Unlocking Human Capital for a Prosperous Nepal Project (P167531)

Stakeholder Engagement Plan

April 2021
ABBREVIATIONS AND ACRONYMS

CBOs  Community-based organizations
E&S   Environmental and Social
ECEC  Early Childhood Education Centers
ECED  Childhood Education and Development
ESCP  Environmental and Social Commitment Plan
ESF   Environmental and Social Framework
ESMF  Environmental and Social Management Framework
ESMP  Environmental and Social Management Plan
ESRS  Environmental and Social Review Summary
ESS   Environmental and Social Standards
GBV   Gender Based Violence
GoN   Government of Nepal
GRM   Grievance Redress Mechanism
IDA   International Development Association
LL    Local Level
LL-PMU Local Level Project Management Unit
M&E   Monitoring and Evaluation
MOF   Ministry of Finance
MOU   Memorandum of Understanding
MOWCSC Ministry of Women, Children and Senior Citizens
MSD   Ministry of Social Development
MTR   Mid-Term Review
NEFIN National Federation of Indigenous Nationalities
NPC   National Planning Commission of Nepal
OH&S  Occupational Health and Safety
OHS   Occupational health and safety
PDO   Project Development Objective
PLCU  Province Level Monitoring Unit
PMU   Project Monitoring Unit
SEP   Stakeholder Engagement Plan
UHCPNP Unlocking Human Capital for a Prosperous Nepal Project
WASH  WASH
WB    World Bank
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EXECUTIVE SUMMARY

The Unlocking Human Capital for a Prosperous Nepal Project (UHCPNP) aims to enhance the capacity of Local Level Governments for delivering human capital services and provide access to a simulation package to encourage behavioral change and use of human capital services particularly for poor and vulnerable households, in selected disadvantaged areas of Nepal. This Stakeholder Engagement Plan (SEP) calls for meaningful consultation with the stakeholders and for their engagement in designing and implementing project-related activities. In order to engage all stakeholders, including those who are affected parties, those who have interests in the project, along with indigenous and vulnerable groups, the project will implement strategic engagement activities to ensure that stakeholders have access to proper and culturally-appropriate information about the risks and impacts of the project and mitigation measures, as well as information about project-related opportunities.

For this purpose, the SEP identifies project stakeholders and categorizes them into groups based on their interest in and influence on the project. The SEP takes into consideration the purpose, timing and methods of stakeholder engagements, and also the required strategy for information disclosure to vulnerable groups and indigenous communities. It also provides a synopsis of the project activities, an organizational structure outlining the persons responsible for the effective implementation of the SEP. It also includes the procedures and mechanisms for effective and meaningful consultations with the stakeholders, and for timely disclosure of information related to the project. In addition, the SEP also proposes a two-tiered grievance redress mechanism (GRM) for the project with clear processes for receiving grievances, addressing and finding resolutions to grievances, and reporting back to complainants in a timely and culturally-appropriate manner. The GRM also incorporates a systematic escalation process if a complainant remains unsatisfied with the resolution and seeks to appeal. Resources required for implementing SEP activities for the whole project lifecycle have been included in the SEP. The SEP also outlines a monitoring and reporting mechanism and enables the project to take corrective measures, if required.

This SEP should be read in context of the current COVID-19 environment and COVID-19 related restrictions which may limit the ability to carry out stakeholder engagement activities as envisaged in the SEP. Considerations for undertaking stakeholder engagements during the context of COVID-19 have been included provided. The SEP is a living document and will be updated and revised as and when required.
1. INTRODUCTION

1.1 Context of this document

This document forms the Stakeholder Engagement Plan (SEP) for the Unlocking Human Capital for a Prosperous Nepal Project (hereinafter “the Project”). The overall purpose and objective of this SEP is to define a program for stakeholder engagement throughout the life of the project. The SEP identifies the project stakeholders and includes strategies for meaningful consultation with these stakeholders. Meaningful communication and engagement with project stakeholders is a critical tool for ensuring transparency, accountability and effectiveness of development projects.

This SEP is prepared under the World Bank’s Environmental and Social Framework (ESF). As per Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, project implementation agencies are required to provide stakeholders with timely, relevant and accessible information about the project, and to consult with them in a culturally appropriate and meaningful manner throughout the project. In complying with this standard, the Government of Nepal (GoN) has prepared this SEP. The GoN recognizes the diverse and varied interests and expectations of project stakeholders and has developed an approach to reach all stakeholders considering their different capacities, with particular attention to vulnerable and marginalized groups. The SEP is a “living document” that will be updated and refined as the project progresses.

1.2 Project Background

The GoN is implementing the Project, with support from the World Bank, to promote greater access and utilization of human capital services particularly for the poor and vulnerable households, in selected disadvantaged areas.

The project focuses on promoting social inclusion (no one left behind) by stimulating improvements in the services available at local level and stimulating the demand of people to use the services. It aims at addressing both vulnerability and inequalities in access to services by geographic area, income or wealth, and gender, but not the creation of new services during this initial phase of the human capital agenda.

The project goal is twofold:

(a) to promote greater access and utilization of human capital services particularly for poor and vulnerable households, in selected disadvantaged areas to improve, protect and promote human capital, and

(b) to improve overall efficiency and service delivery systems at the local level by promoting investments of Local Level (LL) to have better and accessible services for the population, while improving LL capacity to manage and measure impacts of services on human capital development.
The project will develop a holistic and integrated approach to offer Local Levels (LLs) access to the same package of services and resources. Given the innovative nature of the intervention and budgetary constraints, the project will only support all the LLs in Province 2 and in the Karnali Province to adjust design and calibrate both parameters and features before going nationwide. The project is comprised of three components:

**Component One: Improving capacity of the Local Level Governments for delivering human capital services**

This component will support Local Levels (LLs) to improve their capacity for delivering human capital services and ability to design procedures and planning in line with sector policies and priorities by promoting technology adoption and system development at the LLs. The component will help multisector coordination and implementation of data driven policies at LLs to improve services delivery through promotion of technology adoption and system development. The component will also increase the capacity of the LLs to do better multisectoral planning and budgeting, run more efficient and integrated information systems management, and make better preparation for health and early childhood education activities for improved service delivery. The component also aims to strengthen knowledge management activities and physical resources, such as upgrading of human capital service units through minor civil upgrades of ward offices, health and early childhood education centers. Similarly, it will support the development of data systems with adequate tools and technology to the local level governments to boost human capital outcomes for better tracking of the programs and services. The component will also support knowledge management activities, such as promoting use of ICT in classrooms and digital and life skills, including soft skills, leadership, financial literacy, nutrition and empowerment.

**Component Two: Accessing a stimulation package to encourage behavioral change and use of human capital services, particularly for poor and vulnerable households**

This component will support an innovative approach in Nepal for effective service delivery to address demand barriers that households face in using health and education services, which will support the children under 5 years old and adolescents girls aged 11-19 years old. In the initial phase, the approach will combine home visits, community sessions, and large scale and continuous communication campaigns, including various means of mass media to boost behavioral change. The stimulation package may include: (i) parental and hygiene good practices; (ii) harmonized and evidence-based behavior change strategies to increase the reach and uptake of health and nutrition services and promote optimal behaviors; (iii) age-appropriate technologies to bring health services closer to adolescents; and (iv) utilization of audio-visual learning programs for young children (age 3-5), and their parents. In addition, the innovative
approach will use disruptive technologies to reproductive health, as well as social, education, and psychosocial empowerment for adolescent girls. Similarly, the component will also support additional counseling services, such as non-violent conflict resolution and elimination of child maltreatment, climate-responsive approach, and gender-based violence. Under the component, the stimulation package will be designed according to existing documents prepared by the government, sectoral Ministries and Development Partners such as the Multisector Nutrition Plan (MSNP) II, Safe Motherhood and Reproductive Health Program and Gender-Based Violence (GBV) Prevention and Response. At the LL, it will provide households with more incentives to invest in the human capital of their children with the goal of reducing the inter-generational transmission of poverty. The component will finance digital systems for recording poor and vulnerable households, community outreach for reaching the unreached and materials for children and adolescent girls, among others.

**Component 3: Project Management**

This component will support (a) the establishment and maintenance of effective implementation and coordination arrangements at the federal, provincial and local levels; and (b) the setup of and Monitoring & Evaluation mechanism to track the progress (spot checks, citizen engagement and feedback, and policy reviews) and conduct evaluations (including a process and robust impact evaluation).

1.3 Summary of environmental and social risk and impacts

The potential environmental and social risks and impacts of the project to which particular attention may need to be made as part of stakeholder engagement activities are outlined below.

**Potential environmental risks and impacts**

The key environmental risks and impacts are site-specific and relate to the minor civil works for the basic upgrading of service units, ward offices, early childhood education and development (ECED) centers including renovation of playground areas, schools, health facilities (including birthing centers) and medical storage and immunization centers. Other risks are related to activities supporting improved data systems. These risks include:

- Occupational health and safety (OHS) concerns to workers
- Generation and disposal of waste including asbestos waste, electronic waste, waste from WASH facilities, and medical waste from health facilities
- Air and noise pollution during civil works.

**Potential social risks and impacts**

- A significant social risk relates to capacity to manage risks, particularly given that the activities are predominantly located with new local governments
- The minor civil works will also give rise to community health and safety concerns due to noise, vibrations and dust
Given that minor civil works will take place on existing premises, it is not expected that land acquisition will be required, and therefore any permanent or temporary physical or economic displacement is not expected.

The minor civil works to improve existing public facilities may affect squatters who are residing near the public facilities.

There is the potential for exacerbating existing trends of marginalization against the poor and vulnerable (including the elderly, people with disabilities, and indigenous groups) and lower-caste groups in terms of getting access to relevant information around the project benefits due to illiteracy, poverty and remoteness and social status. So, there is a risk that the marginalization could deepen inequalities and undermine the objectives of the project.

The magnitude and scale of each of the above risks and impacts will be carefully assessed based on the nature of the activity, the location, and the stage at which the activity is being considered. The Environmental and Social Management Framework (ESMF) outlines how environmental and social risks and impacts arising under the project will be managed and mitigated.

### 1.4 Objectives of SEP

The overall objectives of the SEP are as follows:

- To identify all project stakeholders and assess their interest and support for the project, particularly vulnerable groups, and to enable the views of stakeholders to be taken into account in project design, to improve environmental and social sustainability of the project, and to ensure inclusiveness in the project.
- To establish a systematic approach to stakeholder engagement that will help the National Planning Commission (NPC) build and maintain a constructive relationship with stakeholders, particularly with project beneficiaries.
- To ensure that all relevant project stakeholders receive relevant information on the project in an inclusive and culturally appropriate manner, so that all stakeholders have the opportunity to participate and take advantage of project benefits.
- To provide a means for effective and inclusive engagement with project-affected parties and other interested parties throughout the project lifecycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts are disclosed to stakeholders in a timely, accessible and appropriate manner and format.
- To provide project stakeholders, in particular project-affected parties, with accessible and inclusive means to raise issues and grievances, and to allow the NPC to respond to and manage such grievances.
The SEP has been developed proportionate to the nature and scale of the project and its potential risks and impacts.

1.5 Previous Stakeholder Engagement Activities

Consultations during project preparation were limited to those undertaken with various key ministries of the government. The purpose of these consultation was to introduce the proposed project and capture their key suggestions and concerns. Further stakeholder engagements with the wider groups of stakeholders including project-affected parties have been outlined further below.

Table 1.1: Previous stakeholder engagement activities

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Date</th>
<th>Key points raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Planning Commission</td>
<td>2nd March 2021</td>
<td>• Support to Multi Sector Nutrition Plan (MSNP) secretariate to reach LL with harmonized intervention&lt;br&gt;• There is a need to converge the nutrition plan and the upcoming WB-supported project</td>
</tr>
<tr>
<td>Ministry of Health and Population</td>
<td>4th March 2021</td>
<td>• Support provincial-level Health Training Centres through a comprehensive health training package and quality improvement tool&lt;br&gt;• Expand immunization support to enable the maintenance of a 24-hour cold chain&lt;br&gt;• Support birthing centers by providing equipment for delivery and waiting homes&lt;br&gt;• Launch capacity enhancement and system development for the health sector&lt;br&gt;• Support tele-consultations between doctors and other health workers</td>
</tr>
<tr>
<td>Ministry of Education, Science and Technology</td>
<td>3rd March 2021</td>
<td>• Equip and support provincial-level training&lt;br&gt;• Strengthen ECD centers by building play areas&lt;br&gt;• Make provision for expert teachers&lt;br&gt;• Provide support on equipment and labs&lt;br&gt;• Manage mid-day meals for school children&lt;br&gt;• Promote school health and nutrition screenings and check-ups</td>
</tr>
<tr>
<td>Ministry of Home Affairs</td>
<td>3rd March 2021</td>
<td>• Develop a multi sector system that converges allowances under the social registry systems and which should include other sectors such as education, health, livelihoods etc.&lt;br&gt;• Ensure a well-functioning accountability mechanism to address issues linked with the disbursements of funds to the correct beneficiaries</td>
</tr>
<tr>
<td>Ministry of Federal Affairs and General Administration</td>
<td>2nd March 2021</td>
<td>• Provide staff support at provincial levels to reduce the workload of Ministry of Social Development at provinces&lt;br&gt;• Support the local levels which have social development units and help other local levels to establish such units&lt;br&gt;• Discuss with local levels on the project activities and allow them to be flexible as they have different priorities and capacity to implement project activities&lt;br&gt;• Conduct vulnerability and epidemiological mapping at the provincial levels</td>
</tr>
<tr>
<td>Ministry of Women, Children and Senior Citizen</td>
<td>4th March 2021</td>
<td>• Support the Local Levels to identify, map and define the vulnerable groups&lt;br&gt;• Place database improvement plan at the federal level to serve as a guide for provincial and local levels</td>
</tr>
</tbody>
</table>
| | Promote female entrepreneurship support models by establishing market linkages  
| | Launch capacity enhancement program for young female leader, including exposure programs, training basic policy and laws |
2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

This section details the procedures that the project has followed to identify project stakeholders who will be informed and consulted about the project, including individuals, institutions, groups, or communities. It also identifies Indigenous Peoples (IPs), vulnerable and disadvantaged groups that may have limitations in participating and/or in understanding project information and/or in participating in the consultation process.

2.1 Procedures for Identification and Analysis

For the purposes of this SEP, as defined in the World Bank ESF, “stakeholder” refers to individuals or groups who:

(i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project (also known as ‘affected parties’); and,

(ii) may have an interest in the project (‘interested parties’) and includes individuals or groups whose interests may be affected by the project and who have the potential to influence the project outcomes in any way.

Generally, stakeholder identification begins with initial screening of the project, often followed by stakeholder mapping through field visits and consultations with potential project stakeholders. However, given that the COVID-19 situation has restricted the ability to undertake field visits and consultations at project locations, the project adopted alternative means to identify the potential stakeholders of the project. The project then categorized the stakeholders based on their interest in and influence on the project, and formulated different engagement strategies for each group. In order to further identify potential stakeholders by using alternative means, the project will:

- Contact officials at local levels to understand potential project stakeholders
- Use secondary sources, such as consulting with women’s group, local cooperatives, schoolteachers, community leaders and community-based organizations (CBO), amongst others, to gather the names of potential stakeholders
- Establish contact with the identified stakeholders through telephone and mobile phone and social media and other secondary means to explain the project and to discuss and understand their general perceptions toward the project
- Prepare a list of stakeholders who represent the diversity in terms of gender, indigenous communities, ethnic minorities such as Muslims, vulnerable groups such as Dalits and others adversely impacted communities
- Validate that the identified stakeholders represent the community by talking informally to a random sample of community members and obtaining their views on who could represent their interests in the most effective and appropriate way
• Prepare a complete list\(^1\) of the project stakeholders that best reflects the diversity of the society.

### 2.2 Stakeholder Categorization

For the purposes of effective and tailored engagement, stakeholders of the project can be divided into the following core categories:

- **Affected Parties:** Individuals, groups and other entities within the project area that are directly impacted by the project-related activities and/or have been identified as most susceptible to the 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;

- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

- **Disadvantaged/vulnerable individuals or groups:** Persons who may be disproportionately impacted or further disadvantaged by the project-related activities as compared with any other groups due to their vulnerable status, and that may require special arrangements to ensure their participation in the consultation and decision-making process in relation to the project.

#### 2.2.1 Project-affected parties

The project is seeking to improve access to human capital services at the local level, so all members of the population from selected LLs will benefit from the improved human services system to be developed and from communication campaigns to be delivered as part of the knowledge and information package. However, there are some groups of the population that are more impacted by the project activities, given their greater utilization of these services. Specifically, the following individuals and groups fall within this category.

- Individual households with children under 5 and adolescents girls aged 11-19 years old.
- Poor and marginalized communities living in the project area of influence and that are highly vulnerable to impact related to climate change.
- Indigenous people and religious minorities.

\(^1\) The SEP being a “living document”, the Stakeholder list will be updated regularly throughout the Project life as appropriate
• The National Planning Commission, which is the implementing agency of the project at the federal level.
• The local municipalities that will be directly involve in implementation of the project.
• District and local area-based health services providers.
• District and local area-based teachers and students.
• Individual and institutions involved in providing social protection.

2.2.2 Other interested parties
The project stakeholders also include parties other than the directly affected communities, including:
• Officials of government agencies directly or indirectly associated with the project at federal, provincial and local level, for example
  o At the provincial level: Ministry of Social Development and Provincial Planning Commission, among others.
  o At the local level: Concerned district-level government agencies of Province 2 and Karnali Provinces.
• Other national and international organizations involved in promoting human capital in Nepal
• Local and international non-government organizations (NGOs)/civil society organizations (CSOs)
• National and local media
• Security agencies
• National Federation of Indigenous Nationalities (NEFIN) and National Women Commission
• Local Child Development Centers
• Primary suppliers and service providers in the education, health, social protection sectors

2.2.3 Disadvantaged/vulnerable individuals or groups:
It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups who are often unable to express their concerns or may not understand the impacts of a project. Vulnerability may stem from an individual’s origin, gender, age, health condition, ethnicity or caste, economic deficiency, and/or disadvantaged status in the community, such as minorities or fringe groups.
stakeholder engagement activities in this project will consider these elements of vulnerability and adapt information disclosure and consultation strategies to the concerns and cultural sensitivities of disadvantaged and vulnerable groups to ensure a full understanding of project activities and benefits. In the context of the project, vulnerable or disadvantaged groups may include the following through consideration of their relative difficulties in accessing project-relevant information and/or their inability to assert their interests and access benefits provided by the project:

- Elderly and children living in the project area
- Individuals with chronic diseases and pre-existing medical conditions
- Indigenous peoples and groups
- Female-headed households
- Disaster-affected populations
- Poor households including homeless and landless families
- Survivors of gender-based violence (GBV), sexual exploitation and abuse, sexual harassment (SEA/SH)
- Minority groups including Dalits and Muslims
- Communities in remote and inaccessible area
- People/children with disabilities; and,
- LGBTI people.

During project implementation, the concerns of vulnerable groups will be assessed and consulted through a dedicated set of consultation and communication strategies. The methods of engagement that will be undertaken by the NPC are described in the following sections.

Where the SEP (and the ESMF/ESMP) are used to address IPs, the SEP will be prepared in a manner consistent with ESS7 to enable targeted meaningful consultation, including identification and involvement of IP communities and their representative bodies and organizations; culturally appropriate engagement processes; providing sufficient time for IPs decision making processes; and allowing their effective participation in the design of project activities or mitigation measures that could affect them positively or negatively. The project will undertake consultations with IP groups to understand how IP groups access and use health, education and social protection services to support the project in addressing inequalities in these services, and in improving the quality of and access to these services.
3. STAKEHOLDER ENGAGEMENT PROGRAM

In addition to the traditional approach of stakeholder engagement activities, the project will apply alternative strategies to achieve the objectives of the Stakeholder Engagement Plan (SEP) due to restrictions imposed by the COVID-19 pandemic. Virtual consultations will be held in a manner consistent with the World Bank technical guidance on “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020), when and where face to face consultations is not feasible.

3.1 Purpose of stakeholder engagement program

The stakeholder engagement program is designed to establish an effective platform for productive interaction with potentially affected parties and others with interest in the preparation and implementation of the project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for the project to:

- Inform project design, implementation, monitoring and evaluation
- Solicit their feedback and comments on project activities
- Clarify project objectives, scope and manage expectations
- Assess and mitigate project environmental and social risks
- Enhance project outcomes and benefits
- Build trust and collaboration with stakeholders
- Disseminate project information/ materials, and
- Address project grievances.

3.2 Principles of meaningful consultation

In order to meet best practice approaches and the overall objectives of the SEP, the project aims to apply the following principles to ensure meaningful engagement with the stakeholders:

- **Openness and life-cycle approach:** Activities related to stakeholder engagement, public consultations and disclosure of project-related information will be conducted throughout the project lifecycle in a transparent manner, free of external manipulation, interference, coercion or intimidation

- **Informed participation and feedback:** Information will be provided to and widely disseminated amongst all stakeholders in an appropriate means and format so as to ensure maximum assess of the stakeholders to project-related information. Opportunities will be provided to stakeholders for their feedback and comments on information related to the project, and appropriate mechanisms will be put in place to address comments and concerns.
• **Inclusiveness and sensitivity**: Stakeholder identification will be undertaken to support better communications and build effective relationships. The project will ensure that the participation process is inclusive and that all the stakeholders are encouraged to be involved in the consultation process. Equal access to information will be provided to all stakeholders. Special attention will be given to IP groups, vulnerable groups particularly children and youth, women, Dalits, and the elderly, and to the cultural sensitivities of diverse ethnic and caste groups.

3.3 Engagement during preparation and implementation

In order to ensure meaningful consultations with the identified stakeholders throughout the project lifecycle, the project will adopt the following stakeholder engagement activities as set out below.

3.3.1 Stakeholder consultation during project preparation

Due to limitation posed by the COVID-19 pandemic, consultations during the project preparation phase will be limited only to the representatives of concerned government agencies, health and education experts and other government agencies associated with activities related to development of human capital in Nepal. In addition, representatives of project-affected parties, selected local governments and officials of Provincial level government agencies will also be consulted before the effectiveness of the project and the SEP will be revised accordingly. During the preparatory phase of the project, the PMU, as per the requirement of the World Bank’s ESF will disclose the SEP, ESMF, ESCP and other related project information.

3.3.2 Stakeholder consultation during project implementation: During the implementation of the project, the PMU will continue to conduct stakeholder engagement activities, particularly with federal, provincial and local government agencies. Similarly, it will also engage local levels, affected people/communities, IPs and vulnerable groups and will provide regular updates on project development and implementation of the mitigation measures, along with sharing project related message and materials with all stakeholders.

3.4 Stakeholder engagement strategy

• **Affected parties**: This group will be managed closely and will be fully engaged. The E&S staff at the LL-PMU will maintain close contact with the stakeholders. In addition, the E&S staff will also organize quarterly consultations with the stakeholders in the form community meeting where concerned project officials will update the project status, including past, planned activities for the coming months and the possible E&S risks and impacts, and record concerns, issues and suggestions raised by the
stakeholders. The E&S staff person will prepare a minute with signatures of the participants and the minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting, the E&S staff will complete a read-out of the minutes and a copy of the minutes will be made available at the local ward office of concerned municipalities.

**Major Engagement strategy:**
- Maintain contact details of the individuals/institutions categorized in the group and update regularly
- Maintain regular and close contact with stakeholders
- Organize pre-informed quarterly consultation meeting
- Provide updates about the project including the past and those upcoming.
- Organize exposure visits to showcase successful cases of implementation, if required.

**Other interested parties:** For stakeholders falling under this group, the project will engage in efforts to keep them informed. The E&S staff will organize targeted consultations with the group at least every six months and inform them about the project status, planned activities and possible E&S risks. The E&S staff will prepare a minute with signatures of the participants and the minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting E&S staff will readout the minutes and a copy of the minute will be made available to the local ward office of concerned municipalities.

**Major Engagement strategy:**
- Regular contact with individuals/institutions categorized in the group
- Organize pre-informed quarterly consultation meetings
- Provide updates about the project including the past and upcoming ones

**Disadvantaged/vulnerable individuals or groups:** The disadvantaged and vulnerable groups represent those underrepresented and voiceless people who may not have access to project information, articulate their concerns and priorities about potential project impacts, lodge official grievance, take opportunities unveiled by the project and participant in various benefit sharing activities of the project mainly due to a number of socio-economic barriers, such as poverty, illiteracy and lower social status, among others.

**Major Engagement strategy**
- Maintain close contact with individuals/institutions categorized in the group and update it regularly
- Organize focus-group discussions (FGDs) to understand their particular risks and concerns
- Maintain close contact with household visits with Dalits, female-headed households, people with disability and elderly with mobility difficulties, and
households of minority religious groups through mobile phone and other available means to ensure they are aware of project developments.

- In case of language issues, organize consultations in local IPs languages so that they understand the project activities and are able to provide comments, feedback, and raise grievances.
- Ensure consultations are organized in an appropriate manner and make sure time and location of consultations are appropriate to their needs.
- Inform participates how their feedback and suggestions had been addressed by the project
- Ensure that vulnerable and IP groups are adequately informed about the consultations at least one week before the scheduled date.

3.5 Engagement during preparation and implementation

In order to ensure meaningful consultations with the identified stakeholders throughout the project lifecycle, the project will adopt the following stakeholder engagement activities as set out below.

3.5.1 Stakeholder consultation during project preparation

Due to limitations imposed by the COVID-19 pandemic, consultations during the project preparation phase will be limited only to the representatives of concerned government agencies, health and education experts and other government agencies associated with activities related to development of human capital in Nepal. In addition, representatives of the project affected parties, selected local governments and officials of Provincial level government agencies will also be consulted. During the preparatory phase of the project, the PMU, as per the requirement of the World Bank’s ESF will disclose the SEP, ESMF, ESCP and other related project information.

3.5.2 Stakeholder consultation during project implementation: During the implementation of the project, the PMU will continue to conduct stakeholder engagement activities, particularly with federal, provincial and local government agencies. Similarly, it will also engage local levels, affected people/communities, IPs and vulnerable groups and will provide regular updates on project development and implementation of the mitigation measures, along with sharing project related message and materials with all stakeholders.
Table 3.1: Plan for Stakeholder Engagement

<table>
<thead>
<tr>
<th>Topic of consultation / message</th>
<th>Target Stakeholders</th>
<th>Method(s) of Engagement</th>
<th>Frequency/time frame</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Phase: Planning and preparation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Rationale of the project</td>
<td>• Federal government line agencies/officials</td>
<td>• Phone, call centers, email, letters</td>
<td>Throughout the project preparation</td>
<td>NPC at the federal level, MoSD at provinces and LLs</td>
</tr>
<tr>
<td>• Planned activities</td>
<td>• Provincial government line agencies/officials</td>
<td>• Orientation Program/Training/workshop</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• E&amp;S principles</td>
<td>• Rural Municipalities and concerned officials</td>
<td>• Virtual/One-on-one meetings</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Potential E&amp;S risk and impacts</td>
<td>• Health, education and social protection experts</td>
<td>• Virtual/face-to-face focus-group discussions (FGDs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Mitigation measures/updated ESMF</td>
<td></td>
<td>• Other outreach activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Grievance Redress mechanisms (GRM)</td>
<td></td>
<td>(All face-to-face meeting and small gathering will be conducted by adopting COVID-19 related protocols)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• GBV risks and impacts</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Topic of consultation / message</th>
<th>Target Stakeholders</th>
<th>Method(s) of Engagement</th>
<th>Frequency/time frame</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Phase: Implementation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Rationale of the project</td>
<td>• Affected individuals (project beneficiaries)</td>
<td>• Virtual one-on-one or group meeting</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Planned activities</td>
<td>• Local communities</td>
<td>• Periodic stakeholder engagement activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Engagement and consultation program with project stakeholder</td>
<td>• Vulnerable groups including women’s groups</td>
<td>• Periodic project-related information disclosure</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Activities to ensure access of all the beneficiaries, including the IP and vulnerable groups,</td>
<td>• Indigenous peoples</td>
<td>• meetings with local municipalities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Program to ensure equity and quality of services</td>
<td>• Local NGOs</td>
<td>• FGDs with stakeholders</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Health and safety impacts including Covid-19</td>
<td>• Local press and media</td>
<td>• Targeted outreach activities and FGDs with women, IP organizations and other vulnerable groups</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Potential environmental and social impacts and management measures</td>
<td></td>
<td>• Regular contacts through phone and text messages with representatives of project</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• GBV risks and impact</td>
<td></td>
<td>• Community radio, social media and local media</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(All face-to-face meeting will be conducted in a small group by adopting COVID-19 related protocols)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Topic of consultation / message</td>
<td>Target Stakeholders</td>
<td>Method(s) of Engagement</td>
<td>Frequency/time frame</td>
<td>Responsibilities</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>---------------------</td>
<td>-------------------------</td>
<td>---------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Project scope and ongoing activities, and project status</td>
<td>Federal government line agencies/officials</td>
<td>Phone, call centers, email, letters</td>
<td>Throughout the project implementation</td>
<td>NPC at the center, MoSD at provinces and LLs</td>
</tr>
<tr>
<td>ESMF (to be updated) and other instruments</td>
<td>Provincial government line agencies/officials</td>
<td>Face-to-face/virtual meetings with federal, provincial and local agencies and officials</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of mitigation measures</td>
<td>Rural Municipalities and concerned officials</td>
<td>Orientation Program/Training/workshop</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Updated SEP aa related activities</td>
<td>Health, education and social protection experts</td>
<td>Regular information updates in the NPC website</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of the GRM</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Periodic stakeholder consultations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project-related information disclosure</td>
<td>Other potential E&amp;S concerns</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project scope and ongoing activities, Status ESMF and related instruments</td>
<td>Affected individuals (project beneficiaries)</td>
<td>Periodic consultation with project stakeholders</td>
<td>Throughout the project implementation</td>
<td>NPC at the center, MoSD at provinces and LLs</td>
</tr>
<tr>
<td>Progress in implementation of mitigation measures</td>
<td>Local communities</td>
<td>Information disclosure through mass meetings, brochures, flyers, project website and local media, among other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Updated SEP and related activities</td>
<td>Vulnerable groups</td>
<td>Functioning GRM established</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GRM implementation</td>
<td>Indigenous peoples</td>
<td>Periodic small groups meetings with vulnerable and IP groups</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Periodic stakeholder consultations</td>
<td>Local NGOs</td>
<td>Sse of audio/visual communication techniques, and other accessible formats to engage with vulnerable groups, including people with disabilities (All face-to-face meeting will be conducted in a small group by adopting COVID-19 related protocols)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project-related information disclosure</td>
<td>Local press and media</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other potential E&amp;S concerns</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Understanding perception of beneficiaries about the activities and services extended under the project | All targeted beneficiaries of Province 2 and Karnali province | Beneficiary Satisfaction Survey | First survey after two years of project implementation and the second during the final year of operation | NPC |
3.6 Proposed strategy for information disclosure

All relevant documents of the project, including the ESMF, SEP and ESRS, among others, will be disclosed and made accessible to all stakeholders. The information will be disclosed through all possible means, including face-to-face and virtual consultations with the project stakeholders, distribution of hard copies, posters, leaflets and brochures, through social media, project website and local media so that the documents are accessible to all project beneficiaries of the project, including those in remote areas.

Table 3.2: Proposed strategy for information disclosure

<table>
<thead>
<tr>
<th>Target stakeholders</th>
<th>List of information to be disclosed</th>
<th>Methods and timing proposed activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project preparation phase</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Government representatives (Federal, provincial, district-level government agencies and local municipalities, including ward offices)</td>
<td>• Project concept&lt;br&gt;• Environmental and Social Commitment Plan (ESCP)&lt;br&gt;• Updated SEP and ESMF&lt;br&gt;• GRM process and&lt;br&gt;• Revised project information</td>
<td>• Group consultation&lt;br&gt;• Training, seminar and workshop&lt;br&gt;• Electronic publications&lt;br&gt;• Information leaflets and brochures&lt;br&gt;• Cluster meetings with provincial authorities (All face-to-face meeting will be conducted in a small group by adopting COVID-19 related protocols)</td>
</tr>
<tr>
<td>Education and health institutions workers both private and public institutions</td>
<td>• Project concept&lt;br&gt;• E&amp;S principles&lt;br&gt;• Updated SEP&lt;br&gt;• GRM procedures&lt;br&gt;• Updated ESMF and ESCP, and&lt;br&gt;• Revised project information</td>
<td>• Face-to-face or virtual meetings,&lt;br&gt;• Telephone calls, emails and SMS&lt;br&gt;• Seminar and workshops&lt;br&gt;• Information boards, leaflets and brochures&lt;br&gt;• Regularly updated project websites</td>
</tr>
<tr>
<td>Local NGOs and CBOs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>National &amp; local Media</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Individuals and communities with a focus on vulnerable groups, including poor and ethnic minorities, IPs, women</td>
<td>• Project concept&lt;br&gt;• E&amp;S procedures&lt;br&gt;• Updated SEP, GRM procedures, ESMF and ESCP, and&lt;br&gt;• Revised project information</td>
<td>• Regular release of public notices though mass media, community radio, television and social media in Nepali as well as local language&lt;br&gt;• Regular updates of information on the NPC website&lt;br&gt;• Distribution of information leaflets and brochures public&lt;br&gt;• Airing of appropriate messages through community radio in Nepali as well as local language&lt;br&gt;• Periodic small group meetings with vulnerable and IP groups in culturally appropriate manner&lt;br&gt;• Regular contacts with the representatives of IP and</td>
</tr>
</tbody>
</table>
vulnerable groups through the use of mobile technology such as phone calls, and emails, text messages (All face-to-face meeting will be conducted in a small group by adopting COVID-19 related protocols)

<table>
<thead>
<tr>
<th><strong>Project implementation phase</strong></th>
<th>Government representatives (Federal, provincial, district-level government agencies and local municipalities, including ward offices)</th>
<th>Education and health institutions workers both private and public institutions, Local NGOs and CBOs, National &amp; local Media</th>
<th>Individuals and communities with a focus on vulnerable groups, including poor and ethnic minorities, IPs, women, Local NGOs and CSOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Scope of project and activities</td>
<td>• Sharing of project update and reports through emails and meetings • Electronic publications as well as dissemination of hard copies • Virtual consultations with provincial authorities • Virtual/face-to-face consultations with local municipalities and ward offices</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Regular updates on project status including the implementation of ESMF, SEP and GRM procedures</td>
<td>• Information boards, Project websites, Project leaflets and brochures • Periodic face-to-face/virtual meeting with project stakeholders • Distribution of electronic publications, and • Dissemination of hard copies (Information will be provided in Nepali and local languages)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Regular sharing of project-related information</td>
<td>• Scope of project and related activities • Periodic updates on project status, including the implementation of ESMF, SEP and mitigation measures • GRM procedures</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Electronic publications as well as dissemination of hard copies</td>
<td>• Periodic updates on project status, including the implementation of ESMF, SEP and mitigation measures • GRM procedures</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Virtual consultations with provincial authorities</td>
<td></td>
<td>• Public notices • Press releases in the local media and on the project website • Information leaflets and brochures • Airing of messages through community radio, • Exchange of information through emails, text messages, use of audio-visual materials • Periodic small group meetings with vulnerable and IP groups by adopting COVID protocols • Regular contacts through electronic means, such as phone calls, and emails, text messages • Information sharing from local level offices (Information will be provided in Nepali as well as local languages as needed)</td>
<td></td>
</tr>
</tbody>
</table>
3.6 Reporting Back

The project recognizes that enabling stakeholders to understand how the feedback they provided during consultations has been received and either adopted or not considered, during project design and implementation are important factors to build trust. Reporting back to stakeholders helps demonstrate that the project seriously takes suggestions, comments and complaints raised by local community and if/how these have been incorporated and addressed into the project. Understanding stakeholder concerns and addressing these early in the project design and before implementation can help to avoid any project issues during implementation and can help to secure consensus for the project from key stakeholders. The project will adopt the following mechanisms to manage stakeholder feedback and comments, and to report back to the stakeholders:

- The project will ensure that feedback and comments received through comments boxes, online platforms in the social media, project email, and dedicated telephone numbers are acknowledged by registering them in a logbook and will be addressed in an appropriate and timely manner.

- A periodic review of the implementation of the SEP will continue to incorporate new issues that have come to light, and concerns and queries raised by the stakeholders during the project implementation. It will also provide information on how the feedback has been considered and addressed by the project.
4. IMPLEMENTATION ARRANGEMENTS
This section explains that institutional arrangements that the project aims to deploy for the effective implementation of the SEP.

4.1 Organizational structure for implementing SEP
The project will appoint an Environmental Specialist and a Social Development Specialist, who will be core team members of PMU at NPC, which is led by a Project Coordinator. The E&S Specialists will have the overall responsibility of ensuring effective implementation of the SEP, monitoring SEP-related activities and preparing a quarterly report on implementation of the SEP, among others. Both the E&S staff and the project monitoring agent, who will be appointed at the local level and provincial level Social Development Ministry respectively will be support the E&S specialists of the NPC-PMU. The organizational structure will be reviewed periodically to ensure the effectiveness of SEP implementation.

Figure 4.1: Organizational Structure for Implementing SEP

4.2 The roles and responsibilities of concerned units/agencies and individuals
The roles and responsibility of key agencies/units envisaged for the implementation and operation of the project is shown in the table below.
Table 4.1: Roles and Responsibility of Related Units/Agencies

<table>
<thead>
<tr>
<th>Key units/agencies</th>
<th>Roles and responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMU (NPC-based)</td>
<td>• Planning, budgeting and implementing the SEP throughout project lifecycle.</td>
</tr>
<tr>
<td></td>
<td>• Ensuring necessary financial and human resources at all the three levels for effective implementation of the SEP.</td>
</tr>
</tbody>
</table>
Ensuring the project activities as per the various guidelines and directives issued by the government and other related organizations, including the one issued for Covid-19 pandemic management.

Planning and guiding stakeholder engagement activities for the success of project.

Ensuring effective management of GRM and timely resolutions.

Coordinate and monitor SEP activities with Provincial Level Coordination Unit and the LLs.

Documenting SEP-related activities in all three levels and their performances and outcomes.

Undertaking periodic monitoring of SEP, and preparation and dissemination of quarterly SEP implementation report.

Taking prompt corrective actions as and when required to ensure effective implementation of the SEP.

Overall evaluation of the SEP.

Province level coordination unit (PLCU)

- Liaising with PMU staff to support and monitoring LL activities.
- Entering necessary project-related data in the system.
- Monitor progress on the field.

LL-PMU (based on Local Levels)

- Coordinating and supporting to ensure implementation of SEP.
- Supporting the PMU in identifying stakeholders of the project at local level and updating the list of stakeholders.
- Reaching out the stakeholders for periodic consultations.
- Disseminating project-related information in a timely manner.
- Managing and ensuring smooth functioning of the Level-1 GRM.

Table 4.2: Roles and Responsibilities of Individual/expert

<table>
<thead>
<tr>
<th>Key staff/expert</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project manager (PMU- NPC)</td>
<td>• Responsible for monitoring and supervising the overall implementation of the SEP, including managing financial resources and supporting logistics and preparing and disseminating quarterly SEP implementation report.</td>
</tr>
</tbody>
</table>
| E&S Safeguards specialist (PMU based at the NPC) | • Responsible for the overall implementation of the SEP, including periodic consultations, information disclosure and effective functioning of the GRM.  
  • Coordinate the SEP activities among the provincial agencies and Local Levels.  
  • Updating the SEP to accommodate any changes and take corrective actions immediately as and when required. |
| Project Monitoring Agent (PLCU-Based)  | • Maintain close contacts with the E&S specialist and E&S staff based at NPC and LL respectively to support implementation of SEP.  
  • Monitor the implementation of the SEP at the LL and the progress on the field. |
| E&S Staff (LL based) | - Document E&S related data and information and enter into the system.  
- Support the PMU in the implementation of the SEP  
- Hold periodic consultations with stakeholders, including IP communities and vulnerable groups and prepare meeting minutes.  
- Disseminate project-related information to the LL based stakeholders through available means  
- Receive and acknowledge grievances and maintain a logbook of grievances and status.  
- Support the LGs to ensure smooth functioning of Level 1 grievance.  
- Communicate status of grievances to the E&S Safeguard Specialists at the NPC and forward unsolved grievances to Level 2.  
- Provide data and field-level information to PLCU and PMU at the NPC.  
- Support E&S Safeguard Specialists to prepare quarterly SEP implementation report. |

### 4.3 Estimated Budget

A tentative budget for implementing activities related to Stakeholder Engagement Plan (SEP) over the period of five years that covers the planning and preparation, and project implementation phases is provided in the table given below. The PMU-NPC will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If required, the plan will be updated, and a new revised SEP will be prepared and disseminated. The budget items and budget will also be revised accordingly.
<table>
<thead>
<tr>
<th>Item</th>
<th>Quantity</th>
<th>Unit Cost (US$)</th>
<th>Months</th>
<th>Total Cost (US$)</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Periodic stakeholder consultations</td>
<td>20</td>
<td>1000</td>
<td>-</td>
<td>20,000</td>
<td>Once in a quarter for 5 years</td>
</tr>
<tr>
<td>Training and orientations for staff on GRM management and information disclosure</td>
<td>5</td>
<td>2,000</td>
<td>-</td>
<td>10,000</td>
<td>Once in a year for 5 years</td>
</tr>
<tr>
<td>Stakeholder Engagement Management System</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>10,000</td>
<td>Lump-sum</td>
</tr>
<tr>
<td>(Operations, collecting and processing grievance, and maintaining database)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Information and GRM Centers (Establishment and operations)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15,000</td>
<td>Lump-sum</td>
</tr>
<tr>
<td>Communication, information disclosure and GRM Materials (FAQs)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15,000</td>
<td>Lump-sum</td>
</tr>
<tr>
<td>Monitoring and Evaluation, including SEP implementation report</td>
<td>10</td>
<td>1,000</td>
<td>-</td>
<td>10,000</td>
<td>Lump-sum</td>
</tr>
<tr>
<td>Beneficiary Satisfaction Survey</td>
<td>2</td>
<td>7,500</td>
<td></td>
<td>15,000</td>
<td>One after two years of implementation and another during the last year of implementation</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>95,000</strong></td>
<td></td>
</tr>
</tbody>
</table>
5. GRIEVANCE REDRESSAL MECHANISM (GRM)

The project will establish a functioning grievance mechanism to promptly address concerns and complaints of beneficiaries and project stakeholders by adopting an understandable and transparent process that is culturally appropriate and readily accessible to all the segments of affected communities. The project will offer the grievance redressal services at no cost to complainants and without retribution. Furthermore, the grievance mechanism will not impede access to judicial and administrative remedies. A functioning and effective grievance redressal will contribute to building trust and cooperation as an integral component of broader community consultation that facilitates corrective actions.

5.1 Objectives of the GRM

The main objectives of the GRM of the project are to:

- Provide affected people with avenues for lodging complaints and resolving any disputes that may arise during the course of the implementation of the project.
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- Avoid the need to resort to judicial proceedings (as a primary level of complaint).
- In the case of IP groups, adopt culturally-appropriate and accessible means by which IPs can lodge complaints for redress, taking into account their customary dispute settlement mechanisms.

5.2 Grievance implementation procedure

The project will develop a written grievance procedure in consultation with project impacted parties. It will incorporate the following steps:

- Publicize and educate stakeholders about GRM procedures.
- Receive, register and acknowledge the grievance.
- Review and investigate the grievance.
- Develop resolution or escalate the grievance.
- Report back on the grievance.
- Implement, monitor and evaluate.

5.3 Grievance Redressal Mechanism (GRM) System

The main purpose of this system is to ensure there is a robust and transparent process available to addressing the complaints. This system comprises a sequential process primary levels of resolution. A subsequent level of resolution is triggered if the complainant, remains unsatisfied with the resolution made by the lower level.

The SEP proposes the following two-tier GRM systems.

Level 1: This is the entry point for all the grievances that come into the GRM system of the project activities. Once the grievance is registered, it would automatically come into the Level
1 of the GRM system. The Level 1 GRM will be handled by E&S staff and if required they can seek support from the Judicial Committee (section 5.5 provides more information about the committee) at the local level.

**Level 2:** If complainant rejects the resolution of level 1 or the GRM system at Level 1 remains unable to make any resolution within specific time period, the grievance will be scaled up to level 2 of the GRM system. The Level 2 GRM system will be headed by Project Manager of the PCU at the NPC. If the complainant is still not satisfied, then they should be advised to take legal recourse.

**Figure 5.1: The two-tier Grievance Management Procedure**

The key steps of the procedure are as follows:

**Step 1:** Receive, register and acknowledge the grievance
The project will ensure the availability of a variety of methods for stakeholders to lodge grievances. This will include:

- Affected people and other stakeholders can lodge a grievance at Level 1 of the GRM system, which is the Local Level Project Management Unit (LL-PMU). The E&S staff will assist in filling out the complaint form for those who have difficulty reading or writing or unfamiliar with the grievance process.
- The complainant may also use project email, social media, phones and mobiles and postal service to lodge their grievance.
- PAPs and other stakeholders can also lodge a written grievance by filling in a complaint form which will be made at the LL-PMU.
- The E&S staff or any other person assigned for the task will provide a unique grievance number to each grievance for easy tracking.

The E&S staff or any other person assigned for the task will provide the complainant with an acknowledgement of the receipt of the complaint within 5 working days through phone call, text message, or through a meeting with the complainant. The acknowledgement will include the grievance registration number so the complainant can use this as a reference to track the status of the complaint by either visiting the LL-PMU office or calling to the E&S staff. If the grievance is not well understood or if additional information is required, the E&S staff will contact the complainant during this step for further clarification.

**Step 2: Review and investigate the grievance**

The grievance is screened and assessed within 10 days of receipt. The significance of the grievance will then be assessed. If the grievance is admissible and related to the project activities and can be resolved locally then it will proceed to the next step. If the complaint is not related to the project or not triggered by the project, the grievance will be rejected, and reasons will be properly communicated to the complainant about the decision along with explanation.

**Step 3: Develop resolution and respond to complainant**

A resolution is developed as soon as possible in consultations with the complainant and other concerned but no later than 15 days after screening and assessing the grievance at the Level 1. The resolution is communicated to the complainant through the proper channel. The E&S staff, or any other person assigned for the task, will ask complainant for written acceptance of the resolution. If the complainant accepts the resolution, then the agreed set of actions will be implemented and the once completed, the grievance will be closed.

**Step 4: Scale up the grievance if complainant remains dissatisfied**

If the complainant rejects the proposed resolution, the Level 1 GRM system will refer the grievance to the Level 2 GRM system led by E&S Safeguards Specialist PMU at NPC. The committee will facilitate to reach to an agreeable resolution and produce a resolution within
20 working days. If the resolution is accepted by the complainant, it will be implemented, and the grievance will be closed once the implementation is completed. But, if the proposed resolution is rejected, the complainant will be free to take available legal recourse.

5.4 GRM in the context of COVID-19

In addition to the traditional approach of handling and processing the grievances and complaints, due to the spread of COVID-19 and its transmissive nature, the project will deploy modern means and tools to allow stakeholders to officially file complaints and grievances against the project activities. In addition to the project website and social media platforms that allow the complainants to directly upload their complaints and grievances, the project will deploy a system that will allow complainant to register grievances by directly calling to E&S Safeguard specialists at the PMU at the NPC and E&S staff at LL-PMU. Moreover, the project will explore option to introduce digital grievance filing system through which complaints can be filed through internet into a designated webpage of the project. Once the complaint or grievance is received through the website, social media, or direct calls, the E&S Safeguard specialists at the PMU at the NPC or the E&S staff at LL-PMU will ensure the registration of such complaints or grievances into the GRM system as explained Section 5.3. In addition to the registration, the E&S staff at the LL will also maintain a grievance registry and will officially close the grievance once it is solved by using the forms given in the Appendix 3.

5.5 Use of the Existing Dispute Resolution Systems

In addition to the GRM system explained above, the project will also explore the possibilities of utilizing the existing regulatory system related to dispute settlement in local level as a supplement to the project based GRM. Article 117 of the Constitution of Nepal, promulgated in 2015, prescribed a three-member Judicial Committee at the local level coordinated by its Vice-Chairperson in the case of a Village Body and by its Deputy Mayor in the case of a Municipality, in order to settle disputes under their respective jurisdictions in accordance with the law. As per the constitutional provisions, the Clause 46 of the Local Government Operation Act 2017 has a provision of such committee every rural municipality and municipality.

5.6 Grievances in relation to GBV

The existing GRM put in place for the project will also be used for addressing GBV-related issues and the PMU at the NPC will be in charge of GBV related complaints. The project will place its uppermost priority on handling and managing the GBV related grievance by maintaining full confidentiality of the survivor. The PMU will put in place necessary mechanisms for confidential reporting with safe and ethical documentation of GBV issues both at the center and local level. The first responders of the grievances in relation to GBV will be the E&S safeguards specialist of the PMU at the NPC and the E&S safeguards specialist will be trained on managing and handling such grievance. GBV referral pathway will be established and communicated to both PMU at the NCP and local level. Further, the GRM will also have
in place the processes to immediately notify both the NPC and the World Bank of any GBV complaints, with the consent of the survivor.
6. MONITORING AND REPORTING

6.1 Monitoring of Stakeholder Engagement Activities

The SEP will be periodically revised and updated as necessary during the course of project implementation in order to ensure that the information presented in the SEP is consistent and up to date, that all project stakeholders are identified and considered in the SEP, and that the methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Broadly, the monitoring and tracking of the implementation of the SEP is important to:

- Ensures effective continuous engagement and follow-up.
- Minimizes slippages and oversight of important engagements.

The project aims to apply two methods to monitor the overall outcomes of stakeholder engagement. These are:

1. **Review of engagement activities in the field:** The E&S staff present at the local level will assess the usefulness and effectiveness of the stakeholder consultation that will be organized quarterly by using a feedback form and interviewing the participants after the activity. The feedback and comments made by the participants will be carefully examined and appropriate reforms will be made in future engagement activities to enhance their effectiveness.

2. **Periodic reporting:** The E&S staff present at the local level will prepare a quarterly SEP Implementation Report and submit it to the Project Manager of the PMU. Once approved by the Project Manager, the report will be disseminated to the stakeholders through periodic consultations and the project website.

6.2 Alternative means of monitoring and reporting in COVID-19 crisis

The COVID-19 crisis has limited the prospects of face-to-face public gathering and group discussion. As such the project will use alternative options to gauge the effectiveness of stakeholder engagement activities and to understand the required corrective actions to ensure that the activities ultimately achieve its goals. In addition to the traditional means of public gathering as mentioned above, E&S staff present at the local level will use the following alternatives means to achieve the goals of effective stakeholder engagement. These include:

- Establishing direct contacts with some of the stakeholder chosen randomly to understanding about their perception about the stakeholder engagement activities.
- Talking with representatives of IP communities, vulnerable groups including Dalits and other marginalized communities to know their perceptions/impressions of engagement activities.
- Talking directly with the Ward Chairperson and other officials of local governments and get their thoughts about the engagement activities.
• Analyze comments and feedback posted in the Facebook and other social media accounts of the project.
• Analyze the news coverage of the project activities in the national and local media and other mass communication means.

6.3 Monitoring of Stakeholder Engagement Activities

Overall performance will be reviewed on an ongoing basis to determine the effectiveness of the SEP, including the methods of engagement being used, their outcomes, and the accuracy of the mapping results.

The project will undertake formal monitoring of the implementation of the SEP as per which the Environmental and Social Safeguards Specialist of the PMU-NPC will collate summaries and internal reports of the stakeholder engagement activities, management of GRM, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions from all the LL-PMUs. Based on the information, The E&S safeguard specialist of the PMU-NPC will lead the preparation of a quarterly monitoring report of the SEP and submit it to the project manager. Once cleared by the Project Manager, the report will be disseminated through the project website and the report will be main periodic review of the implementation of the SEP.

Table 6.1: Performance Indicators

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Performance Indicators</th>
</tr>
</thead>
</table>
| Stakeholders are provided information about the project in a timely and culturally appropriate manner | • Means used to inform stakeholders about the stakeholder meeting.  
• Were the participations given advance notice about the meeting?  
• Were the participations aware in advance about meeting agenda?  
• Means used to organize consultations, such as small group meeting, video/audio conference, group chat meeting in one of the social media platforms and their usage and effectiveness.  
• Number of consultation meetings, both face-to-face and virtual, within a specific time period, particularly with focus on women, IPs and vulnerable people, including religious minorities.  
• Means of dissemination and number of materials disseminated,  
• Comments received on disclosure materials, positive or negative.  
• Locations of information disclosure and nature of participation. |

| Stakeholders have an opportunity to share their views and concerns about the Project’s development | • Type of engagement opportunities given to participants in the meeting  
• Attendance rates and nature of participation in terms of gender and indigenous people and vulnerable people, including religious minorities.  
• Numbers of grievances related to the project activities and means used by the complaints to lodge their grievance. |
<table>
<thead>
<tr>
<th>Objectives</th>
<th>Performance Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informed participation by Vulnerable Groups</td>
<td>• Number and type of engagement opportunities provided to Vulnerable Groups and means and medium of engagement.</td>
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<td>• Types of feedback/comments from vulnerable groups.</td>
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<td>• Attendance rates.</td>
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<tr>
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<td>• Number and type of grievances from vulnerable groups.</td>
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<tr>
<td>Positive working relationships are built and maintained over time</td>
<td>• Number and type of grievances lodged by stakeholders.</td>
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<td>• Methods used in lodging grievances (in person, through forms, phone, email and other means).</td>
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<td>• Number of satisfactorily closed out grievances.</td>
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<td>• Current status of unresolved grievance and major reasons for being unresolved.</td>
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<td></td>
<td>• Community attitudes and perceptions towards the GRM.</td>
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<tr>
<td>Engagement continues to be transparent, inclusive and appropriate throughout the Project lifecycle</td>
<td>• Adherence to the schedule of stakeholder engagement activities.</td>
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<td>• Representation of Vulnerable Groups in engagement activities.</td>
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<td>• Number and type of grievances lodged by community members.</td>
</tr>
<tr>
<td></td>
<td>• Number of satisfactorily closed grievances.</td>
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APPENDIX 1 - SAMPLE GRIEVANCE FORM

Grievance Form

Grievance registration no.  
Date of registration

Details of complainant:  [ ] (Tick the box for anonymity)

Name:

<table>
<thead>
<tr>
<th>First Name</th>
<th>Middle name</th>
<th>Last name</th>
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</table>

Gender:

[ ] Male  [ ] Female  [ ] Others

Address:

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<thead>
<tr>
<th>Province</th>
<th>District</th>
<th>Municipality</th>
<th>Ward No.</th>
<th>Name of place</th>
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Contact details:

Primary mobile no.  Email  Facebook

Secondary mobile no.  

Preferred mode of contact: __________________________

Brief description of grievance

Mode of submission of grievance:

[ ] Verbal  [ ] Written  [ ] Complaint Box  [ ] Phone  [ ] Email  [ ] Others

-----------------------------  -----------------------------
Signature of Complainant  Signature of Grievance Officer
## APPENDIX 2 - SAMPLE GRIEVANCE REGISTRATION TEMPLATE

<table>
<thead>
<tr>
<th>No</th>
<th>Date of receiving incoming letter / form</th>
<th>Grievance Reference Number</th>
<th>Name / Surname of grievance originator (if not anonymous)</th>
<th>Gender</th>
<th>Type of grievance</th>
<th>Details of grievance</th>
<th>Mediu m of comm.</th>
<th>Name of staff responsible for managing the grievance</th>
<th>Date of grievance acknowledgmen t</th>
<th>Date of feedback provision/referenc e number</th>
<th>Present status</th>
<th>Remarks</th>
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## Grievance Closure Form

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<th>Resolution</th>
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<th>Grievance Number</th>
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<th>Grievance registered date</th>
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Describe the steps taken to resolve the grievance

Describe the resolution

<table>
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<th>Department:</th>
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<thead>
<tr>
<th>Mode of communication for reply (meeting/ written/ verbal/ display):</th>
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<th>Date closed:</th>
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**Signatures**

<table>
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<tr>
<th>Complainant:</th>
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<table>
<thead>
<tr>
<th>Project representative:</th>
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<thead>
<tr>
<th>Date:</th>
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