Stakeholders Engagement Plan

For

Resilience, Entrepreneurship and Livelihood Improvement Project (RELIP)

JANUARY 2021

Table of Contents

Abbreviations

CBO	Community Based Organization
CC	Climate Change
CERC	Contingent Emergency Response Component
CHT	Chittagong Hill Tracts
COM	Community Operations Manual
CSO	Civil Society Organizations
DAE	Department of Agricultural Extension
DoF	Department of Fisheries
DoL	Department of Labour
DPs	Development Partners
EA	Executing agency
EA	Environmental Assessment
ESA	Environmental and Social Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
GBV	Gender-based Violence
GEMS	Geo-Enabling Initiative for Monitoring and Supervision
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Management
IA	Implementing Agency
ICT	Information and Communications Technology
IGA	Income-Generating Activities
IP	Indigenous peoples
LMP	Labour Management Procedure
LMS	Loan Management System
M&E	Monitoring and Evaluation
MoF	Ministry of Finance
NGLIP	Nuton Jibon Livelihood Improvement Project
NGO	Non-government organization
PIU	Project Implementation Unit
RELI	Resilience, Entrepreneurship and Livelihood Improvement
SDF	Social Development Foundation
SEC	Small Ethnic Community
SEP	Stakeholders' Engagement Plan
SEVCDF	Small Ethnic Community Development Framework
SEVCDP	Small Ethnic Community Development Plan
SIA	Social Impact Assessment
UNO	Upazilla Nirbahi Officer
WB	World Bank

Executive Summary

Resilience, Entrepreneurship and Livelihood Improvement Project (RELI-P) by Social Development Foundation (SDF), an autonomous "not-for-profit" Trust under the Ministry of Finance, is prepared a follow-up project of its flagship Notun Jibon Livelihood Improvement Project (NJLIP). The overarching aim of RELIP is to improve the livelihoods of the poor and extreme poor, enhance their resilience and support rural entrepreneurship in project areas by reaching over 750,000 direct beneficiaries, of which 90% will be women. The project will cover 3200 villages in 20 districts and the support will comprise, among other, one-time additional cash transfer grant who may have fallen back into poverty because of the ongoing pandemic. In summary, the project will respond to the following urgent needs: (i) Respond to the impact of the crises on the livelihood of vulnerable rural households and support recovery and resilience-building; (ii) Help rural households graduate out of poverty through Income-Generating Activities (IGA); (iii) Support NJLIP's current beneficiaries who had graduated from poverty pre-crisis but have fallen back into poverty because of the crisis; and (iv) Support rural entrepreneurship for sustained post-COVID-19-crisis economic recovery. RELIP will have 4 components, as follows:

i.   Component A: Community Institutions and Livelihood Development
ii.   Component B: Business Development and Institutional Strengthening
iii. Component C: Project Management, Monitoring and Learning
iv.   Component D: Contingent Emergency Response Component (CERC)

The SEP defines the approaches and methods for engaging the project's stakeholders, including public information disclosure and consultation, throughout the implementation of the project. It outlines how the project will engage the different group of stakeholders including individuals, organizations and business entities and provide them with a mechanism through which people can raise concerns, provide feedback, or make positive and negative complaints about the project(s) .

The RELI-P supports community institutions to effectively manage and deliver services and communities to take charge of their development, based on the principles of local participation and decentralized development. It also facilitates public-private dialogue on rural entrepreneurship development, and establish formal partnerships between value chain actors, local governments and the project. The RELI-P works across all 20 districts in Bangladesh prioritizing the remote and underserviced communities.

RELI-P will keep the institutional structure of NJLIP, with an SDF Head Office, Regional Offices, District Offices, and Cluster/Field Offices, as well as a Project Advisory Committee with appropriate representation of key ministries and agencies. The Community Operations Manual (COM) and Human Resource Policy and Manual will be revised accordingly. The management, coordination and implementation of the SEP and the various tasks will be the responsibility of dedicated team members within SDF Head Office under the overall supervision of the Managing Director.

There are pertinent and substantial laws in Bangladesh regarding the right to information, information regulation, and transparency management during the decision-making process/ public hearing. The Constitution of Bangladesh includes several articles about freedom of movement, freedom of assembly, freedom of expression and freedom of association. There is also a comprehensive corpus of laws and policies that uphold transparency and accountability in public life.

ESS 10 and World Bank's ESF stipulates "Stakeholder Engagement and Information Disclosure" and recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". One of the major provisions of ESS 10 is that stakeholder engagement can improve the environmental and social

sustainability of the project by making projects acceptable to the community and help in creating a successful project design and implementation.

RELI-P will engage with a broad range of stakeholders involving communities, their representative organizations (e.g. Gram Samity and Gram Parishad), local NGOs, civil society, local government (Union and Upazilla Parishad), local business and trade associations along with government officials from various service departments (DAE, DoL, DoF, UNO, etc.) to SDF and ministries. The SEP has carried out extensive mapping of the stakeholders based on their degree of engagement, interest to RELIP and overall impacts they are potentially expected to make. The mapping also includes a survey of the disadvantaged and vulnerable groups including the small ethnic communities (i.e. indigenous peoples) that are relevant to RELI-P.

The SEP provides detailed outlines on information disclosure. The ESF documents (ESMF/P. ESIA, SEP, LMP, SECVDF/P, etc.) will be disclosed for public comments and suggestions. Free printed copies of the ESMF/ESMPs and the SEP (along with the other E&S documents) in Bangla and English will be made accessible for the general public at the following locations:

- SDF Headquarters and affected District SDF Offices
- The District Administration offices
- Local NGO offices.
- Other designated public locations to ensure wide dissemination of the materials.
- Newspapers, posters, radio, television.
- Information centers and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings

Electronic versions of the ESMF/ESMPs, LMP, SECVDF, Gender/GBV Action Plan and SEP will be uploaded on the SDF website. This will allow stakeholders with access to the Internet to view the proposed project information and to activate their participation in the public consultation process. The website will be fitted with an online feedback function that will enable readers to leave their remarks about the materials disclosed. The mechanisms will be used for facilitating input from stakeholders.

The project will provide important data and opportunities for stakeholder groups to share their opinions on topics that matter to/affect them. Further, Following the Bank's technical notes on COVID-19 situation, the overall engagement strategy will adopt a flexible approach by taking into account the concerns on public health safety. In particular, it'll consider the following:

i. Make sure that all community groups/beneficiaries and SDF staffs have a decent understanding of social behavior and great cleanliness rehearses. Maintain a social distance including use of sanitizers /disinfectants and face masks
ii. Postpone all gatherings/meetings if these can be avoided.
iii. If a more modest gathering is allowed, conduct discussion in little gathering meeting, such as focus group discussions.
iv. Where direct commitment with the stakeholders is fundamental and cannot be put off, distinguish channels for coordinate correspondence with each influenced unit through a context-specific blend of email messages, mail, online stages, and committed phone lines with learned operators.

If face to face meeting is not allowed, broaden channels of communication and take into account which channels/methods are suitable in the local setting. Where possible rely on ICT based solutions. For IT-based online consultations, the following steps will be considered:

i. Preparation before the occasion is significant: to test technology, create important messages, create Frequently Asked Questions.
ii. Virtual enrolment of applicants: applicants can register online through a devoted platform.
iii. Dissemination of workshop materials to members, including plan, project reports, slides, surveys and discussion points: These can be conveyed online to members.
iv. Review of conveyed data resources: members are given a planned term for this, before planning a discourse on the data provided.
v. Discussion, criticism assortment and sharing members can be coordinated and appointed to distinctive theme branches, groups or virtual 'platforms' if they consent to this. 60 -90 minutes is about greatest you need individuals to be online at a time.
vi. Group, panel and table discussions can be coordinated via web-based social media tools, for example, WhatsApp, Zoom, Facebook Messenger, Skype or zoom etc. Utilize voice feedbacks or chat mechanisms more as appropriate.
vii. Concluding Remarks and summary: The chair of the workshop should summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.

RELI-P will build upon the existing GM of SDF for NJLIP. It would be composed of a three-tier structure: SDF Head Office, Regional and District/Field level. It'll be strengthened to comply with the labour and SEA/SH specific requirements.

At each level, there will be a Grievance Redress Committee (GRC), composed of 3-5 members which will include representatives of project beneficiaries. In areas where there are a small ethnic community, a member from them will be co-opted. The GRC will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. The details of the complaints and their resolution will be recorded by the GRCs in a register with intake details, resolution procedure and the closing process.

SDF will compile the comments/feedback received from the stakeholders (including written and oral remarks) and the project management will take actions as necessary based on the feedback. To close the feedback loop circle, the project's subsequent follow-up actions will be detailed back to the relevant stakeholders. Besides, SDF will share the progress report on the SEP to the World bank through periodic reports where the Stakeholder related activities will be extensively documented.

The total estimated budget for implementation of the SEP is USD 617,294 which stands BDT 52,470,000 at the exchange rate of 1 USD $ = 85 BDT). The budget includes the salary for 5 years of a Stakeholder Engagement & Communication Specialist, besides assorted expenses for training, preparation of communication materials, consultations and meeting, along with running the project grievance management (GM).

Chapter 1: Introduction and Project Overview

1.1   Project Description

Notun Jibon Livelihood Improvement Project (NJLIP) is a flagship project of Social Development Foundation (SDF) an autonomous "not-for-profit" Trust under the Ministry of Finance being implemented with support from the World Bank (WB) started its journey in 2016. Its aim to support poor and ultra-poor in 2,500 villages in 12 districts of Bangladesh through community financing for livelihood improvement, community infrastructure, and skills development training for the un/underemployed youths. This project has been successful in reaching out to the poor and extreme-poor and shown strong impacts on livelihood improvements and empowerment of the target group. Considering the successful implementation of the on-going project, the World Bank extended its support to the SDF with the preparation and design of an investment operation that builds on the lessons learned and results achieved under NJLIP. In this regard, Resilience, Entrepreneurship and Livelihood Improvement (RELI) Project (2021-26) has planned to scale up 20 districts covering eight administrative divisions throughout the country[1]. Overall, it is expected that RELI will contribute in bringing multi-dimensional thought processes and implementation models across the countries in the livelihood improvement contribution through rural entrepreneurship activities.

1.1.1   Objectives of the RELI project

The overarching aim of the project is to improve the livelihoods of the poor and extreme poor, enhance their resilience and support rural entrepreneurship in project areas by reaching over 750,000 direct beneficiaries, of which 90% will be women. Among all 20 targeted districts, the RELI project will carry over its livelihood support in the villages of 12 districts in which SIPP-II and NJLIP have operated but could not reach their support. In summary, the project would cover 3200 villages from 12 districts of previous phase named NJLIP, and 8 new districts added as new addition of the project for implementation throughout the country. The new RELI project would also provide one-time additional support to NJLIP beneficiaries who may have fallen back into poverty because of the pandemic in the form of a cash transfer.

The project will adopt the success of the NJLIP project in reaching the poor and poorest, and will tailor livelihood opportunities in order to respond to the following urgent needs: (i) Respond to the impact of the crises on the livelihood of vulnerable rural households and support recovery and resilience building; (ii) Help rural households graduate out of poverty through income-generating activities (IGA); (iii) Support NJLIP's current beneficiaries who had graduated from poverty pre-crisis but have fallen back into poverty because of the crisis; and (iv) Support rural entrepreneurship for sustained post-COVID-19-crisis economic recovery[2].

1.1.2   Components of the RELI project

The project is built around the following four core components:

   i. Component A: Community Institutions and Livelihood Development
   ii. Component B: Business Development and Institutional Strengthening
   iii. Component C: Project Management, Monitoring and Learning

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[1]Concept Note (2020). Resilience, Entrepreneurship and Livelihood Improvement Project (P175820)
[2]Project Appraisal Document (PAD) (2020). Resilience, Entrepreneurship and Livelihood Improvement Project (P175820)

iv. Component D: Contingent Emergency Response Component (CERC)

Component A focuses on three objectives include mobilizing poor and extreme poor households through formation and strengthening of community institutions; provide technical and financial support to livelihood, infrastructure development and health; and strengthen awareness on socio-cultural norms constraining women, marginalized groups and address climate risks and resilience in the process. The objectives will be achieved by forming village clusters, implementing web-based loan management system (LMS), a geo-enabling initiative for monitoring and supervision (GEMS) and service delivery daily. The component will also provide one-time cash transfer, implement livelihood and income-generating activities (IGA), and support community infrastructure to create climate-resilient productive and provide short-term employment opportunities to those immediately affected by Covid-19. The project outcomes will lead to empowerment of community leaders and beneficiaries with knowledge and technologies to implement the subcomponent activities and adopt new practices to achieve economic development and health benefits. For example, the fund schemes will allow income-generating activities, overcome food security challenges, adoption of climate-smart practices and mitigation measures, access to WASH and better communication. Moreover, it is expected to generate healthy and productive lives by prevention of the spread of vector-borne diseases, awareness of gender-based violence; promotion of productive diversification on-farm towards vegetables, horticulture and nutrient-dense commodities, and raise awareness about nutritious diets among beneficiaries. The components will also establish linkages among community, government and non-government health service providers.

Component B aims to establish Cluster and District Community Societies to ensure village institutions' sustainability, help build producer organizations as commercially oriented entities, support rural entrepreneurship, and ensure skill development training and sustainable employment support for the un/underemployed youths. The main activities of the component will include development and strengthening of second tier institutions. This will be executed by formation of cluster and district level community societies (RCCS and RDCS) and training the committees; construction of RDCS and RCCS office buildings; and support the village institutions through regular monitoring and technical assistance by RCCS. The component also includes commercial agriculture and rural entrepreneurship activities, where formation of and technical assistance to registered PGs, market linkages and partnership building, product promotion and communication, and CARE Fund will play vital roles. Finally, employment generation support will address youths, migrants and immigrant returnees to develop skills through trainings and counseling, followed by networking to work industries and providing financial support to entrepreneurs. The component also supports and extends component A's outcomes through the development and strengthening of second-tier institutions. It will support the networking and aggregation of village-level community institutions created under Component A. Moreover, financial and technical support to producer groups and rural entrepreneurs will contribute to sustained post-COVID-19-crisis economic recovery. In contrast, employment generation support will entail skills development and training for the un/underemployed youths and returning migrants that help generate long-term employment opportunities and further support livelihoods and economic recovery.

Component C focuses on the COVID-19 crisis project areas of management, monitoring and learning. Moreover, recent severe natural disasters can rethink about capacity building of the implementing agency SDF on vulnerability, opportunities and sustainable energy related to climate change. Following significant lessons are accommodated in response to COVID-19 such as 1. decentralization of responsibilities; 2. adopting a booklet consist with public health guidelines of World Health Organization (WHO) and Bangladesh government. 3. Inclusion of local government for the project considering effectiveness and sustainability.

Finally, under component D which is about Contingent Emergency Response Component (CERC) which is entitled to response all kind of disaster and crisis caused by economic or social impact. The Government may request World bank to work with funds in relation to CERC through proper justification. If the world bank groups agree, all the necessary measures will be taken for responding emergency issues and work plan accordingly. Overall, an apt emergency manual will be prepared for CERC.

1.2   Objectives of the SEP

The overall objective of this Stakeholder Engagement Plan (SEP) of the RELI project is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the implementation of the project. The SEP outlines the ways in which the project will engage the different group of stakeholders including Individuals, organizations and business entities besides the regulating entities, and provide them with a mechanism through which people can raise concerns, provide feedback, or make positive and negative complaints about the project(s) themselves.

The RELI project supports community institutions to effectively manage and deliver services and communities to take charge of their own development, based on the principles of local participation and decentralized development. It also facilitates public-private dialogue on rural entrepreneurship development, and establish formal partnerships between value chain actors, local governments and the project. The RELI works across all 20 districts in the Bangladesh prioritizing the remote and underserviced communities.

1.2.1   Summary of the potential social and environmental risks and impacts of the project

The RELI project is rated 'moderate' on Environmental and Social Risk Classification by the World Bank. The main activities consist of cash transfer to the targeted households, group savings and health and nutritional support services to the beneficiaries, activities contributing to improving livelihoods will be prioritized particularly in the context of the ongoing pandemic Covid 19, such as the support to developing and strengthening community organizations, and financing community plans. The project will also support climate resilience building during community mobilization; and through technical and financial support to beneficiaries by raising beneficiaries' awareness to climate change and climate-induced risks.

The project is expected to have indigenous population, besides other marginalized and vulnerable communities as beneficiaries. In any case, majority of the beneficiaries will be women, a generally disadvantaged section of population in the traditional Bangladeshi society. A Small Ethnic and Vulnerable Community Development Framework (SEVCDF) has been prepared for this purpose and it includes robust provisions for inclusion of all the disadvantaged and marginalized communities including the indigenous peoples with their full participation and meaningful participation.

The main anticipated E&S risks and impacts of the project relate to: (1) occupational and community health and safety, (2) water, air & noise pollution, soil contamination, solid waste generation and management, (3) ensuring appropriate benefits to the marginalized and disadvantaged groups including the indigenous peoples from the project activities; (4) managing and mitigating the SEA/SH risks and (5) risk of child labor – all of which are addressed through appropriate mitigation measures.

Environmental Risks and Impacts

The environmental impacts are linked to two major project components vis-à-vis activities. First, from the civil works which includes, construction of office buildings for community institutions at district, cluster and village levels, primarily carried out by Community Infrastructure Works (CIW). Second, from project supported rural livelihood activities such as household based small and medium scale manufacturing, including dairy, poultry and fish farms, cottage industries producing

organic fertilizer and pesticides, handicrafts like ornaments, baskets, mats etc. However, these activities are likely to have localized and reversible negative but limited environmental impacts on air, soil, water and natural setting. Potential impacts on environmental components are – small scale land cover and land use changes, water pollution, air pollution, noise pollution, soil contamination, solid waste generation, and community and occupational health/safety. But the scale of impacts is small and limited, localized and reversible. The project anticipates no significant impacts on local aquatic and terrestrial biodiversity. The project ESMF gives the detailed procedures of Environmental Assessment following the applicable ESS and other Banks guidelines and directives.

Social Risks and Impacts

The project social rating is 'moderate. No land acquisition is anticipated under the project. The construction of office buildings for the Community Organizations will be purchased through "willing buyer willing seller" modality. The repairing and refurbishments of the rural roads and trails and as well as installation of water supply systems are likely to require very small amount of land and will rely on voluntary donation from the communities. The project's ESMF will include detailed procedures for both voluntary land donation and willing buyer willing seller approaches.

The project anticipates very low or no labor influx. The civil and infrastructure-related works will be carried out primarily by the communities. However, for some specialized works, such as water supply system or office buildings of the community organizations, this may entail hiring of contracted and primary supply workers. The project's Labor Management Procedures (LMP), including site-specific Occupational Health and Safety (OHS), and Labor Management Plans, will promote better labor management practices and other appropriate legal measures such as against the use of child labor in all project activities.

Many of the project activities, such as cash transfer, carry inherent risks of Sexual Exploitation and Abuse and Sexual Harrassment (SEA/SH) given the traditional patriarchal values and societal characteristics of the contemporary Bangladesh. A SEA/SH screening based on the Bank's draft Matrix on Cash Transfer programs gives a 'substantial' rating. The SEA/SH Management Plan of the project provides the necessary mitigation measures in this regard.

A considerable percentage of beneficiaries are expected to come from small ethnic communities and and as well as from other marginalized and disadvantaged groups. The project has developed a Small Ethnic and other Vulnerable Community Development Framework (SEVCDF) that details the necessary guidelines in designing and delivering project benefits which are appropriate to the needs and cultural traditions of the social groups involved.

1.3   Project SEP Implementation Arrangements

The project is implemented Social Development Foundation (SDF), an autonomous, non-profit Trust established in 2001 under the Ministry of Finance of the Government of Bangladesh. The project will keep the institutional structure of NJLIP, with an SDF Head Office, Regional Offices, District Offices, and Cluster/Field Offices, as well as a Project Advisory Committee with appropriate representation of key ministries and agencies. The Community Operations Manual (COM) and Human Resource Policy and Manual will be revised accordingly. The management, coordination and implementation of the SEP and the various tasks will be the responsibility of dedicated team members within SDF Head Office under the overall supervision of the Managing Director.

Chapter 2: Regulations and Requirements

2.1   Key National, Social, Legal Provisions and Citizen Engagement

Legal Framework and national policies for citizen engagement is located within the broader discussion about how to guarantee the collective rights of stakeholders' engagement in Bangladesh. There are pertinent and substantial laws in Bangladesh regarding the right to information, information regulation, and transparency management during decision making process/ public hearing. The applicable laws and regulations are:

2.1.1   Constitution of the People's Republic of Bangladesh

Article 36. Freedom of movement states that every citizen in Bangladesh holds the right to have a free movement across Bangladesh, to reside and settle in any location therein and to exit and re-enter Bangladesh except in the cases where she/he stands liable to any logical restrictions for the sake of public interest.

Article 37. Freedom of assembly explains that every citizen holds the right to organize and to take part in public discussions and parade in a peaceful and armless manner except in the cases where she/he is subjected to logical restrictions for maintaining the public order health interests.

Article 38. Freedom of association. Every citizen holds the right to establish alliances or unions except in some cases where she/he is subjected to logical restrictions for the sake of maintaining moral interest and public order.

Article 39. Every citizen holds the right to think and articulate and present her/his opinion freely and without intervention except in cases where she/he is subjected to logical restrictions for the sake of maintaining the security of the state, upholding amicable liaison with the foreign states, public order, dignity or conscience, or concerning disrespect of court, slander or supporting an offence- (a) every citizen's right to freedom of speech and expression; and freedom of the press, are promised.

Article 59. Local Government. The bodies that will constitute of persons under law will be in charge of the local government in every administrative section; Everybody such as is referred to in clause (1) will, liable to this constitution and other law, carry out duties within the relevant 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.

Article 60. Powers of local government bodies gives 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 the power to impose taxes for local purposes, to prepare their budgets and to maintain funds.

2.1.2   Law on Local Government

Being a democratic republic, Bangladesh has two sections of government: national and local. The constitution houses local government (Chapter IV Articles 59 and 60) and the entities like Zilla Parishads (2000), Upazilla Parishads (1998, amended 2009), Union Parishads (2009), Pourashavas (2009), City Corporations (2009) and Hill District Councils (1989) are included in the main legislative texts. Ministry of Local Government, Rural Development and Cooperatives that also houses the local government division, is to serve local government except the fact that Hill District Councils are operated under the Ministry of Chittagong Hill Tract Affairs.

2.1.3   Bangladesh Labour Law, 2006 (Amended in 2013) and Labour Code 2015

Professional rights and safety of workers and the provision of a convenient work setting, and reasonable working situations are promised in Bangladesh Labour Law, 2006 (Amended in 2013). The Labour Law of Bangladesh 2006 prohibits the engagement of children under 14 in any

occupation. Chapter III of the Act under "EMPLOYMENT OF ADOLESCENT WORKER" restricts on the children and adolescent employment puts restrictions on the 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) S/he carries, while at work, a token containing a reference to such certificate.

2.1.4   The Consumers' Right Protection Act, 2009

The Act promises to safeguard the consumer rights and to prevent any form practices that go against consumers rights.

2.1.5   Right to Information Act (RTIA) 2009

The Act aims at guaranteeing the free circulation of information and citizens' access to it. The constitution recognizes the freedom of thought, conscience and speech as rudimentary right and the right to information is inseparable part of that. The right to information will guarantee the transparency and reliability in all public, autonomous and statutory organizations and private organizations that are operated on governmental funding or overseas sponsorship will grow, corruption will drop, and good governance will be ensured.

2.2   World Bank Requirements

On 1 October 2018, the Environmental and Social Framework (ESF) of World Bank came into effect for implementation. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice".

One of the major provisions of ESS 10 is that a stakeholder engagement can drastically improve the environmental and social sustainability of project by making projects acceptable to the community and help in creating a successful project design and implementation. This stakeholder engagement needs to be inclusive conducted throughout the life of the project cycle. By doing this, in an effective manger, it helps in managing successfully risks, social or environmental of the project.

Key elements of ESS10 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."
- "Borrowers 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.

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers 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.

Chapter 3: Brief Summary of Project Stakeholders

Under the NJLIP project, an Indigenous Peoples Plan (IPP) was developed to mitigate the potential negative impacts of the project on their livelihood vis-à-vis their religious, cultural and social organizations/institutions. In other words, the project should not, in any way, hamper or minimize those on their traditional value system. The IPP is considered in the initial stage, screening of the project. A review of geographical area (actual or proposed) to determine the extent of tribal/indigenous population living in the districts under the project. Information was collected from secondary sources (BBS Bangladesh Population Statistics, 2007, and Banglapedia, 2006) and observed the ethnic nationals in the SDF project areas are found which is summarized in Annex II. The proposed screening checklist includes IPP (Annex II).

Mapping the project stakeholders is the primary task in preparing a SEP. During the NJLIP's it's IPPF reviewed the project's geographical area to determine the extent of tribal/ indigenous population living in the districts under the project. The IPPF collected information from secondary sources (BBS Bangladesh Population Statistics, 2007, and Banglapedia, 2006) and observed the ethnic nationals in the SDF project areas The RELI-P project would engage with a broad range of stakeholders and (Annex 2) identified according to their level of engagement and importance with the project.

It is expected that a certain number of project beneficiaries may belong to indigenous people or ethnic minority groups in some regions although population numbers are small, as indicated in the table. Nonetheless, where such population groups are residing, the project would apply its SEVCDF. The main objective is to mitigate the potential negative impacts of the project on their livelihood vis-à-vis their religious, cultural and social organizations/institutions. In other words, the project should not, in any way, hamper or minimize those on their traditional value system.

The former exercise (i.e. IPPF and the IPP) considered:

1. The ethnic and demographic characteristics of the affected population
2. The prevailing intuitions as family, religion, language and education and other indigenous variables and social stigma
3. The IPP should accommodate the local traditional leadership (as headman, karbari), gender issues, and civil and NGOs in their implementation plan
4. The land ownership pattern and availability of required land
5. Consulting rehabilitation and resettlement scheme as per the technical proposal
6. The expected positive and negative impacts on the prevailing institution both formal and informal
7. The mitigation schemes of adverse effect
8. To ensure their participation and approval of their implementation of project inputs and mitigation plan.

3.1   Stakeholder Identification and Mapping

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).

An important element of a successful mapping is knowing who the key stakeholders are and how best to engage with them to ensure achieving the project's objectives. The RELI project operates in multiple implementation environments and consequently will engage with a diverse array of

stakeholders, ranging from government officials and local government representatives through to farmers. While there are similarities across different stakeholder groups, communication initiatives and outreach activities must be tailored to audience needs and interests. Furthermore, it is necessary that RELI be strategic in which stakeholder groups to target and project level of engagement to ensure maximum impact.

The following table provides a cursory glance at the different RELI stakeholder groups and can be used as a guide to the type of communication engagements pursued.

Table 1:Summary of RELI Project (SDF) Stakeholders

Stakeholder Group	Stakeholder

Project-Affected Parties	The term project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.
	• Villages, households, communities and Business entities directly affected by Project construction and operation, if any. Also, individuals residing in the Upazilla, Unions and Wards within which the Project is located. They include:
	    o Project beneficiaries
	    o Vulnerable groups including small ethnic communities, the elderly, the disabled persons, pregnant women, single mothers etc. residing in the area;
	    o Small businesses, farmers' groups to be identified during the consultation activities by SDF.

	• Indirectly Affected Populations are the individuals and organizations located within the Indirect Area of Influence. • Those areas located within 1 km of any project and other ancillary project facilities • Individuals residing in the Upazilla, Unions and Wards within which the Project is located. • Gram Samity and concerned Zillas, Upazilas, and union councils (Union Parishads).
Interested Parties	• Ministry of Local Government, Rural Development and Co-operatives (MoLRD&C), responsible for the development and supporting local government bodies outlining the mode of facilitation, SDF's responsibilities and support after phasing out, as well as local government institutions' mode of engagement and collaboration, types of cooperation expected from three-tiered local government institutions to carry on development efforts.

Stakeholder Group	Stakeholder
	District and Upazilla Administration and Offices to include: • Deputy Commissioner's Office • Civil Surgeon's Office • District Agriculture Officer (DAE) • District Social Welfare Officer • District Youth Welfare Officer • Upazilla Nirbahi Officer (UNO) • Office In-Charge, Police in the Upazilla and district • Department of Cooperatives at district and Upazila level • Department of Women Affairs at district and Upazila level **Elected Officials and Local Politicians to include:** • Zilla Parishad Chairperson and Members • Upazilla Parishad Chairperson and Members • Union Parishad Chairperson and Members • District and Upazila level political leaders (different parties) **Media and Mass Communication to include:** **National** • Newspapers (daily and weekly) • Dhaka-based TV stations • Dhaka-based radio stations **Local** • Social media: Facebook, websites, YouTube • Local FM Radio Channel, if available **Businesses and Associated Groups to include:** • District and Upazilla Truck/Bus/Van Owners President and Members • Bazar Management Committee President and Members • Traders' Associations and their members • Bankers / Money Lenders in the area • Micro-finance Organizations • Private technical training institutions • Civil society groups and NGOs on the national and local levels that pursue environmental and socio-economic interests and may become partners. • Community-based groups and NGOs working on Labor, or Gender issues including GBV and Human Rights in the locality. • Business owners and providers of services, goods and materials that would be involved in the project's wider supply chain and transportation business. • Residents of the other rural settlements within the project area of influence that can benefit from employment and training opportunities stemming from the project, when planned. • IT and ITeS service providers; • Training Service Providers who would be involved in the capacity building of the SDF officers and staffs, local workforce etc. when planned; • Mass media and associated interested groups including District and local Press Club, local, regional and national print and broadcasting media, digital/web-based entities, and their associations. • International and National Non-Governmental Organizations (NGO)

3.2   Disadvantaged/vulnerable individuals or groups

During the stakeholder identification work, the potentially vulnerable groups were also identified. An overview of the potentially vulnerable Project stakeholders is provided in table 2 below. Those will be categorized under the vulnerable groups who are project-affected (individuals or groups) or because of their own context, are in a situation of disadvantage or vulnerability. This identification process facilitates the project by identifying the persons and sub-groups who might have divergent opinions and concerns about the impacts of the project, reductive mechanisms and profits, and who may need unique, or customized, approach of engagement. Keeping this into consideration, this project has formulated a framework following the ESS7 i.e. Small ethnic and Vulnerable Communities Development Framework (SEVCDF) that RELI will use as the primary document.

Table 2:   **RELI Project Potentially Vulnerable and Disadvantaged Groups**

Stakeholder Group	Stakeholder
Women, ethnic minorities, migrants	**The most vulnerable women include:** • Single women-headed households and Widows • Pregnant Women, • Women with physical and mental disabilities • Elderly and disabled women who are dependent on children • Unemployed women • Women from ethnic or otherwise marginalized communities • Women in extreme poverty • Illiterate women • Women who might face harassment or SEA/SH etc. at home or from the project activities such as attending training, meetings, construction works, etc. • Migrants women
Youths and Elderly	They can neither go for a job leaving aside the elderly and the children at home nor can they involve themselves with any small-scale business for lack of money. They are also vulnerable to lack of ability to influence decisions affecting their lives.
People with Disabilities	There are people of different age group and gender, whose physical and mental disability forces them to be dependent on their children/relatives/others. When these groups livelihood is adversely affected by the project looking for an alternative livelihood, these disabled persons are also indirectly and severely affected.
Minority Transgender Community	In the Bangladesh context, the minority transgender community live in a commune of their own and work in a group for their safety and to avoid harassment. This group would then become vulnerable and need special attention and care from SDF, the project contractors, local administration including local police. During the project preparation stage, this group is to be identified by SDF and other IAs in close coordination with local administration, whenever possible with the help of District and Upazilla administration and given jobs at the project site to earn their livelihood.
Households in "Extreme Poverty"*	Vulnerable groups are likely to be economically benefitted by the project and the impact on them during operation is likely to below. However, if anyone of this group is affected, special care is to be taken with support to their livelihoods.

The World Bank uses an updated international poverty line of US $1.90 a day as a line for extreme poverty.

Chapter 4: Stakeholder Engagement Program

4.1   Information Disclosure

The project E&S documents (ESMF/P. ESIA, SEP, LMP, SECVDF/P, etc.) will be disclosed public comments and suggestions. Any additional E & S assessment materials that will be developed during implementation of the project, SDF will continue to follow a similar approach to disclosure.

According to the Bank's requirements, the ESMF report (together with the related environment and social management plan (ESMP)) in Bangla and English will be made available for public comments and consultations. The SEP will be issued concurrently with the ESMF in the public domain and will be available during the same time for the stakeholders' review. Distribution of disclosure will be made accessible at locations and places frequently visited by the community and sites to which unhindered access is available to the public.

Free printed copies of the ESMF/ESMPs and the SEP (along with the other E&S documents) in Bangla and English will be made accessible for the general public at the following locations:

- SDF Headquarters and affected District SDF Offices
- The District Administration offices
- Local NGO offices;
- Other designated public locations to ensure wide dissemination of the materials.
- Newspapers, posters, radio, television;
- Information centers and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings

Electronic versions of the ESMF/ESMPs, LMP, SECVDF, Gender/GBV Action Plan and SEP will be uploaded on the SDF website. This will allow stakeholders with access to the Internet to view the proposed project information and to activate their participation in the public consultation process. The website will be fitted with an online feedback function that will enable readers to leave their remarks about the materials disclosed. The mechanisms will be used for facilitating input from stakeholders. Proposed Information Disclosure Mechanism is given below.

Table 3: Information Disclosure Mechanism

Project stage	List of Information to be disclosed	Methods proposed	Timetable: Locations/Dates	Target stakeholders	Percentage reached	Responsibilities
Project Preparation Phase	SEP, ESMF/P, LMP, ESCP, SECVDF/P, ESIA, etc.	SDF website National and Local Newspaper advertisement District and Upazilla administration website and notice board SDF offices	As soon as the concerned documents are uploaded in the website/published	Expert in the field of E&S, Journalists, NGOs/CBOs, Local Population including local administration and local businessmen	85% of local peoples will be made aware of the project through the process	SDF
Construction	LMPs	SDF website, Signboard Brochures Gram Samity offices	As per need	Contractors, Villagers, local government representatives, Community Workers of the project		
Implementation phase	SEP, SECVDF/P, ESMF, LMP, ESCP, ESIA, etc.	SDF offices Meeting Brochures FGD Gram Samity offices	Quarterly/ As per need	Youth, Women, Business owners and associations at Community level, NGOs, local elected leadership	85% of local peoples will be made aware through the process	SDF in coordination with local administration

4.2   Proposed strategy for stakeholder engagement

Partner engagement programs will provide important data and opportunities for stakeholder groups to share their opinions on topics that matter to/affect them. The following table presents the tasks of partners involvement that SDF will conduct for the initiative.

Following after the Bank's rule in this respect amid the COVID-19 circumstance and given the confinements forces on open meeting and gatherings, nuanced planning is vital to guarantee that stakeholder engagement and meetings comply with theCOVID-19 related safety measures.

The methods used would vary considering the COVID-19 situation, as applied, according to the target audience and would include:

i.   Public/community meetings, separate meetings for women and vulnerable
ii.   Face-to-face meetings
iii.   Focus Group Discussions/Key Informant Interviews
iv.   Workshop with the stakeholders/communities
v.   Surveys, polls etc.
vi.   Interviewing stakeholders and relevant organizations
vii.   Mass/social media communication (as needed)
viii.   Disclosure of written information: brochures, posters, flyers, website

General principles for stakeholder engagement during COVID-19

- Be sure that all task team and PIU members have a good understanding of social behaviour and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings.
- Where direct engagement with project-affected people or beneficiaries is necessary and cannot be postponed, identify channels for direct communication with each affected household via a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators
- If physical meetings are not permitted, diversify means of communication and consider which communication channels are applicable in the local context. Rely on local engagement partners to understand which channels are used by local community members in this non-normal situation to determine which mechanisms can be used to reach the right audience. List out both ICT-based mechanisms and non-ICT approaches that suit local conditions.

Online Consultations

The format of such workshops could include the following steps:

- Preparation before the occasion is significant: to test technology, create important messages, create Frequently Asked Questions.
- Virtual enrolment of applicants: applicants can register online through a devoted platform.
- Dissemination of workshop materials to members, including plan, project reports, slides, surveys and discussion points: These can be conveyed online to members.

- Review of conveyed data resources: members are given a planned term for this, prior to planning a discourse on the data provided.

- Discussion, criticism assortment and sharing members can be coordinated and appointed to distinctive theme branches, groups or virtual 'platforms' if they consent to this. 60 -90 minutes is about greatest you need individuals to be online at a time.

- Group, panel and table discussions can be coordinated via web-based social media tools, for example, WhatsApp, Zoom, Facebook Messenger, Skype or zoom etc. Utilize voice feedbacks or chat mechanisms more as appropriate.

- Concluding Remarks and summary: The chair of the workshop should summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.

Table 4: Proposed Strategy for Stakeholder Engagement

Stage	Target stakeholders	List of Information to be Disclosed	Method(s) used (following COVID-19 safety measures)	Location/frequency	Responsibilities
Stage 1: PLANNING, ESMF/RPF/SEP Disclosure (Project preparation (Project design, Scoping, Resettlement	Project Affected People: • People residing in the project area (within 1` milometer of the project's radius) • Local administration and local leadership	• Project scope and rationale • ESMF, ESMP, SECVDF/P, SEP, LMP disclosures • Project E&S principles • Grievance redress mechanism process including GRC Composition • SEA/SH Action Plan	• Public meetings, separate meetings for women and vulnerable as required • Face-to-face meetings • Mass/social media communication (as needed) • Disclosure of written information: brochures, posters, flyers, Information boards at the project area in Bangla, • Grievance redress mechanism • SDF newsletter and website • Discussion and public consultation, technical assessment	• The project area for disclosure of the ESS documents • Continuous communication through mass/social media and routine interactions • Throughout SEP development as needed • At a central place convenient for all stakeholders • Immediately after finalizing of the ESF documents and then as and when required • As and when required- at different stages	• SDF RELI team, MD
	Other Interested Parties (Internal) • As required	• Project scope, rationale and E&S principles • ESF documents • Grievance redress mechanism process • SEA/SH Action Plan	• Face-to-face meetings • Joint public/community meetings with PAPs • Public Disclosure	• Throughout SEP development as needed or as and when demanded by the affected community • Disclosure meetings in the nearby location	• SDF RELI team, MD
	Other Interested Parties (External) • Press and media • NGOs, CBOs • Businesses and business organizations	• Project scope, rationale and E&S principles • ESF documents • Grievance redress mechanism • SEA/SH Action Plan	• Public meetings, training/workshops (separate meetings specifically for women and vulnerable as needed) • Mass/social media communication	• Project launch meetings in District/Upazilla/Union level • Communication through mass/social media (as needed) • Information desks with	• SDF RELI team, MD

Stage	Target stakeholders	List of Information to be Disclosed	Method(s) used (following COVID-19 safety measures)	Location/frequency	Responsibilities
	• Academic institutions • National Government Ministries • Government Departments • The general public • Young people and youth groups/associations, jobseekers		• Disclosure of written information: Brochures, posters, flyers, website • Information boards at the Project Site • Grievance redressal mechanism • Notice board for employment recruitment	brochures/posters in project-affected locations (Bangla and English) • Public forums in project areas	
STAGE 2: Implementation phase	Project Affected People • People residing in the project area • Vulnerable households	• Grievance redressal mechanism • ESF documents • Employment opportunities • Project status • SEA/SH Action Plan	• Public meetings, workshops • Separate meetings as needed for women and vulnerable • Individual outreach to the Vulnerable persons/groups and minority Transgender community as needed • Disclosure of written information: brochures, posters, flyers in Bangla, website • Notice board(s) at construction sites (Bangla) • Grievance redressal mechanism • SDF newsletter	• Community meetings during the civil constructions • Communication through mass/social media as needed • Notice boards updated weekly • Routine interactions • Brochures in local offices	• SDFRELI team, MD • Contractor/sub-contractors •
	Other Interested Parties (External) • Affected community's representatives	• Project scope, rationale and E&S principles • Grievance redressal mechanism • Project status	• Face-to-face meetings • Joint public/community meetings	• As needed	• SDFRELI team • PD • Consultants • Contractor/sub-contractors

Stage	Target stakeholders	List of Information to be Disclosed	Method(s) used (following COVID-19 safety measures)	Location/frequency	Responsibilities
	Other Interested Parties (External) • Press and media • NGOs • Businesses and business organizations • Academic institutions • National Government Ministries	• Project information - scope and rationale and E&S principles • Project status • Health and safety impacts • Employment opportunities • Environmental concerns • Grievance redressal mechanism process	• Public meetings, open houses, training/workshops • Disclosure of written information: brochures, posters, flyers, website, Information boards in SDF • Notice board(s) • Grievance redressal mechanism	• Community meetings during the civil constructions • Communication through mass/social media as needed • Notice boards updated weekly • Routine interactions • Brochures in local offices	• SDFRELI team, MD
	Other Interested Parties (Internal) • Other SDF staff • Supervision Consultants • Contractor, sub-contractors, service providers, suppliers and their workers	• Project information: scope and rationale and E&S principles • Orientation on ESF/E&S requirements and other sub-management plans • Grievance redressal mechanism	• Face-to-face meetings • Training/workshops • Invitations to public/community meetings	• As needed	• SDFRELI team, MD
STAGE 3: post-implementation Operation and maintenance	Project Affected People: • People residing in the project area • Vulnerable households/persons	• Satisfaction with engagement activities and GRM • Grievance redressal mechanism process • Damage claim process	• Outreach to individual PAPs • SDF website • Grievance redressal mechanism • SDF newsletter	• Outreach as needed • Meetings in affected Area (as needed/requested) • SDF newsletter	• SDFRELI team, MD
	Other Interested Parties (External) • Press and media • NGOs, CBOs • Businesses and business	• Grievance redressal mechanism process • Issues of concern • Status and compliance reports	• Grievance redressal mechanism • SDF website • Face-to-face meetings • Submission of reports as required	• As needed	• SDFRELI team, MD

Stage	Target stakeholders	List of Information to be Disclosed	Method(s) used (following COVID-19 safety measures)	Location/frequency	Responsibilities
	organizations • Academic institutions • Local Government Departments, Local Leadership • General public				

4.3   Review of Comments and closing of feedback loop

The comments/feedback received from the stakeholders will be compiled (including written and oral remarks) and looked into, and the project management will take actions as necessary based on the feedback. To close the feedback loop circle, the project's subsequent follow-up actions will be detailed back to partners though the following process:

- Feedback or remarks are gotten form the partners verbally or in the composed structure at the project level
- The assigned staff would sum up the remarks and bring to the notification of the MDRELI, SDF
- The MD would take actions to the remarks by verbally or written way at the project level (If the remarks are in the composed structure then reply will be written manner)
- The MD may likewise himself/herself organize the meeting with respective stakeholders
- The SDF Board will be brought into notice will address the issue if it is not tackled by the MD
- The responsible Officer will share the summary of the comments to stakeholders at every level.
- A set of accounts of these will be kept and preserved in written version and uploaded in the appropriate website for simple access of all

In the current project, SDF invites proposal and remarks from the stakeholders. SDF would make a significant move based on the proposals from the nearby peoples and chose delegates' in addressing the recommendations.

Chapter 5: Roles, Responsibilities and Resources for Stakeholder Engagement

5.1   Resources

The administration, coordination and execution of the SEP and its necessary tasks will be the duty of assigned team member/unit within SDF Head Office, its district and field offices. According to previously mentioned conversation, the project will guarantee essentials logistics and financial plan to execute the SEP. The contact information of SDF is given below:

Description	Contact details
Company:	SDF
To:	Managing Director
Address:	22/22, Khilji Road, Mohammadpur, Dhaka - 1207
E-mail:	info@sdfbd.org
Website:	www.sdfbd.org
Telephone:	+8802-58157625-28
Fax	+880 2 58157623

Table 5 Tentative budget for implementation of SEP

1	Stakeholder Engagement Activities	Quantity	Unit Cost (BDT)	Times/Month	Total Cost (BDT)
1.1	Staff salaries *Specialist (as assigned)	1	350,000	60	21,000,000
1.2	Travel expenses	1 specialist	10,000	60	600,000
1.3	Stakeholder/Community/ Sensitization meeting	10/year	25,000	5	1,250,000
1.4	Meeting with Upazilla Administration and Union Parishad	10/year	25,000	5	1,250,000
1.5	Meeting with District Administration	4/year	40,000	5	1,000,000
1.6	Communication Materials (Posters, Brochure, Flyers, Billboard, website, etc.)	Lmpsum/year	300,000	5	1,500,000
2	**Grievance Redress Activities**				
2.1	Staff salaries *Specialist (as assigned)	1	350,000	60	21,000,000
2.2	Travel expenses	1 specialist	10,000	60	600,000
2.3	GRM MIS Database	Lump sum	300,000	==	300,000
2.4	Expenses for GRC meetings	Lump sum	500,000	5	2,500,000
2.5	Contingency (5%)				1,470,000
Total					**52,470,000**

Or, USD $ (1 US$ = 85 taka)   617,294

5.2   Management functions and responsibilities

SDF will recruit 2 staff from the market as relevant for the position of a Stakeholders Engagement Specialist and a Social Specialist: Grievance Redress Mechanisms (GRM) to handle the SE and GRM respectively. The Experts will assist the MD (or other related management unit Director in SDF, as applicable) to carry out the related tasks, and will be, in turn, assisted by the assigned staffs by SDF at regional, district and field offices.   nominate staff to assume the responsibilities of the Stakeholder Engagement Specialist or recruit from the market as relevant. S/he will assist the MD (or other related management unit Director in SDF, as applicable) to carry out the related tasks, and will be, in turn, assisted by the assigned staffs by SDF at regional, district and field offices.

The roles and responsibilities of the specialist/expert is provided below:

Responsibilities of the expert engaging stakeholders will include the following:

- o Develop, implement and monitor all stakeholder engagement strategies/plans for the Project;
- o Oversee all stakeholder engagement related activities for the Project;
- o Manage the Grievance redressal mechanism;

- o Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement;
- o Liaise with the MD to ensure that stakeholder engagement requirements/protocols are understood; and
- o Proactively identify stakeholders, project risks and opportunities and inform the senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

The roles and responsibilities of the Social Specialist: Grievance Redress Mechanisms (GRM) is provided below:

Responsibilities of the GRM expert engaging stakeholders will include the following:

1. Managing the grievance redress mechanism and the GRM team
    a. Receive community complaints and concerns and record them in a database.
    b. Resolve complaints and concerns as appropriate.
    c. Assign complaints that cannot be resolved by the GRM Specialist to a complaint owner within the program.
    d. Follow up with complaint parties to ensure complaint resolution is advancing on time and using a fair process.
    e. Update complaint information in the database regularly.
    f. Review complaints regularly and close them out when appropriate.
    g. Monitor any resolutions to grievances to ensure they are implemented.
    h. Prepare periodic reports on the grievance redress mechanism
2. Engaging with stakeholders
    a. Provide information about the grievance mechanism to community stakeholders.
    b. Inform management of concerns and complaints received by the grievance mechanism.
    c. Work with program staff to notify community members of activities that may lead to community concerns or complaints before the program undertakes the activities.
    d. Work with staff tasked with community engagement (e.g. field staff) to understand community issues before, during, and after community engagement
3. Institutionalizing the grievance redress mechanism
    a. Draft and periodically update a GRM Manual with operating procedures and an organogram for grievance redress
    b. Train pertinent staff on grievance redress procedures

Chapter 6: Grievance Mechanism (GM)

6.1   GRM Monitoring and Reporting

To address complaints and grievances SDF will set up a GM by considering the general requirement for the all-out project period. The system will assist with settling issues/ grievances agreeably and in a time-bound manner. The GM will, however, not bar an aggrieved individual to go to the courts of law.

SDF has past experiences of working with the Bank and the ongoing Bank-funded NJLI project has a three-tier functional and effective GM, based at district/field level, Regional level and Head Office. This GM will be further reviewed and improved together specific GM for labor and SEA/SH.

Composition of the Local/District Level GRC

The district local level GRC will be composed of 3-5 members which will include representatives of project beneficiaries. In areas where there are small ethnic community, a member from them will be co-opted in the GRC. The GRC will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice.

All cases at the local level will be addressed within 5 days and on account of GBV cases. Complaints received through any channel will be enlisted and notice of receipt with the confirmation of essential evaluation and resolution given will be recorded and a notice of receipt of the grievance will be shared with the aggrieved individual. The SEA/SH related complaints will be dealt with according to the convention set down in the project's SEA/SH Action Plan which will keep up classification and maintain the standards of survivor focused methodology.

Composition at SDF Regional Office level

In case of any decision being found unacceptable at the local/district level by the aggrieved individual(s), the cases will be forwarded to the Regional office. The Regional office GRC will take cognizance of the case and will deliver a decision within 7 working days.

Composition at SDF HQ level

In case of any decision being found unacceptable at the regional GRC stage by the aggrieved individual(s), the SDF HQ will take charge of the case and they will be provided with the minutes of the hearings at local stages. MD will play the role of convener, assisted by the Stakeholder Engagement Specialist and other SDF staffs as relevant. the MD will resolve the grievance within 15 days.

The details of the complaints and their resolution will be recorded by the GRCs in a register with intake details, resolution procedure and the closing process. SDF will maintain the following three Grievance Registers:

- **Intake Register**: (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection, (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.
- **Resolution Register**: (1) Serial no., (2) Case no.,(3) Name of the complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.
- **Closing Register**: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7)

Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

Grievance resolution will be an ongoing task in the subproject level activities and implementation of those. All the resolved and unresolved grievances and complaints (one file for each case record) will be recorded by SDF both at local and head office level. The related records will be accessible for review in case of request by the Bank. The SDF will also create periodic reports on the grievance resolution process and share these reports with the World Bank. A sample format is provided in Annex 1.

6.2   GRM contact information - SDF

The project's website will also provide information on the project and future stakeholder engagement activities including GM and it will be posted on information board. The point of contact regarding the stakeholder engagement program at SDF is given below:

Description	Contact details
Company:	SDF
To:	Managing Director
Address:	22/22, Khilji Road, Mohammadpur, Dhaka - 1207
E-mail:	info@sdfbd.org
Website:	www.sdfbd.org
Telephone:	+8802-58157625-28
Fax	+880 2 58157623

Chapter 7: Monitoring and Reporting

The PMR unit of SDF in RELI, who will be primarily responsible for monitoring and evaluation, will periodically seek feedback and regular input from project staff and key stakeholder representatives. The SEP is a 'living' document and may be updated if required to maintain its relevance and functionality.

RELI's main mechanism for monitoring the progress and effectiveness of our communications activities, and receiving target audience feedback, will include:

- Monitoring visit and meetings with key stakeholder groups;
- Tracking communication activities and presence;

7.1   Reporting back to stakeholder groups

Responsible staff will collate month-wise overview and internal reports on public grievances and relevant matters, in addition to the status of implementation of associated preventive/reconciliatory measures and refer it to senior management of the project(s). Through the monthly overview, a design can be developed for evaluating the number and type of the complaints and seeking for information, along with the project's capacity in dealing with those timely and effectively.

However, the intensity of exchange and stakeholder engagements differs from one stage to another of the project. Regardless, upon input of grievance, the mandatory time period would be firmly maintained to find resolution of all grievance cases.

The dissemination of the information among the stakeholders on public engagement programs carried out by the Project during the year can be operated in two ways:

- Publishing a standard standalone annual report on the project's exchange with the stakeholders
- Regular monitoring of the multiple Key Performance Indicators (KPIs) 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;
  - Amount of Project's investments in the local communities in the Project Area of Influence.

7.2   Reporting to the World Bank

The Managing Director (MD) will share the progress report on the SEP to the World bank quarterly and annually where the Stakeholder related activities will be extensively documented. Detailed reports on the GM effectiveness, including a register of grievances received, addressed and the pending ones will be included in these reports.

Annex 1: Sample 'Grievance Form' and Grievance redressal mechanism of RELI–SDF

Grievance Form: SDF			
Grievance reference number (to be completed by Project):			
Contact details (maybe submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: ☐	By phone: ☐	By email ☐
Preferred language	☐ Bangla	☐ English	
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like SDF or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website ☐	Email ☐	By hand ☐
	In-person ☐	By telephone ☐	Other (specify) ☐
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of SDF official assigned responsibility			
Resolved or referred to GRC1?	☐ Resolved	☐ Referred	If referred, date:
Resolved referred to GRC2?	☐ Resolved	☐ Referred	If referred, date:
Completion			

Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1st proposed solution			
2nd proposed solution			
3rd proposed solution			

Annex 2: Minutes of Consultations

Social Development Foundation (SDF)

**Minutes of the Virtual Consultation Workshop of Stakeholders' on
Environmental & Social Management Framework (ESMF)**

The virtual consultation workshop of Stakeholders' was held on 20th September 2020 at 10.00 am. at the Conference Room of SDF Head Office. At the beginning of the plenary, participants connected through the cloud-based conference service had a short meet and greet with each other. Amongst others, the respected chairperson of SDF, Mr. Md. Abdus Samad (Senior Secretary, PRL), Mr. A.Z.M Sakhawat Hossain, Managing Director, SDF, Mr. Istiak Sobhan, Environmental Specialist from the World Bank, Mr. Kirti Nishan Chakma, Social Development Specialist of the World Bank, Mr. Md. Shahad Mahabub Chowdhury, Consultant, Mr. Md. Golam Faruque, Director (Implementation & Program Quality Development), Mr. Md. Mahbubul Alam, Director (F&P), all General Managers of SDF's head office and other personnel from SDF's regional and district and representatives of stakeholders' from GOs and NGOs were virtually connected in the workshop (the list of participants is attached in Annex-1).

Immediately after the plenary session of the workshop, the respected chairperson of SDF, in his speech, opined that poverty eradication is the most important agenda for us, and job creation can play a pivotal role. In this regard, he particularly referred to the stimulation package of our honorable Prime Minister to distribute grants to the COVID-19 affected during the lockdown period and praised her prudent decision. Praising her prudent decision, he added that it would have been almost impossible to get the nation back to work after lockdown without the stimulus package, and providing relief for a long time is not possible as well. Quoting the 7th Five Year Plan and 8th Five Year Plan, he said that the main focus of the Government is to eradicate poverty and SDF is working in this particular area. He stated that SDF mobilized the poor community and formed village institutions and as a result, they are distributing revolving loans to the beneficiaries to start income-generating activities. With this loan, the poor beneficiaries are investing in their poultry farm, mini beef fattening farm, cow and goat rearing, etc. He commented that the environment can be polluted in many ways during livelihood intervention, for instance, construction of roads sometimes creates waterlogging and the everyday life of people creates waste that should be managed properly. However, referring to SDF's project as a good instance of environmental management he informed that all environmental and social issues are addressed before project implementation. He confirmed the partakers that SDF would consider associated environmental and social issues with great emphasis in its upcoming project scheduled to be started from March/April 2020 and this is why he sought the opinion of everyone connected. After is invaluable speech, he inaugurated the workshop.

Managing Director of SDF, Mr. A.Z.M Sakhawat Hossain started his speech citing the establishment of SDF that it was the brainchild of our honorable Prime Minister and instituted in 2000 by her kind instruction to work as a salient partner of the Govt. of Bangladesh. He added that SDF has been working to alleviate poverty since 2001 to support Government's development agendas and the poverty rate gradually plummeted to 22% over time because of the statesmanship of the honorable Prime Minister. He expressed satisfaction that access to education is now equal to both gender and boys and girls are continuing their education as well. Informing the audience, he said that SDF is now perusing 9 out of 17 SDGs through implementing NJLIP which was planned to be completed by December 2020; however, the Covid-19 pandemic interrupted the plan out of the blue. Despite it would be completed successfully by 30th June 2021, he hoped. Mr. Hossain thanked all Government officials connected to the workshop for their support and cooperation and said that the new project

is set to start from March/April 2021. In this regard, he also conveyed his sincere appreciation to the World Bank officials based both in Washington and Bangladesh office. Referring to the establishment of water treatment plants in Khulna and Satkhira districts, he stated the uniqueness of SDF for the fact that SDF assists the community both in cash and non-cash activities whist others work in either of the two. He stressed considering the geographical location to assist the community in selecting appropriate livelihood activities. He informed that so far, a total of 75,000 youth received skill development training and some of whom are now working in salaried jobs or some are pursuing entrepreneurship. As an example, he mentioned one trained youth member who started Restaurant and cafeteria business in Satkhira. He also informed that under the nutrition activities, SDF is raising awareness among beneficiary members about the importance of nutritious food, maintaining healthy lifestyles and child care, etc.

After the speeches, Director (Implementation & Program Quality Development) presented the overall project activities of NJLIP currently being implemented focusing on the areas stated underneath:

- About SDF and its implemented project, budget, duration, and objective of the project, etc.
- At a glance of NJLIP;
- Village Development Fund (VDF) and its usage;
- Second-tier institutions, the sustainability of the village institution, type of fund, and its usage.

Mr. Md. Shahad Mahabub Chowdhury, Consultant presented on Environmental and Social Safeguard issues including the following areas:

- The necessity of E & S risk assessment;
- List of the documents of ESMF;
- What is the Environmental and Social Management Framework (ESMF)
- ESMF include Categorization of Sub-project;
- Risk categorization of NJLIP in terms of the extent of environmental and social impact;
- Labor management methodology;
- Small Ethnic groups development framework;
- Stakeholder inclusion planning;
- Environmental and Social Monitoring and Audit.

Recommendations of the some of the participants of the workshop:

- Duration of the training needs to be increased in the area of Beef Fattening/cow rearing (at least 3-4 days);
- Day-long practical field visit to be introduced in the said training.
- Quality seed and feed should be used;
- Should avoid high density/overstocking of fish in the pond;
- Should avoid using steroid hormone in the private hatchery;
- Should avoid using huge amount of antibiotic;
- Should avoid using poultry litter/discharge for fish cultivation;
- More training and awareness program should be Introduced;
- The duration of the training needs to be increased;
- Increasing awareness of primary health care and nutrition for the beneficiaries;
- Developing awareness among beneficiaries on preventive measures to diseases:
- Organizing training on nutritious food production for beneficiaries;
- Managing a risk-free working area.
- Applying the IPM Method for vegetable cultivation;
- Promoting organic manure and vermicompost preparation and use;

- Establishing a demonstration plot on vermicompost in minimum 5 villages;

- Distributing submersible tube-well to the beneficiaries.
- Undertaking palm tree plantation in project areas to prevent lightning due to climate change;
- To consider increasing the width of rural roads from 5 feet to 7 feet for the easy movement of transport;
- To include patriotic contents and values in SDF's training sessions;
- To construct separate rooms in school buildings and more toilet facilities for adolescent girls for their privacy;
- Taking the help of Upazila Parishad for Risk Analysis Guidelines for adopting new infrastructure sub-projects;
- To supply sanitary pad to the adolescent girls and making them aware of the importance of nutritious food, healthy lifestyle, child marriage, etc.;
- To take effective initiative for proper waste management.
- To implement projects on water supply,
- To construct palisade/protection wall in roadside etc.
- SDF should implement the idea of the Father of the Nation, Bangabandhu Sheikh Mujibur Rahman's co-operative based economy and social system.
- Developing alternative water sources i.e. rainwater harvesting, PSF, etc. instead of installation tube well because the groundwater layer goes down rapidly;
- Increasing coordination with local organizations;
- Duration of training related to livestock needs to be increased;
- Informing communities about new ideas, technological options, etc. on livestock;
- He promised to provide all-out cooperation.
- Usage of ES & IEE form for preparing rural infrastructure sub-projects and SS form for livelihoods activities;
- Knowing the negative and positive impact of rural infrastructure sub-projects and livelihood activities and considering EMP and SMP taking all negative impacts and its mitigation measures into account.
- Simplifying ES, IEE, and SS form for use by communities.
- Using alternative methods, IPM and tools i.e. pheromone, light traps, Vermicompost, and organic pesticides instead of chemical pesticides and to protect the environment.
- Using ES and SS form for identifying impacts of the project;
- Simplifying ES and SS form.
- Assisting Producer Group (PG) members to expand the production of non-toxic vegetable;
- No obligation for filling any format for green and orange-A category sub-projects.
- Ensuring free ministerial health awareness programs among adolescent girls as well as distributing free sanitary napkins to them;
- Budget allocation for EMP implementation needs to be kept with a sub-project estimate.
- Simplifying ES, IEE, and SS form.

Overall remarks of some participants:

Mr. Md. Ishtiaque Mahmood, GM (Governance & Accountability) of SDF, informed that Bangladesh has achieved remarkable success in economic and social indicators in recent times and ahead of neighbor countries in nutrition and health. He added that the success of Bangladesh in sanitation is 99%. He recommended that we should give importance to aware communities on social issues like child marriage, dowry, human trafficking, drug addiction, terrorism, militancy, etc.

Mr. Md. Mahbubul Alam, Director (Finance & procurement) of SDF commented that we always give emphasize on economic development but ignore environmental and social issues in development. For the long term sustainability of the development of poor communities, he further added, we should consider the environmental and social impact to implement project activities.

Mr. Istiak Sobhan, the Environmental Specialist from WB, told that he visited many villages under NJLIP and well aware of the capacity of the beneficiaries that they know about both negative and positive impacts and usage of ensuring the quality of constructions materials. He informed us that they are now addressing environmental and social issues very well. He also mentioned that the communities are now taking a small number of loans for small income-generating activities where environmental and social issues are not considered properly, however, in the upcoming project, the number of loans will be increased and IGA will be on a larger scale considering the environmental and social issues.

Mr. Md. Shahad Mahabub Chowdhury, Consultant, ESMF:

- ESMF is created and approved in many organizations but not implemented in most. However, SDF is far ahead of many other organizations he had come across.
- ESMF is being implemented well in NJLIP.
- He is not certain that beneficiaries and SDF's staffs at the implementation level can interpret IEE correctly. So, IEE needs to be simplified.

Concluding remark of the Managing Director, SDF:

The Managing Director of SDF told us that all ideas and suggestions which come from the workshop will be considered during the implementation phase of the new project. He then concluded the workshop with a vote of thanks.