the initial disclosure consultations in the participating subproject areas. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the respective IA websites (MoHFW: <http://www.mohfw.gov.bd/>; MoLGRD&C: <http://www.lgd.gov.bd/>). The overall process for the GRM will include six steps and listed in **Annex 4**

61. Any SEA/SH related complaints will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on gender-based violence. SEA/SH-related complaints will be dealt with strict confidentiality, based on the wishes of the SEA/SH-survivor. The GRM will determine disciplinary action against the perpetrator. Process of grievance resolution is presented in the Figure below:

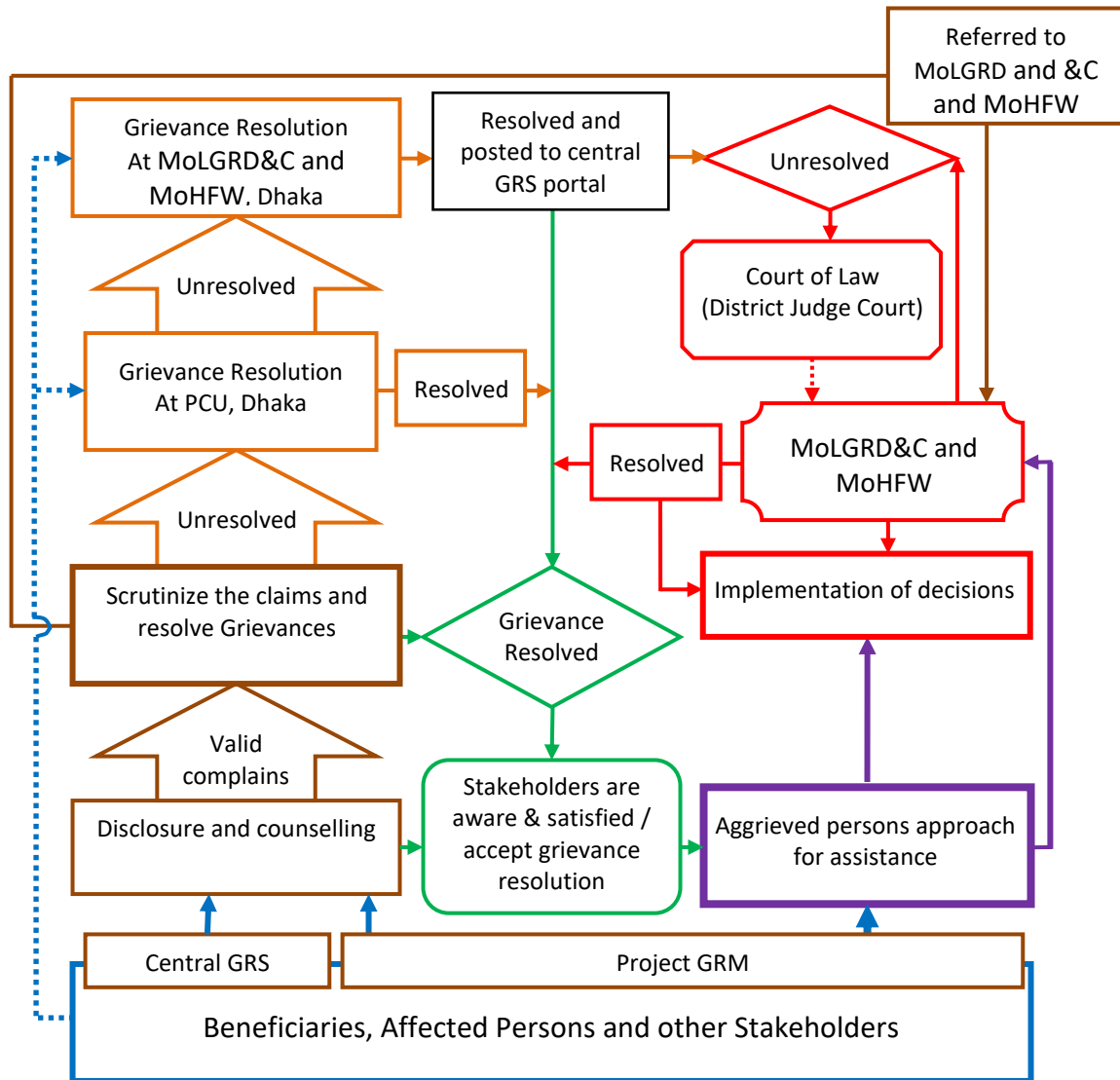


Figure 2: Grievance Resolution Process

## Chapter 5: Implementation of the SEP and Budget

### 5.1 Implementation Arrangements of the SEP

62. MoHFW and MoLGRDC will be the project holder and responsible for managing the E&S risks of the project, including implementation of the SEP through its existing structures. The project implementation team will be recruited from the market or delegated from the existing MoHFW and MoLGRDC for this purpose. For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to

manage and implement the proposed project relevant social management planning documents. Although the project is now at preparation stage, the most likely institutions those would be involved are as follows:

### **The Implementing Agency (IA) and Project Coordination Unit (PCU)**

63. The MoHFW and MoLGRDC will be the Implementing Agencies and be responsible for the overall technical supervision and execution of the Project. A project coordination unit (PCU) will be set-up for coordinating activities of the city corporations and municipalities, maintaining the project account to receive and utilize World Bank funds, preparing financial reports, and undertaking procurement of goods, works and services for the city corporations with the necessary specialists and staff. The PCU will include: a full-time Project Coordinator, a social and environmental specialist along with experts on procurements and financial management. Each of the targeted city corporations and municipalities will assign focal persons for the project.
64. The P will (i) help to supervise and streamline the GRM management system based on the experience from field; (ii) provide support to respective City corporations (and municipalities as and when these are selected under the project) in arranging training on SEA/SH related risk mitigation and sensitization; (iii) manage the overall training and capacity-building program; (iv) monitor and supervise all project management activities; (v) organize monitoring and evaluation activities, including GRM management; (vi) prepare necessary project progress and project completion reports; and (vii) ensure full compliance with GoB and World Bank ESF.
65. **MOHFW** to continue to convene the meetings of the Urban Health Coordination Committee (chaired by the HSD Secretary) regularly (six monthly) with specific agenda about this initiative to be appraised, review and advise about the implementation. Also, to make sure agencies like DGHS, DGFP with their subordinate offices provide all the required support to the initiative. The meeting agenda will include Environment and Social related risk mitigation measures, performance of GRM including Labor, OHS, SEA/SH related complaints and anything relevant.
66. **MOLGRDC** to continue to convene the meetings of the Urban Health Working Group (chaired by the Additional Secretary, LGD) regularly (quarterly) with specific agenda about this initiative to be appraised, review and advise about the implementation.
67. **City Corporations (CCs)** to form Standing Committee on Education, Health, Family Planning and Health Safety system with the co-option of respective Civil Surgeon and Deputy Director – Family Planning. Provide support in the implementation of the initiative.
68. The **contractors** will provide the PCU with monthly progress reports on the implementation of mitigation measures. The reports prepared by the contractors along with quarterly monitoring reports to be prepared by project consultants will be consolidated and submitted to MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram.

**Table 5.1: Role and Responsibilities for SEP Implementation**

<b>Actor/Stakeholder/ responsible person</b>	<b>Responsibilities</b>
Communication/SEP team	<ul style="list-style-type: none"> <li>- Overall planning and implementation of the SEP;</li> <li>- Lead activities on stakeholders' engagement</li> <li>- Management and resolution of grievances;</li> <li>- Guide/coordinate/supervise the contractors for activities related to the SEP</li> <li>- Monitoring and reporting on SEP to MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and World Bank</li> <li>- Take lead in carrying out the beneficiary satisfaction survey</li> </ul>
MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU Officials	<ul style="list-style-type: none"> <li>- Visit project area for M&amp;E (at least quarterly)</li> </ul>
Implementation Consultants	<ul style="list-style-type: none"> <li>- Supervision/monitoring of Contractor on SEP</li> </ul>
Site Contractor(s) / sub-contractors	<ul style="list-style-type: none"> <li>- Report/inform MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram staff on issues related to the implementation of the SEP / engagement with the stakeholders.</li> <li>- Resolve and convey management/resolution of grievance cases to the project GRM team, in particular labor related grievance cases.</li> <li>- Prepare, disclose and implement the contractor's code of conduct, Labor Management Plan etc.</li> <li>- Collaborate/inform the local communities and other local level stakeholders on the E&amp;S monitoring</li> </ul>
Other interested stakeholders (external/regulatory agencies)	<ul style="list-style-type: none"> <li>- Participate in the implementation of SEP activities</li> <li>- Monitor/ensure project's compliance with the laws of Bangladesh</li> <li>- Engage with the project's stakeholders on E&amp;S issues</li> </ul>

### 5.2 Budget for SEP Implementation

69. A tentative budget for implementing the Stakeholder Engagement Plan throughout the entire program management cycle is provided below, to be finalized post effectiveness. This will be annually reviewed by the PCU, and adjusted as needed.

**Table 5: Tentative Annual Budget to Implement Stakeholder Engagement**

Sl.no	Stakeholder Engagement Activities	Quantity	Unit Cost (US \$)	Times/ Months	Total Cost (US \$)
1	Staff/Consultants Salaries				Paid from Project Consulting Service Budget

2	Training on Stakeholder Engagement and GRC issues	6 times	3000		18,000.00
3	Information Desk officer (will be nominated from /PCU existing staff)				Paid from Project Consulting Service Budget
4	Stakeholder/Community/Sensitization meeting in Project areas	Lump Sum			40,000.00
5	Meeting with District and Upazila Govt Officials	4 meeting/yr	1000	16	12,000.00
6	Meeting at PCU with SPs and IPs	3 meeting/yr	2000	12	18,000.00
7	Satisfaction Survey	1/yr	7000	4	21,000.00
8	Travel expenses	Lump Sum/yr	5000	4	20,000.00
9	Communication materials (Poster, Brochure, flier, billboards, website)	Lump Sum			7000.00
10	GRM Guidebook/ Manual	Lump Sum			3000.00
11	Suggestion/complain Boxes	40	50		2000.00
12	GRM /GRC expenses	Lump Sum			10000.00
13	GRM MIS Database	Lump Sum	5000		6000.00
	Sub-Total				157,000.00
14	Contingency (10%)				15,700.00
	<b>Total (Less Serial 1 and 3) (Rounded)</b>				<b>172,700.00</b>

## Chapter 6: Monitoring and Evaluation

70. Both the ministries, MoHFW and MoLGRDC will be responsible for the overall coordination and supervision of the M&E tasks through its existing structures. The Environmental and Social Specialist be responsible for the monitoring and reporting of this SEP. S/he will prepare periodic monitoring report as required (quarterly, six-monthly, annual, etc.) by the project Implementation unit. In case consolidated report on E&S management is prepared, s/he will ensure that specific sections/chapters on the SEP implementation are entered in such reports.
71. The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. The Communication Expert will work on a reporting matrix in this regard.

Table 6.1: Monitoring requirements

Key elements	Time frame	Methods	Responsibilities
Stakeholders' access to project information and consultations	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North, Chattogram and PCU
Project beneficiaries' awareness of project activities, their entitlements and responsibilities	Periodic (during project implementation)	Interviews, observations, survey	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU
Acceptability and appropriateness of consultation and engagement approaches	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU
Community facilitators' engagement with target beneficiaries	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU
Accessibility and readability of public information dissemination materials	Periodic (during project implementation)	Spot checks, interviews, desk-review	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU
Tones in social media and broader public perceptions (including NGOs)	Periodic (during project implementation)	Social media monitoring, interviews, observations	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU
Rate of grievances and complaints (reported and unreported)	Periodic (during project implementation)	Desk review, interviews, survey	MoHFW, MoLGRDC and the City Corporations of Dhaka south, Dhaka North and Chattogram and PCU



## **Closing the Feedback Loop: Reporting back to stakeholder groups**

72. The PCU (Comprising both MoHFW and MoLGRD&C) will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs will involve, preferably, through face-to-face meeting or direct interactions. But in case this found to be impractical, it'll be done through written correspondence or by using IT, such as SMS, phone call, etc. Other pertinent media, such as website, social media, press briefing, may also be used.
73. 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(s). 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.
74. 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.
75. 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.
  - ✓ A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
    - Number of public hearings, 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;
76. The outcomes/feedback from these 'reporting back' measures will be compiled and shared/disclosed with the stakeholders' and general public through the use of proper media, such as MoHFW and MoLGRDC along with the City Corporations of Dhaka South, Dhaka North and Chattogram websites, social media accounts, communication materials, etc. This will also include other urban areas/municipalities as and when such areas are selected under the project.

## Annex 1: Summary of Stakeholder Consultation Outcomes

Issues	Discussion	How the inputs of SCs are taken into consideration during designing phase of the project
Environmental Risks and Management	<p>Followings are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> <li>• Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be refurbished. There should be a proper plan in place to minimize air and noise pollution during the implementation period.</li> <li>• Medical Waste Management System during construction will be one of the major issues and a proper management system will be in place to mitigate the impacts.</li> <li>• Capacity building related to MWM should be one of the primary goals in the urban areas, as the number of private health care service providers are significantly increasing,</li> <li>• Most of the government health service centers premises has decent number of trees inside their compound. During the implementation of the project, need to make sure minimal to no trees are being cut down, and if cut down, according to the rules, three times the number of trees must be planted.</li> </ul>	<p>Capacity building of the Paurashavas considering the project, regarding the medical waste collection</p> <p>This project has taken account of MWM and policies around the work with more sincerity</p>
Social Risks and Management	<ul style="list-style-type: none"> <li>• Accidents and fatalities during construction; Proper measures must be taken to avoid the incidents. OHS related risk and mitigation measures are discussed during the SC.</li> <li>• Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this.</li> <li>• Traffic congestion: During the construction period, the amount of usable land may be reduced, particularly in areas where the health care service provider is adjacent to main roads, hence creating</li> </ul>	<p>Capacity building of the Paurashavas considering the project, regarding the medical waste collection.</p> <p>Vector Control and management; though was already part of the design, came up during the discussions of stakeholder consultations</p>

	<p>traffic congestion. An alternative plan needs to put in place to minimize the congestion.</p> <ul style="list-style-type: none"> <li>• Concern over the present medical waste collection and disposal. Recycling could be a way, but first of all, need proper measures to collect the waste safely as it may occur infection if exposed.</li> </ul>	
<p>Planning and Operational Management</p>	<ul style="list-style-type: none"> <li>• During the project implementation, there will be temporary arrangement for many issues, like labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities.</li> <li>• Integrated Vector management to be considered involving different ministries to cover the whole country effectively. Besides, adequate technical support to be arranged to check the efficiency of the vector control method.</li> <li>• HNP capacity building; in small urban body (Porashava) with one medical officer needs to be improved by assigning additional manpower.</li> <li>• Mayors of the urban bodies may be integrated with the project for increased patronization.</li> <li>• For medical waste management, a model/piloting with innovative ideas may be developed and later on followed by others.</li> <li>• Monitoring and Evaluation: Efficient reporting system may be developed by using the existing MIS systems.</li> <li>• Sustainability of the present modalities of service delivery through NGOs</li> </ul>	<p>Further consultation with related beneficiaries and stakeholders for adapting an appropriate institutional arrangement</p>
<p>Operational Arrangement</p>	<ul style="list-style-type: none"> <li>• Proper institutional arrangements for improved effectiveness of the project interventions.</li> <li>• Clarity in the scope and the work items.</li> <li>• Environmental and Social Documents like ESMF, HORMP, SEP, ESCP, SEA/SH.</li> </ul>	<p>The DPP being prepared by LGD will clearly define the scope, working modalities and the project activities.</p>

## Annex 2: Consultations held during project preparation phase

No.	Date	Venue	Main Participant Groups	No. of Participants	
				Male	Female
01	19 September 2023	In person	Consultations with the NGOs and private sectors to debrief about the overall project	19	3
02	27 September 2023	In person	Consultations with the doctors and medical personnel	30	3
03	27 September 2023	In person	Local level consultation with the government officials of MoHFW	30	3
04	28 September 2023	In person	Consultations with the local health service providers	18	4
06	13 April 2023	In person	Local level consultation with the participants of MoLGRD&C and MOHFW	28	9

### Annex 3: Sample Grievance Registration Form

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

## Annex 4: Six steps of the GRM Process

**Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, Union, project, and Upazila offices) and at project sites, and by mail, telephone, and email.

**Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Assistant Manager/Social Development Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the planning department for processing and resolution and submissions related to SEA/SH will be delegated to a mapped service provider.

**Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.

**Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and resolve the complaints following the Figure 7.1. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

**Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions. Typical grievance resolution process is shown on Figure 4.

**Step 6: Providing feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. On a monthly basis, the Planning Department will report to the Executive Chairman on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days.