

**GUIDANCE
NOTE FOR
BORROWERS**

**Environmental &
Social Framework
for IPF Operations**

**ESS10:
Stakeholder
Engagement
and Information
Disclosure**

The Guidance Notes provide guidance for the Borrower on the application of the Environmental and Social Standards (ESSs), which form part of the World Bank's 2016 Environmental and Social Framework (ESF). The Guidance Notes help to explain the requirements of the ESSs; they are not Bank policy, nor are they mandatory. The Guidance Notes do not substitute for the need to exercise sound judgment in making project decisions. In case of any inconsistency or conflict between the Guidance Notes and the ESSs, the provisions of the ESSs prevail. Each paragraph of the Standard is highlighted in a box, followed by the corresponding guidance.

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Introduction

1. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

2. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

3. This ESS must be read in conjunction with ESS1. Requirements regarding engagement with workers are found in ESS2. Special provisions on emergency preparedness and response are covered in ESS2 and ESS4. In the case of projects involving involuntary resettlement, Indigenous Peoples, or cultural heritage, the Borrower will also apply the special disclosure and consultation requirements set out in ESS5, ESS7, and ESS8.

Objectives

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

Scope of Application

4. ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation, as outlined in ESS1.

GN4.1. Stakeholder engagement is the continuing and iterative process by which the Borrower identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the project design, implementation, and operation.

GN4.2. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for Borrowers to learn from the experience, knowledge, and concerns of the affected and interested stakeholders, and to manage their expectations by clarifying the extent of the Borrower's responsibilities

and resources. Stakeholder consultations provide input for, as appropriate, environmental and social assessment, project design, mitigation plans, monitoring reports, and further evaluation of the project, including the Environmental and Social Commitment Plan (ESCP), summaries of the assessment of all or part of Borrowers' environmental and social frameworks, and any other project plans that may be prepared. The level and frequency of stakeholder engagement conducted is proportionate to the risks and impacts of the project.

GN4.3. The techniques and practices described in this Guidance Note are applied both to the specific requirements of ESS10, and to any engagement, consultation, and disclosure requirements set out in the other ESSs (whether or not such techniques and practices are described in the respective Guidance Notes).

5. For the purpose of this ESS, "stakeholder" refers to individuals or groups who:

- (a) Are affected or likely to be affected by the project (project-affected parties); and
- (b) May have an interest in the project (other interested parties).

GN5.1. The term "project-affected parties" includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

GN5.2. The term "other interested parties" refers to individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

GN5.3. As further discussed in paragraph 20 of this ESS, for both groups, special consideration should be given to stakeholders that may be disadvantaged or vulnerable.

Requirements

6. Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a time frame that enables meaningful consultations with stakeholders on project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

GN6.1. The project life cycle starts with the identification of a proposed project; proceeds through the development of the project, the economic, financial, and environmental, and social assessment; negotiations between Borrowers and the Bank; and project implementation; and ends with the closure and decommissioning of the project. Project-related stakeholder engagement starts at project identification and continues until closure of the project. The extent of the engagement is determined by the significance of the environmental and social risks and impacts of the project and the level of concern expressed by stakeholders. Given that stakeholder engagement improves the quality of project implementation and builds trust with affected communities and other stakeholders, projects with high and substantial environmental and social risk should include several formal points of engagement, as well as ongoing information dissemination throughout the project cycle. Projects with moderate and low risk should include several points of engagement, before the project is approved by the Bank and ideally more than one point of engagement during project implementation. The mandatory disclosure of relevant project documentation is addressed in paragraph 19 of ESS10 and associated guidance.

GN6.2. In cases where the Bank's involvement starts after the Borrower has already initiated a project, the Bank will work with the Borrower to review the stakeholder engagement provisions in place and, if necessary, to develop and implement a supplemental Stakeholder Engagement Plan (SEP) to ensure adequate stakeholder engagement going forward.

GN6.3. Engagement before the Bank approves a project should include the following:

- (a) Stakeholder consultation to inform stakeholder analysis;
- (b) Dissemination of relevant project material, including explanations of intended project benefits and, where appropriate, the setup of a project website; and
- (c) Stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

GN6.4. Engagement after the Bank approves a project should include the following:

- (a) Disclosure of information on how stakeholder feedback was incorporated into project design and environmental and social risk management instruments;
- (b) Stakeholder consultations on implementation and supervision issues, consultations on any new project characteristics or environmental and social risks, and consultations on progress of environmental and social risk mitigation measures;
- (c) Regular efforts to keep stakeholders informed on project implementation; and
- (d) Review of the adequacy of stakeholder identification in light of project implementation and related revisions to the SEP.

7. Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

8. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

9. The Borrower will maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

GN9.1. Documentation of stakeholder engagement should be published in a timely fashion in relevant local languages through channels that are accessible to stakeholders. This documentation includes the following, as appropriate:

- (a) Date and location of each meeting, with copy of the notification to stakeholders;
- (b) The purpose of the engagement (for example, to inform stakeholders of an intended project or to gather their views on potential environmental and social impacts of an intended project);
- (c) The form of engagement and consultation (for example, face-to-face meetings such as town halls or workshops, focus groups, written consultations, online consultations);
- (d) Number of participants and categories of participants;
- (e) A list of relevant documentation disclosed to participants;
- (f) Summary of main points and concerns raised by stakeholders;
- (g) Summary of how stakeholder concerns were responded to and taken into account; and
- (h) Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions.

A. Engagement during Project Preparation

Stakeholder Identification and Analysis

10. The Borrower will identify the different stakeholders, both project-affected parties and other interested parties.¹ As set out in paragraph 5, individuals or groups that are affected or likely to be affected by the project will be identified as 'project-affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'.

Footnote 1. The stakeholders of a project will vary depending on the details of the projects. They may include local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

GN10.1. The process to identify stakeholders includes the following, as appropriate:

- (a) First, at the beginning of the environmental and social assessment for the project, the Borrower develops a list of project-affected and other interested parties, paying special attention to identifying disadvantaged or vulnerable groups. Information from any preliminary social impact assessment can inform this list.
- (b) Second, other interested parties are identified by listing relevant interest groups, and considering historical issues, social relations, relationships between local communities and the project implementer, and any other relevant factors related to the sector and location that help anticipate local and external responses to the project.
- (c) Third, it is advisable to conduct discussions with representatives of the stakeholders identified and with persons knowledgeable about the local, country, and sector contexts. In some circumstances, media and social media searches may help to verify the list and identify any other project-affected or interested parties and to contact them. Specific attention should be paid to identifying any disadvantaged or vulnerable groups.

GN10.2. Depending on the societal context, women, children, youth, and the elderly or other groups may need to be considered as stakeholder groups of their own, and separate consultation formats may be needed to capture suggestions and concerns.

GN10.3. Stakeholders are allowed to participate in the engagement process at any time, even if they had not previously been identified as stakeholders.

11. The Borrower will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable.² Based on this identification, the Borrower will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms, and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

Footnote 2. Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon which they depend.

GN11.1. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to sociopolitical, societal conflict, educational, or practical factors. For example, barriers can exist for ethnic, linguistic, and religious minorities; low-income households; women; youth; persons with limited mobility; or persons with disabilities. An array of strategies can be deployed to mitigate these obstacles by focusing on issues of accessibility, communication, empowerment, and/or confidentiality.

GN11.2. It is important to put in place measures for ensuring that stakeholders, and especially vulnerable and disadvantaged groups, are able to safely participate in consultations and that consultations are free of coercion and duress.

12. Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third-party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.

GN12.1. Guidance in relation to the nature and role of independent third parties is provided in ESS1, paragraph 25 and the Guidance Note accompanying ESS1.

GN12.2. An inclusive engagement process should empower all relevant stakeholders to participate. This participation includes systematic engagement with, for example, women, children, youth, the elderly, people with disabilities, and other vulnerable or disadvantaged groups.

Stakeholder Engagement Plan

13. In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP)³ proportionate to the nature and scale of the project and its potential risks and impacts.⁴ A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower

will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.

Footnote 3. Depending on the nature of the scale of the risks and impacts of the project, the elements of a SEP may be included as part of the ESCP and preparation of a stand-alone SEP may not be necessary.

Footnote 4. Where possible, stakeholder engagement will utilize engagement structures within the national system e.g. community meetings, supplemented as needed with project-specific arrangements.

14. The SEP will describe the timing and methods of engagement with stakeholders throughout the life cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.

GN13.1. The process of preparing the SEP is inclusive, and the draft SEP is designed to accommodate the needs and circumstances of different stakeholders, paying special attention to identified disadvantaged or vulnerable individuals or groups. It identifies the information and types of interaction to be conducted in each phase of the project, considers and addresses stakeholders' communication and physical accessibility challenges, and includes any other stakeholder engagement required by the other ESSs.

GN13.2. As appropriate for the nature and scale of the project and its potential risks and impacts, the SEP will include a description of the project with its anticipated environmental and social impacts, as known at the time; a list of the stakeholder groups identified, including disadvantaged or vulnerable individuals or groups; the proposed stakeholder engagement program (including topics stakeholders will be engaged on, how stakeholders will be notified, the methods of engagement, list of information/documents that will be in the public domain, languages they will be available in, length of consultation period, and opportunities to comment); indication of resources required and the responsibilities for implementing stakeholder engagement activities; summary description of the grievance mechanism; and contact information and process for seeking further information.

GN13.3. The draft SEP is made available to stakeholders in accessible formats and through channels that are appropriate for them. Stakeholders may be notified of the publication of the SEP through various appropriate avenues, which may include websites, posters, radio, social media, or other channels that are suitable in the local context. As relevant to the project, the draft SEP invites input on aspects such as: (a) whether the list of identified stakeholders is accurate; (b) the proposed methods of notification and engagement (for example, where meetings and workshops may be held and how to communicate with disadvantaged or vulnerable groups); (c) the proposed extent and format of engagement (for example, the type of meetings and duration of the consultation period); and (d) the format and language of information to be provided. Stakeholder feedback on these aspects is reviewed and incorporated in the SEP as appropriate. If significant changes are made to the SEP, a revised SEP is publicly disclosed.

GN13.4. The SEP is proportionate to the anticipated environmental and social impact of the proposed project, and to stakeholder concerns regarding the risks and impacts associated with the project. Where the elements of the SEP are included in the ESCP, it is important to ensure that the specific stakeholder engagement arrangements are communicated in formats suitable to and understandable for the identified stakeholders. This may include, for example, a fact sheet, brochure, or radio broadcasts that alerts stakeholders to the information to be provided, along with locations of consultation meetings, channels for providing comments, deadlines for comments, contact information, and a summary of the grievance mechanism.

GN13.5. Because project circumstances and stakeholder concerns can change or new ones may emerge, stakeholder engagement is conducted throughout the project cycle. The SEP may need to be updated during project implementation. This allows improvement to project implementation based on stakeholder feedback, and proactive management of concerns.

15. The SEP will be designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. The SEP will set out how communication with stakeholders will be handled throughout project preparation and implementation.

16. The SEP will describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them.

17. When the stakeholder engagement with local individuals and communities depends substantially on community representatives,⁵ the Borrower will make reasonable efforts to verify that such persons do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner.⁶

Footnote 5. For example, village heads, clan heads, community and religious leaders, local government representatives, civil society representatives, or teachers.

Footnote 6. For example, by conveying, in an accurate and timely manner, information provided by the Borrower to the communities and the comments and concerns of such communities to the Borrower.

GN17.1. All views will be considered, including those of disadvantaged or vulnerable individuals or groups. To support this, it is useful to map community structures carefully, to use diverse methods of leader identification, and to follow systems and processes that foster the accountability of those identified as community representatives. This consideration may take into account the degree of authority and legitimacy residing with those representatives. Good practice suggests that as long as a stakeholder group is offering a perspective that is relevant to the project, its views should be considered.

18. In certain circumstances,⁷ depending on the level of information available about the project, the SEP will take the format of a framework approach, outlining general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with this ESS that will be implemented once the location is known.

Footnote 7. For example, where the exact location of the project is not known.

GN18.1. The use of the SEP framework approach is appropriate where the design and location of the project cannot be known during project preparation, or when a project has multiple subprojects that will only be designed during project implementation. In such cases, the framework sets out the principles to be followed for stakeholder engagement in a manner that is consistent with ESS10 and indicates how people are notified as key information becomes known. The SEP is updated as and when specific details become known, for example the specific locations, stakeholders, and schedule of activities.

Information Disclosure

19. The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information as early as possible before the Bank proceeds to project appraisal, and in a time frame that enables meaningful consultations with stakeholders on project design:

- (a) The purpose, nature, and scale of the project;
- (b) The duration of proposed project activities;
- (c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups, and describing the differentiated measures taken to avoid and minimize these;
- (d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
- (e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
- (f) The process and means by which grievances can be raised and will be addressed.

GN19.1. Meaningful stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available project-related information as early as possible in the project cycle and in a manner, format, and language appropriate for each stakeholder group is important. Formats to provide information may include presentation printouts, nontechnical summaries, project leaflets, and pamphlets. Ideally, maps of the project area and nontechnical drawings should be included in the materials. Documents used in stakeholder consultation should be made available to stakeholders, for example on community public notice boards, and, where possible, on the Borrower's website.

GN19.2. Documentation should also be accessible for stakeholders with sensory disabilities, for instance, through providing documents in Braille or engaging a sign language interpreter at a consultation meeting, as appropriate.

GN19.3. In cases where literacy levels are low, additional formats like location sketches, physical models, and film presentations may be useful to communicate relevant information. The Borrower should help the public to understand technical documents, for instance, through the publication of simplified summaries, nontechnical background explanations, or access to local experts.

GN19.4. The Borrower should make special efforts to inform, engage with, and understand disadvantaged or vulnerable groups with regard to the impacts of the project on them, the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances.

GN19.5. It is important to remain responsive to requests for information from project-affected parties and other interested parties throughout the project cycle. It is helpful to set up appropriate systems to make project information available on a continuous basis. For instance, a website or other media may be useful to provide, and regularly update, project-related information.

20. The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).

Meaningful Consultation

21. The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves.

22. Meaningful consultation is a two-way process, that:

- (a) Begins early in the project planning process to gather initial views on the project proposal and inform project design;
- (b) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- (c) Continues on an ongoing basis, as risks and impacts arise;
- (d) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a time frame that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s), and is understandable to stakeholders;
- (e) Considers and responds to feedback;
- (f) Supports active and inclusive engagement with project-affected parties;
- (g) Is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- (h) Is documented and disclosed by the Borrower.

GN22.1. The aim of consultations is to engage in a meaningful dialogue with stakeholders, receive input on analysis and proposed plans, discuss concerns, and inform the Borrower's decisions, where appropriate. Security and accessibility are expected to be considered when designing a consultation program, especially in fragile and conflict-affected situations.

GN22.2. Stakeholders should be welcome to express any concerns that are project related for the Borrower’s consideration. Participation in consultations and the expression of any opinions should not lead to retaliation, abuse, or any kind of discrimination. The Borrower is expected to address allegations of retaliation, abuse, or discrimination and take appropriate remedial measures.

B. Engagement during Project Implementation and External Reporting

23. The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.⁸

Footnote 8. Additional information may need to be disclosed at key stages in the project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism has identified as of concern to stakeholders.

GN23.1. As implementation of a project progresses, new impacts may arise, while other impacts may be eliminated. Borrowers provide regular updates to stakeholders on project performance and changes in scope or schedule, following the procedures agreed upon in the SEP.

24. The Borrower will continue to conduct stakeholder engagement in accordance with the SEP, and will build upon the channels of communication and engagement already established with stakeholders. In particular, the Borrower will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures in the ESCP.

25. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. The Borrower will disclose an updated ESCP, setting out any additional mitigation measures.

GN24.1. Ongoing stakeholder feedback is useful to monitor risks and impacts and to assess the effectiveness of the measures designed to mitigate environmental and social risks and impacts. Consultations can also be used to assess whether the requirements of the ESCP regarding mitigation measures have been fulfilled, whether additional issues have arisen, and how these are addressed.

C. Grievance Mechanism

26. The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism⁹ to receive and facilitate resolution of such concerns and grievances.

Footnote 9. The grievance mechanism to be provided under this ESS may be utilized as the grievance mechanism required under other ESSs (see ESSs 5 and 7). However, the grievance mechanism for project workers required under ESS2 will be provided separately.

GN26.1. A grievance mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion, and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage.

27. The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements. Further details on grievance mechanisms are set out in Annex A.

(a) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process, or procedure will not prevent access

to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and

- (b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.

GN27.1. A grievance mechanism is designed based on an understanding of the issues that are likely to be the subject of concerns and grievances. The appropriate design and scale of the grievance mechanism is project specific. The design depends upon factors such as the project context, scale, and scope; the number of project beneficiaries; capacity; cultural attitudes toward lodging grievances; available human and financial resources; and technological constraints. Existing formal and/or informal mechanisms identified as part of the environmental and social assessment under ESS1 may be used, provided they are deemed suitable for the project's purposes and, as needed, can be supplemented with project-specific arrangements. In some instances, it may be cost effective and sustainable to build on and improve such formal or informal mechanisms for grievance redress.

GN27.2. A grievance mechanism is established as early as possible in project development and supported by appropriate human and financial resources. The mechanism provides specific places and ways whereby grievances would be received and the means by which they can be submitted (for example, mail, text message, e-mail, website, telephone, suggestion/complaint boxes, grievance form); specifies a person, an office, or an institution responsible for processing grievances; and establishes timelines for processing a complaint and a process for registering and monitoring grievances. Grievance mechanisms for larger or more complex projects may have multiple locations, means, and methods to receive, process, and monitor grievances, an adequately staffed team, and an appeals process.

GN27.3. To make grievance mechanisms accessible to all stakeholders, it is helpful to make the procedures to submit grievances simple and easy to understand; advertise them publicly and broadly via newspapers, radio broadcasts, or other accessible and appropriate channels; and indicate the expected length of timelines for acknowledgment, response, and resolution. The grievance mechanism is free of charge to stakeholders. Accessibility for disadvantaged or vulnerable individuals or groups is important, as is documenting grievances received and responses provided.

GN27.4. Actions taken on the grievance or suggestions should be informed and balanced. The time frame for grievance resolution depends on factors such as the urgency of the complaint; need for research, investigation, consultation, and funding; and capacity. The grievance mechanism sets out indicative time frames for acknowledgment, interim responses, and, where possible, final resolution of grievances. Some grievances may require coordination among multiple departments/agencies, often outside the control of the project, or require detailed investigation. Such grievances may take longer to address, and this should be communicated to the parties concerned when acknowledging receipt of the grievances. Supporting documents needed to achieve resolution form part of the files related to the grievance/feedback.

GN27.5. Grievance mechanisms should require all grievances to be treated confidentially, impartially, objectively, and in a timely manner. In countries where the submission of anonymous grievances is not permitted, it is important to ensure confidentiality; in those cases, the Borrower may consider engaging third-party entities to facilitate submission of grievances. Users of a grievance mechanism may not be subject to retaliation, abuse, or any kind of discrimination. The Borrower is expected to address allegations of retaliation, abuse, or discrimination and take appropriate remedial measures.

D. Organizational Capacity and Commitment

28. The Borrower will define clear roles, responsibilities, and authority, as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.

GN28.1. The Borrower should designate qualified staff to design, implement, and monitor stakeholder engagement activities and, if necessary, consider supplementing the staff with external expert assistance. The number of staff should be proportionate to the nature of the project and the types and levels of risks and impacts that are anticipated.

Annex A: Grievance Mechanism

1. The scope, scale, and type of grievance mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.

2. The grievance mechanism may include the following:

- (a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a website;
- (b) A log where grievances are registered in writing and maintained as a database;
- (c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgment, response, and resolution of their grievances;
- (d) Transparency about the grievance procedure, governing structure, and decision makers; and
- (e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

3. The Borrower may provide mediation as an option where users are not satisfied with the proposed resolution.

References

There are many resources that may be useful to a Borrower in addressing the application of the ESF. Set out below are references that may assist the Borrower in implementing the requirements of the ESF. The resources listed here do not necessarily represent the views of the World Bank.

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