

Stakeholder Engagement Framework (SEF) for

Indonesian Mass Transit Program Support Project (IMTPSP)

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LIST OF ACRONYMS

AFD	French Development Agency
AMDAL	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Assessment — the whole EIA document)
ANDAL	<i>Analisis Dampak Lingkungan</i> (Environmental Impact Analysis)
Andalalin	<i>Analisis Dampak Lalu Lintas</i> (Traffic Impact Assessment)
Angkot	<i>Angkutan Kota</i> (means ‘municipal transportation’ — usually in the form of minivans operated by private companies as common Indonesian public)
Bappeda	<i>Badan Perencanaan Pembangunan Daerah</i> (Regional Development Planning Agency)
BAPPENAS	<i>Badan Perencanaan Pembangunan Nasional</i> (National Development Planning Agency/ Ministry of National Development Planning)
BAU	Business as Usual
Bemo	Minivans operated by private companies as common Indonesian public transportation modes
BPS	Indonesian Central Bureau of Statistics
CBD	Central Business District
CO ₂	Carbon dioxide
DAMRI	Indonesian state-owned public transit bus company
DEMU	Diesel Electric Multiple Unit
Dishub	<i>Dinas Perhubungan</i> (Transportation Agency); could be at provincial/ city/ regency level
DKI	<i>Daerah Khusus Ibukota</i> (Special Capital Region)
DLH	<i>Dinas Lingkungan Hidup</i> (Environmental Agency)
E&S	Environment and Social
EHSG	Environmental, Health, and Safety Guidelines
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRS	Environmental and Social Review Summary
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
FI	Financial Intermediaries
FPIC	Free, prior, and informed consent
GESI	Gender and social inclusion
GHG	Greenhouse gas
GOI	Government of Indonesia
GRM	Grievance Redress Mechanism
IMTPSP	Indonesian Mass Transit Program Support Project
IPF	Investment Project Financing
ITB	<i>Institut Teknologi Bandung</i> (Bandung Institute of Technology)
KLHK	Ministry of Environment and Forestry
KND	National commission of disability
LKPP	National Public Procurement Agency

LRT	Light Rail Transit
MoT	Ministry of Transportation
NAAQS	National Ambient Air Quality Standards
NGO	Non-Governmental Organizations
NPMU	National Project Management Unit
OHS	Occupational Health and Safety
PAP	Project affected party
PCN	Project Concept Note
PIU	Project Implementation Unit
PMU	Project Management Unit
PPE	Personal Protective Equipment
PPP	Public-Private Partnership
PT INTI	PT Industri Telekomunikasi Indonesia (Indonesian Communication Company)
PT KAI	PT Kereta Api Indonesia (Indonesian Railway Company)
PU	<i>Dinas Pekerjaan Umum</i> (Public Works Agency)
PWD	Persons with disabilities
RKL-RPL	Environmental Management Plan (RKL), Environmental Monitoring Plan (RPL)
RPJMD	Regional Mid-Term Development Plan (5-year plan)
RPJMN	National Mid-Term Development Plan (5-year plan)
RPJPD	Regional Long-term development plan (20-year plan)
RPJPN	National Long-term development plan (20-year plan)
Sekda	<i>Sekretariat Daerah</i> (Regional Secretariat — the third highest-ranking official after the head and the deputy of at Province/ City/ Regency)
SEP	Stakeholder Engagement Plan
SPP	Declaration Letter of Environmental Management and Monitoring
TMB	Trans Metro Bandung (City of Bandung Bus Rapid Transit)
ToR	Terms of Reference
UKL-UPL	Environmental Management and Monitoring Efforts (for business/ activities that do not require AMDAL/ EIA)
WB	World Bank

EXECUTIVE SUMMARY

The Government of Indonesia (GOI), through the Ministry of Transport (MoT), with support of the World Bank (WB), is creating the Indonesian Mass Transit Program Support Project (IMTPSP) to increase financial, technical, and institutional capacities of subnational government (SNGs) to plan, implement and manage public transport. This project is in line with the Medium-Term National Development Plan (RPJMN) for 2020-2024, which has targeted mass transit development in 6 metropolitan areas, namely Jakarta, Surabaya, Medan, Bandung, Makassar, and Semarang. All projects supported by WB financing are subject to the policies on environmental and social risk management; this Stakeholder Engagement Framework has been prepared to anticipate, prepare for and guide the involvement of stakeholders in project planning, implementation and in particular in relation to communication about the management of environmental and social impacts and risks associated with the IMTPSP.

A Stakeholder Engagement Framework (SEF) is developed to the MoT, via the 'Acceleration Team for Urban Transport Implementation' at the national level, to guide how the Project, including the City Administrations at the local level, will engage stakeholders. This SEF sets out the key policy references guiding the analysis, assessment, and management of impacts arising from the project, a preliminary analysis of sub-project impacts, and processes and tools for the development of more detailed SEPs after Project approval.

IMTPSP is designed to assist selected cities in planning and implementation of safe, green, resilient, and integrated mass transit on high priority corridors with the following expected measurable results:

- Establishment of an institutional structure to manage IMTPSP at the national level;
- Resource materials, technical supports, and capacity building available for cities participating in the program;
- Establishment of institutional structure in each of the selected cities to plan and manage public transport;
- Operational climate-resilient and integrated mass transit systems in the selected cities; and
- Positive benefits for the inhabitants that live and/ or work in the area. The influence of the new public transport system in terms of travel time savings, reduced vehicle operating costs, reduced air pollution and GHG emissions, and improved user satisfaction with public transport services.

The IMTPSP comprises two main components:

1. Institutional development and project management (comprising technical assistance at the national level); and

2. Supporting the implementation of safe, resilient, green, and integrated mass transit in selected cities (comprising bus and train/ rail infrastructure and systems development projects at the sub-national level).

Stakeholders were initially identified through a Rapid Environmental and Social Assessment which was carried out in early 2019 as part of project preparation to assess potential impacts and identify corresponding mitigation measures. The analyses from the rapid assessment reports have informed this SEF, as well as the ESMF and the accompanying Process Framework, and ESIA-related documents for both Bandung and Medan (sub-projects).

Overall, the environmental and social risks of IMTPSP are deemed substantial on account of the magnitude of works in urban settings, which will create temporary disturbance during the construction stage and have some enduring social and environmental impacts throughout the operation of the infrastructure and transport systems developed particularly the BRT.

As the Stakeholder Engagement Framework provides an overview of the key steps to be taken to engage stakeholders in the project development, further details for specific stakeholders of each sub-project will be developed as Stakeholder Engagement Plans, in line with the Environment and Social Commitment Plan between WB and GOI as part of this Project Loan Agreement. The SEF proposes that the existing national and sub-national grievance mechanisms of *Lapor!* And Medan and Bandung – specific ones are utilized, adapted for the Project purposes. In addition, a specific GRM for each level is outlined, along with the roles and responsibilities within the Project structure.

1. INTRODUCTION

The Stakeholder Engagement Framework (SEF) will be used by the Indonesian Ministry of Transport, participating subnational governments, and selected contractors/ third parties for the the Indonesian Mass Transit Program Support Project (IMTPSP) throughout the project cycle. This SEF will be applied to all project components, including the Technical Assistance activities and their potential downstream activities and impacts. All contractors selected to carry out technical assistance under Component 1 will have to oblige and implement the information disclosure, consultation, and GRM plans as laid out in this stakeholder engagement framework. This project will be financed by the International Bank for Reconstruction and Development (IBRD)/ World Bank (WB), Government of Indonesia (GOI), and Government of France (AFD).

The Stakeholder Engagement Framework provides an overview of the key steps to be taken to engage stakeholders in the project development, as part of a Stakeholder Engagement Program. It responds to the WB Environmental and Social Framework (ESF) for management of impacts, specifically to the Environmental and Social Standard (ESS 10) - Stakeholder Engagement and Information Disclosure. Further details for specific stakeholders of the confirmed sub-projects namely BRT in Bandung and Medan have been developed as Stakeholder Engagement Plans.

The SEF sets out the Project background, context and design; it describes the impacts and issues that stakeholders must be aware of; it identifies general stakeholder groups and details consultations already undertaken and concerns raised, and explains how these have been addressed to date. The SEF also provides methods and timing for planned future engagement program, along with roles and responsibilities, and resources for these activities.

1.1. Project Description

GOI has recognized the importance of having reliable mass transportation systems as the key to achieving sustainable development and better life quality for its people. The Medium-Term National Development Plan (RPJMN) for 2020-2024 has targeted mass transit development in 6 metropolitan areas, namely Jakarta, Surabaya, Medan, Bandung, Makassar, and Semarang. Given limited fiscal and human resource capacities of most Sub-National Governments (SNGs) and sub-optimal institutional framework for urban transport, the establishment of a national Support Projecting mass transit development is considered necessary to meet the increasing demand for urban mobility in Indonesia. The Central Government has created IMTPSP to increase the financial, technical, and institutional capacities of SNGs to plan, implement, and manage public transport.

The Project Development Objective (PDO) is to support the roll-out of IMTPSP and implementation of safe, green, resilient, and integrated mass transit on high priority corridors in selected cities. The project has two main components as described below.

Component 1: Institutional Development, Capacity Building and Technical Assistance. This component will provide support to MoT and sub-national governments to roll out IMTP in BBMA and Mebidang and fine-tune and operationalize the national program based on the experience with the implementation of the demonstration mass transit projects. This component will include the following three sub-components:

- a. Sub-component 1A: Technical assistance to implement and manage IMTP. This sub-component will provide support to MoT to structure and operationalize IMTP, including (i) IMTP design, management and monitoring and evaluation (M&E); (ii) revising and developing policies and a regulatory framework to ensure IMTP sustainability; (iii) assistance for mass transit projects preparation in other Indonesian metropolitan areas in accordance with 2020-24 RPJMN priorities; (iv) developing guidelines, manuals, and other technical materials to facilitate IMTP implementation; (v) implementing training programs to address any capability gaps identified, which could include, among others, workshops, exposure visits and peer-to-peer knowledge exchange activities; (vi) hire a Program Management Consultant for coordinating and overseeing the multiple activities relating to the smooth implementation of this sub-component.
- b. Sub-component 1B: Institutional development at national and sub-national levels. This sub-component will include: (i) reviewing the existing institutional capability at national and sub-national level to plan, implement and operationalize the demonstration BRTs in BBMA and Mebidang and subsequent mass transit projects under IMTP; (ii) estimating the institutional and capacity development needs at national and sub-national level (including organizational structures, necessary skillsets, staffing and training plans) and assistance with operationalization of the institutions, including to carry out regulatory and administrative reviews and amendments that may be required; and (iii) designing and implementing training programs to address any capability gaps identified, which could include, among others, workshops, exposure visits and peer-to-peer knowledge exchange activities.
- c. Sub-component 1C: Project management and technical assistance for demonstration BRTs in BBMA and Mebidang. This sub-component will include providing support to MoT and the sub-national governments to (i) review, develop and finalize the preliminary and detailed engineering designs (DEDs) and other technical studies¹ for both BRTs infrastructure, facilities, equipment (e.g. Intelligent Transport Systems (ITS) and rolling stock) ensuring resilience against natural hazards, including flooding events; (ii) implement both BRTs (including Construction Supervision Consultants); (iii) hire Project Management Consultant (s) for coordinating and overseeing the multiple

¹ These studies could include, among others, (a) demand estimates; (b) service and operations plans; (c) safeguards documents; (d) traffic and demand management strategies and plans; (e) modal integration and accessibility improvement plans; (f) *angkot* reorganization plans; and (g) transaction advisory.

activities relating to the smooth implementation and operationalization of the two demonstration projects; and (iv) conduct road safety audits on BRT corridors during project implementation.

Component 2: Demonstration Mass Transit Systems in Selected Urban Areas. This component will support the implementation of safe, resilient, green and integrated mass transit projects in selected Indonesian cities. This component will include the following two sub-components:

- a. Sub-component 2A: BRT in BBMA. This sub-component will support the development of a bus improvement project to enhance connectivity between the west and east urban corridors of BBMA. It will have an approximate length of 22 km running through the central area of BBMA with a small portion of the system connecting the central area with the Tegallega Park area in the South. The system will include 19 km of segregated bus lanes, 3 km of mixed traffic lanes, and 32 stations.
- b. Sub-component 2B: BRT Line in Mebidang. This sub-component will support the development of a BRT corridor with a dedicated right of way (with an approximate length of 21 km, with 2 terminals and 31 stations, with 8 stations in one direction streets) between Pinang Baris in the west and Amplas Bus Terminals in the southeast of Mebidang. The BRT service proposes to connect to adjoining agglomerations of Sunggal/Binjai City in the west and Tanjung Morawa/Lubuk Pakam in the east.

1.2. Potential Results and Impacts

The project is expected to have the following expected measurable results:

- Establishment of an institutional structure to manage IMTP at the national level;
- Resource materials, technical supports, and capacity building available for cities participating in the program;
- Establishment of institutional structure in each of the selected cities to plan and manage public transport;
- Operational climate-resilient and integrated mass transit systems in the selected cities; and
- Positive benefits for the inhabitants that live and/ or work in the area of influence of the new public transport system in terms of travel time savings, reduced vehicle operating costs, reduced air pollution and GHG emissions, and improved user satisfaction with public transport services.

Measurable benefits from the project specifically include:

- Travel time savings for mass transit passenger and other corridor users;
- Vehicle operating cost reduction due to reduced congestion;
- Reductions in GHG emissions and air pollution;
- Increased accessibility to formal jobs/ centers of economic activity or urban amenities.

The overall impact will be that the Project Beneficiaries, namely the inhabitants of the cities that live and/ or work in the area of influence of the new mass transit systems, benefit in terms of their ability to use a safer, greener, more resilient and integrated systems. There will also be pedestrians and cyclists that will benefit from the improved facilities for non-motorized transport and public space upgrading that may be integrated with the public transport improvements. As the most users of public transport and non-motorized modes tend to be lower-income, this project is expected to benefit people in the bottom 40% economic groups of city populations.

2. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The SEF document was developed with several limiting factors due to the COVID-19 pandemic, which restricted travel and face-to-face meetings with the relevant stakeholders. To address these limitations, most of the material used derives from literature studies as there are many mass transport related WB projects in other countries. Further, it is planned to have some stakeholder consultation at National and in each of the two sub-project cities. These measures will help to overcome the limitations of the SEF, with the necessary additional detail to be included in the Project SEPs for cities with sub-Projects.

Indonesia urban transport is one of sector that has been receiving the World Bank support. The support related to IMTP is started in 2017 covering amongst others urban transport diagnostic, IMTP design, Bandung Basin Metropolitan Area Urban Mobility Plan, national urban mobility guidelines, GESI, and capacity building on transport planning and financing. Other supports related to IMPT are studies on E-mobility adoption for Indonesian cities and Resilient urban mobility for Indonesian cities. The IMTP design is the basis of mass transit program in RPJMN 2020-2024 and the drafting of presidential regulation on IMTP. IMTPSP supports GOI to implement the IMTP.

A summary of engagement activities undertaken as part of the Project development process from diagnostic phase in 2017 to present is provided in Table 1 below.

Table 1: Summary of consultations undertaken to date

Project area	Engagement activities	Topics	Who participated	Date	Note
	Urban transport diagnostic-study	Urban transport	<p><i>National stakeholders:</i></p> <p>National Development Planning Agency, Ministry of Transport (MoT) through Directorate General of Land Transport,</p> <p><i>Subnational stakeholders:</i></p> <p>North Sumatera Provincial Transport Agency, West Java Provincial transport Agency</p> <p>The World Bank</p>	Along 2017	Analytical and study report was disseminated to Bappenas, MoT (DG Land Transport), and city of Bandung (<i>Cekungan and Medingan areas</i>)
	technical support for development of Indonesia Mass Transit Project grand design	Urban mass transit design	<p><i>National stakeholders:</i></p> <p>The National Development Planning Agency and the Ministry of Transport, and</p> <p><i>Subnational stakeholders:</i></p> <p>the subnational government of West Java and transport agency of Bandung metropolitan areas.</p> <p>The World Bank</p>		
	Technical assistance for development of national urban mobility guidelines				

Project area	Engagement activities	Topics	Who participated	Date	Note
	Technical assistance for development of studies on e-mobility adoption for resilient cities	e-mobility study for cities	National stakeholders: The National Development Planning Agency, Ministry of Transport through DG Land Transport, the Transport Agency of West Java, Transport Agency of Bandung city, West Bandung district, Sumedang district, and Cimahi district. The World Bank	Ongoing	Study is anticipated to be completed by mid-2022
	Environmental and Social Management discussion DGLT and North Sumatera and Medan Metropolitan Govt – institutional arrangement for E&S implementation, key concerns for E&S, and grievance redress mechanisms at subnational level	Institutional arrangement and GRM	<i>National stakeholders:</i> Ministry of Transport through DG Land Transport, <i>Subnational governments:</i> the Transport agency of North Sumatera, transport agency of Medan city, and transport agency of Deli Serdang district. The World Bank	October 2021	Data was used to develop ESMF and SEP Medan metropolitan
Greater Bandung Region	Regular meetings where held between the local consultant team and Dishub	Socialization of what environmental and social instruments needed (or have been prepared by city government); world bank social and	<i>National stakeholders:</i> Ministry of Transport through DL Land Transport, <i>Subnational stakeholders:</i> the West Java provincial development planning agency, the West Java transport agency, and City of Bandung transport agency, West Bandung district transport agency, Cimahi district transport agency, and Sumedang district transport agency.		

Project area	Engagement activities	Topics	Who participated	Date	Note
		environmental framework			
	Monthly virtual meeting with provincial transport agency	Urban Mobility plan for Bandung Metropolitan Area	<p>The transport agency of West Java province and transport agency of Bandung city, transport agency of Cimahi, transport Agency of West Bandung district, and transport agency of Sumedang district</p> <p>the local development planning agency of Bandung city joined the meeting several times in November-December 2020 and January 2021.</p>	March 2020 – Jan 2021	
	Finalization of Urban Mobility Plan draft		<p>the transport agency of West Java province; development planning agency of West Java province; and transport agency of Bandung city, transport agency of Cimahi, transport Agency of West Bandung district, and transport agency of Sumedang district.</p> <p>The World Bank</p>	October 2020	Urban Mobility plan report
	Discussion of Feasibility Study	FS for BRT Bandung	The transport agency of West Java province and transport agency of Bandung city, transport agency of Cimahi, transport Agency of West Bandung district, and transport agency of Sumedang district	Jan 2021	Feasibility Study report
	Gender and Social Inclusion assessment in regards to the Sustainable Urban Mobility Plan at provincial level in Bandung (GESI)	GESI Report	<p>Transport agency of West Java and transport agency of Bandung city.</p> <p>The World Bank</p>	March 2021	If there is any data on how many participants disaggregated by gender

Project area	Engagement activities	Topics	Who participated	Date	Note
Greater Medan Region	Project concept socialization	18 th of March 2021	<p><i>National stakeholders:</i></p> <p>Ministry of Transport (DG Land Transport) and The National Planning Agency</p> <p><i>Subnational stakeholders:</i></p> <p>the North Sumatera provincial development planning agency, the North Sumatera transport agency, and City of Medan transport agency, Deli Serdang district transport agency,</p> <p>The World Bank</p>		
	Regular meetings between Dishub Medan, Govt of Medan city and PT SMI – feasibility study prep by PT SMI	The Medan Metropolitan BRT system FS was completed in February 2019 by PT.SMI	<p><i>National stakeholders:</i></p> <p>Ministry of Transport through DL Land Transport, PT Sarana Mandiri Infrastructure (Ministry of Finance).</p> <p><i>Subnational stakeholders:</i></p> <p>the North Sumatera provincial development planning agency, the North Sumatera transport agency, and City of Medan transport agency, Deli Serdang district transport agency,</p>	2016	Initial Feasibility Study report
	Regular meetings between Dishub Medan, Govt of Medan city and PT SMI	The Medan Metropolitan BRT system FS was completed in	The City Government of Medan, The Transport Agency of Medan, and PT SMI (Ministry of Finance)	Feb 2019	Feasibility study report

Project area	Engagement activities	Topics	Who participated	Date	Note
		February 2019 by PT.SMI			
	AMDAL study	Environmental assessment study	The Government City of Medan, The Transport Agency of Medan, and the Environmental Agency of Medan city.	2018	AMDAL report – gaps identified and needs to be filled
	regular virtual meeting with provincial transport agency	Urban Mobility plan for Medan Metropolitan Area	<p><i>National stakeholders:</i></p> <p>Ministry of Transport through DL Land Transport, World Bank</p> <p><i>Subnational stakeholders:</i></p> <p>, the North Sumatera transport agency. Along April to October 2021, the City of Medan transport agency, Deli Sedang district transport agency participated in the meeting</p>	Ongoing	
	Project concept socialization	Concept of Pilot Bus Rapid Transit project, as part of Indonesia Mass Transit Support Project	<p>MoT and subnational governments</p> <p>The World Bank</p>	18 th of March 2021	
	Gender and Social Inclusion assessment in regards to the Sustainable Urban Mobility	GESI Report for Medan city	Transport agency of North Sumatera and transport agency of Medan city	April 2021	If there is any data on how many participants disaggregated by gender

Project area	Engagement activities	Topics	Who participated	Date	Note
	Plan at provincial level in Bandung (GESI)		The World Bank		
	Public consultation for the project design and ESMF (please find the report on the Annex)	Project design at subnational level and ESMF	Participants are from: Transport Agency of Deli Serdang district, Public Work agency of Medan city, Medan Development Planning Agency (Bappeda), Communication and Information Agency of Medan city (Kominfo), Public transport operators of Medan city and North Sumatera (DPC and DPU ORGANDA), technical units of bus depots (BPTD Terminal Pinang Baris/ BTPD II North Sumatera), head of subdistrict of West Medan, <i>angkot</i> drivers, cultural heritage individual expert, and GESI individual expert.	December 9, 2021	Concerns and inputs from participants/ key stakeholders at subnational level were used to refine preliminary social assessment, ESMF, and SEPs at city levels (i.e. for planning follow up
	Public consultation for the project design and ESMF draft (please find the report on the Annex)	Project design at subnational level and ESMF	Participants are from: Transport Agency of Cimahi district, Development Planning Agency of Cimahi (Bappeda), Public Transport Regional Governing Body (<i>Balai Transporasi Publik Daerah</i> /BTPD Wilayah IX of West Java), Development Planning of Bandung City, Environmental Agency of Bandung City (DLH), West Bandung Transport Agency, Public Transport Operators of West Java and Bandung (ORGANDA DPC and DPP), the Land Transport Operator (a state-owned company, DAMRI), the Indonesian Railway Operator (a state-owned company, PT KAI), taxi driver, <i>angkot</i> drivers, Global Future Cities Program (GFCP).	13 December 2021	Concerns and inputs from participants/ key stakeholders at subnational level were used to refine preliminary social assessment, ESMF, and SEPs at city levels (i.e. for planning follow up consultation on specific topic as per each groups' concern/ aspiration).

3. STAKEHOLDER IDENTIFICATION

Timely and systematic stakeholder participation at all levels is a key instrument for ensuring project success. It involves the relevant governmental agencies at all administrative levels, including the Subdistrict (*Kecamatan*) and neighbourhood (RT/RW) level government and communities in the early stages of planning the project activities. Moreover, appropriate approaches for impacted parties, such as residents and business owners most disturbed during construction activities, needs to be in place. This section of SEF outlines the categories and types of stakeholders involved with the Project, as well as the Project’s stakeholder mapping, consultation and disclosure activities and guidelines.

General stakeholder mapping has been carried out as part of Project planning, impact scoping and to fulfill E&S requirements, with more specific detail to be provided in the subsequent Stakeholder Engagement Plans. Overall Project stakeholder categories are shown below:

3.1 Government agencies

No	Governments	
1	National level (<i>Kementerian dan Lembaga/ K/L</i>)	Key ministries and agencies, including MoT, BAPPENAS, PU and KLHK MoT Land Transportation Regional 2
2	Provincial level	All relevant key government agencies in respective provinces: Provincial Working Group/ <i>Satuan Kerja (Satker)</i> Bappeda Province of West Java and Province of North Sumatera Provincial government- Secretary (Sekretaris Daerah/ Sekda at provincial level) Provincial Transport agency (Dinas Perhubungan/ Dishub at provincial level) Public Works agency (Pekerjaan Umum/ PU) Environmental agency (Dinas Lingkungan Hidup) The Policy Department (POLDA) in respective province
3	City level	Key agencies will be part of the <i>Satuan Kerja (Satker)</i> at provincial level. The Satker will be the PIU for Component 2. For overall coordination – Bappeda, Sekda and Dishub of participating cities For land acquisition related issue – Road office, Dinas Pertanahan ATR/BPN For communication with public in coordination with Dinas Kominfo For technical in field in coordination with the Police Office and Satpol PP (and to avoid unnecessary physical contacts with PAPs) Dishub of Bandung Barat district, Cimahi district, Sumedang district Bappeda of Bandung Barat district, Cimahi district, Sumedang district Dishub of Deli Serdang district and Binjai city Bappeda of Deli Serdang district and city of Binjai

3.2 Project Affected Parties/Peoples (PAPs)

No.	Broad category	Sub-category relevant in this Project
1.a	PAPs – potentially to be relocated and/or	Landowners & people who rent the land in relocation affected areas;

No.	Broad category	Sub-category relevant in this Project
	made some adjustments due to BRT construction or operation	Formal land users such as Office buildings and night market vendors (formal) ; or informal land users: street vendors .
1.b	PAPs – potentially have to be relocated and categorised as vulnerable groups (double marginalised)	Informal settlers with family member person with disability Informal settlers with elderly family member Informal settlers with women as the head of household (or single-headed household)
2.	PAPs – potential loss or reduction of income such as public transport operators such as angkot drivers, metromini drivers, etc that affected by the output of the project (new route of mass transit) or during construction phase	Public transport operators, which are divided into: <ul style="list-style-type: none"> • Vehicle owners (renting one’s assets to others, income from renting cash) • Drivers and also the vehicle owners • Drivers (and not owning vehicle) • Temporary drivers (<i>supir tembak</i>) <p>While all groups are PAPs, ones in red are the most likely to be also vulnerable due to their socioeconomic conditions and lack of assets’ ownership.</p>
3	Road users	The Project will take place in main roads of metropolitan areas, and thus road users will be affected during construction (increase in traffic jam) or have to share-the lane during BRT operation which may increase travel-time.

3.3 Vulnerable groups

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 (see ESMF for more details).

Identification of the vulnerable stakeholders takes into account considerations of age, including the elderly and minors, and including circumstances such as disability. The objective in consulting vulnerable groups is to ensure impacts are adequately understood and adjustments to project design and mitigation measures are made.

As identified in red-lighter on sub section above, several PAPs may be also categorised as vulnerable due to:

- their earnings were drawn from existing economic activities that will be affected by the Project (both during construction and/or operation).
- Lack of productive assets ownerships, such as vehicles or land
- Relatively come from low-income households compared to the rest of other stakeholders, and often engaged in multiple precarious economic activities

- Lack of participation capacity and/or opportunity in decision making due to social norms, social status, or assets ownerships. For instance, consultation may be conducted with ORGANDA, which usually are association for public transport owners not drivers, and thus drivers and temporary drivers may be left out in consultation proves. This will be addressed in the following section and in detail in subnational- SEPs.

Table 2. Vulnerable groups (may be overlapped with PAPs)

Vulnerable groups		
1.	people with disability, elderly, pregnant women, school children/ young people	<p>people with disabilities, Elderly Pregnant women School children, children and young people (under 18 years old)</p> <p>In public transport context in urban settings in Indonesia, these groups are generally considered as vulnerable, despite on different levels (for instance people with multiple disabilities are relatively more vulnerable than a healthy-pregnant woman), due to several reasons, including potential risk of harassment on and around public transport (station) and financial and physical limitations which affect the way they are able to/ limited in using public transport for mobility.</p>
2	PAPs who are also vulnerable in socio-economic terms	<p>Landowners & people who rent the land in relocation affected areas; Public transport drivers who did not own vehicles or the temporary drivers Informal settlers and/ or street sellers</p>

3.4 Other Interested Parties

There may be broader stakeholders who are interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

Moreover, civil society and nongovernmental organizations may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the project to consider and address in the assessment process. Other interested parties include:

- Academia.
- Commuters and/ or future commuters (who are not frequently using public transport, but interested to try on when BRT starts operating)
- Public transport/ green city/ urban development practitioners
- Social welfare/ Poverty and people with disabilities-rights based NGOs
- Religious Organizations/social semi-formal organization or NGOs
- Transport companies; and
- Media.

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Purpose and timing of stakeholder engagement program

The key principles for Stakeholder Engagement include:

- **Clear, accurate and timely communication:** the Project should provide information that is clear, accurate, relevant and timely, recognizing the different communication needs and preferences of various stakeholders and that effective communication involves listening and talking;
- **Accessibility and Inclusivity:** The Project will seek out stakeholders potentially affected by, or interested in, the activities, processes, or decisions of MoT or participating subnational governments and provide them with whatever information they need to participate in an appropriate and meaningful way; particularly for people with special needs/ people with disabilities.

- **Transparency:** management should clearly identify and explain the engagement process, stakeholders' role in the engagement process, and communicate how their input was considered and how it informed the decision or Project; and
- **Measurability:** evaluating engagement activities will assist in identifying effective stakeholder engagement methods and improve the quality of stakeholder engagement over time.
- **Sensitivity and oriented towards public health safety:** as Covid-19 cases are still being a concern of public health in Indonesia (and across the globe), all stakeholders engagement activities will have to follow the Covid-19 health/ social gathering' procedures and to adjust the plan as appropriate, while meeting the engagement objectives.
- **Confidentiality:** Whenever complainant requests for a confidential-reporting, after verifying the complaint (whenever possible), GR officer/social specialist/local facilitator/OHS officer should remove any identities attached to the complainant and to ensure that there is no information that can lead to identification of the complainant. The M&E process will ensure that confidentiality is respected and maintained throughout the project cycle.

In practical terms, this means that Project personnel involved in stakeholder relationships, for formal and informal consultations will endeavor to:

- Provide clear, factual and accurate information in a transparent manner on an on-going basis to community stakeholders through free, prior and informed consultation;
- Listen and learning about local and social culture and wisdom;
- Provide opportunities for community stakeholders to raise issues, make suggestions and voice their concerns and expectations with regard to the Project;
- Engage with people with disability, (pregnant) women, men, elderly, youth and vulnerable community members, indigenous people, as well as those in positions of authority and power; to ensure that communication modalities are appropriate for each target group, and to consider extra measures to reach people with disabilities.
- Provide stakeholders with feedback on how their contributions have been considered in the development of relevant assessments and plans. Community and stakeholders' involvement in preparation of ESIA (AMDAL) will be included during approval of RKL-RPL documents through consultation with ESIA (AMDAL) Technical Team. Input and suggestions from the related stakeholders will be used in improve the project documents with specific mention to be included to show where stakeholder input has been taken on;

- Build capacity among community stakeholders to interpret the information provided to them;
- Treat all community stakeholders with respect, and ensuring that all Project personnel and contractors in contact with community stakeholders do the same;
- Respond to issues and requests for permission; and
- Build constructive relationships with identified influential community stakeholders through appropriate levels of contact.

4.2. Methods for Stakeholder Engagement

Engagement, consultation and disclosure are ongoing processes throughout the Project life cycle. As stated in the ESF guidelines, the Project team will develop a stakeholder engagement program/plan to guide and structure its analysis of, and interactions with, all categories of stakeholder for the Project duration. The objective of the SEP is to illustrate strategies and implementation efforts to engage relevant, influential stakeholders in all the Project activity processes.

Communication during Project development and execution involves seeking and imparting information, and reaching agreements through dialogue. A variety of methods of communication should be used to reach the majority of stakeholders and to provide easy access to information as well as effective response processes. IMTPSP teams at national and city level (PIUs) should select the communication methods that are most appropriate for each stakeholder group, and have a clear rationale for their choices. The draft plans should be disclosed to the public and should include a statement welcoming comments on the proposed engagement plan and suggestions for improvement.

The program should anticipate the means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts. Following such consultations, an updated ESMF and / or SEPs will be disclosed.

Error! Reference source not found. below summarizes some of the most commonly used techniques for conveying information to the public and their respective advantages and disadvantages. The safeguards specialist in the PIU may use any of these techniques in developing future consultation and engagement activities as part of the Stakeholder Engagement Plan.

Table 3: Techniques for Conveying Information to the Public and other Stakeholders

Technique	Key points	Advantages	Disadvantages	Appropriate for topics:
Printed materials	<ul style="list-style-type: none"> Information bulletins, brochures, reports: Text should be simple and non-technical and relevant to the reader; and Provide clear instructions on how to obtain more information. 	<ul style="list-style-type: none"> Direct; Can impart detailed information; Cost-effective; and Yields a permanent record of communication. 	<ul style="list-style-type: none"> Demands specialized skills and resources; and Not effective for illiterate stakeholders. 	Design phase and Construction phase <ul style="list-style-type: none"> Road/ traffic disruptions; construction grand plan (project timeline); detailed information on construction timeline (particularly to be put on locations where wet markets nearby/ or busy roads)
Displays and exhibits	Can serve both to inform and to collect comments. Should be located where the target audience gathers or passes regularly.	<ul style="list-style-type: none"> May reach previously unknown parties; and Minimal demands the public. 	<ul style="list-style-type: none"> Costs of preparation and staffing; and Insufficient without supporting techniques. 	
Print media	<ul style="list-style-type: none"> Newspapers, press releases, and press conferences can all disseminate a large amount and wide variety of information; and Identify newspapers likely to be interested in the Project and to reach the target audience. 	<ul style="list-style-type: none"> Offers both national and local coverage; Can reach most literate adults; and Can provide detailed information. 	<ul style="list-style-type: none"> Loss of control of presentation; Media relationships are demanding; and Excludes illiterates and the poor. 	
Electronic Media	<ul style="list-style-type: none"> Radio, internet, social media, and video: Determine the coverage (social media, internet, or radio), the types of viewer; the perceived objectivity, and the type of broadcast offered; and Determine how to disseminate the social media hashtag/ web address etc. to the audience. 	<ul style="list-style-type: none"> May be considered authoritative; Many people have access to radio and cell phones; and Social media can be inexpensive. 	Disadvantages those without cell phones/ internet access.	Construction phase <ul style="list-style-type: none"> BRT plan as part of city Mobility plan ('city- and province- pride and readiness for urban growth) This can be linked with other agencies, such as tourism agency or trade/ investments agency.

Technique	Key points	Advantages	Disadvantages	Appropriate for topics:
Advertising	<ul style="list-style-type: none"> • Useful for announcing public meetings or other activities; and • Effectiveness depends on good preparation and targeting. 	<ul style="list-style-type: none"> • Retain control of presentation. 	<ul style="list-style-type: none"> • May cause suspicion. 	
Formal information sessions	<p>Targeted briefing: can be arranged by Project sponsor or by request, for a particular community group, NGO etc.</p>	<ul style="list-style-type: none"> • Useful for groups with specific concerns; and • Allow detailed discussion of specific issues. 	<ul style="list-style-type: none"> • May raise unrealistic expectations. 	<p>Throughout the project cycle (particularly for public transports operators, street sellers/ business owners that will be affected negatively by the Project)</p> <ul style="list-style-type: none"> • Public transport operators • Land acquisition • (wet/ night) Market activities and/ or spatial disruptions (for instance, if the night market have to reduce their opening time due to construction/ operation of BRT, or not allowed to use space that used to be part of the market) • Women and peoples with disability (for technical design of the bus station/ terminal and particular services to increase inclusivity of the service)
Informal information sessions	<p>Open House, site visits, and field offices: a selected audience can obtain first-hand information or interact with project staff. Visits should be supported with more detailed written material or additional briefings or consultations.</p>	<ul style="list-style-type: none"> • Provide detailed information; • Useful for comparing alternatives; • Immediate and direct; • Useful when the project is complex; • Local concerns are communicated to staff; and • May help reach non-resident stakeholders. 	<ul style="list-style-type: none"> • Attendance is difficult to predict, resulting in limited consensus-building value; • May demand considerable planning; • Field offices can be costly to operate; and • Only reach a small group of people. 	

Source: adjusted from the WB Environmental Assessment Sourcebook

4.3. Strategies to Incorporate the Views of Vulnerable Groups

The Project's Gender and Social Inclusion Assessment (2021) identified and recommended several actions that serve as aspects of a strategy to minimise negative impacts on vulnerable groups. These are summarised below as guidance for the development of stakeholder engagement activities within the site/city level SEPs.

Gender-Inclusive Stakeholder Consultations, Engagement, and Communication

- Establish and follow GESI-responsive communications and engagement protocols
- Conduct community consultations with women, men, PWDs, people with limited mobility, socioeconomically disadvantaged, and students
- Consult with persons with disabilities (PWDs) to garner feedback that can inform alignment and access consideration to improve mobility
- Ensure inclusive consultations inform infrastructure design for bus stops, bus and train stations, and rolling stock (e.g., comfort, accessibility, security, and information/wayfinding signs). Participation in inclusive consultations, at least:
 - 30% women's participation
 - 20% elderly (male and female)
 - 10% people with disabilities (male and female)
- Ensure inclusive consultations inform operational systems design (e.g., affordability, security, peak and off-peak scheduling, intermodal links, and use of public space for vendors). Participation in inclusive consultations, at least:
 - 30% women's participation
 - 20% economically-disadvantaged (lowest wealth quintile)
 - 10% people with disabilities (male and female)
 - 10% vendors (male and female)
 - 10% students (male and female)
- Be documented

GESI consultation-approach will enable feedback from women, people from low-income households, people with disability, and elderly (and indigenous people when present). Feedback from this consultation will be incorporated throughout the project cycle, depending on the topic that is being discussed. For instance, if the topic is around technical bus station design (e.g., how to make it accessible, safe, and comfortable for pregnant women, people with disability, and elderly) then it would be conducted during the design phase to be incorporated in the construction phase.

GESI-approach is incorporated to the overall engagement activities, as described in section below (please refer to **Table 4. Engagement activities for Component 1**).

4.4. Engagement Activities to Support Objectives of Component 1

After knowing options for methods and understanding that incorporation of vulnerable groups' views is crucial for the success of this Project, we will lay out engagement strategy for Component 1, which entails activities on institutional development, capacity building and technical assistance.

Engagement strategy for Component 2, on the downstream impact of Component 1, physical investments for BRT development in Bandung Metropolitan and Medan metropolitan, will be detailed in Stakeholder Engagement Plan (SEPs) for respective cities (in separate documents).

Below is proposed engagement strategy in each phase of project activities under Component 1. All engagement activities below are subject to Covid-19 situation, and to follow the health protocol set by the Government of Indonesia. This includes requirement to adjust the details/technical plan as necessary, while ensuring to meet the objectives of the activity.

Table 4. Engagement activities for Component 1

Project Stage and Information Disclosure	Target Stakeholders	Methods, Appropriate adjustments in Covid pandemic (virtual meeting, phone calls, etc.)	PIC
<p>Preparation stage: Public consultations during project preparation will focus on high-level consultations with national and local government counterparts, including North Sumatera government, West Java government, as well as city and district levels governments of Medan Metropolitan and Bandung Metropolitan. Consultation will focus on project design, institutional arrangements, and E&S approaches/instruments applicable to the project.</p> <p>Internal discussions (consultations) with key government stakeholders on institutional arrangement for E&S implementation, potential land acquisition, and Grievance Redress Mechanism was conducted three times during this preparation stage. The three meetings were conducted throughout the third and fourth week of October 2021 through virtual meetings with government of North Sumatera (Bappeda and Dishub), government of West Java (Bappeda and Dishub), governments of Bandung city, Cimahi, West Bandung, and Sumedang, and governments of Medan, Deli Sedang and Binjai.</p> <p>One large meeting with all key internal stakeholders across scales (national and subnational) was conducted virtually on the second week of October. This meeting discussed technical aspects, while acknowledging the potential issue of land acquisition and environmental permitting issue (ESIA/ extended LARAP). These identified issues then were discussed on separate meeting (as described on the above paragraph).</p>			<p>Directorate General of Land Transport (DGLT), Ministry of Transport</p> <p>BAPPENAS and DGLT led the large meeting with all key internal stakeholders.</p>
<p>Project design ESMF, SEF, SEPs for city-levels, Preliminary ESIA for city level, and ESCP</p>	<ul style="list-style-type: none"> • DGLT • DGLT and Bappenas • Line ministries and agencies (national and subnational) • Potential Project Affected Parties • PAPs – vulnerable groups (women, informal workers from low-income households/ parking attendants, street sellers, etc) 	<ul style="list-style-type: none"> • Formal meetings both bilateral and multilateral. • Exchange of emails, and WhatsApp’s and calls • Workshop • Informal interviews during field visit to Bandung and Medan • Informal interviews during field visit to Bandung and Medan 	<ul style="list-style-type: none"> • DGLT in coordination with Project Streeting Committee
<p>Project implementation Component 1– institutional development, capacity building and technical assistance</p>			

Project Stage and Information Disclosure	Target Stakeholders	Methods, Appropriate adjustments in Covid pandemic (virtual meeting, phone calls, etc.)	PIC
<p>C.1.A Project management and technical assistance for demonstration BRTs in Greater Bandung and Greater Medan: review, develop and finalize DED and other technical studies; hire construction supervision and project management consultant</p> <p><i>GRM implementation is integral for all engagement activities</i></p>	<ul style="list-style-type: none"> Line ministries and agencies at national and subnational 	<ul style="list-style-type: none"> Formal meetings Exchange of official letters, emails, WhatsApp and calls Filed visit 	<ul style="list-style-type: none"> DGLT
	<ul style="list-style-type: none"> Private sector (contractors and/or consultants) 	<ul style="list-style-type: none"> Formal meetings Exchange of emails, WhatsApp and calls 	<ul style="list-style-type: none"> DGLT with close coordination with PIUs
	<ul style="list-style-type: none"> Project Affected Parties (PAPs) 	<ul style="list-style-type: none"> Formal and informal meetings/ forum (esp. In developing and finalizing ESIA/ AMDAL) Interviews and/or socio-economic surveys Field visit/ direct engagement in the field GRM implementation for PAPs 	
	<ul style="list-style-type: none"> PAPs – vulnerable groups (women/ elderly engaged in informal workers from low-income households/ street sellers who are negatively affected by the Project construction and operation) 	<ul style="list-style-type: none"> Separate meeting/ forum Interviews and/or socio-economic surveys Field visit/ direct engagement in the field GRM implementation for PAPs 	
	<ul style="list-style-type: none"> Vulnerable groups (commuters or future public transport users), such as pregnant women, women, elderly, people with disability, school children 	<ul style="list-style-type: none"> Separate meetings/ forums (focused-group discussions) Workshops Electronic/telephone survey 	
<ul style="list-style-type: none"> NGOs/ CSOs 	<ul style="list-style-type: none"> Formal and informal meetings/ forum (esp. In developing and finalizing ESIA/ AMDAL) 		
<p>C.1.B Institutional development at</p>	<ul style="list-style-type: none"> Line ministries and agencies (at national and subnational levels) 	<ul style="list-style-type: none"> Formal and informal meetings Workshops 	<ul style="list-style-type: none"> DGLT

Project Stage and Information Disclosure	Target Stakeholders	Methods, Appropriate adjustments in Covid pandemic (virtual meeting, phone calls, etc.)	PIC
national and subnational levels: review the existing institutional capacity and develop and implement trainings, staffing, and other technical assistance to fill the skillsets/ institutional capacity gaps <i>GRM implementation is integral for all engagement activities</i>	<ul style="list-style-type: none"> Private sector (contractors and/or consultants) – in regards of their involvement in TAs for the Project Development partners 	<ul style="list-style-type: none"> Formal meetings Workshops Formal and informal meetings 	
C.1.C Technical assistance to implement and manage IMTP: develop and implement IMTP design, management, M&E system, revised and promote policies/ regulatory framework to support sustainability of IMTP, develop manuals/ technical guidelines to facilitate IMTP implementation <i>GRM implementation is integral for all engagement activities</i>	<ul style="list-style-type: none"> Line ministries and agencies (at national and subnational levels) Other relevant government agencies that is not directly involved in the Project but have influence over urban mass transit Development stakeholders NGOs/ CSOs Media General public 	<ul style="list-style-type: none"> Formal meetings Workshops Exchange of official letters, emails, WhatsApp, and calls Formal meetings Sponsoring public events/third parties or government-led events such as seminars and/or talk shows on urban mass rapid transit involving development partners and NGOs/CSOs (As part of institutional capacity development and public campaign, for instance, the topic can be on ‘gender sensitive/ inclusive urban mass transit for better peoples mobility’ and so on) 	<ul style="list-style-type: none"> DGLT in close coordination with Project Streeting Committee DGLT
Component 2 is detailed in Stakeholder Engagement Plan (SEP) for respective participating cities (please refer to SEPs for each participating city).			

5. GRIEVANCE MECHANISM

This Project will provide a grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, especially vulnerable groups (i.e., women, peoples with disabilities, pregnant women, elderly, and school students) at the site level must be able to voice their concerns regarding the environmental and social performance of the project. Project-affected parties will have access, as appropriate, to project grievance mechanisms, local grievance mechanisms and the national judicial system if needed. This Project agreed to leverage the existing governments' GRM system both at national and subnational levels. Capacity development (including technical assistance and trainings) will be undertaken by the Project to enable an inclusive and effective GRM.

5.1. WB Requirements for Grievance Redress

A GRM is required for the entire project duration, where project-affected parties can raise their concerns related to the environmental and social performance of the project. This is beyond the government requirement of the ESIA process, which only asks for stakeholder engagement during the AMDAL review stage. Based on the WB's ESF, some requirements related to GRM are summarized in Table 5 below.

Table 5: GRM related Requirements in ESS

ESS	GRM Requirements
ESS2 Labor and Working Conditions	<ul style="list-style-type: none"> • Provide for all direct workers and contracted workers to raise workplace concerns; workers will be informed of GRM at the time of recruitment and the measures put in place to protect them against any reprisal for its use; • Proportionate to the nature and scale and the potential risks and impacts of the project; existing grievance mechanisms may be supplemented as needed with project-specific arrangements; • Not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements; • Clearly identify the terms and conditions on which community labor will be engaged, incl. amount and method of payment (if applicable) and times of work. The Borrower will assess the potential risks and impacts of the activities to be conducted by community workers and, at a minimum, apply the relevant requirements of the general EHSs and industry-specific EHSs; and • The project will not restrict project workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The Borrower should not seek to influence or control these alternative mechanisms. The Borrower will not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining or alternative mechanisms.

ESS	GRM Requirements
ESS5 Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	<ul style="list-style-type: none"> • Ensure that a GRM for the project is in place, as early as possible in project development to address specific concerns about compensation, relocation, or livelihood restoration measures raised by displaced persons (or others) in a timely fashion. Where possible, such GRM will utilize existing formal or informal grievance mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements designed to resolve disputes in an impartial manner; • Not resort to forced evictions of affected persons. “Forced eviction” is defined as the permanent or temporary removal against the will of individuals, families/ communities from the homes/ land which they occupy without the provision of, and access to, appropriate forms of legal and other protection, including all applicable procedures and principles in this ESS; • GRM in the resettlement plan: describes affordable and accessible procedures for third-party settlement of disputes arising from displacement or resettlement; such GRM should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms; • GRM in the resettlement framework; and • GRM in the process framework: should describe the process^{[1][2]} for resolving disputes relating to resource^{[1][2]} use restrictions that may arise between or among affected communities, and grievances that may arise from members of communities who are dissatisfied with the eligibility criteria, community planning measures, or actual implementation.
ESS7 Indigenous Peoples (IP)	<ul style="list-style-type: none"> • Ensure that the GRM is culturally appropriate and accessible to affected IP and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among IP.
ESS10 Stakeholder Engagement and Information Disclosure in the preparation of SEF for this project	<ul style="list-style-type: none"> • Respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner; • Proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the GRM will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements; • Address concerns promptly and effectively,^{[1][2]} 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;^{[1][2]} • 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.^{[1][2]} • May include 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 web site; a log where grievances are registered in writing and maintained as a database;^{[1][2]} publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;^{[1][2]} transparency about the grievance procedure, governing structure and decision makers; and an appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of

ESS	GRM Requirements
	grievance has not been achieved; and <ul style="list-style-type: none"> • May provide mediation as an option where users are not satisfied with the proposed resolution.

5.2. Potential Project – Related Grievances Identified

Related to IMTPSP, some possible grievances² or concerns that were identified from the Rapid E&S Assessment in Bandung and Medan, are categorized into:

- a. Livelihoods related, such as the threat of loss/ less of economic activities due to project implementation (*becak-angkot* drivers, traditional market/ informal sellers, business/ property owners, etc.)
- b. Land acquisition concerns including potential Tenurial conflict due to trail-track area/ street widening and curvy roads straightened;
- c. Labor and working conditions, such as accidents with laborers might occur due to handling of heavy machinery, utility services and working at height in an urban setting;
- d. Health and safety issues of the public caused by noise, air pollution, traffic, and floods during construction and operation of the transport projects;
- e. Cultural heritage disturbances; and
- f. Grievance related to the project, such as dissatisfaction with public consultation, disputes on fund management.

Complaints regarding the effects of project activities will be addressed with reference to standard operating procedures which will be drafted during project inception. A two-tier system for handling of project-level grievances is established, with site/ sub-national level (City/ Regency, Province) and national level responses, outlined in the sections below.

5.3. National Level Grievance Redress Mechanism

Grievance handling at the national level will be done by PMU. At the national level, an existing GRM portal called *Lapor!* is utilized for the grievance handling mechanism. *Lapor!*³ (literally means ‘report’) is managed by the Ministry of Administrative Reform and Bureaucracy Reform (Ministry of PANRB). Through this platform, citizens can convey their complaints (to any government programs/ policy/ activities), anonymously, or in discreet (will not be published) as they wish. The grievances will be verified and forward to the related

² Further assessments are needed to complete this identification.

³ <https://www.lapor.go.id/>

government institutions in three days, then will be followed up by the institutions in 5 days. The complaints may send their feedback in ten days.

Besides through LAPOR! website, *Lapor!* can also be accessed through SMS 1708, Twitter @lapor1708, and Android/ IOS apps. Other than LAPOR!, grievances to PMU/ Project at national level can be received via/ captured by existing mechanism, such as:

- Visit to office : DG Land Transport MoT Jl. Merdeka Barat No. 8 Jakarta Pusat 10110 Gedung Karsa Lt. 3);
- Call/ *phone*: +62 (21) 3456919, 3811308 Ext. 1102, 1350 | Fax: (021) 3857085
- Email : humas_hubdat@go.id or
- Social media: Instagram and twitter @ditjen_hubdat.

GRM Mechanism for PMU at National Level

Basically, the stages of national GRM comprise:

Grievance Documentation and Administration

- Every complaint must be documented and filed in the Project Grievance Log (Database), maintained under the national Program Manager by the Project safeguard specialist. The Safeguard Specialist will filter grievances and follow the handling procedures outlined below, resolution steps through to resolution which is also to be recorded in the database. At this stage, a registration number will be assigned to each filed complaint. Complaint status progress can be monitored with the registration number. The process must be transparent, and the complainants must be informed about it; and
- For appeals, all supplementary documents, processes, and final recommendations must be submitted by PIU to PMU.

Grievance Handling

- PIU can consult government authorities or other stakeholders to get input in handling the grievance. If required, site investigation can be conducted to get further data and information about the filed complaint. The handling process must be done within 60 days since the complaints are received.
- Results of the handling and recommendations will be informed to the complainants. If a complaint is solved, a report/record is filed in the database, and collated through regular monitoring. The results of grievance handling are final, and all processes must be documented well to be used as lessons learned.

5.4. Site/Sub-National Level GRM

The current available GRMs of for the greater Bandung and Medan areas are summarized in Table 6. Detailed arrangement of the GRM in each of the cities are provided in the Bandung and Medan SEP and will be finalized and operationalized during implementation.

Table 6: The Existing GRM at Provincial and City Government Level of the Greater Bandung and Medan Area

Level	Available GRM
West Java Province	<p>Official website of the Provincial Government. The website put the link to <i>Lapor!</i>, a national-wide GRM platform. ‘Contact Us’ is provided to inform the public how to reach them (via address, email, phone, fax of the Communication and Information Agency/ <i>Dinas Kominfo</i>, completed with a location map). Moreover, short cut icons for their social media, namely Facebook, Twitter, Instagram, Google+, and YouTube also available on the website⁴.</p> <p>Official website of the Provincial Dishub. The website put the link to <i>Lapor!</i>, a national-wide GRM platform. ‘Contact Us’ is provided to inform the public how to reach them (via address, email, phone, fax, completed with a location map). Moreover, short cut icons for their social media, namely Twitter, Instagram, and Youtube also available on the website⁵. <i>Dishub</i> also provides the procedures and steps for getting information, and also how to send objections to the refusal of public information requests⁶.</p>
City of Bandung	<p>Official website of the City Government. The website put the link to <i>Lapor!</i> and their twitter for receiving the citizens’ grievances⁷.</p>
North Sumatra Province	<p><i>Lapor!</i> page for the North Sumatra Province for receiving the grievances in the provinces⁸.</p> <p>Official website of the Provincial Government. The website⁹ provides the provincial government office address and phone number.</p> <p>Official website of the Provincial Dishub. The website¹⁰ provides ‘contact us’ form.</p>
Medan City	<p>Official website of the City Government. The website¹¹ put the link to <i>Lapor!</i>.</p> <p>Official website of the City Dishub. The website¹² provides ‘contact us’ form and <i>Dishub’s</i> office address and phone number.</p>

GRM Steps at the Site/City Level

Site level grievance redress would be handled by the respective PIUs at sub-national level. One of the roles expected for the PIU is to become mediator in settling grievance or disputes,

⁴ <https://jabarprov.go.id/-popup>

⁵ <http://www.dishub.jabarprov.go.id/>

⁶ <http://dishub.jabarprov.go.id/content/view/589.html>

⁷ <https://bandung.go.id/>

⁸ <https://www.lapor.go.id/instansi/pemerintah-provinsi-sumatera-utara>

⁹ <https://www.sumutprov.go.id/>

¹⁰ <https://dishub.sumutprov.go.id/>

¹¹ <https://pemkomedan.go.id/>

¹² <https://dishub.pemkomedan.go.id/>

so that all issues encountered on site can be resolved immediately. In other words, settlement of issues is not delayed for too long, which can make them more complex and widen the scope. In general, the stages of GRM must involve the following:

Grievance Report

- Those who file complaints can be members of the community, people, a group of people, or institutions;
- Complainants are those who have interest based on legal object entity of the complainants that can be proven with valid permit documents;
- The complainants complete Grievance Form (see Annex 2) that contains information about complainant's identity and description of the grievance;
- The complainants must list their identity, address, phone number that can be contacted to clarify their identity and communication, as well as correspondences regarding the handling of the complaints. Anonymous complaints may be registered through the same mechanism, however follow up responses will be determined on a case by case basis; and
- Grievance can be filed directly to the PIU or by completing grievance form available at *Dishub* office or on the project website/ communication portal.

Grievance Documentation and Administration

- Every complaint must be documented and filed in the database. At this stage, a registration number will be assigned to each filed complaint. The PIU will issue complaint receipt for each complainant; and
- The complaint's progress status can be monitored with the registration number. The process must be transparent, and the complainants must be well informed about it.

Grievance Material Verification and Validation

- Complaints will go through preliminary verification to determine whether complainants are eligible to file complaint and it is done through verification of complainant's identity and other required documents; and
- Further verification is conducted to determine if the material can be handled by PIU. If not, the decision and reasons must be submitted in writing to the complainants. Verification and validation must be conducted immediately, not more than 14 days after complaints are received.

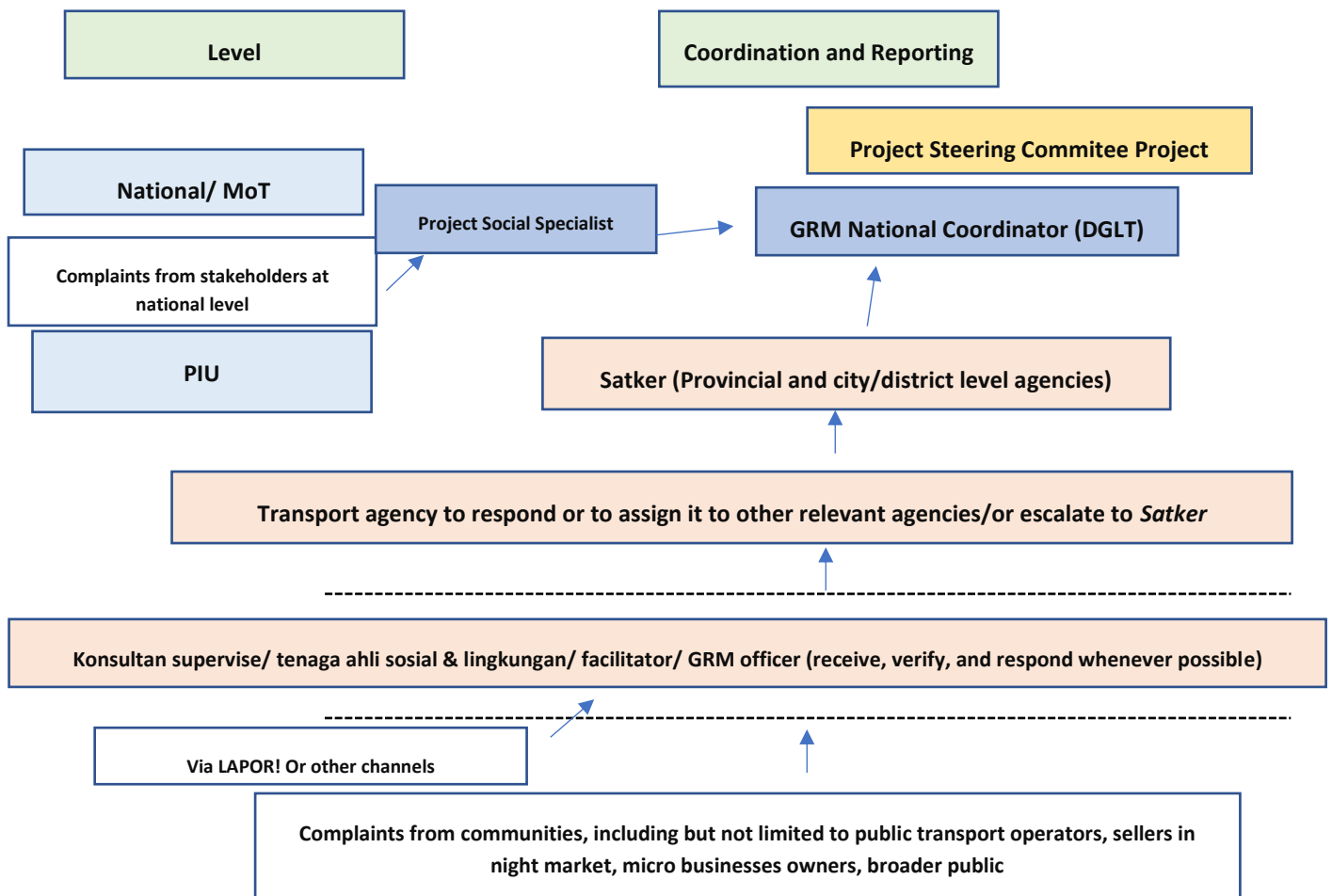
Grievance Handling

- PIU can consult the provincial stakeholder to get inputs in handling grievance. If required, site investigation can be conducted to get further data and information about the filed complaint. The handling process must be done within 60 days since the complaints are received; and

- All process must be documented well. Results of the handling and recommendations will be reported to the complainants. If a complaint is solved, a report/ record is filed in the database, and collated through regular monitoring. However, if a complaint has not been solved, further handling will be done by national level PMU.

Institutional Arrangement for GRM implementation is as follows.

Figure 1. Institutional Arrangement for GRM implementation



6. SEF ROLES AND RESPONSIBILITIES

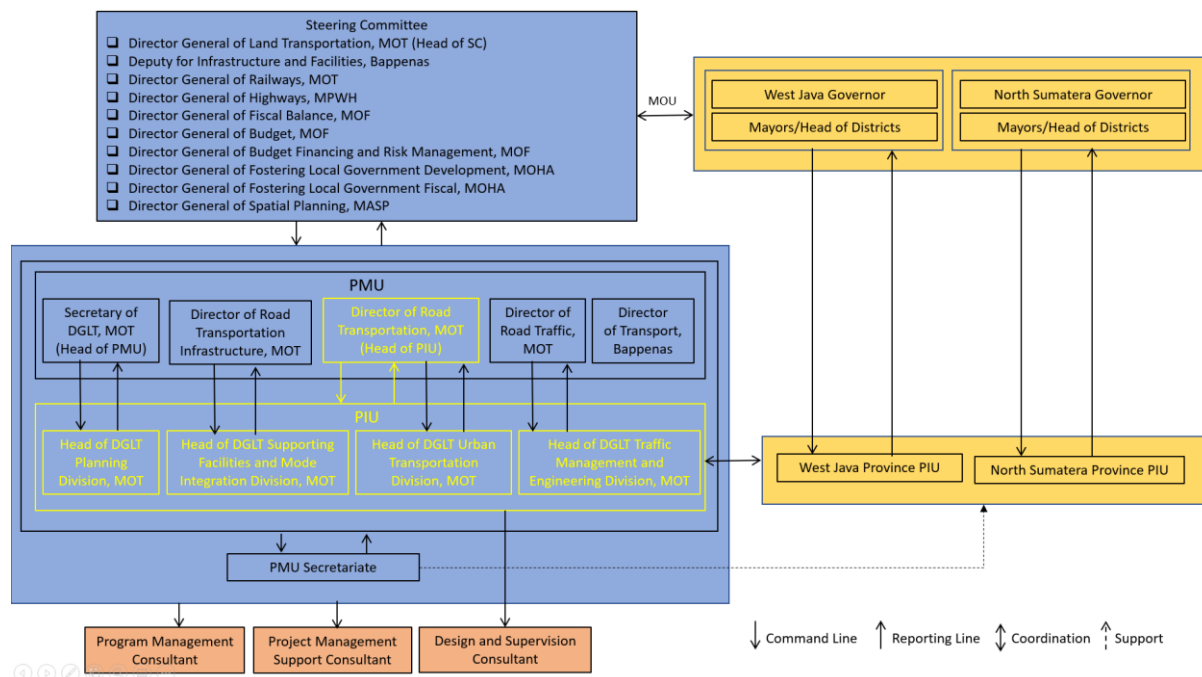
The general responsibility implementing this SEF and related safeguard instruments lies with the Project Manager and the joint Executing Agency with DGs Land and Railways Transport of MoT (Central Project Management Unit below). It will be responsible for the day-to-day organization and supervision of implementation of the measures recommended in this SEF at the national level, and for overseeing the implementation of the different mitigation measures prescribed in this Framework for the site/regional Project teams.

The Program Managers of the regional Project Implementation units will be responsible for the day-to-day implementation of the measures recommended in this SEF and the yet to be developed SEPs. While the selected contractors would be responsible to conduct engagement activities as per the contract-agreement, the Program manager at PMU should oversee and monitor the implementation. These requirements are built into the ESMP and bidding documents and reflected in the contract with the contractors/ third parties. Program manager at PIUs will ensure that the regional team closely coordinates all Project activities with local stakeholders, and holds bi-annual consultations to inform the government and community of ongoing Project activities, seeking men and women’s views, and respond to questions or grievances.

Stakeholder engagement must be closely coordinated by the PMU with the other government agency leaders and elected officials. The Mayor and other officials in each city will have an interest in ensuring that stakeholder engagement is effective and that timing of activities is coordinated, considering other events at the city level.

The below provides an overview of the relationships between Project actors and stakeholders.

Figure 2. Relationships between Project actors and stakeholders



6.1. Institutional arrangement for stakeholder engagement implementation

The regional Project Managers will regularly report on the implementation of the SEF to the national Project Manager. The reports will be according to the Log-frame and Project M&E indicators identified in the Project Agreement. **Error! Reference source not found.** below summarizes the SEF responsibilities of each of the Project stakeholders.

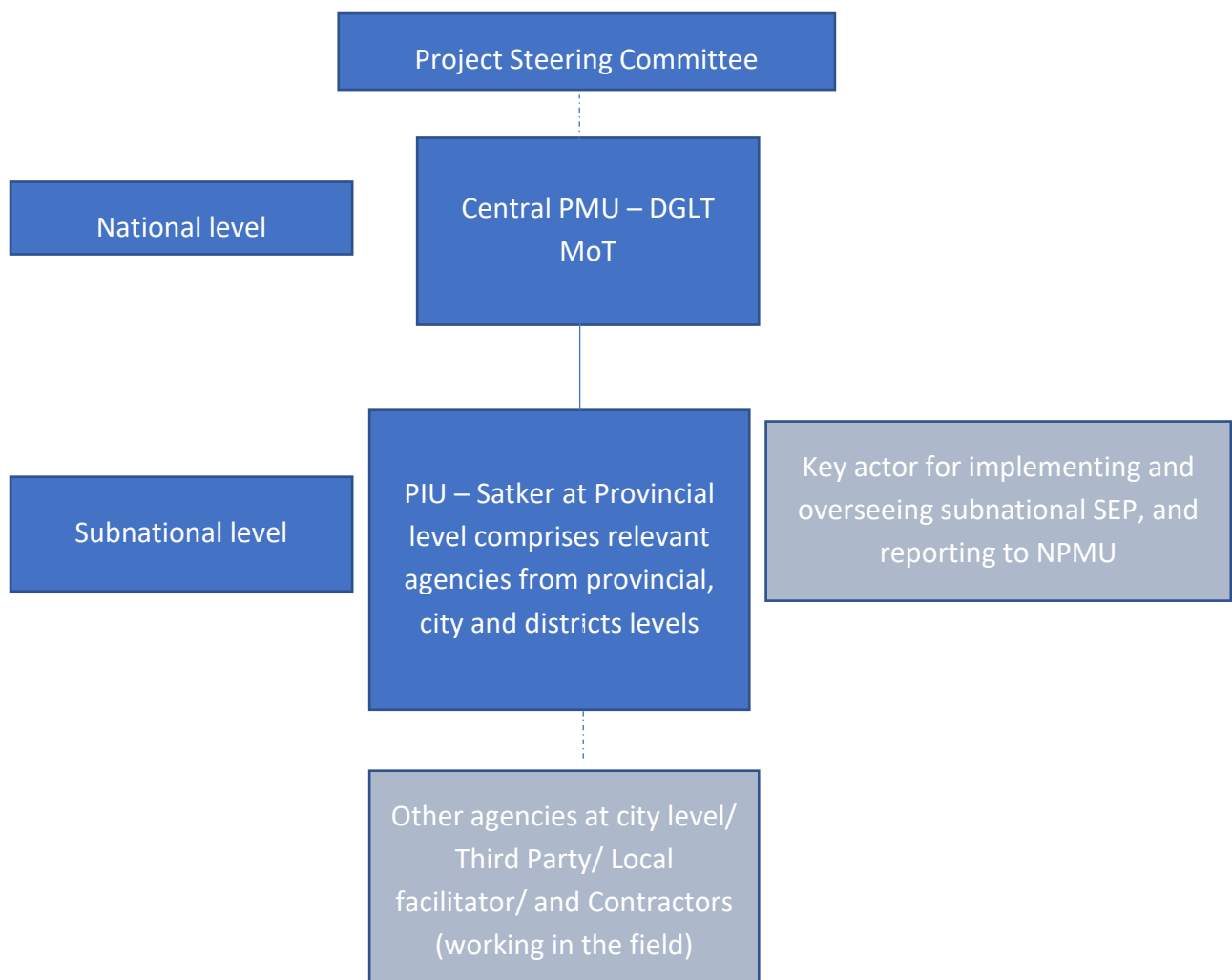
Table 7: Roles and Responsibilities for SEF Implementation

Entity	SEF Responsibilities
Project Central Management Unit	Overall supervision and oversight of the SEF implementation.
National Project Manager with technical inputs from the Safeguards Specialist/ Consultant	<ul style="list-style-type: none"> • Oversight of policy and technical aspects of SEF; • Ensuring safeguard documents are aligned with national regulations and legislation; • Ensuring qualified and experienced personnel are available in the Project Areas; • Development of relevant reporting templates and mechanisms for E&S Standards compliance (for example Consultation Register and Grievance Log); • Coordinating with relevant regional PIUs regarding the planning and implementation of the E&S assessment cycle in relation to the Project implementation schedule; • Provisioning the necessary technical assistance to facilitate the implementation, management, and monitoring of E&S standards; • Reviewing and approving screening reports, baseline socio-economic data, and site-specific ESMPs and SEPs; and • Developing, planning, and implementing trainings on SEF application, safeguard instruments, and environmental awareness.
Regional Project Managers, which is part of the Satker/ PIU (Provincial level)	<ul style="list-style-type: none"> • Ensuring that potential land tenure issues and competing claims are identified through review of existing grievances and GRM implementation during the pre-inception phase; • Ensuring, in close collaboration with the National, Project Manager that E&S screening is carried out for each sub-Project/activity prior to implementation; • Closely coordinating with the National Project Manager for review and approval of screening decisions and recommendations; • Ensuring, in close collaboration with the National Project Manager, the timely preparation of SEP, stakeholder register/ data collection, depending on the screening outcome; • Closely coordinating with the National Project Manager and Environmental Agencies to obtain any necessary clearances and environmental permits (e.g. ESIA/ AMDAL); • Ensuring that relevant SEP provisions are included in the design and in tender documents and in contractor/supplier agreements; • Ensuring SEP compliance during planning, construction, and operation; • Preparing and submitting regular E&S Monitoring and Progress Reports to the National Project Manager; • Closely coordinating with the National Project Manager to plan and deliver trainings and workshops on the Project's E&S standard requirements and procedures to staff and contractors; • Developing a GRM in close collaboration with the National Project Manager, as well as ensuring that grievances are addressed at the appropriate level; • Raising awareness and disseminating and disclosing information on the GRM and the associated procedures at the Regional level; and • Ensuring adequate public consultation during E&S screening, SEP development, and encouraging community participation during sub-Project planning, management, and monitoring in close collaboration with the National Project Manager.
Selected contractors	<ul style="list-style-type: none"> • Ensuring that all engagement activities (communication and outreach, consultation, and GRM) that have been agreed on the working agreement will be undertaken. • These requirements will be included in the ESMP and bidding documents, and reflected on the contract agreement. • Provide information and facilitate the M&E specialist on M&E activities • Develop engagement activities report on a midterm basis, as part of E&S management activities report

Entity	SEF Responsibilities
	<ul style="list-style-type: none"> • Closely coordinate with PMU/PIUs on the GRM implementation, particularly for any complaints that cannot be resolved by contractors (I.e. beyond their space of influence or authority) • Ensuring GRM is in place, be recorded.

Institutional arrangement for Stakeholder Engagement, which is part of environmental and social management activities, is as follows:

Figure 3. Institutional Arrangement for Stakeholder Engagement implementation



Key Note:

PIU at provincial level, henceforth called ‘Satuan Kerja/ Satker’ consist of all relevant agencies at provincial, city and district levels. This should be legalised through Surat Keputusan Gubernur, which is substantiated by the Memorandum of Understanding (MoU)/ Nota Perjanjian between DGLT and subnational governments

(provincial and city/ district level agencies). The head of PIU ought to be joint-Bappeda-Sekda and Dishub government Province of West Java (to be confirmed once all settled).

6.2. Capacity Building

Proper stakeholder engagement requires particular capacities in the team members, and an awareness of the knowledge and skills, including gaps, of the other stakeholders involved in the Project. All key personnel and the contractors should be trained in the contents and requirements of the SEF and SEPs, to ensure that approaches to stakeholder engagement are consistent.

An initial capacity building assessment process identified that the Project team needs to improve and strengthen the environmental and social (E&S) standard awareness, government (national/ sub-national), relevant stakeholders, civil society, and internal team members, particularly at sub-project level. E&S experts will be hired to provide on the job support for the PIUs, including to support the consistent implementation of the SEF and SEP requirements. In addition, a specific training program will be developed, to be conducted a regular basis, which may support the Project personnel in being well informed on matters that could be raised by public or affected persons. The training for the Project teams comprises technical themes and specialized E&S topics, as detailed in the Project's ESMF.

6.3. Financing

As part of environmental and social management, stakeholder engagement activities will be financed under Component 1 and Component 2, while others will be covered by Contractors' budget.

Component 1 entails technical assistance activities, which may be resulted in downstream activities i.e. on ground activities in the subnational levels. In this case, engagement budget will be embedded to subprojects under Component 2 and thus discussed in SEP at city level.

The selected contractors, who will be hired/selected during implementation of Component 2, will be required to implement some of the engagement activities, as part of their roles and responsibilities. For instance, when contractors are selected to develop Detailed Engineering Designs for bus depot, engagement activities/ consultations and GRM will be attached to that subproject budget and they would be required to conduct such consultations with relevant stakeholders. Details requirements of engagement activities would be stated in TOR and on contract-agreement with contractors.

The budget estimation for engagement activities is as follow:

Expenditure Items	Est. Amount	Source of funding
Recruitment of environmental and social specialists, including community engagement specialist, throughout the project implementation.	IDR 6 billion (Approximation IDR 1.2 billion per year)	Component 1
Public consultations, with all key stakeholders, at the provincial and city levels, including sequence of consultations with public transport operators organisations (ORGANDA), <i>angkot</i> drivers, and other PAPs (Consultations may be delivered in hybrid mode due to the uncertainty of public health condition induced by Covid-19 Omicron variant). Annually to report progress, and update concerns/ feedback for the ongoing project operation.	IDR 1.5 billion	Component 2
Stakeholder engagement with vulnerable groups (in separate sessions) throughout the project cycle, such as with people with disabilities, the elderly, pregnant women, and schoolchildren.	IDR 1 billion	Component 2
Community facilitators (two persons) Community facilitators will be needed during prepration of construction and by the last year of projec implementation, to lead consultation with angkot drivers, street vendors, or market vendors that will be affected by the construction and the BRT operation when it is ready.	IDR 960 million (Approximation IDR 480 million for 1 year)	
Capacity building on community engagement for sub-national governments (may be delivered in hybrid mode due to the uncertainty of public health condition induced by Covid-19 Omicron variant)	IDR 1 billion	
Stakeholder engagement and community awareness materials and campaign at subnational levels	IDR 150 million	
Advertisement of the BRT project, via radio and local newspaper, several times (for instance, at the beginning, in the middle and at the end to promote the BRT) for the full cycle of the project	IDR 2 billion	
GRM operationalization/ development of modules or SOP and trainings and initial implementation (including hiring additional professional GRM trainers for assisting social specialist)	IDR 650 million	Component 1
GRM operationalization: Grievance Log/ database (IT based service) throughout the project cycle	IDR 750 million	
Recruitment for Gender specialist for Sexual Exploitation and Abuse (SEA); city-level mitigation measures and response/referral mechanisms	IDR 600 million	
Monitoring and Evaluation, and Reporting consultants (periodically as per engagement plan)	IDR 1.5 billion	
Sexual Exploitation and Abuse (SEA) complaints' response mechanism.	TBD	
Engagement activities for building awareness of the public (through sponsoring or conducting seminar or workshop on inclusive urban mobility and/or public transport topics)	IDR 500 million	Contractors' budget
Consultations that will be conducted by contractors as part of component 2 subproject activities (i.e. DEDs	TBD	

development, LARAP development/refinement, GRM implementation within their working site)		
Total BUDGET ESTIMATION		IDR 16.6 billion

7. MONITORING AND REPORTING

SEF monitoring will follow the wider Project M&E Plan which has developed a mechanism, tools and timeframe (frequency) for monitoring and evaluation plan of the Project implementation. The Project ESMF provides the wider outline of this monitoring, and for SEF objective of framing the monitoring of stakeholder engagement, the most relevant activities involving external stakeholders, are outlined by components below. Key items are highlighted in bold.

Table 8: Checklist for SEF Monitoring and Evaluation

Working Areas of Component 1	Aspect for M&E	Frequency
Technical		
Capacity is built for the development of plans for integrated urban development, mobility plans, transit orientated development, corridor, and mode selection studies.	Stakeholder engagement capacities are included in training for PMU and PIUs.	Semi-annually
Relevant assessments and studies to develop a pipeline of cities for subsequent implementation following RPJMN priorities.	E&S trainings for PIUs to make them aware of the relevant E&S considerations in prioritizing in the pipeline, including stakeholder engagement. ESMF and SEPs have been established.	Semi-annually
Institutional		
<ul style="list-style-type: none"> PMU/ Technical Secretariat manages the implementation of the first phase of the national program; Establishment of sub-national PIUs in each of the first phase cities to manage the planning, procurement (including PPP and Transaction Advisory services) and implementation of Mass Transit Systems in each city; and Sub-national institutional structures for the Mass Transit Systems in each city are established to continue with Mass Rapid transport operation, maintenance and possible future expansion of the network. 	<p>Each PIU has appointed an environmental and social expert to the team.</p> <p>The PIUs also include environmental agency representatives.</p> <p>E&S trainings conducted for the national and regional PIUs.</p> <p>PIUs conduct trainings for constructor companies on greening and OHS and clean and green housekeeping practices.</p> <p>Grievance mechanisms at national and for each sub-project has been developed.</p>	Semi-annually
Component 2: Subprojects of Rapid Transport Systems		
Working areas of component 2		Monitoring and

Working Areas of Component 1	Aspect for M&E	Frequency
		Reporting frequency
Inception/ Planning/ Design Stage		
Environmental permits on relevant activities	ESMF and sub-project ESMPs and SEPs have been developed. ESIAs and permits have been issued.	Semi-annually
Additional analysis: 1. In depth assessment of affected livelihoods of route expansion 2. Baseline analysis of GHG emissions existing in the sub-region before the Mass rapid transport interventions. 3. Design of the Mass rapid transport systems consider disabled people and security for women.	Relevant reports are available to the PIUs, including consultation records and adaptation to design, addressing stakeholder input.	Semi-annually
Stakeholder engagement, especially affected communities: consultations regarding the SEF and the specific concerns (land acquisition, business disturbance, and loss of livelihood) were conducted, specifically including minority groups (women, disabled people or IPs)	Records of Workshop / meetings. Voluntary land acquisition agreements. Grievance mechanisms at sub-regional levels are established and made publicly known.	Semi-annually
Operation of Rapid transport systems		
Feedback from local stakeholders who are affected on the environmental and social negative impacts.	Records of stakeholder meetings.	
Grievance Handling	Records of grievances and incidents.	Semi-annually
Monitoring of Mass rapid transport usage with special attention to disabled people and pregnant women	Survey results demonstrating impacts and perceptions of different stakeholder categories.	Semi-annually
Monitoring of how request for confidential-reporting was implemented; is there any gaps or challenges to maintain confidentiality (and to recommend approach/SOPs refinement whenever possible).	Process-tracing for confidential complaints: review if confidential request was captured, whether verification is possible, and whether confidentially was maintained until the complaint was resolved (if confidentially can't be maintained, to identify what are the challenges)	Semi-annually
Monitoring of GHG emissions of the sub-projects.	Monthly Measurements and disclosure (evidence) of M&E results.	Semi-annually

8. ANNEXES

8.1. Public consultation notes

Please see in SEPs at city level

8.2. Outline for Stakeholder Engagement Plan for (future) subprojects

The following outlines the general content for the SEPs to be developed for the sites/sub-projects at city level. The SEPs will be developed by the PMU and PIU's, combining government and specialist input to ensure the necessary stakeholders and appropriate processes are included. The principal difference between this SEF and the subsequent SEPs is in the details of each site/city and sub-project's local stakeholders, the engagement methods or approaches tailored to them, and the break-down of activities planned by stage of the activity implementation- pre-construction, construction and operations stage. This detailed level of planning is to be implemented by the PIUs in each city, such that the SEP is an operational level document against which stakeholder engagement will be monitored.

1. INTRODUCTION

- 1.1. Overview and Objective
- 1.2. Project Description
- 1.3. Regulations and requirements

2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT

- 2.1. What is Stakeholder Engagement and Principles for Effective Stakeholder Engagement
- 2.2. Stakeholder Engagement Considerations
- 2.3. Stakeholder Identification
- 2.4. Stakeholder identification and consultation methods
- 2.5. Stakeholders identified
 - 2.5.1. Stakeholder Categories / Communities
 - 2.5.2. Non-community stakeholders
- 2.6. Stakeholder Engagement Objectives and Principles
 - 2.6.1. Policy objectives
 - 2.6.2. Operational objectives
 - 2.6.3. Key principles

3. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE

Stakeholder Engagement activities

4. SEP RESOURCES AND RESPONSIBILITIES

5.1 Roles and responsibilities

Aside of roles of each government agency, to include roles and responsibilities of contractors that will be implementing the result from Technical Assistance (Component 1) to be a physical investment at subnational levels.

5.2 Institutional arrangement

5.3 Financing

5. GRIEVANCE MECHANISM

6.1 Definitions and Grievance Procedure

6.2 Grievance Redress Process

6.3 Community Level Grievance Redress Mechanism

6.4 Project Level Grievance Redress Mechanism

6.5 Judiciary Level Grievance Redress Mechanism

6. MONITORING AND REPORTING

8.3. Example grievance form.

The sample form below can be adapted to Bahasa Indonesia or local languages where the project located, e.g. Sundanese for the project in Bandung, or Batak for the project in Medan. Below is the example of the English language form and the adaption to Bahasa Indonesia.

COMPLAINT FORM

Registration Number <i>(will be filled by the grievance's staff)</i>	
Date of Complaint	
Reporter's Name <i>(not required, may be left blank)</i>	
Cellular Phone Number	
Email	
Identity Number	
Request for Confidentiality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Complaint Description	
Annex	

FORMULIR PENGADUAN/ KELUHAN

Nomor Registrasi Keluhan <i>(akan diisi oleh petugas)</i>	
Tanggal Pelaporan Keluhan	
Nama Pelapor <i>(tidak harus diisi, dapat dikosongkan)</i>	
Nomor Telpon/ HP	
Email/ Alamat Surat-Menyurat	
Nomor Identitas	
Permintaan Merahasiakan Laporan untuk	<input type="checkbox"/> Ya <input type="checkbox"/> Tidak
Deskripsi Keluhan <i>(dapat dilengkapi dengan tanggal dan lokasi kejadian)</i>	
Lampiran <i>(data pendukung, dapat berupa dokumen, foto, dll.)</i>	