

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
মহিলা ও শিশু বিষয়ক মন্ত্রণালয়
পরিকল্পনা-৩ শাখা
বাংলাদেশ সচিবালয়, ঢাকা।
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তারিখঃ ১২/০৩/২০২৪

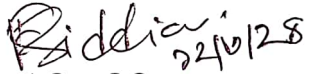
বিষয়ঃ Inclusive Services and Opportunities Project ডকুমেন্ট মূল্যায়ন সংক্রান্ত।

সূত্র: Sabah Moyeen, Senior Social Development Specialist, Social Sustainability and Inclusion Global Practice, South Asia Region, The World Bank হতে ২১ ফেব্রুয়ারি ২০২৪ ইং তারিখে ই-মেইলে প্রাপ্ত।

উপর্যুক্ত বিষয় ও সূত্রের প্রেক্ষিতে জানানো যাচ্ছে যে, Inclusive Services and Opportunities Project প্রকল্প প্রক্রিয়াকরণের জন্য বিশ্বব্যাংক কর্তৃক নিম্নবর্ণিত ডকুমেন্টগুলো ডকুমেন্টগুলো অনুমোদন এবং ওয়েবসাইটে প্রকাশের জন্য বিশ্বব্যাংক কর্তৃক অনুরোধ করা হয়েছে:

- I. Environmental and Social Commitment Plan (ESCP)
- II. Labor Management Procedure (LMP)
- III. Stakeholder Engagement Plan (SEP)

১০। এমতাবস্থায়, বিশ্বব্যাংক হতে প্রাপ্ত ডকুমেন্টগুলো ওয়েবসাইটে প্রকাশের প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য নির্দেশক্রমে অনুরোধ করা হলো।


২৪/৩/২৪

(ফৌজিয়া সিদ্দিকা)

সিনিয়র সহকারী সচিব

ফোনঃ ২২২৩৩৮৩৫০৫

E-mail: planingtwo@gmail.com

উপসচিব (অতিরিক্ত দায়িত্ব)

আইসিটি শাখা

মহিলা ও শিশু বিষয়ক মন্ত্রণালয়

বাংলাদেশ সচিবালয়, ঢাকা।

সদয় অবগতির জন্য অনুলিপি :

১. সচিবের একান্ত সচিব, মহিলা ও শিশু বিষয়ক মন্ত্রণালয়, বাংলাদেশ সচিবালয়, ঢাকা।
২. অতিরিক্ত সচিব (উন্নয়ন, পরিকল্পনা ও পরিসংখ্যান) মহোদয়ের ব্যক্তিগত কর্মকর্তা, মহিলা ও শিশু বিষয়ক মন্ত্রণালয়, বাংলাদেশ সচিবালয়, ঢাকা।
৩. যুগ্মসচিব (পরিকল্পনা ও পরিসংখ্যান) মহোদয়ের ব্যক্তিগত কর্মকর্তা, মহিলা ও শিশু বিষয়ক মন্ত্রণালয় পরিবহনপুল ভবন, সচিবালয় লিংক রোড, ঢাকা।
৪. অফিস কপি/মাস্টার কপি।

**Ministry of Disaster Management and Relief,
Ministry of Women and Children Affairs, Ministry of Health and Family Welfare,
Ministry of Primary and Mass Education, Ministry of Social Welfare**

**Inclusive Services and Opportunities for Host Communities
and Forcibly Displaced Myanmar Nationals (FDMN)/
Displaced Rohingya Population (DRP)
(P500727)**

Draft
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

07 February 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The People's Republic of Bangladesh (the Borrower) will implement the Inclusive Services and Opportunities for the Host Communities and Forcibly Displaced Myanmar Nationals/ Displaced Rohingya Population (P500727) Project (the Project), with the involvement of the Ministries of Disaster Management and Relief (MoDMR), Women and Children Affairs (MoWCA), Health and Family Welfare (MoHFW), Primary and Mass Education (MoPME), Social Welfare (MoSW), as set out in the Financing Agreement. The International Development Association (The Association) of the World Bank (the Bank) has agreed to provide financing (P500727) for the Project, as set out in the referred agreement(s).
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (ES) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said ES instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through MoDMR, MoWCA, MoHFW, MoPME and MoSW and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower represented by the representatives of the Implementing Ministries. The Borrower shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---------------------------------|---|--|--|
| MONITORING AND REPORTING | | | |
| A | <p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of ES instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism</p> | <p>Submit quarterly progress reports to the Association throughout Project implementation, commencing three months after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p> | <p>PMU set up at Department of Disaster Management (DDM) of MoDMR, PIUs of, MoWCA, MoHFW, MoPME and MoSW</p> |
| B | <p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> | <p>Notify the Association no later than 24 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within 48 hours</p> | <p>PMU of DDM of MoDMR , PIUs, MoWCA, MoHFW, MoPME and MoSW, as and when applicable</p> |

| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
|---|---|---|--|
| 1.1 | ORGANIZATIONAL STRUCTURE Establish and maintain a PMU (DDM) and separate PIUs (DPE, DSS, MoWCA, HSD, MEFWD) with qualified staff and resources to support management of ESHS risks and impacts of the Project and appoint an Environmental and Social Specialist, a Gender Specialist (two positions) in each PIU and the PMU. | Establish and maintain the PMU and PIU as set out in the (Financing Agreement). Initiate the process for recruiting Specialists within two months of effectiveness. Prior to the assignment of the specialist, assign one ES focal point from each PIU and the PMU to work on behalf. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW |
| 1.2 | ENVIRONMENTAL AND SOCIAL INSTRUMENTS Develop an Environmental and Social Code of Practice (ESCoP) to address the ES risks and impacts related to the different activities under the project. The activities related to substantial and high ES risk and impact shall be ineligible to receive financing under the Project. | Develop and adopt the ESCoP and the exclusion list within two months of effectiveness and comply with both throughout the Project implementation. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW |
| 1.3 | MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant ES instruments, the Labor Management Procedures (LMP), and Code of Conduct (CoC), into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms, if any. Thereafter, ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. | Incorporate relevant clauses in the respective bid documents and contracts. Comply throughout the Project implementation. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW; as applicable |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES Adopt and implement a Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (relating to SEA/SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. | Develop the LMP prior to Appraisal and adopt and implement the LMP throughout Project implementation. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW; |
| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a Grievance Mechanism for Project workers, as described in the LMP and consistent with ESS2. | Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW; |

| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
|---|---|---|--|
| 3.1 | RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESCoP. | Throughout the Project implementation. | Health Services Division (HSD) of the MoHFW |
| 3.2 | WASTE MANAGEMENT PLAN Adopt and implement a medical Waste Management code of practices to manage minor medical wastes as anticipated, consistent with ESS3. These practices to be integrated in the ESCoP as outlined under ESS1. | Same timeframe as for the adoption and implementation of the ESCoP | Health Services Division (HSD) of the MoHFW |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project and include mitigation measures in the ESCoP. | Same timeframe as for the adoption and implementation of the ESCoP | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW; |
| 4.2 | SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH. | Develop and adopt the SEA/SH Action Plan within three months of effectiveness, and thereafter implement the SEA/SH Action Plan throughout the Project implementation. | PMU at DDM of MoDMR, PIUs of MoWCA, MoHFW, MoPME and MoSW |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | |
| 5.1 | Not Applicable | | |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | |
| 6.1 | Not Applicable | | |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES | | | |
| 7.1 | INDIGENOUS PEOPLES PLAN Develop and adopt measures to address impacts on the Small Ethnic Communities (SEC) in the ESCoP, consistent with ESS7. | Same timeframe as for the adoption and implementation of the ESCoP | Same as above |
| 7.2 | GRIEVANCE MECHANISM Adopt the Project GRM to address the issues of small ethnic communities being cognizant of the cultural, linguistic and social differences | Same timeframe as for the Project GRM (ESS10) | Same as above |
| ESS 8: CULTURAL HERITAGE | | | |
| 8.1 | Not Applicable | | |
| ESS 9: FINANCIAL INTERMEDIARIES | | | |
| 9.1 | Not Applicable | | |

| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |
|--|---|---|---------------|
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> | Develop the SEP by Appraisal and thereafter implement the SEP throughout the Project implementation. | Same as above |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> | Establish the grievance mechanism within three months of effectiveness and thereafter maintain and operate the mechanism throughout Project implementation. | Same as above |
| CAPACITY SUPPORT | | | |
| CS1 | <p>Develop and provide following types of capacity assessment/training to the relevant target groups, such as PMU/PIU staff, stakeholder community, project workers, consultants, contractors etc:</p> <ul style="list-style-type: none"> • Introduction to World Bank ESF • Labor and working conditions including OHS • Community health and safety • Stakeholder Engagement • Preparation of EScOP • ES compliance monitoring and audit • Incident reporting ESIRT • SEA/SH and mitigation measures • Bid document and ES issues | Develop and provide capacity development measures beginning from three month of effectiveness and continue throughout the Project | Same as above |



Government of the People's Republic of Bangladesh

Inclusive Services and Opportunities (ISO) for Host Communities and Forcibly Displaced Myanmar Nationals (FDMN)/ Displaced Rohingya Population (DRP)

Ministry of Disaster Management and Relief (MoDMR)

Ministry of Women and Children Affairs (MoWCA)

Ministry of Health and Family Welfare (MoHFW)

Ministry of Primary and Mass Education (MoPME)

Ministry of Social Welfare (MoSW)

(Project Code: P500727)

Labor Management Procedure (LMP)

February 2024

Executive Summary

This Labor Management Procedure (LMP) is prepared for the Inclusive Services and Opportunities for Host Communities and Forcibly Displaced Myanmar Nationals (FDMN)/ Displaced Rohingya Population (DRP) Project, corresponding to the requirements of ESS2 of World Bank's ESF. The purpose of this LMP is to facilitate planning and implementation of the project by identifying the main labor requirements and risks associated with the project, and to determine the resources necessary to address project labor issues. The LMP will help in determining the resources necessary to address project labor issues to meet the objectives and requirements of the World Bank Environmental and Social Standards (ESSs) on Labor and Working Conditions (ESS2), the National Labor Laws of the People's Republic of Bangladesh, as well as Occupational Health, Safety and Working Condition requirements. The LMP assesses the potential risks and impacts of employment of workers for implementation of Project activities and proposes mitigation measures in line with ESS2 of the Bank and the national legal framework on labor.

Various types of workers as per ESS2, their estimated numbers and characteristics have been outlined in this LMP. Major potential and associated environmental and social (ES) risks—such as occupational health and safety (OHS), Gender-Based Violence (GBV) including sexual exploitation and abuse (SEA), sexual harassment (SH), community health and safety (CHS), waste management, discrimination to disadvantaged and the vulnerable groups, communities and individuals for project benefit and engagement, exploitation of child and forced labor have been identified. Given the type of activities, the potential ES risks and impacts, the capacity and experience of the IAs in managing and mitigating the ES risks and the context under which the project will be implemented, the overall ES risks have been determined to be moderate.

Provisions of World Bank ESSs, Bangladesh Labor Act 2006 (including Amendments of 2013 and 2018), National Child Labor Elimination Policy 2010, GoB and WHO guidelines for the pandemic of COVID-19 and the Infectious Diseases (Prevention, Control and Elimination) Act 2018 have been studied and cited to meet their requirements and obligations. Conditions of employment, OHS, and CHS are highly relevant and significant for this project as it involves some degree of refurbishment works with involvement of few workers.

A Grievance Redress Mechanism (GRM) for workers has been provisioned as part of this LMP (which will adopt the project GRM given the minimum number of workers and refurbishment work) so that anyone employed in the project can raise their concerns, complaints, or feedback to the attention of the Contractor and project management/implementation unit (PMU/PIU) and the implementation partners. Detailed contractor management guidelines have been prepared for the IAs to direct them in the selection, retention, monitoring and guiding of contractors in accordance with the ESS2 and national laws.

Abbreviations

| | |
|----------|--|
| BoQ | Bill of Quantities |
| CoC | Code of Conduct |
| CHS | Community Health and Safety |
| COVID-19 | Novel coronavirus disease |
| EHS | Environment, Health and Safety |
| EPI | Expanded Program on Immunization |
| ESMP | Environmental and Social Management Plan |
| ESSs | Environment and Social Standards |
| FDMN | Forcibly Displaced Myanmar Nationals |
| GBV | Gender Based Violence |
| GoB | Government of Bangladesh |
| GRC | Grievance Redress Committee |
| GRM | Grievance Redress Mechanism |
| HD | Human Development |
| HNP | Health, Nutrition and Population |
| HIV/AIDS | Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome |
| HNP | Health, Nutrition and Population |
| HSD | Health Services Division |
| ICT | Information and Communications Technology |
| IEDCR | Institute of Epidemiology and Disease Control Research |
| ILO | International Labor Organization |
| LMP | Labor Management Plan |
| NCD | Non-Communicable Diseases |
| NGO | Non-Government Organization |
| NID | National Identification Card |
| MoFA | Ministry of Foreign Affairs |
| MoWCA | Ministry of Women and Children Affairs |
| MoHFA | Ministry of Health and Family Welfare |
| MoDMR | Ministry of Disaster Management and Relief |
| MoSW | Ministry of Social Welfare |
| MoPME | Ministry of Primary and Mass Education |
| OH&S | Occupational Health and Safety |
| OHS | Occupational Health Safety |
| OHSP | Occupational Health & Safety Plan |
| PV | Photo Voltaic |
| PIU | Project Implementation Unit |
| PMU | Project Management Unit |
| PPE | Personal Protective Equipment |
| SEA | Sexual Exploitation and Abuse |
| SH | Sexual Harassment |
| WASH | Water, Sanitation, and Hygiene |
| WB | World Bank |
| WHO | World Health Organization |

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Labor Management Procedure (LMP)

Chapter 1: Introduction

1.1 Background:

The Inclusive Services And Opportunities For Host Communities and Forcibly Displaced Myanmar Nationals/ Displaced Rohingya Population (DRP) is prepared and will be implemented by the Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Disaster Management and Relief (MoDMR), Ministry of Social Welfare (MoSW) and Ministry of Primary and Mass Education (MoPME). The Government of Bangladesh (GoB) intends to implement the Project with finance from the International Development Association (IDA) of the World Bank. This Labor Management Procedure (LMP) is prepared for the ISO following the requirements of Environmental and Social Standards (ESSs) for Labor and Working Conditions (ESS2) of the World Bank Environmental and Social Framework (ESF), Bangladesh Labor Act, 2006 (including all its amendment till 2018) and Bangladesh Labor Rules 2015. This LMP includes the assessment of risks and impacts and required mitigation measures to ensure the health and safety of the contractor's workers that may be exposed to health risks. The LMP will be applied to all types of workers that will be employed by the project. Issues such as child labor, forced labor, SEA/SH issues, occupational health and safety are also addressed through the LMP.

1.2 Objectives of the LMP:

The objective of this LMP is to ensure appropriate worker management procedures and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions for project sustainability. During the period of minor repair and refurbishment of the existing facilities, contractors will follow this LMP to prepare a simplified labor management plan if required and a Code of Conduct (CoC). Considering the facts, WB-ESS2 on Labour and Working Conditions and Bangladesh Labour Act, 2006, has set out the following specific objectives:

- To promote occupational health and safety of workers
- To promote the fair treatment, non-discrimination and equal opportunity of project workers
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children and migrant workers, contracted workers, as appropriate
- To prevent the use of all forms of forced and child labour
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law
- To provide project workers with an accessible means to raise workplace concerns.

1.3 Project Description

The project is designed to improve access to economic opportunities, safety nets, learning, health, and gender responsive services for vulnerable Host and Rohingya communities.

Component 1: Building Community Resilience & Self-Reliance

This component will support short-term employment opportunities in the host community (HC) and FDMN. The project will finance (i) stipends to HC beneficiaries under the Employment Generation Program for the Poorest Plus (EGPP+); (ii) the procurement of goods and services for implementation of a community service program for the FDMN; (iii) stipends to the FDMN beneficiaries in the community service program; and (iv) the establishment and operation of the Project Management Unit (PMU) for the component activities. Activities will be implemented by the Department of Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MoDMR).

Component 2: Supporting Learning for Children

This component will support children's learning in the HC and FDMN communities. The project will be used to finance (i) procurement of goods, services, and works for the refurbishment of primary/pre-primary school facilities in Chattogram Division; (ii) procurement of goods and services to increase attendance and enrolment of out-of-school children (OOSC) in the HCs; (iii) procurement of goods and services for the operation of Learning Centers in the FDMN communities; and (iv) the establishment and operation of the Project Implementation Unit (PIU) for the component activities. Activities will be implemented by the Department of Primary Education (DPE), under the Ministry of Primary and Mass Education (MoPME).

Component 3: Providing Safety-nets

This component will support safety nets in the HC and child protection services for the FDMN. The project will be used to finance (i) procurement of goods, services, and works for refurbishment and renovation of child protection facilities in Chattogram Division; (ii) procurement of goods and services for training HC beneficiaries of livelihood support programs; (iii) stipends for HC beneficiaries of livelihood support programs; (iv) procurement of goods and services for child protection services for the FDMN; and (v) the establishment and operation of the PIU for the component activities. Activities will be implemented by the Department of Social Services (DSS), under the Ministry of Social Welfare (MoSW).

Component 4: Healthier Communities

This component will support the provision of goods, services, and works to provide essential HNP services in the HC and FDMN. The project will finance (i) goods, services, and works to provide essential HNP services in the host and FDMN communities; and (ii) the establishment and operation of the PIU for the component activities. Essential HNP services will focus on primary healthcare, family planning, and nutrition services by first, improving the readiness of facilities at different tiers of the health system (community clinics, union health and family welfare centers, upazila health complexes, maternal and child welfare centers and district hospitals in the Chattogram division; health posts and primary health care centers located within the camps in Cox's Bazar district and the 20-bed facility in Bhasan Char). The activities will include (i) repair and renovation of the physical infrastructure of the existing required facilities (ii) deployment of required health workforce (iii) ensuring proper functional equipment with necessary supplies (iv) uninterrupted supplies of medicines, vaccines and contraceptives (v) functional referral system amongst the facilities including purchase, operation and maintenance of two water ambulances (vi) and ensuring regular monitoring and supervision. The activities will be guided by the Operations Manual. Activities will be implemented by the Health Services Division (HSD) and Medical Education and Family Welfare Division (MEFWD) of the Ministry of Health.

Component 5: GBV Response and Protection

This component, implemented by the Ministry of Women and Children Affairs (MoWCA), will support (i) goods, services, and works to enable provision of GBV response and prevention services in the host and FDMN communities; and (ii) the establishment and operation of the PIU for the component activities. The activities will include screening, case management, psychosocial support, multisectoral referral, and mental health support through the One-stop Crisis Centers/Cells, Trauma Counseling Centers, DNA Labs, Shelters, Women-Friendly Spaces (WFS) in the host community in Chittagong Division, and WFS and Women and Youth Support Centers (WYSC) in the FDMN in CXB and Bhasan Chor.

1.4 Project Environmental and Social Risk and Impact

The Project's ES risk, as per World Bank ESS1 is anticipated to be moderate, which indicates a likelihood of adverse impacts associated with medical waste generation, risk of exclusion, minimum risk emanating from small scale refurbishment work etc. There will be no impact on cultural heritages, biodiversity and natural resources. There will also be no land acquisition, and physical or economic displacement are unlikely. There is likely to be no negative impact on small ethnic communities (SECs). The main point of concern would be exclusion of certain strata of beneficiaries—especially the persons with disability, female headed household, children and the elderly. The potential for SEA/SH risk (determined to be substantial) due to cash transfer modalities and interaction between the beneficiaries and the service provider may also be likely. Overall both the environmental risk and the social risk have been rated as Moderate.

1.5 Overview of Labor Use in the Project

For this project, the provisions related to direct workers and contracted workers are relevant. Due to the nature of project, it is expected that there will not be any concentration of labours at the same place and at the same time. Also, no labor influx is expected in the project's context. During implementation phase, subcomponent wise the labor requirement will range from 5 labours to 8 during normal operations.

The LMP applies to all types of workers engaged by the project including but not limited to full-time, part-time, and temporary workers. This LMP is also applicable for the direct project staff including project officials and PMU/PIU team. The LMP is applicable to:

- ✓ People employed or engaged directly by the IAs to work specifically in relation to the different components of the project;
- ✓ People employed or engaged by contractor, sub-contractors & consultant to perform work related to the core function of the project, regardless of location;

- a. **Direct Workers¹:** Direct workers will be engaged with this project; i.e.; the project implementation team, component-based staffs and the Permanent Staffs will be considered as Direct Workers. Government officials consisting of PMU/PIUs will be subject to the prevailing provisions of national legislations by the Government. The consultants will be engaged by the component/s to undertake short period assignments as required by the project. The contractual relationship of these consultants will be governed by specific agreements signed between the parties and PIUs.

¹ A "direct worker" is a worker with whom the Program has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

- b. **Contracted Workers**²: Based on the requirement in every component and sub-component, the PMU/PIUs will employ contractors who will hire contracted workers based on their level of skills and project needs especially for repair and refurbishment works. Contracted workers are eligible to work for a period fixed by the contractor. Their contracts will be renewed, if required, based on satisfactory services.

Chapter 2: Assessment of the Potential Labor Risk

2.1 Key Labor Risk

The main labor risks associated with the project are assessed to be related to the discrimination during employment, unsafe working condition, SEA/SH risk, risk associated with management of medical wastes, the associated risk of accidents, transmission of communicable diseases. Based on current conditions in the FDMN camps, it is assessed that the risk of engaging child labour or forced labour in the project may be likely.

- The conduct of hazardous work or use of hazardous materials related to waste management and as well during construction activities in different camps
- Risk of engaging child labors
- Risk of SEA/SH
- Possible accidents or emergencies
- Risk of infections among labors who will be working for Waste Management
- General understanding and implementation of occupational health and safety requirements
- Risk of transmitting communicable diseases among the labors and adjacent neighborhoods including FDMN living in the camps

2.2 Labour Influx

There will be minor repair and refurbishment work and labor influx is not expected. Most of the unskilled labor will be hired locally. The contractor will be responsible for the accommodation of labor (if required) and ensuring labor travel from off site. For accommodation on site, water supply and sanitation services, etc. will be provided by the contractor.

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

The SEA/SH risk is assessed as ‘Substantial’. The related risk of SEA/SH will be mitigated by implementing a Code of Conduct (CoC) before employing any labor in the project and ensuring necessary training and monitoring. The Contractor’s training program will cover topics related to CoC such as sexual harassment, particularly towards women and children. This will be monitored by the PMU/PIUs on a regular basis. The overall SEA/SH risk mitigation measures include the following:

- Training and awareness raising for the workforce about refraining from unacceptable conduct toward women workers. Training must be repeated during the project implementation period.
- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;
- Closely monitoring the works and activities of laborers, especially if in close proximity with female laborers
- Enforcement of a code of conduct for all workers; and

² A “contracted worker” is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker.

- Instituting a GRM which will also capture workplace SEA/SH related complaints/issues and informing laborers on the complaint filing procedures

The contractors are to maintain labor relations through a designated code of conduct (CoC). The CoC commits and obliges all project workers to acceptable standards of behavior. The CoC shall include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence (GBV), sexual exploitation abuse and sexual harassment (SEA/SH) including termination. The CoC shall be written in Bangla and in a reader-friendly manner and to be signed by each worker and employee to indicate that they have:

- (a) received a copy of the CoC as part of respective contract;
- (b) had the CoC explained to them as part of induction process;
- (c) acknowledged that adherence to this CoC is a mandatory condition of employment;
- (d) understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the said CoC shall be displayed in a location easily accessible to the community and project affected people.

2.4 Occupational/Community Health and Safety

There are risks associated with projects with waste management, refurbishment and renovation in existing primary and pre-primary schools and facilities. Besides, lack of clean and ventilated workspace may also be risks during the project. The expected risks may lead to personal injury, traffic-related accidents, fall from height, poor working conditions, and lack of PPEs. PMU/PIUs must make arrangements for contractors training on health and safety, records of their compliance have to be inspected monthly and audited bi-annually. The key potential OHS risk associated are listed below.

- Hazardous work and process: risk due to working at heights or in confined spaces or use of hazardous materials.
- Accidents or emergencies: exposure to unsafe machinery, flammable chemicals/fuel, construction materials, at workplace.
- General understanding and implementation of occupational health and safety requirements. Work related diseases (e.g., Allergies, Respiratory problems, Muscular-skeletal disorder, Eye problem), communicable diseases including Sexually Transmitted Infections (STIs)
- Risks associated with waste management (health hazards, risk of infection from contaminated waste, etc.)

The risk will be mitigated by contractor, providing training, monitoring and personal protective equipment (PPE) for workers, such as safety shoes, helmets, safety vests, masks, gloves, protective clothing, goggles, full-face eye shields and ear protection based on the work requirements, the contractor is obliged of hiring trained operators, using appropriate equipment's, providing appropriate cautions, training of fire extinguishment etc. Workers shall maintain the PPE properly by cleaning dirty ones and replacing damaged ones. PMU/PIUs will require the contractors to prepare and implement the Occupational Health & Safety Plan (OHSP) following the World Bank Environment, Health and Safety (EHS) Guidelines and local legislations.

Laborers will require to keep minimal interaction with the community they will be working in. Labor movements must not hamper the hospital patients, school and college going students and people living in surrounding localities. The relevant protocols must be included in labor Code of Conduct (CoC) and all contractors must train their labor on CoC.

2.5 Spread of Infections in the neighborhoods and healthcare seeking beneficiaries.

As project involves minor refurbishment works, which will involve a workforce including labor, contractors, suppliers with regular flow of parties entering and existing the site on a frequent basis. However, due to the nature of the work and work locations, on-site accommodation may not be required. Given the complexity and the concentrated number of people in the project areas, the potential for the spread of infectious disease in projects is high and it will be addressed with adequate measures.

2.6 Risk of Engaging Child Labors

As per the Labor Act 2006, no one below the age of 14 (minimum age) will be employed as a labor. A child over the minimum age (14) and under the age of 18 may be employed or engaged in connection with the project only if the work is not likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development; an appropriate risk assessment should be conducted prior to the work commencing. For this project contractors will be prohibited from employing anyone under the age of 18. Also, contractors must check existing documents, i.e.; Birth certificate, NID of the workers as a proof of their age before pursuing any employment.

2.7 Risk of Engaging Forced Labor

Forced employment of laborers, especially of local laborer's, is a serious offence and must be prohibited. Sudden and random inspection of the site and primary suppliers by the IAs needs to be done on a regular basis to ensure compliance. Contractor agreement will include strict provisions against forced labor.

Chapter 3: Labor Legislation: Terms and Conditions and Guidelines

Standards for labor and Working Conditions are defined in Bangladesh Labor Act, 2006 (amendments in 2013 and 2018) and Bangladesh Labor Rules 2015 and Occupational Health and Safety Policies 2013. Bangladesh Labor Act, 2006 is a comprehensive legislation. The Act addresses three areas: (i) Conditions of service and employment including wages and payment, establishment of Wages Boards, employment of young people, maternity benefits, working hours and leave; (ii) health, safety, hygiene, and welfare, and compensation for injury; and (iii) trade unions and industrial relations. Besides this, due to the ongoing pandemic of COVID 19 World Health Organization (WHO) and Directorate General of Health Services (DGHS), under the Ministry of Health and Family Welfare, provided guidelines for infection prevention and control. The health and safety issues relevant to COVID-19 should be addressed with reference to ILO Occupational Safety and Health Convention, 1981 (No. 155), ILO Occupational Health Services Convention, 1985 (No. 161), ILO Safety and Health in Construction Convention, 1988 (No. 167), WHO International Health Regulations, 2005, WHO Emergency Response Framework, 2017.

3.1 Child and Forced Labor

Bangladesh's Children Act 2013 identifies anyone under the age of 18 as children and the Bangladesh Labor Act, 2006 does not permit any children under the age of 14 years to work. Bangladesh Labor Act, 2006 also states that children aged between 14 till 18, can be authorized to do light and hazard-free jobs without compromising their education. As the project will require laborers for its implementation, there remains a minor risk of engagement of child labors, even beyond the parameter. However, the risk of child labor will be mitigated through certification of labors' age. This will be done by using legally recognized documents such as the National Identification Card (NID), and Birth Certificate. Further, sessions on raising awareness will be conducted on a regular basis by implementing agencies/contractors to the communities to sensitize on prohibition and negative impacts of child and forced labor.

3.2 Health and Safety Offences in Bangladesh

There are five offences in the Bangladesh Labour Act, 2006 specifically relating to health, safety and welfare – the selling of unguarded machinery (Section 208), failure to give notice of an accident (Section 290), a breach causing death (Section 309a), a breach causing grievous bodily harm (Section 309b) and a breach causing any harm (Section 309c).

In addition, there is a ‘catch-all’ offence that allows prosecutions against “whoever contravenes or fails to comply with any provisions of the Code, or any rules of scheme made under it” – which is punishable by up to 3 (three) months imprisonment or with a fine of up to Tk. 1,000 (One thousand) or both (Section 307). This offence would, for example, apply to any breach of the obligations involving health, safety and welfare, not already covered by the offences above. A repeat conviction for the same offence can result in double the fine or sentence of imprisonment (Section 308).

When there has been a breach of a duty imposed upon an employer, any one of individuals defined as an employer can be prosecuted. In addition, when a company is prosecuted, “every director, partner, shareholder or manager or secretary or any other officer or representative directly involved in [its] administration” shall be deemed guilty unless he can prove the offence has been committed without his knowledge.

3.3 Bangladesh Labor Act 2006

Bangladesh Labor Act 2006 is specific to labor and working conditions. This act focuses on the protection of the basic rights of workers, fostering constructive worker-management relationships, as well as promoting fair treatment and the provision of a safe and healthy workplace.

The Labor Management Procedure (LMP) has been prepared in accordance with the Bangladesh Labour Law 2006 (together with its amendment till 2018) as well as the World Bank’s Environmental and Social Framework (ESF), specifically the Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4).

Table 3.1: Analysis of ESS2 and ESS 4 with provisions in the Bangladesh Labor Act, 2006 (including its amendment 2018)

| SL | ESSs and Key Topic | Bangladesh Labor Act 2006 (amendment 2018) |
|----|--|--|
| a. | Working conditions and management of labor relations -Written labor management Procedures -Nondiscrimination and equal opportunity -Timely Payment -Working Hour and over time -Minimum Wages -Regular leave and benefit | -The Labor Act does not specifically require that development be assessed and reviewed in terms of labor and working conditions before approval. -The Labor Act does not require development projects to prepare Labor Management Plans/Procedure. -Section 195-made it unlawful to discriminate against any person in regard to any employment, promotion, condition of employment or working condition; -Section 123 – wages shall be paid before the expiry of seventh working day after the last day of wage period in respect of which the wages are payable. -Section 102 – maximum working hours in a week is restricted to 48hours, but as of section 108 workers working over 48hrs will be entitled to extra allowance for overtime which would be twice the ordinary basic wage rate. |

| SL | ESSs and Key Topic | Bangladesh Labor Act 2006 (amendment 2018) |
|----|--|--|
| b. | Right of Woman -Maternity Pay | Section 46 – maternity leave and benefit applicable for women workers who are employed for not less than six months immediately preceding the day of her delivery and no maternity benefits shall be payable if at the time of her confinement she has two or more surviving children. |
| c. | Protecting the work force - Child labor - Forced labor | The Bangladesh Labor Act, 2006 Section 34- No child shall be employed to work in any occupation. Section 44- Anyone under the age 14 is considered as child and less than 18 but over 14 is considered as adolescent. Section 37- this suggests a fitness certificate required for adolescents to get employed. Forced Labor Convention, 1930 ratified by Bangladesh on 22.06.1972 -Forced Labor is prohibited in Bangladesh. The country’s Constitution prohibits forced labor |
| d. | Grievance mechanism- GRM should be in place for direct and contracted workers | Section 33 provides a complete procedure of grievance where it is vividly described of whom to complain and the actions of employer regarding enquiries and the actions to be taken by the labor court. In case of any grievance against his employer relating to his apprenticeship and if it is not redressed by the employer, applies to the competent authority for redress, and shall abide by the decision of the competent authority, Section 28o (f). |
| e. | OHS- Detailed Procedure required for each and every project. - Requirements to protect workers, train workers, document incidents, emergency preparation, addressing issues; - Monitor OSH performance | -The Labor Act does not specifically require that development be assessed and reviewed in terms of OHS requirements before approval. - The Labor Act does not require development projects to prepare OHS Plan. The Bangladesh Labor Act, 2006 Section 79- vividly states that any hazardous operations to be declared beforehand and prohibits employment of any women, children, adolescent or any unfit person for such jobs. Section 80- In case of accidents or any loss of life or bodily injury on the project site, the employer is obliged to inform the Inspector within two working days. Section 89- first aid appliances to be strictly maintained and provided as to be readily accessible during working hours. Section 91 to section 94 includes the facilities to be provided to workers during working hours, namely canteens, washing facility, shelters, rooms for children under age 6 of women workers. Section 99- it is compulsory for establishments wherein minimum two hundred (200) permanent workers are employed, to introduce group insurance. |

| SL | ESSs and Key Topic | Bangladesh Labor Act 2006 (amendment 2018) |
|----------------------|--|--|
| | | Section 150- in case of injuries of workers caused by accident in the course of employment, the employer shall be liable to pay any compensation in accordance with certain provisions. |
| f. | Age of Employment | As per Bangladesh Labor Act, 2006, no one below the age of 14 (minimum age) will be employed as a labor. A child over the minimum age (14) and under the age of 18 may be employed or engaged in connection with the project only if the work is not likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development; an appropriate risk assessment is conducted prior to the work commencing; |
| g. | Employee assessment - procedure for determination of compliance of the worker of post (the performed work) by assessment of execution of job responsibilities, level of knowledge, skills and professional training. | Section 195-made it unlawful to discriminate against any person in regard to any employment, promotion, condition of employment or working condition; |
| h. | Freedom of association and collective bargaining | The Bangladesh Labour Act, 2006 Section 176- focuses on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The procedures for registration of trade unions are set out in detail under Sections 177 and 178 and the requirements for registration are clearly stated in Section 179. The 2006 Act has made a direct provision that if a single trade union remains then that shall be treated as the Collective Bargaining Agent. |
| Key Elements: | | |
| I | To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle from both routine and non-routine circumstances. | <p>The Bangladesh Labour Act, 2006, Section 61- Inspectors will assess the condition of building, machinery or plant in an establishment and recommend if any measures are required for handling imminent danger to human life or safety.</p> <p>Section 62- in case of sudden fire, necessary precautions to be taken in advance are well mentioned and provisions of fire exit to be established in buildings are strictly directed.</p> |

3.4 Key OHS legislation

The special provision related to OHS and working condition has been stipulated in the Bangladesh Labor Act 2006, ESS 2 and ESS 4 and The IFC General EHS Guidelines 2007. The provisions are made to protect the labor and concerned people at the workplace against hazards to safety and health arising in connection with the activities. This act entrusts the employer with the obligation to ensure the safety and health of all its employees, and also to mitigate risks of exposure to any hazards in the workplace.

There are basically two additional components of OHS that relates to the adjacent community. One is the physical safety of project communities who are exposed to the project activities, including risks of accidents and risks of violence due to increase in crimes and conflict between locals and migrant population. The other pertains to the

exposure and/or increased risks of diseases by the community including pollution. The legal obligations on OHS, applicable to LMP of project, are listed below:

- Provision to demonstrate OHS policy at workplace.
- Provision of OHS risk for the waste management workers
- Responsibility of employers towards worker such as information, facility, personal protective equipment and training on all kinds of OHS related training.
- Provision regarding the protection of non-labours such as visitors and others.
- Fundamental provision on Occupational Health and Safety (OHS) including role and responsibility of manufacturer, importer and suppliers for assurance of OHS for their goods and services.
- Provision of non-discrimination based on caste/ethnicity, gender, religion, language, origin and ideology.
- Provision responsibility towards employee such as information, facility, personal protective equipment and training on OHS and responsibility of labourers for work and use of safety gears.
- Special provision for OHS for eye protection, protection against harmful chemicals, operation of pressurized machine/vessel, machine guarding, handling/lifting of load, fire protection, provision against fatigue.
- Provision for treatment and prevention of communicable diseases.
- Provision of onsite first aid and primary health care.
- Provision of accident investigation, inventory of work-related diseases and compensation.
- In the Bangladesh Labor Law health and hygiene related provisions are mentioned at section 51 to 60 and safety of workers related provisions are mentioned at section 61 to 78.

Cleanliness: As per section 51, every establishment shall be kept clean and free from effluvia arising from any drain, privy or other nuisance. The floors of every workroom shall be cleaned regularly, effective means of drainage shall be provided and maintained, the factory shall be re-painted or re varnished at least once in every three years and be cleaned at least once in every fourteenth months, finally the date on which the processes are carried out shall be entered in the prescribed register.

Ventilation and temperature: Section 52 of the law states that, in every workroom and in every establishment, adequate ventilation by the circulation of fresh air and comfortable temperature shall be maintained to prevent workers' injury to health.

Dust and fume: As per the section 53 of the law, in every establishment effective exhaust appliance shall be applied as near as possible to the point of origin of the dust, fume or other impurity, which are likely to be injurious to the workers and such point shall be enclosed so far as possible.

Disposal of wastes and effluents: According to Section 54, effective arrangements shall be made in every establishment for disposal of wastes and effluents due to the manufacturing process carried on therein.

Overcrowding: As per Section 56 of the Act, to prevent injury to the health of the workers, overcrowding of every workroom in any establishment shall be prevented and at least 9.5 cubic meter of space for every worker employed in a workroom in the establishment shall be provided.

Lighting: As per section 57 of the Act, in every part of an establishment where workers are working or passing, there shall be provided and maintained sufficient and suitable lighting, natural or artificial, or both and all glazed windows and skylights used for the lighting of the work-room shall be kept clean on both the outer and inner surfaces and free from obstruction as far as possible.

Drinking water: As per section 58 of the act, effective arrangement of sufficient supply of wholesome drinking water for all workers employed in every establishment shall be provided and maintained at a suitable point conveniently situated therein.

Latrines and urinals: As per section 59 of the act, in every establishment sufficient latrine and urinal, separately for male and female workers, adequately lighted, ventilated, conveniently situated and accessible to workers at all times while they are in the establishment shall be provided and maintained in a clean and sanitary condition at all times with suitable detergents and disinfectants.

Dustbin and spittoon: As per section 60 of the act, in every establishment there shall be provided, at convenient places, a sufficient number of dustbins and spittoons which shall be maintained in a clean and hygienic condition. No person shall throw any dirt or spit within the premises of an establishment except in the dustbins and spittoons provided for the purpose.

Fire safety: Section 62 of the act states that every establishment shall be provided with at least one alternative connection stairway with each floor and such means of escape in case of fire and for carrying fire-fighting apparatus. In every establishment the doors providing an exit from any room shall not be locked or fastened so that they can be easily and immediately opened from inside while work is being carried on in the room. In every establishment, every window or other exit affording means of escape in case of fire shall be distinctively marked in red Bangla letters of adequate and clearly understandable size. A free passageway giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the establishment.

Fencing of machinery: Section 63 of the act states that, in every establishment all dangerous machinery must be securely fenced; e.g., every moving part of a prime mover and every fly wheel connected to a prime mover, the head-race and tail-race of every water wheel and water turbine, every part of an electric generator, every part of transmission machinery and every dangerous part of any machinery.

Work on or near machinery in motion: Section 64 of the act states that, work on or near machinery in motion shall be carried out only by a specially trained adult male worker wearing tight-fitting clothing whose name has been recorded in the register prescribed in this behalf and while engaged he shall not handle a belt at a moving pulley unless the belt is less than fifteen centimeters in width and unless the belt-joint is either laced or flush with the belt.

Cranes and other lifting machinery: Section 68 of the act states that, every part of cranes and other lifting machinery, including the working gear, whether fixed or movable, ropes and chains and anchoring and fixing appliances shall be of good construction, sound material and adequate strength, properly maintained, thoroughly examined by a competent person at least once in every period of twelve months and a register shall be kept containing the prescribed particulars of every such examination.

Hoists and lifts: Section 69 of the act states that, in every establishment every hoist and lift shall be of good mechanical construction, sound material and adequate strength, properly maintained, shall be thoroughly examined by competent person at least once in every period of six months, a register shall be kept containing the prescribed particulars of every such examination, every hoist way and lift way shall be sufficiently protected by an enclosure fitted with gates, and the hoist or lift and every such enclosure shall be so constructed as to prevent any person or thing from being trapped between any part of the hoist or lift and any fixed structure or moving part, every gate shall be fitted with interlocking or other efficient device to secure that the gate cannot be opened except when the cage is at the landing and that the cage cannot be moved unless the gate is closed.

Excessive weights: Section 74 of the act states that, no person shall be employed in any establishment to lift, carry or move any load so heavy as to be likely to cause him injury.

Chapter 4: Environmental and Social Risk Management

4.1 Occupational Hazard Management

Most environmental and social impacts of project resulting from activities directly under the control of contractors will be mitigated directly by the same contractors. Consequently, ensuring that contractors effectively mitigate project activities related impacts is the core of the Project's approach. If and when necessary, the IAs will incorporate standardized environmental and social clauses in the contract agreement. PMU/PIUs will enforce compliance by contractors with these clauses. The health and safety procedure illustrated in the Labor Acts, ESS2 will be referenced all activities under important Project implementation. PMU/PIUs will carry out field visits and inspections from time to time. IAs should put in place specific standards meeting, Good International and Industry Practices (GIIP) in the contract agreement and contracts reflecting appropriate level of risk as and when necessary. The contractual arrangements with each project worker must be clearly defined in accordance with Labor Acts. All environmental and social requirements shall be included in the contract agreement in addition to any additional clauses, which are contained, in the Projects environmental and social instruments.

Under no circumstances this project can engage forced labor. Forced labor includes bonded labor (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work in a non-voluntary basis. In accordance to the, Bangladesh labor act, 2006, PMU/PIUs shall:

1. Comply with legislation and other applicable requirements which relate to the occupational health and safety hazards.
2. Enable active participation in OHS risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
3. Continually improve the OHS management system and performance.
4. Communicate this policy statement to all persons working under the control of contractors with emphasis on individual OH&S responsibilities.
5. Avail this policy statement to all interested parties at all project sites. In accordance with Labour Acts, correspondence PIUs via contractors/subcontractors should:
 - ✓ Identify potential hazards;
 - ✓ In collaboration with the employer, investigate the cause of accidents at the workplace;
 - ✓ Inspect the workplace with a view to ascertaining the safety and health of employees provided that the employer is informed about the purpose of the inspection;
 - ✓ Accompany an inspector whilst that inspector is carrying out the inspector's duties in the workplace;
 - ✓ Attend meetings of the safety and health committee to which that safety and health representative is a member;
 - ✓ Make recommendations to the employer in respect of safety and health matters affecting employees, through a safety and health committee; and
 - ✓ Where there is no safety and health committee, the safety and health representatives shall make recommendations directly to the employer in respect of any safety and health matters affecting the employees.

In accordance to Bangladesh labour act, 2006 first aid provisions are required. These provisions, and to avoid work related accidents and injuries, the contractor will:

- Provide occupational health and safety training to all employees involved in works.
- Provide PPE (Personal Protective Equipment), i.e.; protective masks, helmet, overall and safety shoes, and safety goggles, as appropriate.
- Provide workers in high noise areas with earplugs or earmuffs.
- Ensure availability of first aid box.
- Provide workers with access to toilets and potable drinking water.
- Provide safety and occupational safety measures to workers with Personal Protection Equipment (PPE) to prevent accidents during replacement and installation and follow safety measures in installing submersible pump and cleaning the raiser pipes.
- Properly dispose of medical waste as per existing protocol.

4.2 Grievance Mechanism

Given the scale of the labor use in this project, contractors will adopt the project GRM to allow their works to raise grievances. Information about the GRM (including channels to raise grievances, the procedure, timeline, etc.) will be publicized as part of the initial disclosure consultations in the participating subproject areas. Brochures/notice board/posters will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the respective IA websites.

The project GRM should have the following Grievance Redress Committee (GRC) Members:

- Head of the Project/Project Director (PD)
- E&S Specialist (consultant or assigned from the organization)
- An elected member of the respective camp or host community
- A female member of the respective camp or host community
- Respective labor representative (for resolving labor related issues)

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

Management of Gender and SEA/SH Related Complaints: Gender based discrimination is to be strictly prohibited and monitored by the PMU/PIUs of the Project. The PMU/PIUs with support from E&S specialists/consultants, identify issues of SEA/SH associated with labor engagement. In case the PMU/PIUs and the contractors are not equipped to handle complaints or provide relevant services to survivors of SEA/SH, they will refer them to SEA/SH service providers (could be local NGOs having such program and services) who will in turn use health facilities, law enforcement's gender unit or others, and other services for management of the issue. Grievances related to SEA/SH should also be channeled through the related service provider, if employed, else keeping the complainants' confidentiality. All the contractors who will be engaged for the project will be required to ensure their workers understand and sign the CoC and are trained and monitored for any potential SEA/SH related incidents.

4.3 Contractor Management

PMU/PIUs shall make sure that contractors monitor, keep records and report on terms and conditions related to labour management. The contractor must provide workers with evidence of all payments made including conditions of service. The Project's oversight of contractors is set out in this LMP. The following procedures are to be followed

by PMU/PIUs for contractor management, adhering to LMP provisions and the project management unit shall be liable to comply with these procedures:

1. Ensure that Contractors have valid contracts with clearly define service level agreement and all environmental and social clauses
2. Monthly submission of records: Contractor submission to Project Implementation Unit, copied to Project Management Unit. This includes:
 - ✓ Incidents and accidents, the Incident Reporting and Investigation Procedure is followed, and the Incident/Accident Monitoring Register is used to monitor.
 - ✓ Contractor employees recorded using Contractors Employee List
3. Monthly site visits (at a minimum) and reports
4. Concerns or issues tracking using monitoring register.

Contractors should develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of communicable diseases.

4.4 Management of Medical Waste Management Workers of the Project Sites

Mechanisms to reduce exposure to medical waste will include a combination, of improvements to management practice, technology and workers behavior. Examples include appropriate use of PPE such as gloves, full-body suits, boots, glasses, gas detectors. They also include technologies to support installation and operationalization of microwave- based disposal systems, using which temporary waste will be converted into non-communicable waste. Regardless of technologies used, workers need to be trained in their use according to standard operating procedures and mechanisms to ensure they are being followed need to be in place to ensure risks are mitigated. The following key measures are suggested for the workers.

- Educate all workers about the potential risks associated with their work
- Increase awareness about hazards at the workplace, waste collection areas and municipalities
- Outline all emergency, spill and injury response procedures
- Educate on safe work practices
- Provide training on PPE use
- Provide refresher training on handling sharps containers, hazardous and chemical containers, handling contaminated line and handling radioactive waste, where applicable
- Response to injuries
- Personal hygiene including hand hygiene
- Donning, removing and cleaning PPE

Chapter 5: Implementation and Monitoring

5.1 Responsible Staff

PMU/PIUs will have the overall responsibility to oversee all aspects of the implementation of the LMP. The detailed approach is described in the following sections.

Occupational Health and Safety: PMU/PIU should oversee day-to-day compliance with specified safety measures and records of any incidents. Minor incidents shall be reported to the PMU/PIUs (Established in all IAs) on a monthly basis,

serious incidents shall be reported immediately. Minor incidents will be reflected in the quarterly reports to the World Bank, major issues will be flagged to the World Bank immediately.

Labour and Working Conditions: The PMU/PIUs will ensure labor and working conditions are met as per GIIP and require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Worker Grievances: Contractors will be required to adopt the project grievance redress mechanism which responds to the minimum requirements in this LMP. The PMU/PIUs will review records on a monthly basis. Where worker concerns are not resolved, the national system will be used as set out in the section, but the PMU/PIUs will keep abreast of resolutions and reflect it in quarterly reports to the World Bank.

Additional Training: If training is required, this will be the contractor’s responsibility. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required, as specified by the contract.

Table 5.1: Summarization of Risks, Mitigation Measures and Responsible person

| Potential Impacts/Risks | Mitigation Measures | Responsibility |
|--|---|---|
| Engagement of child and forced labor | <ul style="list-style-type: none"> Verify NID cards and/or birth certificate Sessions on awareness raising within the local community and contractors Prepare and implement code of conduct (CoC) Contract document will prohibit child and forced labor | <p>Implementation: Contractors/sub-contractors</p> <p>Supervision: PMU/PIUs will supervise the construction activities in the host and camps.</p> |
| Risk of potential transmission of infectious diseases, particularly for the workers of Waste Management | <ul style="list-style-type: none"> Conducting pre-employment health check controlling entry and exit from site/workplace; reviewing contract durations, to reduce the frequency of workers entering/exiting the site; rearranging work tasks or reducing numbers on the worksite to allow social/physical distancing, or rotating workers through a 24-hour schedule; providing appropriate forms of personal protective equipment (PPE); putting in place alternatives to direct contact, like tele-medicine appointments and live stream of instructions; | Same as above |
| Sexual harassment of women and girls, exploitative sexual relations, and illicit sexual | <ul style="list-style-type: none"> The risk of SEA/SH and discrimination will be mitigated implementing a code of conduct, contract before employing any labor in the work and ensuring necessary training. The Contractor’s monthly training program will also cover topics related to Code of Conduct such as discrimination, sexual harassment, particularly towards women and | Same as above |

| Potential Impacts/Risks | Mitigation Measures | Responsibility |
|--|---|----------------|
| relations with minors from the local community. | <p>children, violence, including sexual and/or gender-based violence and respectful attitude while interacting with the local community.</p> <ul style="list-style-type: none"> Contractor engaged Labour Expert will be responsible to ensure the mitigation measure. | |
| Hazardous work and process | <ul style="list-style-type: none"> The Risk will be mitigated by Contractor, providing personal protective equipment (PPE) for workers, such as safety shoes, helmets, safety vests, masks, gloves, protective clothing, goggles, full-face eye shields and ear protection based on the work requirements. Workers shall maintain the PPE properly by cleaning dirty ones and replacing damaged ones. Contractors must engage a minimum of one Occupational Health and Safety representative who will be responsible to ensure the mitigation measure. | Same as above |
| Community health and Safety (CHS) | <ul style="list-style-type: none"> Reduce interaction with communities Ensure storage, worksite cleanliness and timing of work, so as not to impact people using medical and education facilities | Same as above |

5.2 Provision of LMP in contract agreement

The summary of measures in this LMP will be included in the contract agreement. The implementation of measures will be contractor’s responsibilities.

5.3 Monitoring and evaluation

PMU/PIUs will conduct monitoring in coordination with contractors and sub-contractors. This will be done as per commitment made in the ESCP. Reporting of accidents and incidents will be made to the Bank by the PMU/PIUs

Annex 1: Labor Code of Conduct (CoC)

The purpose of this *Code of Conduct* (CoC) is to:

1. Create a common understanding of what constitutes expected behavior from workers
2. Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to any environmental and social negative issues (including SEA/SH), and
3. Create understanding that breach of this code of conduct will result in disciplinary action.

Definitions

Sexual Exploitation and Abuse (SEA)³

Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another⁴.

Sexual Abuse: “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

Sexual Harassment:⁵

Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

Sexual Harassment versus SEA⁶

SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Consent is the choice behind a person’s voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. **Under this Code of Conduct⁷ consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation
- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse

³ As defined in the UN Secretary’s bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

⁴In the context of World Bank Financed operations exploitation occurs when access to, or benefit from a World Bank Financed good or service is used to extract sexual gain.

⁵ Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community based complaint mechanism. Global standard Operating Procedures.* May 2016

⁶ Ibid

⁷In accordance with the United Nations Convention on the Rights of the Child.

(SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- A worker that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A project worker gets drunk after being paid and rapes a local woman.
- A project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.
- A worker begins a friendship with a 17-year-old girl who walks to and from school on the road where project related work is taking place. He gives her rides to school. He tells her that he loves her. They have sex.

(2) **Examples of sexual harassment in a work context** include, but are not limited to:

- Male staff comment on female staffs' appearances (both positive and negative) and sexual desirability.
- When a female staff member complains about comments male staff are making about her appearance, they say she is "asking for it" because of how she dresses.
- A male manager touches a female staff members' buttocks when he passes her at work.
A male staff member tells a female staff member he will get her a raise if she sends him naked photographs of herself.

Individual signed commitment:

I, _____, acknowledge that creating situations that impact the environment and communities as well as sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (*employee/contractor*) of (*contracted agency / sub-contracted agency*)in(*country*), I acknowledge that unwarranted habits/occurrence/practice that has negative environmental and social consequences and SEA and SH activities on the work site, the work site surroundings, at workers' camps, or the surrounding community constitute a violation of this *Code of Conduct*. I understand these activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit such activities may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under (*country*) law (*and other local law, where applicable*).
- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.

- **Not** solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” under this Code.
- Not engage in any activity detrimental to the environment and communities.

I commit to:

- Adhere to the provisions of this code of conduct both on and off the project site. Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect any such activities, at the project site or surrounding community, I understand that I am encouraged to report it to the Grievance Reporting Mechanism (GRM) or to my manager. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

Sanctions: I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning or formal warning
- Additional training.
- Loss of salary.
- Suspension of employment (with or without payment of salary)
- Termination of employment.
- Report to the police or other authorities as warranted.

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as detrimental to environment and the community including SEA and SH. Any such actions will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report any activities detrimental to the environment and communities including SEA and SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

ANNEX 2: Certificate of Age and Fitness

Part-A of the Registered Medical Practitioner

| | | | |
|---|--|---|--|
| Certificate of Age and Fitness | | Certificate of Age and Fitness | |
| Serial No: | | Serial No: | |
| Date: | | Date: | |
| Name: | | | |
| Father's Name: | | It is being certified that (Name)....., Father..... Mother..... Address..... has been examined by me. His identifying mark is.....He is willing to be employed in establishment, and it has been found in my examination that his age is..... and he is fit to be employed in establishment as an adult/adolescent worker. | |
| Mother's Name: | | | |
| Sex: | | | |
| Permanent Address: | | | |
| Temporary/Mailing Address: | | | |
| Date of Birth according to Birth Certificate/ School Certificate: | | | |
| Physical Fitness: | | | |
| Identifying Marks: | | | |
| Signature/Thumb Impression of the Concerned Person | | Signature/Thumb Impression of the Concerned Person | |
| Signature of the Registered Practitioner | | Signature of the Registered Practitioner | |

ANNEX 3: Record Book on the Training

Name of Contractor/ Sub- contractor:.....

Address of Contractor/ Sub- contractor:.....

Number of Total Workers and Employees:.....

Male:Female:.....

| Serial No. | Date & Time | Type of Training | | | Number of Participants in Training | | | Duration of Training | Signature of Contractor | Remark |
|------------|-------------|------------------|-----|--------|------------------------------------|--------|-------|----------------------|-------------------------|--------|
| | | OHS | CHS | SEA/SH | Male | Female | Total | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |



Government of the People's Republic of Bangladesh

Inclusive Services and Opportunities (ISO) for Host Communities and Forcibly Displaced Myanmar Nationals (FDMN)/Displaced Rohingya Population (DRP)

Ministry of Disaster Management and Relief (MoDMR)

Ministry of Women and Children Affairs (MoWCA)

Ministry of Health and Family Welfare (MoHFW)

Ministry of Primary and Mass Education (MoPME)

Ministry of Social Welfare (MoSW)

(Project Code: P500727)

Stakeholder Engagement Plan (SEP)

Draft

February 2024

Executive Summary

The preparation of the Stakeholder Engagement Plan (SEP) for Inclusive Services and Opportunities (ISO) for Host Communities and Forcibly Displaced Myanmar Nationals (FDMN)/ Displaced Rohingya Population (DRP) started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project's implementation strategy.

This Stakeholder Engagement Plan (SEP) is prepared and will be followed throughout the project life cycle. The SEP will be considered a living document and will be revised as necessary if changing project context requires so with clearance from the World Bank (Bank). Both in person and virtual consultations were carried out to develop this SEP. The SEP identifies the “project affected parties”, “other interested parties” and the “vulnerable and disadvantaged groups” specific to Implementing Agencies, here Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Disaster Management and Relief (MoDMR), Ministry of Social Welfare (MoSW) and Ministry of Primary and Mass Education (MoPME), 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 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 Management/Implementation Units (PMU/PIUs) will be established in each implementing Agencies (IAs), will be connected to the central national GRM system, register and attend project-specific grievances that may potentially rise in the project cycle. The GRM will be of three tiers/levels; site/community level, PIU level (with a Grievance Redress Committee (GRC) at each level) and PMU level. Members of the GRCs will include women and affected persons (beneficiaries and likely affected persons). Training will be provided to the staffs who will work on managing the grievances. The GRMs will also be equipped to deal with labor and SEA/SH related grievances. Any SEA/SH related complaints will be handled following a survivor-centric approach with confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence.

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

The mechanism of information disclosure dissemination will be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community

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

- Timeline and progress of the program and sub-project by components;
- Information on beneficiary participation;
- E&S risks and impacts and mitigation measures (including grievance handling)

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 |
| FDMN | Forcibly Displaced Myanmar Nationals |
| GBV | Gender Based Violence |
| GoB | Government of Bangladesh |
| GRC | Grievance Redress Committee |
| GRM | Grievance Redress Mechanism |
| HNP | Health, Nutrition and Population |
| HIV/AIDS | Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome |
| HNP | Health, Nutrition and Population |
| LMP | Labor Management Procedure |
| HSD | Health Services Division |
| ICT | Information and Communications Technology |
| IEDCR | Institute of Epidemiology and Disease Control Research |
| ILO | International Labor Organization |
| NCD | Non-Communicable Diseases |
| NGO | Non-Government Organization |
| NID | National Identification Card |
| MoFA | Ministry of Foreign Affairs |
| MoWCA | Ministry of Women and Children Affairs |
| MoHFA | Ministry of Health and Family Welfare |
| MoDMR | Ministry of Disaster Management and Relief |
| MoSW | Ministry of Social Welfare |
| MoPME | Ministry of Primary and Mass Education |
| PIU | Project Implementation Unit |
| PMU | Project Management Unit |
| SEP | Stakeholder Engagement Plan |
| WASH | Water, Sanitation and Hygiene |
| WB | World Bank |
| WHO | World Health Organization |

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Chapter 1: Introduction

1.1 Introduction

1. The “Inclusive Services And Opportunities For Host Communities And Forcibly Displaced Myanmar Nationals (FDMN)/Displaced Rohingya People (DRP) (ISO)” is prepared by the Ministry of Women and Children Affairs (MoWCA), Ministry of Health and Family Welfare (MoHFW), Ministry of Disaster Management and Relief (MoDMR), Ministry of Social Welfare (MoSW) and Ministry of Primary and Mass Education (MoPME). The Government of Bangladesh (GoB) intends to implement the Project with finance from the International Development Association (IDA) of the World Bank. To improve access to economic opportunities, safety nets, learning, health, and gender responsive services for vulnerable Host and Rohingya communities. As part of the core requirements, the preparation of the Stakeholder Engagement Plan (SEP) started during inception stage of the project preparation and involved extensive consultations with a broad array of stakeholders. The feedback from these consultations shaped the overall approaches, methods and process of engagement with the stakeholders of this SEP. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project’s implementation strategy. In the context of the above, in person consultations with different stakeholders were carried out to develop this SEP.
2. The purpose of this SEP is to support the proposed Project in delivering efficient and effective engagement and communication with stakeholders of the project so that their views and concerns are reflected in the project design and implementation, and that they are fully informed about the project activities. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

1.2 Project Description and Components

3. The project is designed to improve access to economic opportunities, safety nets, learning, health, and gender responsive services for vulnerable Host and Rohingya communities.
4. **Component 1: Building Community Resilience & Self-Reliance** -- This component will support short-term employment opportunities in the host and FDMN communities. The project will finance (i) stipends to HC beneficiaries under the Employment Generation Program for the Poorest Plus (EGPP+); (ii) the procurement of good services for implementation of a community service program for the FDMN; (iii) stipends to the FDMN beneficiaries in the community service program; and (iv) the establishment and operation of the Project Management Unit (PMU) for the component activities. Activities will be implemented by the Department of Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MoDMR).
5. **Component 2: Supporting Learning for Children** -- This component will support children’s learning in the host and FDMN communities. The project will be used to finance (i) procurement of goods, services, and works for the refurbishment of primary/pre-primary school facilities in Chattogram Division; (ii) procurement of goods and services to increase attendance and enrolment of out-of-school children (OOSC) in the HCs; (iii) procurement of goods and services for the operation of Learning Centers in the FDMN communities; and (iv) the establishment and operation of the Project Implementation Unit (PIU) for the component

activities. Activities will be implemented by the Department of Primary Education (DPE), under the Ministry of Primary and Mass Education (MoPME)

6. **Component 3: Providing safety-nets** – This component will support safety nets in the HC and child protection services for the FDMN. The project will be used to finance (i) procurement of goods, services, and works for refurbishment and renovation of child protection facilities in Chattogram Division; (ii) procurement of goods and services for training HC beneficiaries of livelihood support programs; (iii) stipends for HC beneficiaries of livelihood support programs; (iv) procurement of goods and services for child protection services for the FDMN; and (v) the establishment and operation of the PIU for the component activities. Activities will be implemented by the Department of Social Services (DSS), under the Ministry of Social Welfare (MoSW).
7. **Component 4: Healthier communities** -- This component will support the provision of goods, services, and works to provide essential HNP services in the host and FDMN communities. The project will finance (i) goods, services, and works to provide essential HNP services in the host and FDMN communities; and (ii) the establishment and operation of the PIU for the component activities. Essential HNP services will focus on primary healthcare, family planning, and nutrition services by first, improving the readiness of facilities at different tiers of the health system (community clinics, union health and family welfare centers, upazila health complexes, maternal and child welfare centers and district hospitals in the Chattogram division; health posts and primary health care centers located within the camps in Cox’s Bazar district and the 20-bed facility in Bhasan Char). The activities will include (i) repair and renovation of the physical infrastructure of the existing required facilities (ii) deployment of required health workforce (iii) ensuring proper functional equipment with necessary supplies (iv) uninterrupted supplies of medicines, vaccines and contraceptives (v) functional referral system amongst the facilities including purchase, operation and maintenance of two water ambulances (vi) and ensuring regular monitoring and supervision. The activities will be guided by the Operations Manual. Activities will be implemented by the Health Services Division (HSD) and Medical Education and Family Welfare Division (MEFWD) of the Ministry of Health.
8. **Component 5: GBV Response and Protection** – This component, implemented by the Ministry of Women and Children Affairs, will support (i) goods, services, and works to enable provision of GBV response and prevention services in the host and FDMN communities; and (ii) and the establishment and operation of the PIU for the component activities. The activities will include screening, case management, psychosocial support, multisectoral referral, and mental health support through the One-stop Crisis Centers/Cells, Trauma Counseling Centers, DNA Labs, Shelters, Women-Friendly Spaces (WFS) in the host community in Chittagong Division, and WFS and Women and Youth Support Centers (WYSC) in the FDMN communities in CXB and Bhasan Chor.

1.3 Potential Environmental and Social Impacts

9. The proposed project is not envisaged to involve any civil works, such as new construction or significant rehabilitation of existing buildings in the targeted area. It will, however, involve minor repair, refurbishment and renovation of schools, waste management, which will be done by the government agency in accordance with national and local laws and procedures. The environmental and social impact assessment are aligned with the Bank’s 10 Environmental and Social Standards in the environmental and social framework (ESF), as following:

10. **Environmental Risks:** The environmental risk is rated as “Moderate” considering the type, scale of operation, nature, magnitude of potential environmental risks and impacts. The main concerns will be generation of medical waste in medical facilities. Work at individual locations will involve small scale repair and refurbishment work and are not supposed to have significant environmental impacts.
11. **Social Risks:** The social risk is rated as “Moderate” due to the potential of exclusion of vulnerable stakeholders from consultations, owing to their economic status, lack of access to information and decision-making abilities. There will be no land acquisition and displacement. There will also be no risk on cultural heritage. The risk of labor influx is expected to be minimal.
12. **Gender:** SEA/SH risk of this project is determined as Substantial. The project will include screening, case management, psychosocial support, multisectoral referral, and mental health support through the One-stop Crisis Centers/Cells, Trauma Counseling Centers, DNA Labs, Shelters, Women-Friendly Spaces (WFS) in the host community in Chittagong Division, and WFS and Women and Youth Support Centers (WYSC) in the FDMN communities in CXB and Bhasan Chor. The project will support the institutional capacity building of MOWCA through training staff, strengthening monitoring and reporting systems, review and implementation of policy and plans, and enhancing coordination with key stakeholders such as the MoH to ensure comprehensive GBV response and prevention services. MOWCA will build on their experience of implementing the Multisectoral Program on Violence against Women, and a scale up of the Health and Gender Support Project for CXB.

1.4 Objectives of the Stakeholder Engagement Plan (SEP)

13. The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the implementation of the project, starting from the early stage of the project preparation. The SEP outlines the ways in which the project will engage the relevant stakeholders including the marginalized and disadvantaged groups, and provide them with a mechanism through which people can raise concerns and provide feedback.
14. The involvement of the stakeholders is essential to the success of the project in order to ensure smooth collaboration with the project staff to minimize and mitigate environmental and social risks related to the proposed project. The project’s stakeholder engagement is an inclusive process conducted throughout the project life cycle. It supports the development of strong, constructive and responsive relationships that are important for successful management of environmental and social risks identified in the project. Communicating early, often, and clearly with stakeholders will help the project management to manage expectations and avoid risks, potential conflict, and project delays. In addition, the plan assists in managing stakeholder expectations, which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively with stakeholders to support project interests. The SEP will:
 - Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions, and ensures that this information is taken into consideration when making decisions pertaining to the Project.

- Involves interaction with the Project Affected Parties (PAP) include communities where the project activities will take place, households and communities under the project, members of the public who use the public facilities that will come under project intervention, vulnerable groups include children in the community, women, female-led households, persons with disability, waste handlers and waste pickers etc. Begins early during the project planning process to gather initial views on the project proposal and design.
 - Encourages stakeholder’s feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
 - Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.
 - Considers and responds to feedback.
 - Supports active and inclusive engagement with project affected parties, project beneficiary group and Project’s Other Interested Parties include Government officials, mass media, various NGOs and suppliers.
 - Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.
15. In addition, the SEP of the proposed Project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And, it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

1.5 Requirements for Stakeholder Engagement

16. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks. As per ESS10 the process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting back to stakeholders. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

Chapter 2: Legislative and Policy Requirements

National Provision and Citizen Engagement

17. Bangladesh has relevant laws on right to information, information disclosure, transparency, and citizen participation in development decisions. The Constitution of the People’s Republic of Bangladesh guarantees

freedom of thought and conscience, and freedom of expression and speech, subject to any reasonable restrictions imposed by law. The Right to Information Act 2009 makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. Citizen participation in development decisions is recognized and obliged under the laws on local governments including the zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), paurashavas (2009), city corporations (2009) and hill district councils (1989).

18. The right to information shall ensure that transparency and accountability in all public, autonomous, and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established. The Government of Bangladesh (GoB) 2014 Secretariat Instructions (chapter 8 instructions 262(1) and (2)) mandate provisions for receiving opinions from citizens and to redress grievances in a transparent and neutral manner. The Cabinet Division's Coordination and Reform Unit issued a revised version of the 2015 guidelines on the GoB's grievance redress system in 2018, which provides instructions on a range of issues, such as classification and monitoring of grievances and the responsibilities of various ministries including the Cabinet Division.
19. Key legislative instruments governing citizen rights to information, freedom of expression and speech, citizen participation in development decisions and policy formulation inclusive of gender and social vulnerability are as follows:
 - The Constitution of Bangladesh
 - The Right to Information Act 2009
 - The Zila Parishad Act 2000
 - Local Government (Upazila Parishad) Act 1998
 - Local Government (Union Parishad) Act 2009
 - Local Government (Paurashava) Act 2009
 - The Local Government (City Corporation) Act, 2009
 - Hill District Council Acts 1989
 - The Five-Year Plans (Bangladesh)
 - Bangladesh Secretariat Instructions 2014
 - Grievance Redress System Guidelines, 2015

Key National, Social, Legal Provisions and Citizen Engagement

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

Constitution of the People's Republic of Bangladesh

21. **Article 36. Freedom of movement.** Subject to any reasonable restrictions imposed by law in the public interest, every citizen shall have the right to move freely throughout Bangladesh, to reside and settle in any place therein and to leave and re-enter Bangladesh.

22. **Article 37. Freedom of assembly.** Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order health.

23. **Article 38. Freedom of association.** Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order;

24. **Article 39. Freedom of thought and conscience, and of speech.**

(1) Freedom of thought and conscience is guaranteed.

(2) Subject to any reasonable restrictions imposed by law in the interests of the security of the State, friendly relations with foreign states, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence-

(3) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.

25. **Article 59. Local Government.**

(1) Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law.

(2) Everybody such as is referred to in clause (1) shall, subject to this Constitution and any other law, perform within the appropriate administrative unit such functions as shall be prescribed by Act of Parliament, which may include functions relating to-

(a) Administration and the work of public officers.

(b) the maintenance of public order;

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

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

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

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

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

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

29. **Law on Local Government.** Bangladesh is a democratic republic with two spheres of government: national and local. Local government is enshrined in the constitution (Chapter IV Articles 59 and 60) and the main

legislative texts include the Acts covering zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), pourashavas (2009), city corporations (2009) and hill district councils (1989). The local government division within the Ministry of Local Government, Rural Development and Cooperatives is responsible for local government, with the exception of the hill district councils, which are under the Ministry of Hill Tract Affairs.

World Bank Requirements

30. The World Bank's ESF came into effect on October 1, 2018. The ESF includes Environmental and Social Standard 10 (ESS10) on "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. As defined by the ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS 10 include:

- Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project.
- Borrower agency will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrower will engage in meaningful consultations with all stakeholders. Borrower will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
- Borrower will develop SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders would be identified, and the SEP would be disclosed for public

review and comment as early as possible, before the project is placed for the World Bank appraisal.

- ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

Chapter 3: Stakeholder Identification and Engagement Process

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

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

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

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

3.1 Stakeholder identification and analysis

33. Project stakeholders are defined as individuals, groups or other entities who are grouped into affected parties, interested parties and vulnerable groups as discussed in para 32.
34. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:
- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
 - *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
 - *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly, persons with disabilities, and those with underlying health issues.
 - *Flexibility*: if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication.
35. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

Affected Parties: Persons, groups and other entities directly influenced, either positively or adversely, (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. The following individuals and groups fall within this category:

- People, particularly women living in the host communities
- Women and children living in the camps
- Communities in the vicinity of the project's planned activities, including host communities.
- Waste (solid and liquid) handlers and medical waste-pickers in the camps and host communities
- Local population and communities including local/neighborhood associations/clubs, youth groups/associations
- People who opt for public health service assistance

- Third Gender Community, if exists.
- People of ethnic minority living around the project area
- Residents, business entities, and individual entrepreneurs in the area of the project that can benefit from the employment, training and business opportunities
- Local government officials in the project area, environmental protection authorities and health authorities

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

- 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

36. **Vulnerable individuals or Groups:** It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups, be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community, dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

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

- Third Gender communities
- People with disabilities
- Female-headed households
- Elderly (especially those of 60 years and above) people
- Low-income people from ethnic minority living in the project area/host communities
- Waste collectors

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

3.2 Stakeholder Engagement Process

39. Stakeholder engagement process for this project starts from the identification stage. This Stakeholder Engagement process will help clarify the stakeholder identification procedure at project level. **Table 3.1** show the plan and techniques suggested to be used during the engagement process:

Table 3.1: Stakeholder Engagement Plan (SEP) and Techniques

| ENGAGEMENT TECHNIQUE | APPROPRIATE APPLICATION OF THE TECHNIQUE |
|---|---|
| Correspondences (Phone, Emails, Text, instant messaging) | <ul style="list-style-type: none"> • Distribute information to IAs and officials of different government agencies, NGOs, and organizations • Invite stakeholders to meetings and follow-up. |
| One-on-one meetings | <ul style="list-style-type: none"> • Seeking views and opinions • Enable stakeholder to speak freely about sensitive issues. • Build personal relationships. • Record meetings |
| Formal meetings | <ul style="list-style-type: none"> • Present the Project information to a group of stakeholders. • Allow group to comment – opinions and views. • Build impersonal relation with high level stakeholders. • Disseminate technical information of the project. • Record discussions |
| Public meetings/workshop | <ul style="list-style-type: none"> • Present Project information to a large group of stakeholders, especially communities • Discuss about the all-project components. • Allow the group to provide their views and opinions. • Build relationship with the communities, especially those impacted. • Distribute non-technical information. • Facilitate meetings with presentations, PowerPoint, posters etc. • Record discussions, comments, questions. |
| Focus group meetings | <ul style="list-style-type: none"> • Present Project information to a group of stakeholders • Allow stakeholders to provide their views on targeted baseline information. • Build relationships with communities. • Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions. • Record responses |
| Project on website/Information Centre/information Boards/GRM | <ul style="list-style-type: none"> • Establish Information Board in each project area. • Present project information and progress updates • Disclose E&S documents • Disclose component wise project activities |
| Direct communication with affected people | <ul style="list-style-type: none"> • Share information on timing of project activities. • Collect the opinion about the project |
| Project information on site | <ul style="list-style-type: none"> • Share information on project activities. • Provide information on construction materials that will be needed to incite potential suppliers |
| Project leaflet | <ul style="list-style-type: none"> • Brief project information to provide regular update |

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

3.3 Planned Stakeholder Engagement Strategy

40. Stakeholder engagement strategy will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. Table below presents the stakeholder engagement activities PMU/PIUs will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation and implementation.

Table 3.2: Stakeholder Engagement Strategy

| Stage | Target stakeholders | Topic(s) of engagement | Method(s) used | Location/frequency | Responsibilities |
|------------------------------|---|---|--|--|------------------|
| Stage 1: Project preparation | Project Affected People: People residing in project area Vulnerable households | Project scope and rationale; Project ES risk and impacts; 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 | PMU and PIUs |
| | Other Interested Parties (External) – NGO working in waste management, climate resilience issues and GBV sectors | ES Code of Practice (ESCoP), LMP, SEP, SEA/SH Action Plan disclosures; Project scope, rationale and E&S risk and impacts and mitigation measures, Grievance mechanism process | Face-to-face meetings Joint public/community meetings | Quarterly meetings with interested parties | PMU and PIUs |
| | Other Interested Parties (Internal) Press and media Local NGOs, Different Government Departments having link with project implementation etc. General public, jobseekers etc. | ESCoP, LMP and SEP, SEA/SH Action Plan disclosures Grievance mechanism Project scope, rationale and E&S risks and impacts and mitigation measures | Public meetings, trainings/workshops, Mass/social media communication Disclosure of written information: Brochures, posters, flyers, website Information boards Grievance mechanism Notice board for employment recruitment | Project launch meetings with relevant stakeholders Meetings in affected locations/communities as needed; Communication through mass/social media (as needed) Information desks with brochures/posters | PMU and PIUs |
| | Other Government Departments from which | Legal compliance issues Project information scope and rationale | Face-to-face meetings Invitations to public/community meetings | Disclosure meetings Reports as required | PMU and PIUs |

| | | | | | |
|-------------------------------|---|--|---|---|--------------|
| | permissions/clearances are required; Businessmen, Contractors and suppliers | and E&S risks, impacts and mitigation measures, Coordination activities Grievance mechanism process ESCoP/LMP /SEP, SEA/SH Action Plan disclosures, Submission of required reports | | | |
| STAGE 2: Implementation Phase | Project Affected People, including Vulnerable community | Grievance mechanism Health and safety impacts, Employment opportunities Project status | Public meetings, open houses, trainings/workshops Separate meetings as needed for women and vulnerable group Individual outreach to PAPs as needed Disclosure of written information: brochures, posters, flyers, website Information boards; Notice board(s) at construction sites Grievance mechanism -Local monthly newsletter | Quarterly meetings during construction phase Communication through mass/social media as needed Notice boards updated weekly Routine interactions Brochures in local offices | PMU and PIUs |
| | Other Interested Parties (Internal) | Reporting, monitoring, incidents handling, contract management. | Face-to-face meetings Joint public/community meetings with PAPs | As needed (monthly during construction phase) | PMU and PIUs |
| | 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) | PMU and PIUs |

| | | | | | |
|--|--|---|--|---|---------------------|
| | <p>Other Interested Parties (External) Press and media Various Government Departments General public, jobseekers</p> | <p>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</p> | <p>Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards Notice board(s) at construction sites Grievance mechanism</p> <p>GBV related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, medical sector NGOs, NGOs specifically working on GBV matter, local leadership, religious leaders, elders including women representatives, teacher of the local schools and Madrassas.</p> | <p>At regular intervals throughout the project period to educate and raise awareness amongst the population</p> | <p>PMU and PIUs</p> |
|--|--|---|--|---|---------------------|

3.4 Description of Information Discloser Method

- 41. As a standard practice, the Project ESF documents (ESCoP, LMP and SEP, SEA/SH Action Plan etc.) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PIUs in a formal manner. PIUs will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. The ESCoP, LMP, SEP and SEA/SH Action Plan in English with Bangla translation of the executive summaries will be made available for public review for meaningful engagement with the stakeholders.
- 42. Distribution of the disclosure materials will also be done by making them available online, with hardcopies at PMU/PIUs and field offices. This will allow stakeholders to obtain information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. Basing on the improvement of situation, free copies may be available at office locations.
- 43. The SEP along with the other E&S documents will remain in the public domain for the entire project life cycle. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their

involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically.

44. The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table below provides a description of recommended stakeholder engagement and disclosure methods to be implemented during stakeholder engagement process.

Table 3.3: Stakeholder Engagement and Disclosure Methods

| Stakeholder Group | Project Information Shared | Means of communication/ disclosure |
|---|---|---|
| Project-affected parties | Public Grievance Procedure; Regular updates on Project development. | Online notices. Electronic publications (in Bangla and English languages) and press releases on the Project website. Dissemination of hard copies (in Bangla and English languages) at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures (in Bangla and English languages). Separate focus group meetings with vulnerable groups, as appropriate. |
| Non-governmental and community-based organizations | ESCoP, SEP, LMP, SEA/SH Action Plan, Public Grievance Procedure; Regular updates on Project development. | Public notices (in Bangla and English languages). Electronic publications and press releases on the project website. Dissemination of hard copies at designated public locations. Press releases in the local media (in Bangla and English languages). Consultation meetings. Information leaflets and brochures (in Bangla and English languages) |
| Government authorities and agencies | ESCoP, SEP, LMP, SEA/SH Action Plan; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting. | Dissemination of hard copies of the ESCoP, LMP, SEP and SEA/SH Action Plan at PIU offices Project status reports. Meetings and round tables. |
| Related businesses and enterprises | SEP; Public Grievance Procedure; Updates on Project development and procurement announcements. | Electronic publications and press releases on the Project website. Information leaflets and brochures. |

Chapter 4: Grievance Redress Mechanism

45. The fundamental objective of GRM will be to resolve any project related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. The GRM will be consistent with the requirements of the World Bank policies to ensure mitigation of stakeholders' concerns, risk management, and maximization of environmental and social benefits. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level. The GRM will be accessible to diverse members of the stakeholders, including women, senior citizens and other vulnerable groups. Culturally-appropriate communication mechanisms will be used at all project sites both to spread awareness regarding the GRM process as well as complaints management. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance management system available with the small ethnic communities and the Grievance Redress Committee (GRC) will include a representative from these communities.
46. The Department of Disaster Management (DDM) and other IAs involved in this project are currently using the government's central GRM accessible online and by phone: <https://www.grs.gov.bd/>, which also include a detailed user manual as well as guideline and process map on the website. However, given the number of IAs involved in the project, a separate project GRM will be developed and used. The GRM will be brought into effectiveness as per timeline mentioned in ESCP.

SPECIAL GRM FOR SEA/SH RELATED COMPLAINTS

47. All three tiers/levels (mentioned below) of the GRM will be sensitized to receive SEA/SH and labor related complaints. PMU/PIUs, the project unit and the contractor are not equipped to handle complaints or provide relevant services to survivors but will refer any person to relevant service providers, including health facilities, law enforcement's gender unit or others, as relevant using the information on available services. Grievances related to gender-based violence be reported through the project/contractor, the nature of the complaint will be recorded along with the age of the complainant and relation to the project will be recorded. After consultation with the service providers and assessing the complaint, appropriate disciplinary measures will be taken against the perpetrator. The project GRM will also be equipped to receive SEA/SH related complaints with a protocol of survivor centric approach. Survivor centric approach will prioritize the wish of the victim, and take measures accordingly.
48. **SEA/SH GRM Process:** The following will be the steps to be followed addressing SEA/SH GBV cases

Table 4.1: SEA/SH GRM process

| STEP | FUNCTION | DETAILS |
|-----------------------------|---|--|
| Uptake | Receive SEA/SH allegation through multiple reporting channels established for the project | <p>Project GRM channel will be used.</p> <p>Survivor must be informed that her/his wishes to continue with the case will prevail.</p> <p>Upon receiving the allegation, the survivor will be immediately referred to PMU level GRC who will deal with the case in its entirety, given its sensitivity and requirement of training. PMU GRC will have staff trained and assigned for SEA/SH cases</p> |
| Sort and process | Document and register allegation | The SEA/SH coordinator at PMU 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 | <p>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 prior to the 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.</p> <p>Survivor must consent to share the four nonidentifiable data with PMU and WB. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity.</p> |
| | Notify the World Bank in accordance with the required reporting protocols | If a survivor gives consent, the SEA/SH coordinator will inform PMU and WB on the four sets of data. Else, only an intimation to the WB and PMU 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 PMU GRC Coordinator (Annex F).</i></p> <p>At this stage the survivor will be referred to various service providers. Before referral, the survivor’s consent must be 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.</p> |
| Verify, investigate and act | Provide support services to survivors | GBV service providers support survivors until their services are no longer needed. |
| | 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 PMU 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 PMU 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 | The SEA/SH Coordinator needs to provide ongoing feedback to the survivor throughout the process but especially: (1) when the grievance is received; (2) when the case is reported to PMU 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. 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, particularly when sanctions will be taken. |

Following issues to be kept in mind while dealing in SEA/SH issues:

Table 4.2: Issues to keep in mind while dealing with SEA/SH complaints

| ISSUES | | DO'S | DON'T'S |
|------------------------|---|------|--|
| Confidentiality | 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 Establish a formal protocol with clear rules and procedures for interagency information-sharing of case-level data to ensure confidentiality | | Register the case in a logbook used for other types of grievances Leave information/logbook easily accessible Underestimate the importance of keeping survivor files confidential, even within an organization or with colleagues Discuss survivor files with anyone unrelated to the case or include identifiable data or information about individual cases in interagency reports Include any elements in shared data that could help identify survivors, including names, characteristics, or specific locations |

| | | |
|-----------------------|--|---|
| <p>Consent</p> | <p>Document a survivor’s consent to receive referrals and for the sharing of any data 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 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) Act on the allegation in any way without the consent of the survivor Coerce a survivor to make a particular decision or create false expectations of available services and support 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> |
|-----------------------|--|---|

Communication & Awareness Raising on GRM

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

OPERATIONALIZATION OF PROJECT GRM

- 50. Project GRM will establish and operate Grievance Redress Committee (GRC) at respective locations with the GROs as the key member with applicable responsibility to coordinate and communicate between the Project GRM. The project GRCs will deal with the project related questions, complaints, and suggestions.
- 51. The PMU/PIUs will develop a Project GRM Manual with clearly defined mandates, roles, and responsibilities of itself, the implementation partners and service providers, channels for producing complaints and grievances. A GRM Handout will also be produced in national Bangla language, circulated among the stakeholders, and briefed in formal and informal discussion sessions. The GRM Manual and the Handout will be developed by IAs within the timeline (mentioned in ESCP) of activation of the PIUs, and adopted following the approval by all IAs and concurrence from the World Bank.

GRIEVANCE MECHANISM STRUCTURE

52. A three-tier/level grievance redress mechanism has been proposed for the affected people and other stakeholders (Project GRM) under this project to address all grievances/claims and allow the people to go to the upper level or to the courts of law for seeking final judgment. The GRM will be at site/sub-project level, PIU level and PMU level. Sample Grievance Registration Form is provided as **Annex 3**

Table 4.3: GRM Structure (including GRCs at various Levels) and Responsibilities

| Level | Organogram | Role | Timeline |
|--|---|---|---|
| <p>Level 1 Local Level</p> | <p>Local GRC</p> <p>Head/Chair: Regional/ Local Officer of the respective IA</p> <p>Member 1: Local camp head (Majhi, for FDMN communities)</p> <p>Member 2: An Elected Member of community (Chairman for the host community)</p> <p>Member 3: A Female Member of the camp or host community who is in a leadership position</p> <p>Member 4: A Representative of the beneficiaries and affected persons in the subprojects</p> <p>Member 5: Labor representative for labor related dispute</p> <p>GRC Uptake Staff</p> <p>At least one will be a female member. They may be posted to subproject sites.</p> | <p>Uptake Staffs:</p> <ul style="list-style-type: none"> Maintain and implement GRC uptake channels (Phone, SMS etc.) Log in grievances and provide tracking number Receiving grievances for logging forwarded from other Tiers/levels Intimating progress to Complainant Keeping and maintaining Logbook and files Report quarterly progress to level two <p>Local GRC:</p> <ul style="list-style-type: none"> Ensure GRM is publicized locally Screening against eligibility criteria (If admissible or not) Carryout inquiry on eligible grievances Arrange to solve simple complaints informally Consult with Contractors and other parties against whom complaints have been launched and mediate, if feasible Carryout GRC meeting and provide final decision on complaints Forward complaints to level two if Complainant is not satisfied with resolution Refer to Legal and law Enforcement Agencies, NGO if deem fit Carryout local stakeholder consultation quarterly Provide GRM related training to staffs Monitor GRM progress | <p>Uptake to Initial Feedback on eligibility and next course of action = 48 hours</p> <p>Eligibility acceptance to level one/level one Resolution = 16 days</p> |

| | | | |
|--|---|---|---|
| <p>Level Two: PIU level</p> | <p>PIU GRC Head: Assigned head of the Respective IA for the Project</p> <p>Member 1: E&S Specialist of the Project (consultant or assigned from the organization)</p> <p>Member 2: An elected member of the respective camp or host community</p> <p>Member 3: A female member of the respective camp or host community</p> | <ul style="list-style-type: none"> • Monitor GRM status of level one - Local GRC • Combine the report of all level one GRC and provide feedback to level three PMU GRC • Inquire and decide on cases forwarded from level one GRC • Forward case to level three GRC if unable to decide or if decision rejected by Complainant • Train own staffs on GRM • Monitor GRM Progress of level one • Arrange meeting with stakeholders • Provide guidance to level one Local GRCs | <p>Receive from level one to Resolution = 15 days</p> |
| <p>Level Three: PMU Level</p> | <p>GRC Head/Chairman: Head of the Project (PD)</p> <p>Member 1: Deputy Project Director (DPD)</p> <p>Member 2: E&S Specialist of the PMU (consultant or assigned from the organization)</p> <p>One will be trained SEA/SH Coordinator</p> | <ul style="list-style-type: none"> • Develop GRM policy and implement • Train staffs on GRM Procedure and provide guidance incl SEA/SH GRM • Provide logistics to various GRCs • Develop and maintain various uptake channels • Monitor GRM progress of level 1 and 2 • Compile GRM database and share with World Bank and PMU (GRM Aggregator) • Carryout field visits • Provide resolution to complaints forwarded from level two GRC • Ensure Telephone/SMS receivers receive complaints and forwards to level one GRC and keep log of complaints • Carryout high-level stakeholder consultation • Maintain database of all GRC members at all levels/tiers • Be responsible for addressing SEA/SH issues | <p>Receive from level two to Resolution = 15 days</p> |

The Project GRM process will be followed as under. This will be tested in the field and may be changed depending on practicality.

Table 4.4: GRM Process (Uptake, Investigate, Response, Closure)

| Stage | Activities | Responsibility | Timeframe |
|-------|------------|----------------|-----------|
|-------|------------|----------------|-----------|

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|---|--|--|--|
| <p>Uptake</p> | <p>Carryout activities listed as per GRM Uptake Channel paragraph. If complaint not eligible as decided by first level intimate the Complainant and refer him/her to Legal/Law Enforcing Agency/NGOs etc. if the complainant desires If eligible, level one will begin their activities</p> | <p>The Uptake staffs assigned at each field office. If complaint is received via telephone, SMS, Website and email these will be referred to the uptake staffs of that specific field office where the complaint originates who will record, assign tracking number and follow Activities 1 and 2.</p> | <p>The Complainant will be informed if the complaint is legible or not within 48 hours</p> |
| <p>Screening for Eligibility (Just after uptake)</p> | <p>After receiving complaints level one GRC will test complaint for eligibility. The eligibility will be informed to Uptake Channel staffs</p> | <p>The Level one GRC will be responsible to inform Uptake Channel staffs of eligibility</p> | <p>Eligibility will be intimated to Uptake Channel Staffs in less than 48 hours</p> |
| <p>Complaint Assessment</p> | <p>If the initial assessment establishes the eligibility of the complaint to be pursued, a further assessment is recommended of the seriousness of the complaint—classified in terms of high, medium, or low—and its impact on both the complainant and the project. Criteria for classification include the following:</p> <ul style="list-style-type: none"> • Severity of the problem, • Potential impact on the well-being of an individual or group, • potential impact on the project, and • public profile of the issue. <p>Additional data collection through field visits to the sites, discussions and interviews with Complainants and other relevant persons or groups in the community, and cross-checking the information already provided will be required. This phase is an investigation phase</p> | <p>Level one GRC</p> | <p>3 working days from eligibility intimation to intimation to Complainant of a solution/ option</p> |
| <p>Formulate a Response</p> | <p>Having completed the complaint assessment, a response along with options will be formulated on how to proceed with the complaint for solution. This response should be communicated to the complainant. The response should include the following elements:</p> <ul style="list-style-type: none"> • acceptance or rejection of the complaint • reasons for acceptance or rejection • provide an initial solution including options • a time frame; and | <p>Level one GRC</p> | <p>3 working days from option intimation to agreement with the Complainant about solution</p> |

| | | | |
|---|--|-----------------|--|
| | <ul style="list-style-type: none"> • further documents or evidence required for investigation, if required. <p>In case further evidence is required, the GRC will carry out further investigation with new evidence and repeat the process above</p> | | |
| Implementing the Solution (if accepted) | <p>If Complainant agrees with the solution the GRC will settle grievances through:</p> <ul style="list-style-type: none"> • requesting the relevant agencies responsible for the grievance to take appropriate measures to remove the cause of grievance (e.g., contractors to clear access roads or provide alternative roads, clear canals and other irrigation systems, remove garbage, warn workers or take disciplinary measures against workers etc.) • provide timeline for the resolution by the responsible party • signing agreements between Affected Parties (APs) and the GRC for solutions mutually agreed upon • initiating a monitoring process to see if the agreed actions are being implemented or not • After action is completed, intimate the Complainant and get his/her signature in GRM Resolution Satisfaction Form | Level one GRC | 10 working days from agreement |
| Implementing the Solution (if not accepted, or for a complex issue not under level one jurisdiction) | <p>The complaint will be forwarded to Level two with intimation to the Complainant about timeline. Monitor complain handling process</p> | Level one GRC | 2 working days from solution being unaccepted by Complainant |
| | <p>Level two GRC will repeat complain resolution process mentioned above for level one. Complaint resolution and options will be intimated to level one by level two who will interact with the Complainant. Resolution activities will also be coordinated by level two. For complex issues, level two will directly contact Complainant</p> | Level two GRC | Presentation of solution in 15 working days from receiving complain from level two |
| If level two Solution is not accepted | <p>Level two will forward the Complaint to Level three and same process will follow</p> | Level three GRC | Presentation of solution in 15 working days from receiving complain from level two |

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|-----------------------------|---|----------------|------------|
| Complaint Evaluation | <p>An evaluation system should assess the overall effectiveness and the impact of the GRM. Such evaluations will take place biannually, and their results should contribute to improving the performance of the GRM and provide valuable feedback to PMU. The following questions will be addressed in such evaluations:</p> <ul style="list-style-type: none"> • How many complaints have been raised? • What types of complaints have been raised? • What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)? • How long did it take to solve the problem? • How many APs have used the grievance redress procedure? • What were the outcomes? • Is the GRM effective in realizing the stated goals, objectives, and principles? • Is the GRM capable of responding to the range of grievances specified in their scope? | All GRC levels | Biannually |
|-----------------------------|---|----------------|------------|

Note 1: for serious Complaints (GBV, fatality, near misses, hazardous spill etc.) initial reports must be given to PMU and World Bank within 24-hour time

Note 2: Complainant will not be barred from seeking redress from Legal/ Law Enforcement/NGOs. All levels of GRC should maintain a good communication network with them, including local Government officials so that Complainant referred to these agencies can be given adequate attention.

Note 3. The above processes should not create incentives for Affected Parties (APs) to seek further redress (e.g., by having the level two routinely yield more benefits or higher compensation than level one etc.). The process should not encourage unjustified multiple appeals.

Note 4. GRCs must upkeep *Complaint Forms, GRC Review Meeting Form, M&E/Quarterly Report Compilation Form and GRM Satisfaction Forms* – both blank and those filled by the GRM process for future references. *Filled form must also be saved digitally*

There will be several uptake channels for complaints to be received:

Table 4.5: GRM Uptake Channels

| Channel | Particular | Timetable | Responsibility |
|---------------------|---|---|--|
| Face-to-Face | There will be a number of field offices, and each field office will nominate an individual to register complaints. He/ She should have a register to note the | Will be operated from 6 AM to 6 PM (12 hours) | 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 |

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| | complaints and complaint forms to fill up. The form will be signed by both the staff and the Complainant. | This information must be disseminated to the public | begin with greetings. The staff will note, fill up the company form (Annex A), 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 first GRC level for eligibility checking as well as the Central GRC aggregator for compilation. After eligibility check by the first 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) |
| Telephone | 01711-XXXXXX | Will be operated from 6 AM to 6 PM (12 hours) | Will be manned by two operators working 6 hours shifts. One female and one male. Will be open 7 days a week, even in Government holidays. Following will be noted (Action 1): Name and address (none required if anonymity sought) Complaint, in summary Nature of Complaints If it is project related. Complaint against, if any Operator will (Action 2): Register the complaint in a register Provide a tracking number Provide a timeline Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing) Intimate the first level of GRC about the complaint Intimate Central GRC aggregator After eligibility check by first 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.) |
| SMS | 01911-XXXXXX (different from above number) | Will be operated from 6 AM to 6 PM (12 hours) | Will be manned by above two operators. After SMS is received, Operator will call back and execute above steps |
| Email | Project.GRM@email.com | Will be monitored as per above timing (12 hours) | Will be operated by the Social Development Specialist/Communication Specialist/ Any other nominated staff of the PMU 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. |
| Website | www.BDProject.com/GRM | Will be monitored as per above timing (12 hours). The site will provide a format for complaint registration. This will include info required | As above |

| | | | |
|------------------------|--|--|--|
| | | in Action 1 above. The complaint will be redirected to the email above with a Subject GRM From Web – Date and Time. | |
| Letter | Social Development Specialist XXX Project H XX, Rd XX, Sector XX Dhaka Phone: 01711-XXXXXX | Will be received and opened during office hours | After the letter is received, the complaint will be studied and if ineligible, it will be intimated to the Complainant including provision of other options. If eligible Action 1 and 2 above will be implemented |
| Suggestions 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 |

Chapter 5: Implementation of the SEP and Budget

5.1 Implementation Arrangements of the SEP

53. PIUs of the respective IA and PMU are responsible for managing the E&S risks of the project, including implementation of the SEP through their existing structures. For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the proposed project relevant ES management planning documents. Although the project is now at preparation stage, the most likely institutions those would be involved are the Implementing Agencies (IAs) and their Project Implementation Unit (PIUs) and Project Management Unit (PMU).
54. This project's institutional and implementation arrangements reflect the unique nature of the development challenge that it is trying to address, while working within the confines of the GoB's rules of business, and policy stance on Forcibly Displaced Myanmar Nationals (FDMN), Displaced Rohingya Population (DRP), while also presenting a multisectoral response, as requested by the government. Components 1, 2, 3, and 5 will be managed and implemented by DDM, DPE, DSS, and MoWCA, respectively. Component 4 will be managed and implemented by the two component entities within MoH, specifically the HSD and MEFWD. DDM will have a PMU, and will play the role of central coordination across all implementing agencies (IAs) within the project, while all other IAs will have a PIU. Each PMU/PIU will be responsible for implementation, coordination, monitoring and supervision of their respective component in consultation with the Secretary/Senior Secretary of their respective parent ministry. The coordination and monitoring between IAs will take place at the central, divisional, district and upazila levels for implementation of the interventions for both the Host Communities (HC) and FDMN using existing GoB mechanisms. For services to the FDMN community, each PMU/PIU will coordinate with the office of the Refugee Relief and Repatriation Commissioner.
55. The PMU/PIUs will (i) help to supervise and streamline the 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.

Table 5.1: Role and Responsibilities for SEP Implementation

| Actor/Stakeholder/ responsible person | Responsibilities |
|--|--|
| Communication/SEP team of PMU/PIUs | <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 DDM and other IAs and World Bank - Take lead in carrying out the beneficiary satisfaction survey |
| PMU and PIU Officials | <ul style="list-style-type: none"> - Visit project area for M&E (at least quarterly) |
| Site Contractor(s) / sub-contractors | <ul style="list-style-type: none"> - Report/inform PMU on 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. - 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 |

5.2 Budget for SEP Implementation

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

Table 5.2: Tentative Annual Budget to Implement Stakeholder Engagement

| Sl.no | Stakeholder Engagement Activities | Quantity | Unit Cost (US \$) | Times/ Months | Total Cost (US \$) |
|-------|--|--------------|-------------------|---------------|---|
| 1 | Staff/Consultants Salaries | | | | Paid from Project Consulting Service Budget |
| 2 | Training on Stakeholder Engagement and GRC issues | 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 PMU/PIUs with SPs and IPs | 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 | GRM Guidebook/ Manual | Lump Sum | | | 500.00 |
| 11 | Suggestion/complain Boxes | 20 | 50 | | 1,000.00 |
| 12 | GRM /GRC expenses | Lump Sum | | | 2,000.00 |
| 13 | GRM 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) |

Chapter 6: Monitoring and Evaluation

57. PMU/PIUs will be responsible for the overall coordination and supervision of the M&E tasks through their existing structures. The Environmental and Social Specialist be responsible for the monitoring and reporting of this SEP. PMU/PIUs will prepare periodic monitoring report as required by the ESCP. In case consolidated report on E&S management is prepared, they will ensure that specific sections/chapters on the SEP implementation are entered in such reports.
58. The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. The Social Expert will work on a reporting matrix in this regard.

Table 6.1: Monitoring requirements

| Key elements | Time frame | Methods | Responsibilities |
|---|--|--|------------------|
| Stakeholders' access to project information and consultations | Periodic (during project preparation and maintained throughout project implementation) | Interviews, observations, survey | PMU and PIUs |
| Project beneficiaries' awareness of project activities, their entitlements and responsibilities | Periodic (during project implementation) | Interviews, observations, survey | PMU and PIUs |
| Acceptability and appropriateness of consultation and engagement approaches | Periodic (during project implementation) | Interviews, observations, survey, score-card as relevant | PMU and PIUs |
| Community facilitators' engagement with target beneficiaries | Periodic (during project implementation) | Interviews, observations, survey, score-card as relevant | PMU and PIUs |

| | | | |
|---|--|---|---------------------|
| Accessibility and readability of public information dissemination materials | Periodic (during project implementation) | Spot checks, interviews, desk-review | PMU and PIUs |
| Tones in social media and broader public perceptions (including NGOs) | Periodic (during project implementation) | Social media monitoring, interviews, observations | PMU and PIUs |
| Rate of grievances and complaints (reported and unreported) | Periodic (during project implementation) | Desk review, interviews, survey | DDM and PIUs |

Closing the Feedback Loop: Reporting back to stakeholder groups

59. The PMU/PIUs will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs will involve, preferably, through face-to-face meeting or direct interactions. But in case this found to be impractical, it'll be done through written correspondence or by using IT, such as SMS, phone call, etc. Other pertinent media, such as website, social media, press briefing, may also be used.
60. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.
61. The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations.
62. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:
- ✓ Publication of a standalone annual report on project's interaction with the stakeholders.
 - ✓ A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);
 - Frequency of public engagement activities;

- Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas;
 - 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;
63. The outcomes/feedback from these ‘reporting back’ measures will be compiled and shared/disclosed with the stakeholders’ and general public through the use of proper media, such as websites, social media accounts, communication materials, etc.

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 to reduce risk. • The support in the same areas in immunization and maternal and newborn health. Nutrition is aligned. • Some of the support currently providing is a continuation and that would be for the HR at the upazila and the HH and those that were never recruited. • Renovation – there will be renovation and construction and GoB would like to do this themselves and we are happy with that. • For short-term, the exact areas of interventions need to be mentions. Camp interventions will remain the same. • There has been a lot on investment in CXB and on the credit side – in terms of health there is not much reconstruction not needed in CXB and hence we are expanding the host areas to allow the IDA credit to be utilized in renovating facilities in the whole of Chattogram Division. • The impact may not be as acute, but the rest of Chittagong is impacted through inflation the influx of FDMN. • Nutrition Package: within the camp it would be similar, and we are going ahead with it • Renovation will be in Upazila Health Complexes and some of the District Hospitals. Also, some schools of the Chittagong division. • Expanding Child protection (CP) services for both population and livelihoods and skills training for Host population, focused on microcredit program which is underfunded currently. WB perspective using an existing program is more desirable. • On CP there is an MoU in place between UNICEF and DSW- what are the findings and gap from the current interventions? • We emphasize learning lessons from CBPS (has a TAPP that covers the whole country and Chittagong Division and CXB District) | <ul style="list-style-type: none"> • Consultation assisted in the selection of schools, medical facilities, types of activities for project interventions. • 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 |

| | | |
|---|---|--|
| | <ul style="list-style-type: none"> • Refurbishment of government orphanages shelter homes and others. • Coherently working in the camps and has case workers and the MoU here has helped get these services into the camp. • Accelerate CP across the country. and happy to have the Bank on board – there are huge caps in HR and building capacity on case management and this links to GBV and the service delivery for GBV comes from MoSW – responding to the GBV case management through the GBVIMS. • Work on the multipurpose centers in the camps; Integrated services for CP and women and we are having the discussion with GoB in aligning efforts and provision here. • MoU here for ISO would be inter ministry not for the service delivery. • The resilience and service operations – GoB 2 umbrella DPP – one for construction and one for services defining activities and allocations for hosts and DRP. These DPPs are in writing. • Anything that can be done to allow whatever program design has been done to keep coherence will help the gov to have consistency between what is done outside and inside the camps and also the angle of cost effectiveness plays out here. • Social Safety Net: previous project EMRCRP there were 2 activities – (i) public works in camps and (ii) employment generation program in the HC and once again public works to provide temp employment (aka safety net). CXB program was expanded to include a large of days and the benefits was almost doubled for all EGPP+ beneficiaries across the country. | |
| <p>Planning and Operational Management</p> | <ul style="list-style-type: none"> • During the project implementation, there will be temporary arrangement for many issues, like labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities. • Integrated Vector management to be considered involving different ministries to cover the whole country effectively. Besides, adequate technical support to be arranged to check the efficiency of the vector control method. | <ul style="list-style-type: none"> • Issues of medical waste management • Facility refurbishment • Labor Engagement • ES Risk management and community involvement |

| | | |
|--------------------------------|--|---|
| | <ul style="list-style-type: none"> • HNP capacity building; in small urban body with one medical officer needs to be improved by assigning additional manpower. • Mayors of the urban bodies may be integrated with the project for increased patronization. • 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 | |
| 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, SEA/SH Action Plan. • Mid-term evolution | The DPP will clearly define the scope, working modalities and the project activities. |

Annex 2: Consultations held during project preparation phase

| No. | Date | Venue | Main Participant Groups | No. of Participants | |
|-----|-----------------|-----------|--|---------------------|--------|
| | | | | Male | Female |
| 01 | 22 January 2024 | In person | Consultations with the task team and debrief on the overall project | 19 | 3 |
| 02 | 28 January 2024 | In person | Consultations with the UNICEF | 30 | 3 |
| 03 | 1 February 2024 | In person | Consultation with the government officials | 30 | 3 |
| 04 | 18 January 2024 | In person | Local level consultation with the IAs | 28 | 9 |
| 05 | 9 January 2024 | In person | Representatives of FDMN in the camps | 20 | 40 |
| 06 | 9 January 2024 | In person | Representatives of Health Centers, one stop crisis cell, service beneficiaries | 10 | 20 |

Annex 3: Sample Grievance Registration 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 | | | |