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Local Government Engineering Department
Department of Public Health Engineering
Bangladesh Power Development Board
Roads and Highways Department

**Host and Rohingya Enhancement of Lives Project
(HELP)**

Project Code: P501274

Stakeholder Engagement Plan (SEP)

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The preparation of the Stakeholder Engagement Plan (SEP) for Host and Rohingya Enhancement of Lives Project (HELP) 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 SEP will be followed throughout the project life cycle and will be considered a living document to 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 activities under the Implementing Agencies, here LGED, DPHE, RHD and BPDB 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 Implementation Units (PIUs) will establish and operate Grievance Redress Mechanisms (GRMs) to receive, register and attend to project-specific grievances that may potentially rise in the project cycle. The GRM will be of three tiers; local level (separate for camp and host communities), PIU level and Steering committee 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 staff 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 15 working days. All proceedings of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by the Implementing Agency (IA). All Environmental and Social (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, expected benefits and potential adverse impacts, entitlements including compensation and assistance to be given to project affected people, 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:

- Project and sub-project activities. Timeline and progress of the Project and sub-project by components.
- Information on beneficiary participation.
- Information on compensation/entitlements related to expected impacts of the Project/sub-project.
- 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

BoQ	Bill of Quantities
CoC	Code of Conduct
CHS	Community Health and Safety
COVID-19	Novel coronavirus disease
DRP	Displaced Rohingya Population
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
HELP	Host and Rohingya Enhancement of Lives Project
HNP	Health, Nutrition and Population
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HNP	Health, Nutrition and Population
LMP	Labor Management Plan
HSD	Health Services Division
ICT	Information and Communications Technology
IEDCR	Institute of Epidemiology and Disease Control Research
ILO	International Labor Organization
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

PV	Photo Voltaic
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
WASH	Water, Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization

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1. Introduction/Project Description

This Stakeholder's Engagement Plan (SEP) is prepared for Host and Rohingya Enhancement of Lives Project (HELP) financed by World Bank and implemented by Local Government Engineering Department (LGED) and Department of Public Health Engineering (DPHE) under the Ministry of Local Government, Rural Development and Cooperatives, Bangladesh Power Development Board (BPDB) under the Ministry of Power, Energy and Mineral Resources) and Roads and Highways Department (Ministry of Road, Transport and Bridges). The project aims to support Displaced Rohingya People (DRPs) residing in 33 camps in Ukhiya & Teknaf Upazilas of Cox's Bazar District (CXB), Bhasan Char (BC) island in Noakhali District comprising 1700 hectares of government land, formed by Himalayan silt in 2006, 37 miles away from the mainland and host communities. The project will also operate in host communities (HC) in CXB District and Bandarban district.

The Project Development Objective is to improve access to basic services and enhance disaster and climate resilience of the host communities and Displaced Rohingya Population (DRP). Progress towards the PDO will be measured through the following three indicators: i) People with access to improved basic services because of the project ii) People with increased disaster and climate resilience as a result of increased disaster protection standard and increased access to climate resilient multipurpose disaster shelters and iii) Strengthened government capacity to respond to emergencies in the camp areas and to sustain basic services delivery in host communities.

The project aims to improve access to basic services and enhance disaster and climate resilience of DRP and the host communities.

The HELP comprises of four components:

- **Component 1:** will finance necessary infrastructure and programs to enhance reliable access to safely managed and gender-sensitive WASH facilities with climate resilient features to reduce risks of damage from climate extremes and disasters and to reduce emissions from WASH-related activities.
- **Component Two:** will support improved access to basic services, climate-resilient infrastructure, and disaster and emergency response services in a socially inclusive manner through interventions related to resilient transport infrastructure, renewable energy supply and lighting, disaster risk reduction, improvement of markets and growth centers, and disaster preparedness and response programs.
- **Component 3:** will strengthen the Government of Bangladesh (GoB)'s capacity to provide essential services and address the needs of the host communities and the DRP, including risks to disasters and climate change.
- **Component 4:** Contingency Emergency Response will ensure provision of immediate response to an eligible crisis.

The Project proposes the following activities which are similar to those ongoing under the Emergency Multisector Rohingya Crisis Response Project (EMCRP): provision of water supply, fecal sludge management, solid waste management, construction/upgrading of infrastructure like rehabilitation of rural roads, cold storage, ICT facilities for an early warning system, public lighting, expansion of existing disaster shelters; natural and earthen slope stabilization, and capacity strengthening of the GoB. In Bhasan Char, sustainable power generation and distribution will be enhanced, given the absence of connection to the country's main grid. The activity will involve the construction and commissioning of an eight MW hybrid power plant using solar sources and a battery energy storage system (BESS) by the BPDB.

The locations are prone to floods and landslides. The camp areas in CXB are already modified habitats. No project activities will be permitted to impact forests, nor any other natural habitat. CXB division has small ethnic communities (SEC) meeting the criteria of ESS7, but project activities will not impact them negatively. The investment in Bandarban will support the rehabilitation of rural roads within existing alignments to climate-resilient standards to enhance communication and support year-round access to essential services for local communities.

The HELP is being prepared under the World Bank's Environment and Social Framework (ESF). All proposed activities under the Project will be subject to an Exclusion List, to screen out any High-risk related activity. No activity requiring any land acquisition, major displacement, bearing any type of adverse impacts on SECs will be permitted under the project.

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the LGED, DPHE, RHD and BPDB will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

As part of the core requirements, the preparation of the 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.

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. The SEP will:

- Involve interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensure that this information is taken into consideration when making decisions pertaining to the Project.
- Involve interaction with the Project Affected Parties (PAP) including 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 including children in the community, women, female-led households, persons with disabilities, waste handlers and waste pickers etc. It begins early during the project planning process to gather initial views on the project proposal and design.
- Ensure special arrangements are made for vulnerable groups such as women's only sessions with a female moderator at an appropriate time and place, universal accessibility for persons with disabilities and moderators speaking languages understandable to PAPs.
- Encourage 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.

- Ensure 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.
- Consider and respond to stakeholder feedback thereby closing the stakeholder loop.
- Support 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.
- Ensure that implementation of the SEP will be documented and disclosed prior to Project appraisal.

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.

3. Stakeholder identification and analysis per project component

3.1 Methodology

For the HELP, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

Component	Implementing Agency	Stakeholders	Analysis
Component 1: Resilient WASH	DPHE	Vulnerable Host Communities DRP (CXB and Bhasan Char), Women (for menstrual health and hygiene) Adolescents & Children Suppliers & Laborers Small Ethnic Communities Waste Handlers and Pickers	Vulnerable Host & DRP Communities: Directly impacted by improvements in water, sanitation, and hygiene facilities. Ensuring the well-being of both displaced populations and host communities is critical for social cohesion and public health. Women: Menstrual Health and Hygiene impacted by improvements in sanitation, and hygiene facilities. Adolescents, Children: Vulnerable groups requiring specific attention to address their unique needs and vulnerabilities. Small Ethnic Communities: Engaging diverse stakeholders to address specific needs, promote inclusivity, and enhance project sustainability. Waste Handlers and Pickers: Ensuring the most vulnerable populations are included to promote inclusivity and improve livelihoods.

			<p>- Contractors & Workforce: Their role is imperative in the implementation of project activities.</p>
<p>Component 2: Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response</p>	<p>LGED</p>	<p>Vulnerable Host Communities DRP in Bhasan Char Women and Children Disabled Rural Communities Disaster-affected communities Small Ethnic Communities Contractors, Suppliers & Laborers Waste Handlers and Pickers Local Government Officials Environmental Protection Authorities Health Authorities Residents Business Entities Individual Entrepreneurs</p>	<p>- Host Communities: Direct beneficiaries of improved infrastructure, energy access, and emergency response mechanisms, enhancing resilience and quality of life. – Rural and Disaster-affected Communities: Critical to ensure infrastructure enhancements and emergency response capacities to mitigate future risks and protect vulnerable populations.</p> <p>- Local Government Officials, Environmental Protection Authorities, Health Authorities: Responsible for oversight and coordination of development activities, ensuring compliance with regulations and safeguarding public health and environmental integrity.</p> <p>- Residents, Business Entities, Individual Entrepreneurs: Stand to benefit from enhancement of infrastructure, increased employment opportunities, and improved service provision, contributing to local economic development.</p> <p>- Suppliers, Contractors, Laborers: Their role is imperative in the implementation of project activities.</p>
	<p>RHD</p>	<p>Road users Host Communities Rural Communities Other Local Communities Disaster-affected Communities Contractors, Suppliers & Laborers Waste Handlers and Pickers</p>	<p>- Host Communities: Improving rural connectivity, accessibility, and resilience to disasters, promoting economic growth and social development.</p> <p>- Disaster-affected Communities: Mitigating risks and enhancing resilience through robust infrastructure and emergency response measures.</p> <p>- Local Population: Directly impacted by road improvements, benefiting from enhanced mobility and access to services.</p> <p>Waste Handlers and Pickers: Ensuring the most vulnerable</p>

			<p>populations are included to promote inclusivity and improve livelihoods.</p> <ul style="list-style-type: none"> - Suppliers, Contractors, Laborers: Their role is imperative in the implementation of project activities.
	BPDB	DRP in Bhasan Char	<ul style="list-style-type: none"> - DRP: is the primary beneficiary, expected to benefit from improved living conditions and socio-economic opportunities through access to electricity. - BPDB: Will provide sustainable energy solutions. - Suppliers, Contractors, Laborers: Their role is imperative in the implementation of project activities.
Component 3: Strengthening Institutional Systems to Enhance Service Provision and Support Integrated Resilient Development	DPHE, LGED, RHD, BPDB, DoE	<p>Vulnerable Host Communities DRP Women Government Officials Civil Society Local Politicians National & International Health Organizations NGOs Suppliers Contractors, Agencies in WASH Sector Sustainable Energy Agencies Small Ethnic Communities Waste Handlers and Pickers</p>	<ul style="list-style-type: none"> - Government Officials, Local Government Officials, Environmental Protection Authorities, Health Authorities: Critical for ensuring effective governance, regulatory compliance, and sustainable service provision. - Vulnerable Host Populations, DRP & Other Local Vulnerable Populations: Benefitting from improved service delivery, economic opportunities, and disaster resilience. - Suppliers, Contractors, Laborers: Their role is imperative in the implementation of project activities. - Agencies in WASH Sector, Sustainable Energy Agencies, NGOs, National & International Health Organizations: Providing expertise, resources, and support to address complex challenges and promote community well-being. - Small Ethnic Communities, Waste Handlers and Pickers: Will be benefitting from improved service delivery, economic opportunities, and disaster resilience. Engaging diverse stakeholders to address specific needs, promote inclusivity, and enhance project sustainability.
Component 4: Contingency			

Emergency Response (CERC)	N/A at this stage	N/A at this stage	N/A at this stage
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3.2. Affected parties.

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Displaced Rohingya People
- Local host communities.
- Women, adolescents, children living in the camps and host communities.
- Communities in the vicinity of the project’s planned activities, including host communities.
- Waste (solid and liquid) handlers and waste-pickers in the camps and host communities
- Local population and communities including local/neighborhood associations/clubs, youth groups/associations.
- Small Ethnic Communities living around the project area.
- Residents, business entities, and individual entrepreneurs around the project that can benefit from the employment, training and business opportunities.
- Local government officials in the project area, environmental protection authorities and health authorities

3.3. Other interested parties

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

- Officials of Government agencies, directly and indirectly linked with project.
- Local and national media, including electronics and print media.
- Participants/ influencers of social media
- Civil society and local Politicians
- Other national and international health organizations
- National & International NGOs currently operating in camps and host communities.
- Businesses and service providers in WASH sector
- Suppliers, contractors and contractors’ workforce, etc.
- Agencies working with sustainable energy sources.

3.4. Disadvantaged / vulnerable individuals or groupsⁱ

It is crucial to assess whether the effects of the project might unfairly affect individuals or groups who are disadvantaged or vulnerable. These individuals often lack a platform to voice their concerns or fully comprehend the project's impacts. To address this, it is important to tailor awareness-raising and stakeholder engagement efforts for these groups, considering their specific sensitivities, concerns, and cultural aspects. Vulnerability can arise from various factors such as origin, gender, age, health, economic status, financial insecurity, marginalized position in the community, dependence on others or natural resources, and more. Engaging with these vulnerable groups requires implementing specific measures and assistance to facilitate their involvement in project-related decision-making. This ensures that their awareness and input in the overall process are on par with other stakeholders. Within the project, these vulnerable or disadvantaged groups may encompass, but are not restricted to, the following:

- Displaced Rohingya People
- Transgender and LGBTQ groups/people
- People with disabilities
- Women
- Female-headed households
- Elderly (especially those of 60 years and above) people
- Low-income people from Small Ethnic Communities living in the project area
- Waste collectors
- DRP and host community laborers

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

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted.

Table 1: Summary of consultation meetings

No	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	Female	
01	27/01/24	Bhasanchar	FGD with the Navy and RRRC to debrief about the overall project	5	3	Potential locations for the substation, Potential E&S impacts and mitigation measures
02	28/01/24	Bhasanchar	FGD with the DRP	8	4	Potential locations for the substation, Potential E&S impacts and mitigation measures
03	16/01/24	In person	Local level consultation with the government officials, RRRC, CIC etc.	30	3	Discussed on the potential scopes of the LGED, DPHE, RHD and BPDB activities, and potential E&S impacts and mitigation measures.
04	16/01/24	In person	Consultations with the DRP communities	18	4	Discussed on the project scopes, benefits, and E&S issues, GRM and future consultation meetings.
06	15/01/24	In person	Local level consultation with vulnerable communities	28	9	Discussed on the project scopes, benefits, and E&S issues, GRM and future consultation meetings.

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

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 2: SEP Summary Table

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation SEA/SH Action plan Disclosure)	Project Affected People: DRP, People residing in project area, Vulnerable households	ESMF, LMP, SEP, ESCP, Gender and SEA/SH action plan and RPF; 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.	LGED, DPHE, RHD and BPDB PIUs
	Other Interested Parties (External) – NGO working in waste management, climate resilience issues and GBV sectors	ESMF, LMP, SEP, ESCP, Gender and SEA/SH action plan and RPF. 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	LGED, DPHE, RHD and BPDB PIUs
	Other Interested Parties (Internal)	ESMF, LMP, SEP, ESCP, Gender and SEA/SH action plan and RPF; Grievance mechanism	Public meetings, trainings/workshops (separate meetings specifically for	Project launch meetings with relevant stakeholders Meetings in affected locations/	PIUs

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	<p>Press and media Local NGOs, Different Government Departments having link with project implementation etc. General public, jobseekers etc.</p>	<p>Project scope, rationale and E&S principles</p>	<p>women and vulnerable people as needed) Mass/social media communication Disclosure of written information: Brochures, posters, flyers, website Information boards Grievance mechanism Notice board for employment recruitment</p>	<p>communities as needed. Communication through mass/social media (as needed) Information desks with brochures/posters in affected villages (continuous)</p>	
	<p>Other Interested Parties (External) Other Government Departments from which permissions/clearances are required. Businessmen, Contractors and suppliers</p>	<p>Legal compliance issues Project information scope and rationale and E&S principles Coordination activities Grievance mechanism process ESMF, LMP, SEP, ESCP, Gender and SEA/SH action plan and RPF;</p>	<p>Face-to-face meetings Invitations to public/community meetings Submission of required reports</p>	<p>Disclosure meetings Reports as required</p>	<p>PIUs</p>
<p>STAGE 2: Implementation Phase</p>	<p>Project Affected People, including Vulnerable community</p>	<p>Grievance mechanism Health and safety impacts (RAP, ESMP, ESIA community H&S, community concerns) Employment opportunities Project status</p>	<p>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,</p>	<p>Quarterly meetings during construction phase Communication through mass/social media as needed. Notice boards updated weekly. Routine interactions Brochures in local offices</p>	<p>PIUs</p>

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			website Information boards. Notice board(s) at construction sites Grievance mechanism -Local monthly newsletter		
	Other Interested Parties (External)	Project scope, rationale and E&S principles Grievance mechanism Project status	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction phase)	PIUs
	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	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 addressing GBV in respective community.	PIUs

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			GBV matter, local leadership, religious leaders, elders including women representatives, teacher of the local schools and Madrassas.		
STAGE 3: Operation and maintenance	Project Affected People including vulnerable community	Satisfaction with engagement activities and GRM Grievance mechanism process	Outreach to individual PAPs, PIUs website, Grievance mechanism, Newsletter	Outreach as needed. Meetings in affected people and villages (as needed/ requested)	PIUs
	Other Interested Parties (External), Press and media, NGOs linked with on GBV issue, Various Government Departments, local people,	Grievance mechanism process Issues of concern Status and compliance reports	Grievance mechanism PIUs websites Face-to-face meetings Submission of reports as required	As needed	PIUs

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	etc.				

4.3. Proposed strategy to incorporate the views of vulnerable groups.

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

The project will work in Bandarban where there are communities meeting the requirements of ESS7. The Project will not bear any adverse impact on Small Ethnic Communities and the proposed road rehabilitation works are expected to bring great benefits to the local communities through enhanced connectivity and access to essential services, trade centers and employment opportunities. This was demonstrable during preliminary screenings/survey conducted for the roadworks when the team had brief discussions with locals around the proposed alignments. The project does not permit any land acquisition and no adverse impact on any SEC land, or their livelihoods will be allowed as per the Exclusion List for the Project (attached to ESMF). Several detailed consultations will be held with communities, SECs, local government officials, SEC leaders and headmen, women, youth, NGOs and other civil society organizations in Bandarban.

5. Resources and Responsibilities for implementing stakeholder engagement

5.1. Implementation Arrangements and Resources

The Project Implementation Units (PIU) will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities are E&S and gender experts of all four PIUs, Design and Supervision Firm of LGED, Monitoring and Supervision Firm of DPHE and Supervision Firm of RHD. The overall responsibility for SEP implementation lies with the PIU director. LGED, DPHE and RHD PIUs will recruit three communication specialists (one communication specialist under each PIU) who will be field based.

The project's stakeholder engagement implementation arrangements are as follows:

PIUs 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 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 Implementation Unit (PIUs)

PIUs will have overall responsibility for project implementation and management. PIUs with the support of the communication specialists will coordinate the consultation and communication needs of the project as per the SEP.

The PIUs will (i) help to supervise and streamline the Grievance Redress Mechanism (GRM) management system based on the experience from field; (ii) provide support to respective camps and host communities 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.

Each project implementation agency will have a Project Implementation Committee (PIC), chaired by the head of agency (Chief Engineers of LGED, DPHE, RHD and Chairperson of BPDB), which will assist in the supervision of the respective components. The PIC is expected to include relevant representatives from ministries, divisions, departments/agencies. The PIC will ensure that implementation follows both Government and Bank rules and regulations. Specifically, the PIC will be responsible for: (i) supervising and reviewing implementation and providing necessary advice for timely delivery; (ii) monitoring and evaluating implementation progress and suggesting necessary course corrections; (iii) resolving issues and conflicts that may emerge during implementation; (iv) facilitation coordination and convergence with other line ministries, division, and departments/agencies; and (v) keeping the Project Steering Committee apprised on overall performance and key issues relating to the project.

The firms and contractors will provide the PIUs 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.

Table 3: Role and Responsibilities for SEP Implementation

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

The stakeholder engagement activities will be documented through PIUs.

Budget

The budget estimate for the preparing and implementing SEP is USD 26,500. The budget breakdown can be found in Annex2.However, this budget will be updated before implementation of this SEP.

6. Grievance Mechanism

A Grievance Mechanism (GM) is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.A three Tier GM will be established in this project. Detailed grievance management procedures at host communities and the camps are described in the Labor Management Procedures (LMP) and Annex 5 of this SEP.

Among the project's four IAs, LGED and DPHE have been implementing similar activities in Rohingya camps and host communities under the EMCRP. The same GM from EMCRP will continue for HELP

across certain districts. RHD will adapt a similar approach for SEC in Bandarban. BPDB will operate solely in Bhasan Char. Before specialists are hired, existing GMs or designated focal points will handle grievances. Each IA will provide monthly GM reports, compiled into quarterly reports by LGED's hired Project M&E Firm.

6.1 Description of Grievance Mechanism (GM)

Step	Description of process	Timeframe	Responsibility
GM implementation structure GM IN THE HOST COMMUNITIES	<p>Local level GRC Composition (all Upazilas where IA has activities):</p> <ul style="list-style-type: none"> Upazila Engineer/Sub-divisional Engineer (for RHD)/nominated official by the PD – Convener (from Upazila where complaint originates) Environment Specialist and/or Social Specialist or both, from the PIU (as per nature of the complaint) – Member-Secretary(s) (will be common across the GRCs for that particular IA) Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA - Member. Representative from respective Union Parishad (from where the complaint originates; must be female if the complainant is female) - Member. Representative from the community (teacher, NGO, or local person nominated by the complainant) –Member. 	<p>Specialists to be hired within 3-6 months of effectiveness.</p> <p>All cases at the local level will be heard within 10 days of their receipt.</p>	<ul style="list-style-type: none"> All complaints will be received at the Office of the respective Upazila Engineer (LGED/DPHE) Complains related to BPDB will be received at the site level project office by the E&S specialist. Complains related to RHD will be received at the site office by the E&S specialist
	<p>PIU Level GRC</p> <ul style="list-style-type: none"> Project Director- Convener Social Specialist and Environmental Specialist of PIU- Member-Secretary Local Government Representative (can be the same representative who was present at the local GRC hearing, or other as required; must be female if the 	<p>The decisions on unresolved cases will be communicated to the PIU level GRC and will be solved within 15 working days.</p>	<p>If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings of the local GRC to project level for further review. With active assistance from the PIU will make a decision and communicate it to the concerned GRC. The Social/Environmental</p>

Step	Description of process	Timeframe	Responsibility
	<p>complainant is female) - Member</p> <ul style="list-style-type: none"> Representative from the community (teacher, NGO, or local person nominated by the complainant – preferably the same person who was present at the local GRC hearing) – Member 		<p>Specialist at PIU with the support of member secretary of local GRC will make periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books</p>
	<p>PSC Level GRC</p> <ul style="list-style-type: none"> Representative of secretary from Respective ministry- Convener Project Director-Member-Secretary 	<p>Four weeks</p>	<p>All the unsolved cases at the project level, decisions on unresolved cases, if any, will be made in no more than four-week representative of the Secretary, respective ministry. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon IAs.</p>
<p>GM for CAMPS at COX'S BAZAR</p>	<p>Composition Camp GRC</p> <ul style="list-style-type: none"> Upazila Engineer/nominated official by the PD – Convener (from the Upazila where the Camps are located and from where complaint originates) Environment Specialist and/or Social Specialist from the PIU hired by each IA (as per nature of the complaint) – Member-Secretary (will be common across the GRCs in camps for that particular IA). Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA-Member. 	<p>All cases at the local level will be heard within 10 days of their receipt.</p>	<p>The Site Managers keep a Grievance Recording Book, reporting grievances as "Resolved" or "Not Resolved" to the Member Secretaries. They record and convey complaints to the Convener (Upazila Engineer) of the local GRC for investigation with the respective site manager and the complainant. Camp GRC must record all the grievances and address</p>
<p>GM at CAMPS in BHASANCHAR</p>	<ul style="list-style-type: none"> The same procedure and GRC composition will be followed in Bhasan Char. RHD will not have any activities in Bhasan Char. BPDB will only work in Bhasan Char. It does not have an Upazila level engineers and therefore the PD will be 	<p>All cases at the local level will be heard within 10 days of their receipt.</p>	<p>The Site Managers keep a Grievance Recording Book, reporting grievances as "Resolved" or "Not Resolved" to the Member Secretaries. They record and convey complaints to the Convener (Upazila Engineer) of the local GRC for investigation</p>

Step	Description of process	Timeframe	Responsibility
	the Convener of the GRC for them in Bhasan Char when complaints are received/recorded by the site managers.		with the respective site manager and the complainant. Camp GRC must record all the grievances and address
Grievance uptake	<p>Face-to Face: There will be a few field offices by the supervision firms/contractors, and each field office will nominate an individual to register complaints. He/ She will register to note the complaints and complaint forms to fill up. The form will be signed by both the staff and the Complainant.</p>	<p>Will be operated from 7 AM to 4 PM (at camp) Will operate 7 am to 7 pm (at host communities) This information will be disseminated to the public</p>	<ul style="list-style-type: none"> The complaint desk will be manned during working days only. For non-working days, virtual means (SMS, Telephone, email etc.) will be suggested. The field level staff will welcome the Complainant and make him/her comfortable and begin with greetings. The staff will note, fill up the company form, get complainant's signature and sign the form him/herself. The Staff will also provide estimated timeline and a tracking number. The Staff will also intimate the local GRC level for eligibility checking. <p>After eligibility check by the local level, the Staff will inform the Complainant if the complaint is eligible to be considered or otherwise. If not eligible, the Complainant will be provided other options (NGO, police, legal etc)</p>
	<p>Telephone: 01711-XXXXXX . Phone number of the Member Secretaries (this will be a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage), and the official number of the Upazila office/Sub-division office (for RHD) of the respective IAs – (this is a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage) All level telephone number is</p>	<p>Will be operated from 6 AM to 10 PM</p>	<p>Grievance site focal and E&S specialist Following will be noted (Action 1): <i>Name and address (none required if anonymity sought)</i> <i>Complaint, in summary</i> <i>Nature of Complaints</i> <i>If it is project related.</i> <i>Complaint against, if any</i></p> <p>Operator will (Action 2): <i>Register the complaint in a register</i> <i>Provide a tracking number</i></p>

Step	Description of process	Timeframe	Responsibility
	<p>attached with SEP for LGED.</p> <p>There will be telephone numbers available for all IAs.</p>		<p><i>Provide a timeline</i></p> <p><i>Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing)</i></p> <p><i>Intimate the first level of GRC about the complaint</i></p> <p><i>Intimate Central GRC aggregator</i></p> <p><i>After eligibility check by first/local level, inform the complainant if the complaint is eligible to be considered or otherwise. If not eligible, the complainant will be provided other options (NGO, police, legal etc.)</i></p>
	<p>Email: Project.GRM@email.com</p>	<p>Will be monitored as per above timing (12 hours)</p>	<p>Will be operated by the Social Development Specialist/Communication Specialist/ Any other nominated staff of the PIU at Project Office. If no details are given will request number (Action 1) above. If phone number is given, the Complainants will be called to get the above information, else email will suffice. Then the Staff will carry out Action 2 above.</p>
	<p>Website: www.helpproject.com/GRM</p>	<p>Will be monitored as per above timing (12 hours). The site will provide a format for complaint registration. This will include info required in Action 1 above. The complaint will be redirected to the email above with a Subject GRM From Web – Date and Time.</p>	<p>As above</p>
	<p>Letter: Social Development Specialist. Environmental Specialist XXX Project H XX, Rd XX, Sector XX</p>	<p>Will be received and opened during office hours</p>	<p>After the letter is received, the complaint will be studied and if ineligible, it will be intimated to the Complainant including provision of other</p>

Step	Description of process	Timeframe	Responsibility
	Dhaka Phone: 01711-XXXXXX		options. If eligible Action 1 and 2 above will be implemented
	Drop- Box: Suggestion Boxes will be placed in front of every field office	Will remain open round the clock. Will be opened during the beginning of office hours by the staff responsible to register complaints in each field office	As above
Sorting, processing	Any complaint received is forwarded to local GRC office; logged in by member secretary of local Recategorized according to the complaint types	Upon receipt of complaint	Local grievance focal points
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by cell or written as suitable	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	<ul style="list-style-type: none"> Investigation of the complaint is led by local GRC. Member Secretaries document unresolved complaints, promptly address non-project-related grievances and consider anonymous complaints. SEA/SH/GBV-related complaints go to the Gender and GBV Specialist. The Convener and Member Secretaries work with site managers to resolve issues. Unresolved complaints escalate to the full GRC for resolution within 10 days. Compensation follows RPF/RAP procedures; complainants are notified. Unresolved issues may go to the PIU Level GRC and then to the Project Steering Committee GRC. If necessary, the Project Director may conduct field investigations within 15 days. Complainants can seek legal 	Within 5 working days of receipt	Local GRC

Step	Description of process	Timeframe	Responsibility
	<p>recourse if issues persist.</p> <ul style="list-style-type: none"> Bank-received complaints are reported to GRS and forwarded to the Project Director. A proposed resolution is formulated by local GRC and communicated to the complainant by cell or email or physically as suitable. 		
Monitoring and evaluation	<p>Supervision Firm hired including:</p> <ul style="list-style-type: none"> Environmental Specialist Social Specialist <p>Both will be members of all the local level GRCs convened at the Upazilas where the IA will be active and where complaints will originate from.</p>	Within 6-9 months of project effectiveness	PIU & Monitoring and Supervision Firm
	Data on complaints are collected in every month and reported to PIU every <i>month</i>	Every month	Monitoring and Supervision Firm
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by monitoring and supervision firm and local GRCs	Every month	Local GRC and Monitoring and Supervision firm
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants are grievance uptake, sorting, record, response, address, and feedback mechanism	Every quarter	Monitoring and supervision firm
If relevant, payment of reparations following complaint resolution	Following the guidelines of RPF, ESMF and SECPF	As warrant	Respective PIUs and Monitoring and supervision firm
Appeals process	If the aggrieved person is not satisfied with the decision of the local GRC, can appeal to the project level GRC	Within 10 working days of the decision of the local GRC	Aggrieved person with the support of local GRC or directly to the PIU

Labor GM:

A separate mechanism will be available for the laborers working under contractors and sub- contractors. For contracted workers, the Contractor is obligated under the Contract (as per ESS2) to set up the Workers GM to redress complaints relating to workers deployed for construction works under this Project. It is mandated that contractors set up a Workers GM according to contractual obligations, ensuring compliance with international standards such as transparency, confidentiality, and protection against retribution. Upon engagement, workers are required to sign the Labor Code of Conduct (CoC) and undergo training on the GRM processes. There will be labor GRC at both host communities and Rohingya camps which is described in detail in the Labor Management Procedures and in Annex 5.

In both Rohingya camps and host communities, Contractors and subcontractors appoint Site Managers as focal persons for the Labor GM. These managers are tasked with the responsibility of receiving, recording, and addressing grievances from workers or related to workers at their respective construction sites. The GM includes training for workers on the CoC and related issues such as SEA/SH. A structured process is outlined for resolving grievances, involving an inquiry, opportunity for the worker to be heard, and communication of findings within a stipulated timeframe. Overall, the labor GRM aims to ensure fair and transparent handling of labor-related issues within the project's operational framework.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

All three tiers/levels (mentioned below) of the GM will be sensitized to receive SEA/SH related complaints. As per latest World Bank Good Practice Note on SEA/SH, GM will be responsive to complaints of child SEA/SH as well. The project GM will be linked with service providers supported by World Bank in the Host and Rohingya Enhancement of Lives Project (HELP). Utilizing GBV service providers from HELP, PIUs 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 SEA/SH will be reported through the project/contractor, after which the nature of the complaint (without details) 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. It will adopt a survivor centric approach when responding to SEA/SH complaints. Survivor centric approach will prioritize the wish of the survivor and take measures accordingly.

The LGED/DPHE/BPDB/RHD projects intends to strengthen the GRM through information and communication technology to ensure that all complaints including those of SEA/SH are immediately reported to the Government. LGED/DPHE/BPDB/RHD will integrate the GRM on a web-based dashboard, to adequately and promptly address any potential grievance related to GBV and SEA/SH. The complaints registered in this system will be managed by a dedicated administrator that will liaise immediately any GBV and SEA/SH complaints with the contractors, consultant and LGED/DPHE/BPDB/RHD for immediate measures. If the GRM receives a case on sexual exploitation and abuse related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. The supervision consultant will keep the information confidential to protect privacy of GBV and SEA/SH complainants. In cases, where the perpetrator(s) is linked to project activities then the contractor will take appropriate actions as per the Code of Conduct signed by the particular person and under the effective law in Bangladesh. LGED/DPHE/BPDB/RHD will report activities and outcomes of GBV and SEA/SH surveillance and management to the World Bank on a regular basis.

SEA/SH GRM Process: The following will be the steps to be followed addressing SEA/SH/GBV cases

Table 8: SEA/SH GRM process

STEP	FUNCTION	DETAILS
Uptake	Receive SEA/SH allegation through multiple reporting channels established for the project.	<ul style="list-style-type: none"> • Project GRM channel will be used. • Survivor must be informed that her/his wishes to continue with the case will prevail. • Upon receiving the allegation, the survivor will be immediately referred to PIU level GRC who will deal with the case in its entirety, given its sensitivity and requirement of training. All PIU-GRC will have staff trained and assigned for SEA/SH cases
Sort and process	Document and register allegation	The SEA/SH coordinator (Gender and GBV Specialists under PIUs) at PIU GRC is responsible to document and register the allegation. It can be done over phone, video conferencing or in person (suggested). The coordinator needs to visit the survivor in person immediately after initial documentation, if the survivor consents to proceed with the case and consent for the coordinator to disseminate the four information. The SEA/SH allegation will document only (1) the nature of the allegation— what a survivor says in his or her own words without direct questioning; (2) if, to the best of the survivor’s knowledge, the perpetrator is associated with the project; (3) when possible, the age and sex of the survivor; and (4) when possible, information about whether the survivor was referred to services (Health, psychosocial, legal etc.).
	Inform survivors about legal and internal data-sharing obligations	If applicable, the survivor will be informed about any legal obligations to report SEA/SH to the Police. Wherever possible, this information should be delivered to the communities and the survivor <i>prior to the</i> disclosure of any information that could trigger mandatory reporting, both through community awareness-raising activities and by providing information as a first step in the uptake phase. Survivor must consent to share the four nonidentifiable data with PIU and WB. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity.
	Notify the World Bank in accordance with the required reporting protocols	If a survivor gives consent, the SEA/SH coordinator will inform PIU and WB on the four sets of data. Else, only an intimation to the WB and PIU about the survivor’s non-consent will be made
Acknowledge and follow-up	Refer the survivor to relevant GBV service providers	<p><i>Note: A List of various SEA/SH service providers (Medical, psychosocial, legal, livelihood etc.) will be kept at the PIU GRC Coordinator. Service providers supported under HELP project will be mapped and listed.</i></p> <p>At this stage the survivor will be referred to various service providers. Before referral, the survivor’s consent must be</p>

		documented. This means that the survivor can choose to fill out, sign, or fingerprint a consent form that outlines the survivor’s choices regarding whether information about the case is shared and whether the survivor wants to take up the proposed referrals or not.
Verify, investigate and act¹	Provide support services to survivors	GBV service providers support survivors until survivors choose to stop availing services.
	Review allegation and determine the likelihood that it is project-related	If a survivor wishes to proceed with accountability measures, the SEA/SH Coordinator, with the help of other GRC members/Contractors as appropriate, will determine the likelihood that it is related to the project.
	Implement sanctions for perpetrators in accordance with employment contracts and local labor laws	If SEA/SH allegations are confirmed, the appropriate party—the employer of the perpetrator, which could be the implementing agency, the supervising engineer, or a contractor—implements disciplinary actions in line with labor law, employment contract and Code of Conduct (CoC).
	Resolve and close cases	If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the case can be closed by the coordinator. The SEA/SH GRM Coordinator records the resolution of the incident, the date it was resolved, and marks it as closed. The PIU and World Bank are notified that the case is closed
Monitor and evaluate	Monitor, track, and provide regular reports	The SEA/SH Coordinator is responsible for issuing regular (e. g., monthly/quarterly) reports to the PIU that can only contain data such as the total number of allegations, the number of alleged perpetrators who have a relationship to the project, the type of incident, the age and sex of survivors and the referral status.
Provide feedback	Respond to survivors	<p>The SEA/SH Coordinator needs to provide ongoing feedback to the survivor throughout the process but especially:</p> <ol style="list-style-type: none"> (1) when the grievance is received; (2) when the case is reported to PIU and WB; (3) when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and (4) when an investigation concludes or when any outcomes are achieved or disciplinary action taken. <p>When an investigation is concluded, the survivor must be informed first to assess his or her safety before the investigation’s conclusions are communicated to the perpetrator,</p>

¹ Incident response and reporting to World Bank will adhere to the Environment and Social Incident Response Toolkit Guidance 2023.

		particularly when sanctions will be taken.
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Following issues to be kept in mind while dealing in SEA/SH issues:

Table 9: Issues to keep in mind while dealing with SEA/SH complaints

ISSUES	DO'S	DON'T'S
Confidentiality	<p>To record SEA/SH allegations, use an encrypted electronic storage system with proper tracing or a separate logbook that will be kept safe and that guarantees the confidentiality of data. Create a sound coding system to anonymize case files by, for example, assigning tracking numbers</p> <p>Establish a formal protocol with clear rules and procedures for interagency information-sharing of case-level data to ensure confidentiality</p>	<p>Register the case in a logbook used for other types of grievances</p> <p>Leave information/logbook easily accessible</p> <p>Underestimate the importance of keeping survivor files confidential, even within an organization or with colleagues</p> <p>Discuss survivor files with anyone unrelated to the case or include identifiable data or information about individual cases in interagency reports</p> <p>Include any elements in shared data that could help identify survivors, including names, characteristics, or specific locations</p>
Consent	<p>Document a survivor's consent to receive referrals and for the sharing of any data.</p> <p>Depict the benefits and risks of every referral option and clearly relate to the survivor what cannot be provided as well as any limitations on services</p> <p>Adopt a context-sensitive approach for reporting to the police and making referrals to the legal justice system. Security actors and the rule of law may not be reliable in some context; and some survivors may prefer to turn to traditional, informal justice mechanisms</p>	<p>Force a survivor to file a formal complaint with the grievance mechanism (some survivors may only wish to access services)</p> <p>Act on the allegation in any way without the consent of the survivor</p> <p>Coerce a survivor to make a particular decision or create false expectations of available services and support.</p> <p>Assume that reporting to the police, accessing legal support or dealing with the justice system is necessarily desirable. (In many cases, survivors do not want to pursue security- or police-related actions, and their decisions must be respected.)</p>

A one-page **information brochure** on the GM process containing the contact information of the relevant GRC Convener (Upazila Engineer/Sub-divisional Engineer/nominated official by the PD; from Upazila, where the construction site is located), will be provided to every complainant by the Site Manager so that the complainant can also raise the issue directly to the GRC if he/she is not satisfied.

6.4 World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by project interventions may submit complaints to existing project-level GM or the WB Grievance Redress Service (GRS). Project affected communities and individuals may also submit their complaint to the World Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, because of non-compliance with WB safeguards policies and procedures. Details of the procedures to submit complaints to the WB's corporate GRS, is available in the GRS website: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org. Any disclosure instrument on GM will provide addresses of the GRS and the Inspection Panel.

7. Monitoring and Reporting

7.1. Summary of how SEP will be monitored and reported upon (including indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex3.

7.2. Reporting back to stakeholder groups

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

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 project managers.

Specific mechanisms to report back to the stakeholders include 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.

This reporting back to the stakeholders will be compiled and shared/disclosed with the stakeholders' and publicising proper media, line ministries 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.

Annexes

Annex 1: Summary of Stakeholder Consultation Outcomes

Issues	Discussion	How the inputs of consultations are taken into consideration during designing phase of the project
Environmental and Social Risks and Management	<ul style="list-style-type: none"> • Learning from existing interventions of EMCRP to reduce risk. • Key objectives of the project and potential E&S impact • Grievance mechanism at different levels • Vulnerable communities will be consulted through the project, and they will be able to access the project information's easily. 	<ul style="list-style-type: none"> • Based on the consultation, project confirms that there will be no widen of the existing roads • Consultation also aided in understanding of local context and develop ES risk profile mitigation measures. • Involvement of UN agencies and other partners and their scope of work
Planning and Operational Management	<ul style="list-style-type: none"> • During the project implementation, there will be temporary arrangements 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. • Monitoring and Evaluation: Efficient reporting system may be developed by using the existing MIS systems. • Sustainability of the present modalities of service delivery through NGOs 	<ul style="list-style-type: none"> • Issues of medical waste management • Facility refurbishment • Labor Engagement • ES Risk management and community involvement
Operational Arrangement	<ul style="list-style-type: none"> • Proper institutional arrangements for improved effectiveness of the project interventions. • Clarity in the scope and the work items. • Environmental and Social Documents like LMP, SEP, ESCP, ESMF, RPF SEA/SH Action Plan. • Mid-term evolution 	<p>The DPP will clearly define the scope, working modalities and the project activities.</p>

Annex 2. Tentative Budget

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	3 times	500		1500.00
3	Information Desk officer (will be nominated from /PIUs existing staff)				Paid from Project Consulting Service Budget
4	Stakeholder/Community/Sensitization meeting in Project areas	Lump Sum			5000.00
5	Meeting with District and Upazila Govt Officials	4 meeting/yr	500	12	6000.00
6	Meeting at PIUs with APs and SECs	1 meeting/yr	500	3	1500.00
7	Satisfaction Survey	1/yr	1000	3	3,000.00
8	Travel expenses	Lump Sum	2000		2,000.00
9	Communication materials (Poster, Brochure, flier, billboards, website)	Lump Sum			3,000.00
10	GM Guidebook/ Manual	Lump Sum			500.00
11	Suggestion/complain Boxes	20	50		1,000.00
12	GM /GRC expenses	Lump Sum			2,000.00
13	GM MIS Database	Lump Sum	5000		1,000.00
	Sub-Total				26,500.00
14	Contingency				2,500.00
	Total (Less Serial 1 and 3) (Rounded)				29,000.00 USD
					BDT 35,00,000.00 (Rounded)

Annex 3. Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means	<ul style="list-style-type: none"> Are project-affected parties raising issues and grievances? How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion 	Records from the implementing agency and other relevant agencies

<p>to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>		<p>boxes placed in the villages/project communities.</p> <ul style="list-style-type: none"> • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	
<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional</p>

difference in project design and implementation?	information disclosed to relevant parties throughout the project cycle?	<p>affected parties.</p> <ul style="list-style-type: none"> • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	media entries on the project results
Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

Annex 4: Grievance submission form

Grievance Form			
Grievance reference number (to be completed by Project):			
Contact details (Can be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> 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 IA (RHD, BRTA, DGHS, BP) or another party/person to do to solve the problem?			
How have you submitted this form to the project?	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"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of IA's official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> 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 5: Detailed GRIEVANCE REDRESSAL MECHANISM – HELP

For the HELP Project four Implementing Agencies (IAs) will be working – LGED, DPHE, RHD, and BPDB.

LGED and DPHE have been conducting the same or very similar (in nature and scale) activities in the DRP camps in and in the host communities in CXB under the Emergency Multisectoral Rohingya Crisis Response Project (EMCRP), which is still active. The same Grievance Redress Mechanism (GM) being utilized for EMCRP will be continued/continued for HELP across CXB, Noakhali and Bandarban districts of Chittagong Division where the project will be active; RHD will follow the same modality adopting a more nuanced approach in Bandarban to cater to the Small Ethnic Communities (SEC) meeting the requirements of ESS7 present there. BPDB will only be active in Bhasan Char.

Each IA will maintain a its own separate GM (there is no lead agency). Given the localized nature of the activities and for the easy accessibility of the GM by local people, all IAs will maintain a local level Grievance Redress Committee (GRC) to be convened at every Upazila they have activities in.

Each IA will set up a Project Implementation Unit (PIU) which will hire 1 Environmental Specialist, 1 Social Specialist, and 1 Gender and GBV Specialist. Furthermore, LGED, DPHE and RHD will hire 1 Communication Specialist (for SEP implementation but can also support the GRC as needed). All these specialists will be hired **within 3 to 6 months of Effectiveness**. The PIU level Environment Specialist and Social Specialist will be Member Secretaries of the PIU level and Local level GRCs. The PIU will screen all proposed sites as per the **Exclusion List** provided in the ESMF.

Each PIU will also hire a **Supervision Firm within 6 to 9 months of Effectiveness** which will include 1 Environmental Specialist and 1 Social Specialist who will be members of all the local level GRCs convened at the Upazilas where the IA will be active and where complaints will originate from.

Construction activities in the Project are planned to start **9 to 12 months after Effectiveness** ensuring GRCs and supervision structures are adequately established to support the Project's needs.

For all grievances which may accrue before the PIU specialists and the Supervision Firm are on board the **IAs will use their existing GMs/designate focal points from their own staff** and share their contact details at the field level (and to be disseminated as part of the SEP).

Each IA will provide monthly reports on GM separately. LGED will hire a Project M&E team to compile these reports of all four IAs into quarterly reports.

GM IN THE HOST COMMUNITIES

Local level GRC Composition (all Upazilas where IA has activities):

- Upazila Engineer/Sub-divisional Engineer (for RHD)/nominated official by the PD – **Convener** (from Upazila where complaint originates)
- Environment Specialist and/or Social Specialist or both, from the PIU (as per nature of the complaint) – **Member-Secretary(s)** (will be common across the GRCs for that particular IA)
- Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA - **Member**.
- Representative from respective Union Parishad (from where the complaint originates; must be female if the complainant is female) - **Member**.
- Representative from the community (teacher, NGO, or local person nominated by the complainant) –**Member**.

Since all the activities are civil works related, through experience on EMCRP and many other such projects, it is found that the aggrieved person usually approaches the Site Manager (from the Contractor) of the ongoing construction works first. In most cases the complaints are simple in nature and can be resolved by the Site Manager. The latter will be trained/instructed to record the complaint and report it as “Resolved” or Not Resolved” to the Member Secretaries of the GRC (E & S Specialists of the PIU) at a designated email address. A one-page **information brochure** on the GM process containing the contact information of the relevant GRC Convener (Upazila Engineer/Sub-divisional Engineer/nominated official by the PD; from Upazila, where the construction site is located), will be provided to every complainant by the Site Manager so that the complainant can also raise the issue directly to the GRC if he/she is not satisfied.

Other channels through which the aggrieved persons can reach their respective GRC are – complaint drop-boxes at all construction site offices, union parishad office, upazila level office of the respective IAs; **postal address** for the union parishad and upazila level offices of the IAs; **official email address for the respective GRC** (accessed only by the Member Secretaries); **phone number of the Member Secretaries** (this will be a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage), and the **official number of the Upazila office/Sub-division office (for RHD)** of the respective IAs – (this is a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage). Receiver will record the complaint and forward to Member Secretaries). This makes the GM accessible for all people in the host community who own mobile phones or have access to one (vulnerable groups like women, children, people with disability, elderly, Small Ethnic Communities may use representatives to call in – NGO, neighbor, ward member etc.). All information regarding the GM process (including the Bank’s GRS), ways to access it, GRCs, location of local offices of IAs etc. and feedback regarding suitability of each access point/channel will be widely discussed and disseminated through the **Stakeholder Engagement Plan (SEP)** which mandates ongoing consultations through the life of the Project. The numbers provided to the communities will also be used to deliver feedback to the Member Secretaries of the local GRCs regarding the responsiveness of the GM and the experience of the complainants which will be duly recorded. The feedback loop will be closed by the Member Secretaries responding to the complainants.

Those complaints which are unresolved at the site office, and those which are received by the GRC through all the other channels mentioned above will be gathered and recorded by the Member Secretaries – he/she will categorize the grievances (format will be provided to them) and respond to the complainants immediately if the complaint is found to be unrelated to the Project. Anonymous complaints will also be considered. The Member Secretaries (Environment Specialist or Social Specialist or both – as per nature of complaint - of the PIU hired by the IA) will inform the Convener of the GRC (however, if the complaint is related to **SEA/SH/GBV** the complaint will be sent directly to the **Gender and GBV Specialist at the PIU** maintaining all ethical protocols and confidentiality and will be dealt with as per the **Gender and SEA/SH Action Plan**). The Convener, along with the Member Secretaries, will call/communicate with the particular construction site manager who will contact the complainant and try to resolve the issue. If resolved, he/she will inform the Member Secretaries and the complaint will be recorded as resolved after the Member Secretaries call or communicate with the complainant to ensure that the issue is satisfactorily resolved. If the complaint is not resolved the Convener will raise the complaint to the **full GRC**. The full GRC will meet (at a designated place convenient for the local members) and invite the complainant for a hearing. Investigation will be carried out and a resolution will be given to the complainant within 10 working days (if compensation is required, it will follow the RPF/RAP process and timeline and the complainant will be informed accordingly). If the complaint is still not resolved, then the Convener of the GRC will raise the complaint to the **PIU Level GRC**.

PIU Level GRC composition

- Project Director- **Convener**
- Social Specialist and Environmental Specialist of PIU- **Member-Secretary**
- Local Government Representative (can be the same representative who was present at the local GRC hearing, or other as required; must be female if the complainant is female) - **Member**

- Representative from the community (teacher, NGO, or local person nominated by the complainant – preferably the same person who was present at the local GRC hearing) – **Member**

The Project Director (PD) will try to resolve the issue through the meeting. If needed the committee will go to the field level to conduct an investigation and resolve the complaint within 15 working days. If the issue is not resolved at the PIU level, the complaint will be raised to the **Project Steering Committee GRC**.

Composition Steering Committee GRC

- Representative of secretary from Respective Ministry- **Convener**
- Project Director-Member-Secretary

If the complaint is still not resolved the complainant will have all rights to approach the **legal system/courts** of the country.

To be noted, for EMCRP 99% cases were resolved at the local GRCs (mostly at the construction site by the site manager).

All complaints received by the Bank directly will be reported to GRS and forwarded to the PD.

GM for CAMPS at COX'S BAZAR

Only LGED and DPHE will be working inside the camps in CXB. The Project activities in the camps will be exactly the same as under EMCRP but lighter because the **bulk of the activities will be rehabilitation of the infrastructure already built and its operation and maintenance**. The existing GM modality under EMCRP will be used.

If a **UN agency** is hired by an IA, the respective UN agency's GM system will be used to resolve the complaints and the record will be provided to the Camp level GRC of the IA. If the issue cannot be resolved the respective GRC will take it up.

All activity sites will be screened by IAs' E & S Specialists as per the **Exclusion List** provided in the ESMF, then the site is jointly screened by CiC, UNHCR/IOM and the IAs in coordination with Inter Sector Coordination Group (ISCG) at the field level². All hired contractors will establish a temporary site office inside the camp. The **Site Managers** maintain a Grievance Recording Book (most cases are for seeking jobs as the DRP themselves are mainly used inside the camps for unskilled and semi- skilled labor). The Site Managers report the grievances as "Resolved" or Not Resolved" to the **Member Secretaries** of the Local Level GRC who are the same Environment and Social specialists of the PIU of the respective IAs (as in host communities. They record and convey the complaints to the **Convener** of the local GRC (Upazila Engineer) and together they investigate the matter with the respective site manager and the complainant. **Complaints are usually resolved at this level.** If not, the complaint will be raised to the PD (who must also inform the Bank). The PD with the PIU level E&S Specialist will meet with the Camp in Charge (CiC) and the complainant in order to resolve the complaint. Any SEA/SH or GBV related complaint associated with the Project received at any level will be directly reported to the **Gender and GBV Specialist** of the PIU maintaining appropriate protocols and confidentiality, and the cases will be dealt with in accordance with the **Gender and SEA/SH Action Plan.**

Composition Camp GRC

- Upazila Engineer/nominated official by the PD – **Convener** (from the Upazila where the Camps are located and from where complaint originates)
- Environment Specialist and/or Social Specialist from the PIU hired by each IA (as per nature of the complaint) – **Member-Secretary** (will be common across the GRCs in camps for that particular IA).
- Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA- **Member.**

GM at CAMPS in BHASANCHAR

The same procedure and GRC composition will be followed in **Bhashan Char.**

RHD will not have any activities in Bhashan Char.

BPDB will only work in Bhashan Char. It does not have an Upazila level engineers and therefore the **PD will be the Convener of the GRC for them in Bhashan Char** when complaints are received/recorded by the site managers.

² *The selection and appraisal of infrastructure investments will be done in close coordination with existing arrangements of the GoB explained above. The existing Development Partner/Multi-Lateral/Bi-Lateral/UN Agencies coordination mechanism in the field will be through the Inter Sector Coordination Group (ISCG) and coordinated in Dhaka by the Strategic Executive Group (SEG). Inter-agency field level coordination on project activities will be done with the RRRC, the ISCG, and the implementing agencies.*

Information Leaflet (sample):

Important addresses to submit complaints

EXECUTIVE ENGINEER		PROJECT DIRECTOR
LGED, Cox's Bazar Phone :0341-62163 Email: xen.coxbazar@lged.gov.bd		Emergency Multi Sector Rohingya Crisis Response Project (EMCRP). LGED Head Office, Dhaka. Ph.: 02-8143334 Email: pdlged.emcrp@gmail.com
UPAZILA ENGINEER, LGED		
For Ukhiya: Ph:01708-161279 Email: ue.ukhiya@lged.gov.bd	For Cox-bazar Sadar: Ph:01708-161273 Email: ue.sadar@lged.gov.bd	For Chakaria: Ph:01708-161272 Email: ue.chakaria@lged.gov.bd
For Teknaf: Ph: 01708-161278 Email: ue.teknaf@lged.gov.bd	For Kutubdia: Ph: 01708-161274 Email: ue.kutubdia@lged.gov.bd	For Moheshkhali: Ph: 01708-161275 Email: ue.moheshkhali@lged.gov.bd
For Pekua: Ph:01708-161276 Email: ue.pekua@lged.gov.bd	For Ramu: Ph: 01708-161277 Email: ue.ramu@lged.gov.bd	

GM FOR LABOR HIRED UNDER THE PROJECT

For contracted workers, the Contractor is obligated under the Contract (as per ESS2) to set up the Workers GM to redress complaints relating to workers deployed for construction works under this Project.

All the Contractors/Sub-Contractors who will be engaged for the project will be required to produce their GM as a requirement for tender which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, confidential, adheres to non-retribution practices and includes right to representation. After they are engaged, they will be required to produce proof that each employee has signed the Labor Code of Conduct (CoC) and attended the training on the GM.

Labor GM at Camp:The Environment Specialists and the Social Specialists of the PIUs will train all the Contractors/Sub-Contractors on the Labor GM. Contractor/s and sub-contractors in the camps at CXB and Bhashan Char will assign the Site Managers to be the focal persons for the Labor GM at the various construction sites to be responsible for recording and addressing all the grievances from workers/related to workers at their respective sites. The Site Manager will inform all the workers about the GM and train them on the CoC, SEA/SH related issues etc.

If any grievance remains unsolved at the site level, the Site Manager will inform the PIU about the grievance and PIU with the support of its the E&S Specialists will sit with the aggrieved person in presence of the Site Manager and will solve the grievances.

Labor GM at the Host communities: Contractor/s and sub-contractors operating in the host communities will also assign the designated Site Manager to be the focal persons for the Labor GM responsible for recording and addressing all the grievances. The labor Grievance Redressal Mechanism is summarized below:

- Any worker including a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment, who has any complaint in respect of anything and intends to get redress thereof, shall send his/her complaint in writing or orally or through phone call to the Employer, who will refer the complaint to the respective Site Manager.
- The Site Manager shall within 15 days of receipt of the complaint, make enquiry into the complaint and shall after giving the concerned worker an opportunity of being heard, communicate to the Employer as to the findings from the hearing. The Employer will convey its decision to the relevant employee as to their decision in writing.
- If the Employer fails to give any decision, or if the concerned worker is dissatisfied with such decision, he may submit a complaint in writing, to the Project PIU, within 7 (seven) days from the date of expiry or, as the case may be, within 7 (seven) days from the date of the decision of the Employer, who shall make an attempt to sort out the issues within (3) three days.
- If PIU fails to give any decision, or if the concerned worker is dissatisfied with such decision, he may submit a complaint in writing, to the Labor Court³ within 30 (thirty) days from the date of expiry of contract or within 30 (thirty) days from the date of the decision of the Employer.
- The Labor Court shall, on receipt of the complaint, give notice to both the parties and hear their statement on the complaint, and considering the circumstances of the case shall pass such order as it may deem just.
- The Labor Court may amongst other reliefs, direct for reinstatement of the complainant in service, with or without arrear wages and convert the order of dismissal, removal or discharges to any minor punishment specified in section 23(2) of Bangladesh labor act 2006.
- Any person aggrieved by an order of the Labor Court, may, within thirty days of the order, prefer an appeal to the Tribunal, and the decision of the Tribunal on such appeal shall be final.

<u>Important addresses to submit complaints</u>	
EXECUTIVE ENGINEER LGED, Cox's Bazar Phone :0341-62163 Email: xen.coxbazar@lged.gov.bd	PROJECT DIRECTOR Emergency Multi Sector Rohingya Crisis Response Project (EMCRP). LGED Head Office, Dhaka. Ph.: 02-8143334 Email: pdlged.emcrp@gmail.com
UPAZILA ENGINEER, LGED	

³ There is thirteen Labor Courts in the country; two are in Chattogram Division.

<p>For Ukhiya: Ph:01708-161279 Email: ue.ukhiya@lged.gov.bd</p> <p>For Teknaf: Ph: 01708-161278 Email: ue.teknaf@lged.gov.bd</p> <p>For Pekua: Ph:01708-161276 Email: ue.pekua@lged.gov.bd</p>	<p>For Cox-bazar Sadar: Ph:01708-161273 Email: ue.sadar@lged.gov.bd</p> <p>For Kutubdia: Ph: 01708-161274 Email: ue.kutubdia@lged.gov.bd</p> <p>For Ramu: Ph: 01708-161277 Email: ue.ramu@lged.gov.bd</p>	<p>For Chakaria: Ph:01708-161272 Email: ue.chakaria@lged.gov.bd</p> <p>For Moheshkhali: Ph: 01708-161275 Email: ue.moheshkhali@lged.gov.bd</p>
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Annex 6: Sample Grievance report format

Period from.....to.....20.....
Phase:.....

Project

Case No.	Complainant's name, gender and location	Nature of complaints and expectation of complainant	Date of Petition submitted	Method of resolution with dates	Decisions and date of communication to the complainant	Agreement with and commitment to complainant	Progress (solved/pending)	Reason, if pending

ⁱ 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 are adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), 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.