Sri Lanka Public Financial Management Strengthening Project (P178432)

Stakeholder Engagement Plan (SEP)

Contents

1. Introduction and ProjectDescription

The development objective of the project is to enhance transparency in procurement and strengthen the institutional capacity of the National Audit Office of Sri Lanka (NAOSL). The project is aligned with and supports selected governance reforms as prioritized by the GoSL.

The project will support:

> **Component 1: Improving the operational efficiency and transparency in public expenditures through e-procurement:** This will include support to the development, enhancement, roll out, and implementation of new modules and functionalities in the e-procurement system with open contracting standards to enhance transparency and accountability; and support to developing dedicated procurement procedures for procurement in situations of urgent need, including an emergency procurement manual; and

> **Component 2: Enhancing accountability and institutional capacity of NAOSL:** This will support the implementation of NAOSL's development action plan, build institutional and human resource capacities, capacities for specialized auditing (procurement , environment ,performance and investigation) and audit of State Owned Enterprises, and pilot test a framework for participatory auditing, that involves citizens in the audit process.

Project beneficiaries: The direct project beneficiaries are the key departments and agencies of the Ministry of Finance (MoF), including Public Finance, the Electronic Government Procurement Secretariat, Fiscal Policy, Inland Revenue, National Planning Department, NAOSL,Sri Lankan citizens and the private sector are expected to benefit from the envisaged outcomes of this project through sustenance of the economic recovery facilitated by enhanced transparency and accountability in public financial management. The project will support: (i) the key reform areas critical for the expected fiscal adjustment and structural reform in the context of current economic crisis, including macro-fiscal planning, tax policy analysis, and debt management; and (ii) strengthening the legal framework and prioritization in public investment management (PIM), e-procurement in key service delivery ministries and enhancing the accountability mechanism. Sri Lankan citizens and the private sector are expected to benefit from the envisaged outcomes of this project through economic recovery facilitated by improved fiscal sustainability and enhanced transparency and accountability in public financial management.

Project implementation arrangements: The proposed Project will be implemented at the national level by the National Audit Office of Sri Lanka (NAOSL) and Ministry of Finance (MOF). It will finance the deployment of technical support in the form of consulting and advisory services, capacity building and training activities. In addition, the project will finance the procurement of information technology (IT) goods and operation expenses to rollout of an e-procurement system. Project activities will be conducted in the main offices of the relevant implementing agencies which are in the capital city of Colombo.

Project's Environmental and Social Risks: Based on the project components identified at the concept stage, the overall environmental and social risks of the project are expected to be low. No physical interventions or studies focused on the delivery of infrastructure, such as feasibility assessments, will be undertaken under project financing nor will it involve construction or other activities that involve physical interventions to the environment to be undertaken. A positive impact is that the project will support the NAOSL develop their capacity on Environmental , Procurement, performance, investigation and Particptaory Auditing, very much in line with the guidance of ESF and ESSs and thus support the capacity building

initiatives in line with the ESF on best practices on environmental and participatory auditing and will be integrated to the ESF support to the grant operation as this will provide benefit in terms of client capacity building.

From the social perspective, since nophysical interventions such as construction works are financed by the project, social risks and resettlement impacts are not anticipated. Sri Lankan citizens and the private sector are expected to benefit from the envisaged outcomes of this project through economic recovery facilitated by improved fiscal sustainability and enhanced transparency and accountability in public financial management. In addition, the project will enhance collaboration between citizens, civil society and NAOSL to engage in auditing processes involving public finance management. However, while project will create positive impacts, there could be possible risks associated with: a) exclusion of key officials benefiting from capacity building initiatives and b) inadequate representation of key citizens groups and interested parties participating in audit processes piloted by the project due to lack of inclusive procedures and systems in selection of trainees and engaging of citizens groups and their organizations.

The project has applied the Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Assessment Tool and determined the SEA/SH risk level to be 'low.' The project does not involve any civil works that could result in labor influx or close interactions with communities however, there is a potential risk of SEA/SH at workplace. Though the SEA/SH risks may be low, as per WB requirements, the project will include orientation to implementing agencies on SEA/SH, ensure signing of a code of conduct by project workers and the project GRM is able to address SEA/SH incidents following the appropriate protocols. Accordingly, measures for addressing SEA/SH risks will be included in the OM of the project.

2. Objectives &Brief Summary of Previous Stakeholder Engagement Activities

2.1 Objectives of Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) is prepared for the Sri Lanka Public Financial Management Strengthening Project (P178432) in accordance with the requirements of the World Bank's Environmental and Social Framework (ESF) and in particular with the Environment and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of potentially affected or impacted individuals and groups, and building relationships based on trust.

The purpose of the present SEP is to explain how the various stakeholders relating to the project will be engaged throughout the project lifetime and which methods will be used as part of the process. The SEP also outlines the responsibilities of the PMU, other relevant government, and private institutions in the implementation of stakeholder engagement activities, including the ways in which the PMU will communicate with stakeholders; the mechanism by which people can raise concerns; provide feedback; and/or make complaints about the PMU, other implementing partners and the project itself. SEP will identify stakeholders and mechanisms through which they will be included in the engagement process as part of project preparation and implementation and will serve as a record for the engagement process during the project preparation period.

2.2 Brief Summary of Previous Stakeholder Engagement Activities

A joint World Bank and EU mission was conducted from November 2-9, 2022, to advance preparation of the proposed Multi-Donor Trust Fund for Public Financial Management Strengthening Project.

The mission held discussions with the Ministry of Finance departments of External Resources (ERD), National Planning (NPD), Public Finance (PFD), and the National Audit Office of Sri Lanka (NAOSL).

During the mission the following was discussed and agreed: (i) the project objectives, components, and the component cost allocation; (ii) the allocation of the grant funds between the Recipient Executed and Bank Executed parts, the corporate cost recovery, and supervision costs; (iii) the proposed results framework/indicators, and (iv) the project's implementation and oversight arrangements.

The aide memoire prepared subsequent to the mission have summarized the mission's findings and agreements reached.

3. Stakeholder Identification and Analysis

For the purpose of the SEP, stakeholders of the proposed Project will be divided into the following core categories:

1. **Affected Parties** : impacted or likely to be impacted directly or indirectly, positively or adversely, by the project, 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.
2. **Other Interested Parties**: may have an interest in the project, including individuals or groups whose interests may be affected by the project and who have the potential to influence the project outcomes in some way.
3. **Vulnerable/DisadvantagedGroups**: persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholders toward the successful implementation of the project and will enable the project to draw on their pre-existing, expertise, networks, and agenda. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

Table 1: Stakeholder identification and Classification

Affected Parties	Other Interested Parties	Disadvantaged and Vulnerable groups
• National Audit Office of Sri Lanka (NAOSL) • All auditee institutions come under the audit scope of the NAOSL • Electronic Government Procurement Secretariat (e-GP Secretariat) • Key departments and agencies of the Ministry of Finance (MoF): Fiscal Policy Department (FPD), Inland Revenue Department (IRD) & National Planning Department (NPD). • Government Procuring Entities • Supplier Community (material and service suppliers, distributors, vendors) • Commercial Banks. • Private sector business operators	• Ministry of Finance (MoF) • Parliament of Sri Lanka • Sri Lankan Citizens and their civil society organizations • State Owned Enterprises (SOES) • Private auditors • PradeshiyaSabhas, Divisional Secretariats • Oversight agencies • Internet Service Providers	• Government and private sector institutions engaged in procurement procedures who may not have access to digital infrastructure or the staff with IT literacy – for e.g. Government Institutions in rural areas and Small enterprises that lack IT infrastructure. • Key citizens groups and interested parties who may be deprived of participating in audit processes piloted by the project due to lack of inclusive procedures and systems in engaging of citizens groups and their organizations • Key officials who may be excluded from benefiting from capacity building initiatives due to lack of inclusive procedures and systems in the selection of trainees

3.1 Affected Parties

"Affected Parties" are, persons, groups and other entities within the Project Area of Influence (PAI) who are directly influenced (actually or potentially) by the project and/or have been identified as being 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.

Table 2 provides an assessment of the project's risks and impacts on individuals, groups, and other stakeholders that may be directly or positively or negatively affected by the project. The assessment further extends to analyse the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes.

Table 2: Project's impact on affected parties and their level of influence

Project affected parties	Description of Impacts	Level of Impact	Level of Influence
National Audit Office of Sri Lanka (NAOSL)	NOASL accountability and institutional capacity will be improved and will be responsible for the design and implementation of project activities.	High	High
Ministries and Departments, Public Corporations, Authorities, Boards and statutory Funds, Non-statutory Funds, Foreign Aid Funds, Provincial Councils, Local Authorities, Public Companies.	Will be benefited in strengthening control environment, internal control framework, Financial Reporting Framework to minimize the audit observations.	High	High
Electronic Government Procurement Secretariat (e-GP Secretariat)			
Government Procuring Entities	Will benefit from the e-GP system and reduce time and lengthy procedures		
Supplier Community (material and service suppliers, distributors, vendors)	Will benefit from the e-GP system for view procurement notices, submission of Bids and receive alerts and award notifications		
Commercial Banks	Will benefit from the e-GP system to issue Bid Securities, Performance securities and advance guarantees		
Private sector business operators	Will benefit from the e-GP system for view procurement notices, submission of Bids and receive alerts and award notifications		
Key departments and agencies of the Ministry of Finance (MoF): Fiscal Policy Department (FPD), Inland Revenue Department (IRD) & National Planning Department (NPD).			

3.2 Other Interested Parties

"Other Interested Parties" constitute individuals/groups/entities that may not experience direct impact from the project but who consider or perceive their interest as being affected by the project and/or who could affect the project and the process of its implementation in some way. Table 3 presents the multiple interests of other parties and their level of potential influence over the Project.

Table 3: Interest of other parties and their level of influence over the project

Other Interested Parties	Description of Interests	Level of Interest	Level of Influence
Ministry of Finance (MoF)	To enhance the efficiency, quality and transparency of the public audits	**High**	**High**
Parliament of Sri Lanka	To receive public audit reports in time with high quality standards	**High**	**High**
Sri Lankan Citizens and their civil society organizations	Participate in the public auditing processes while ensuring public accountability and transparency in procurement processes	**High**	**Low**
State Owned Enterprises (SOES)	To receive the audit reportstimely in order to enhance the efficiency and good governance.	**High**	**High**
Private auditors	Interest in learning opportunities inparticipate in audits with the NAOSL officers. Less number of audits may be outsourced to the private auditors with the improvements in the audit methodology	**Low**	**Low**
PradeshiyaSabhas, Divisional Secretariats			
Oversight agencies Internet Service Providers	Will be getting expansion opportunities in the networkof the NAOSL.	**High**	**High**

3.3 Disadvantaged / Vulnerable Individuals or Groups

"Disadvantaged/Vulnerable Groups" are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. They would include the following groups.

1. Government and private sector institutions engaged in procurement procedures who may not have access to digital infrastructure or the staff with IT literacy

2. Key citizens groups and interested parties who may be deprived of participating in audit processes piloted by the project due to lack of inclusive procedures and systems in engaging of citizens groups and their organizations

3. Key officials who may be excluded from benefiting from capacity building initiatives due to lack of inclusive procedures and systems in the selection of trainees

Table 4: identifies the communication methods and resources required for the engagement of disadvantaged/vulnerable persons and groups in the project.

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
Government and private sector institutions engaged in procurement procedures – especially Government Institutions in rural areas and small enterprises that lack IT infrastructure.	• Lack of access to digital infrastructure • Lack of staff with IT literacy		
Key citizens groups and interested parties who may be deprived of participating in audit processes piloted by the project	• Lack of access to information on the available opportunities for participation • Subject to political or other discriminations and practical restrictions	Having awareness programs, individual and group meetings, leaflets etc.	Network upgrading requirement for whistleblowers to send public representations
Key officials who may be excluded from benefiting from capacity building initiatives	• Subject to discrimination by some higher authorities • Lack of basic IT knowledge and skills		

4. Stakeholder Engagement Program

The SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10.

4.1 Proposed Strategy for Information Disclosure

Information disclosure and consultation processes will continue with affected parties, other interested parties and vulnerable groups during (i) project preparation, (ii) project implementation, and (iii) project operational phases. A variety of methods such as group consultations, individual consultations and interviews through different offline and virtual medians such as emails, telephone and conference calls etc. and communication through printed and electronic media, appropriate to the target audience, will be used for information disclosure and consultation.

During project preparation and planning, information related to project scope and schedule will be shared with project affected persons and other stakeholders during consultations. The Project will also provide up-to-date information on the websites of MoF, NAOSL other the relevant stakeholder agencies.

At the appraisal stage, safeguard instruments including Environmental and Social Commitment Plan (ESCP), and the SEP prepared for this project will be disclosed on the websites of MoF, NAOSL and related agencies and on the World Bank's external website, after their clearance by the GoSL and the Bank. Additionally, copies of the referenced documents will be kept at the MoF and NAOSL for public reference. Any changes to the approved ESCP, and SEP would have to follow the same clearance/ approval procedures and disclosure.

During project implementation, sub-project specific safeguard instruments will be publicly disclosed in-country. The documents and plans to be disclosed include:
• Environmental and Social Commitment Plan (ESCP)
• Stakeholder Engagement Plan (SEP)
• Monitoring activities undertaken as per ESCP and SEP
• Project quarterly reports and annual reports

Translations of executive summary of all documents prepared by the project in Sinhala and Tamil will also be made available to the public through the websites of MoF, NAOSL and other related agencies. Information can also be disseminated through digital platform (where available) like Twitter, WhatsApp/viber groups, and traditional means of communications (TV, newspaper, radio, phone calls and e-mails) with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

Table 5: provides a plan for information disclosure during project preparatory, implementation and operational periods.

Table   05   should   be   included.

Table 6: Communications / Information Disclosure Plan

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
Project preparation and planning phase				
• Scope of the project • Project implementation arrangements including partner agencies and their roles and responsibilities • Project beneficiaries and anticipated impacts • Environmental and Social Commitment Plan & Stakeholder Engagement Plan • Grievance redress mechanism including places to report sexual harassment, and gender-based violence • Arrangements for project monitoring & reporting	• Websites of the MoF, NAOSL and other relevant departments • Pre-arranged workshops/seminars • E-brochures printed in English, Sinhala & Tamil • Printed reports • Newspaper advertisements in English, Sinhala & Tamil	Three months prior to the commencement of the project and will continue throughout the project period	Affected parties, other interested parties and vulnerable groups	PMU or PCT ???
Project implementation phase				
• Plans for developing the e-procurement system • Reforms to be introduced for fiscal adjustment, macro fiscal planning, tax policy analysis, debt management etc. • Legal frameworks to be strengthened for public investment management • Procurement plans during emergency situations/needs • IT goods, consulting and non-consulting services to be procured • Capacity building trainings planned and available • Opportunities for participation in public auditing • Grievance redress mechanism including places to report sexual harassment, and gender-based violence • Summary outcomes of stakeholder consultations and feedback received • Project progress and deliverables	• Websites of the MoF, NAOSL and other relevant departments • Pre-arranged workshops/seminars • Printed reports • E-brochures	Continuously and as and when they are ready	Affected parties, other interested parties and vulnerable groups	PMU
Project operational phase				

• Project's achievements, drawbacks, challenges, any remedial measure adopted • Feedback from project beneficiaries and other interested parties on project's impacts • Project management information, procedures for open-competitive bidding, procurement opportunities, contract awards etc.	• Websites of the MoF, NAOSL and other relevant departments • Pre-arranged workshops/seminars • E-brochures printed in English, Sinhala & Tamil • Printed reports • Newspaper advertisements in English, Sinhala & Tamil	Continuously and as and when they are ready	Affected parties, other interested parties and vulnerable groups	PMU

4.2 Proposed Strategy for Consultations

The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, in order to elicit their views and feedback. Individual and group meetings, mini-workshops/focus group discussions, satisfaction surveys, social media, etc. will be used to facilitate the consultations on the following:

1. Reforms to be introduced for fiscal management, macro-fiscal planning, tax policy analysis and debt management
2. Legal and regulatory frameworks to be introduced for strengthening the public investment management
3. Participatory auditing processes
4. Capacity building trainings for the staff of relevant agencies
5. Procurement of IT goods and developing digital infrastructure
6. Strengthening the participation of disadvantaged/vulnerable groups in project cycle
7. Stakeholder satisfaction on project processes, deliverables and outcomes and impacts

Table 7: Strategy for Stakeholder Consultations

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
Project preparation and planning phase				
• Ministry of Finance • Public Finance Department • National Audit Office of Sri Lanka (NAOSL) • Electronic Government Procurement Secretariat (e-GP Secretariat) • Fiscal Policy Department (FPD) • Inland Revenue Department (IRD) • National Planning Department (NPD)	• Project's scope, key deliverables and anticipated impacts • Project implementation arrangements and resource allocations • Environmental and social requirements of the project (stakeholder engagement, information disclosure, consultations, grievance redress mechanism).	Consultative workshops/seminars/meetings with ppt. presentations, and a document summarizing the key aspects of the topics to be covered	Prior to the project's commencement at e-GP Secretariatand at the NAOSL	PMU
Project Implementation Phase				
• Representative of all project affected parties listed in Table 2 • Representatives of other interested parties listed in Table 2 • Representatives of Disadvantaged and vulnerable groups listed in Table 2	• Project's scope, key deliverables and anticipated impacts • Project implementation arrangements and gaps, drawbacks and challenges • Strengthening project's environmental and social requirements (stakeholder engagement, information disclosure, consultations, grievance redress mechanism) • Citizens' engagement and project monitoring	Consultative workshops/seminars/meetings with ppt. presentations, and a document summarizing the key aspects of the topics to be covered	At project's commencements and later bi-annual at e-GP Secretariat	PMU
Project Operational Phase				
• Representative of all project affected parties listed in Table 2 • Representatives of other interested parties listed in Table 3 • Representatives of Disadvantaged and vulnerable groups listed in Table 4	• Review and monitor the establishment and functioning of project's outputs, outcomes, and impacts • Feedback on project's operational modalities, project's outcomes and impacts	Consultative workshops/seminars/meetings with ppt. presentations, and a document summarizing the key aspects of the topics to be covered	Periodically during project's operation phase at e-GP Secretariatand at NAOSL	PMU

4.3 Proposed Strategy for engaging Vulnerable Groups

Table 8 presents a strategy for the engagement of vulnerable and disadvantaged groups in consultative processes.

Table 8: Strategy for the engagement of Disadvantaged/Vulnerable groups

Disadvantaged/Vulnerable Groups	Strategy
Government and private sector institutions engaged in procurement procedures who may not have access to digital infrastructure or the staff with IT literacy - especially Government Institutions in rural areas and small enterprises that lack IT infrastructure.	• Conduct consultations to identify their issues and constraints for participation in project activities • Support them to acquire or have access to digital infrastructure • Provide capacity building trainings for staff to enhance their IT literacy
Key citizens groups and interested parties who may be deprived of participating in audit processes piloted by the project due to lack of inclusive procedures and systems in engaging of citizens groups and their organizations	• Conduct group consultations to identify their potentials/constraints for participation and representation • Screen and establish procedures ensuring their proactive participation
Key officials who may be excluded from benefiting from capacity building initiatives due to lack of inclusive procedures and systems in the selection of trainees	• Conduct individual/groups consultations to identify constraints for their participation • Develop a strategy ensuring their inclusion and participation in project processes and benefits • Provide basic trainings for them to be eligible for their inclusion

4.4 Public Comments and Feedback/Reporting to Stakeholders

Public/stakeholders will be given a period of 2 weeks to review and submit their comments on the project related documents including the ESCP and the SEP disclosed. Such submissions can be made to a designated focal point at the PMU either verbally or in writing including emails, social media messages etc. Verbal communications either via telephone or in person will be recorded by a member of thePMU. All comments received by the project will be reviewed by the PMU and any decisions made based on public/stakeholders' comments will be communicated to all relevant stakeholders within 05 days after the review meetings. If the project had not been able to make any decision in response to public/stakeholder comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

5 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1 Resources

Resources required for implementation of the stakeholder engagement plan would include costs of information disclosure and stakeholder consultations, and the cost of the grievance redress mechanism. The project cost tables and annual work plans and budget shall allocate costs for specific information disclosure and stakeholder consultation activities including: preparation, printing and dissemination of information materials, communications, and costs of stakeholder consultation workshops, and grievance redressal procedures.

5.2 Management Functions and Responsibilities

The project will be implemented by MoF and NAOSL. A Project Management Unit (PMU) will be established for implementation of the project. The PMU will be headed by a Project Director (PD) who will be designated by the MoF. The PMU is responsible for overall implementation of the project ensuring that all environmental and social safeguard requirements are met in accordance with the requirements of the World Bank's Environmental and Social Framework. A staff from the PMU will be designated as the focal person for Environmental and Social,who will be responsible for the overall coordination, implementation and monitoring of the SEP including the GRM.

The roles and responsibilities of the different stakeholders in SEP implementation are described in Table 9.

Table 9: Responsibility of PMU in SEP implementation

Entity/Person	Responsibility
Project Director	• Ensure that all project activities are undertaken as per SEP • Undertake stakeholder and public consultations • Provide feedback to stakeholders • Provide information on environmental and social requirements to stakeholders • Function as the project's Grievance Redress Mechanism • Give information on GRM of the project to all stakeholders.
Financial Manager/Specialist	• Ensure Financial and Procurement related aspects required for this plan areimplemented in a timely manner
Focal person for Environment and Social.	• Ensure that the consultants hired is informed regarding the provisions of the SEP; • Ensure relevant stakeholder engagement activities in SEP are implemented in a timely manner; • Support PD in GRM operations • Give information on GRM of the project to consultants and stakeholder involved.
Project affected parties	• Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities

	• Use GRM to report grievances and complaints and ensure their satisfactory resolution • Assist the relevant authorities to develop and implement appropriate mitigation measures • Participate and support the implementation of stakeholder engagement activities in the SEP, ESCP, etc. • Provide feedback on project related documents disclosed for public scrutiny • Provide feedback on project deliverables and outcomes
Other interested parties	• Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Assist the project affected parties to raise their grievance and concerns with the relevant agencies. • Assist the relevant authorities to develop and implement appropriate mitigation measures. • Provide feedback on project related documents disclosed for public scrutiny • Provide feedback on project deliverables and outcomes

6 Grievance Redressal Mechanism (GRM)

The Project Director (PD) of the e-GP Secretariat will be responsible for the implementation and operation of the grievance redress mechanism for the project. (What about NAOSL)

- **Reporting of grievances:**Any project related grievances/complaints can be reported either in writing (letters, emails, sms) or verbally (in-person or by telephone) to the Project Director. Aggrieved parties can also use the project's website to report their grievances, provisions for which will be included in the website. Or else, grievances can also be lodged with any of the key officers of the PMU.

- **Recording:** All grievances/complaints will be recorded and will be brought to the attention of the PD. Grievances/complaints reported verbally via telephone will be recorded by the receiving officer and forward them to the PD. A printed format will also be made available at PMU for parties to report their grievances. The grievances/complaints will be acknowledged by the PD on the same day it was reported or on the following day.

- **Resolution:**A decision on the grievances/complaints received will be taken within 5 days after receiving the grievances/complaints, and the decision will be communicated to the aggrieved party. If additional time is required for their resolution, same will be communicated to the aggrieved party. The PD whenever necessary will consult the relevant agencies and solicit their support for grievance redress. The PD will also request the aggrieved parties to communicate their agreement/disagreement with the resolution provided.

Focal point to report grievances:
- **Designation: Project Director**
- **Address:**
- **Telephone:**
- **Email:**
- **Website:**

Handling Gender-Based Violence (GBV) Issues

The PD will also designate one of his officers, preferably a female, to receive and record any grievances/complaints related to SEA, SH and GBV at work places. Any beneficiary experience an incident related to Sexual Exploitation and Abuse, Sexual Harassment (SEA/SH) should be referred by the GRM to a qualified service provider, institution, NGO such as:
- o The National Women's Helpline (no. 1938) managed by the Ministry of Women,
- o MithuruPiyasa from Ministry of Health, which are available at most State Hospitals,
- o Women In Need etc. to handle SEA/SH incidents.
- o Women's Unit established at the closest Police Station
- o

The SEA,SH services provider will use its own case management system to respond to the case. GRM is also required to immediately inform the World Bank of such incidences. Survivor confidentiality should be always protected to prevent any risks of stigmatization and reprisals against the survivor.

The GRM will follow the following guidelines when SEA/SH are received:

a) Only three elements related to a SEA/SH allegation will be recorded: (i) the allegation in the survivor's own words; (ii) if the alleged perpetrator is, to the best of the survivor's knowledge, related to the project; and, if possible, (iii) the age and sex of the survivor.

b) the GM operator will report minimal information to the implementing agency, which in turn informs the Bank task team. This information should be along four lines: (i) the nature of the case; (ii) if the case is project-related; (iii) age and sex of survivor (if available); and (iv) if the survivor was referred to services.

c) Finally, the GBV complaints or allegations made to the project GRM will be referred to the GBV service providers that have been identified, regardless of the perpetrator's identity.

7 Monitoring and Reporting

7.1 Involvement of Stakeholders in Monitoring Activities

The project will establish multiple mechanisms for monitor and evaluate the SEP implementation. They would include the following arrangements: (i) overall monitoring and evaluation by the PMU; and (ii) engagement of the project affected parties, other interested parties, and disadvantaged /vulnerable groups, to monitor and report on the adequacy and usefulness of (i) information disclosure programs; (ii) consultations; and (iii) stakeholder engagement activities via their participation in individual/group consultations, and in the GRM.

The project will use a variety of methods and tools for monitoring and evaluation. They will include review of project documents and progress reports, stakeholder interviews and group discussions, feedback surveys, site visits etc. Focal person for Environment and Social at thePMU will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records

of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations/meetings, public comments/feedback received for disclosed documents, informal feedback, decisions made, and reporting back to the stakeholders.

7.2 Reporting back to Stakeholder Groups

The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through website and/or formal communications.

The PMU will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank. SEP monitoring will be part of the project monitoring reports submitted.