

Preliminary Stakeholder Engagement Plan (SEP)
WEST BANK EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT

1. Introduction/Project Description

The Project is aimed to provide cash support and short-term employment opportunities to vulnerable populations in the West Bank affected by COVID-19. This operation is funded from the West Bank and Gaza Trust Fund (WBGTF), however, it will follow the fast track processing of the World Bank COVID19 Facility.

The Project is also helping to set the basis for making cash transfers responsive to future shocks, including climate-related shocks. In particular, the Project is using, and improving upon, existing delivery platforms to scale up cash support and to provide cash for work opportunities to households affected by COVID-19. This experience will provide valuable lessons and allow the Palestinian Authority to respond quickly and effectively to mitigate the adverse effects of future crisis, including those triggered by climate-related shocks, on poor and near poor households.

The Project will support the PA's emergency response to the COVID-19 crisis through four components, namely,

Component 1: Emergency Cash Transfers in the West Bank

This component will finance temporary (three months) cash transfers to poor and vulnerable to poverty households affected by COVID-19 in the West Bank. It has two subcomponents: (1.1) Emergency Cash Transfers to households vulnerable to poverty not benefiting from the CTP system and (1.2) Emergency benefit top-ups for selected CTP beneficiaries.

Subcomponent 1.1. Emergency Cash Transfer to households vulnerable to poverty

This subcomponent will finance temporary (3 months) cash transfers for 28,000 vulnerable households from the West Bank that are currently not benefiting from Cash Transfer Program (CTP). The subcomponent aims to reach households that were vulnerable to poverty prior to the pandemic, and derived their labor income from daily activities and informal sources, as well as potentially other households with vulnerable members, such as children and disabled persons, in areas especially affected by the COVID-19 outbreak. This subcomponent will be implemented by the MoL, which will be responsible for defining the criteria for the selection of beneficiaries, running program communications, and finalizing the beneficiary list. In addition, MoL will work in close collaboration with MoSD to focus on the quick and efficient service delivery of the cash transfer.

Subcomponent 1.2: Emergency benefit top-ups for selected CTP beneficiaries

This subcomponent will finance temporary (three months) benefit top-ups for about 32,000 poor households in the West Bank and will be managed entirely by MoSD, as the targeted beneficiaries are already benefiting from the MoSD CTP system. The subcomponent aims to provide a minimum benefit of NIS 500 for all CTP beneficiaries in the West Bank. The focus on the West Bank is justified as it has been affected far more than Gaza by the spread of the virus, loss of livelihoods, and higher consumer prices particularly for food and health-related costs.

Component 2: Cash for Work in the West Bank (C4W)

This component will finance short temporary employment opportunities for approximately 5,200 (of 2,600 women) beneficiaries, building on the delivery model developed for Gaza. This component will provide Cash for Work Sub-grants to selected NGOs to implement Cash for Work subprojects employing the targeted vulnerable populations. Supported subprojects will include focus on health and other social services provided by NGOs to vulnerable groups affected by COVID-19, but also include economic livelihoods initiatives to assist vulnerable populations in the recovery from the crisis. Services to support economic livelihoods will mainly be in the area of agricultural activities but other types of activities could also be considered. Health services include clinics and other health services, including support to disabled and elderly populations. Other social services in which beneficiaries will be employed will be as teachers in the education sector, as social workers providing psychosocial support, as workers to support women who have been victims of GBV, and as providers of child services.

Component 3: Capacity Building Project Management, Monitoring and Evaluation

This component will ensure that the PCU and the technical entities working directly with the PCU will be operational and will implement the project in conformity with the Legal Agreement, the PAD, and the project's Operations Manual. It will support the PCU, MoSD, and the MoL/PFESP with the management, monitoring and evaluation (M&E) of project activities and cover:

- a. Remuneration of project staff and consultants who are not civil servants;
- b. Equipment and operating costs for the PCU, MoSD, and MoL/PFESP directly linked to the daily management of the project;
- c. IT and systems;
- d. Contractual services;
- e. Communication;
- f. Monitoring and evaluation activities.

Component 4: Contingent Emergency Response Component (CERC)

In the event of a future eligible crisis or emergency, the project will contribute to providing an immediate and effective response. This component would draw from uncommitted funds under the other components of the project. In the event that the CERC is activated, the restructuring of the project would need to occur within three months after activation.

Potential social and environmental risks and impacts of the project

The substantial environmental and social risks and impacts are as follows:

Environmental Risk Rating

Substantial

The environmental risk is classified as Substantial, given the combination of OHS risks and the Borrower's limited capacity in environmental and social risk management. OHS risks are mainly associated with the work of beneficiaries in subprojects/activities under component 2. Beneficiaries will be operating in the agricultural sector, clinics, or will be working with disabled children in schools, in early childhood support, food distribution, and will provide assistance to the elderly. Elders, persons with disability and those with preconditions are more vulnerable to COVID-19 infection,

therefore social workers need to comply with OHS guidelines, including through the wear of adequate PPEs, to avoid COVID-19 contagion.

Beneficiaries working in agricultural projects may also be exposed to health and safety risks associated with pesticides use and injuries from agricultural equipment. Waste and medical waste management generated during the subproject activities may also constitute a substantial risk for workers and community health and safety.

Social Risk Rating

Substantial

The overall social risk is rated substantial. The risks can be summarized as: (i) risks of elite capture, especially with regards to component 1.1 that targets the vulnerable groups that are not fully identified; (ii) risks associated with poor targeting and social exclusion based on gender, disability and other forms of vulnerability under component 1 and 2; (iii) community health and safety risks due to exposure to communicable diseases, including COVID-19, and potentially inadequate management of hazardous medical waste and pesticides under component 2. Vulnerable youth, including children, and women may be exposed to violence, sexual exploitation and abuse and sexual harassment risks in exchange for project benefits under C4W component; and finally (iv) risks related to labor and working conditions for direct and contracted workers, under component 2.

To address the risk related to access, social inclusion under the cash transfer component, CTP-beneficiaries are ranked through a proxy means testing and categorized as poor or extreme poor. The newly poor enrolling through component 1.1. will be those affected by COVID-19 through loss of livelihood/income and then included through a unique form/system in the CTP database. The Cash for Work component (2) also benefits the most vulnerable, those that are unemployed and will receive temporary cash support by working for 6-months just below the minimum wage. The stipend/wage rate just set below the minimum wage incentives those in need to apply and avoids market distortions on the labor market. To ensure inclusion of women and the most vulnerable, including disabled, 50% of household beneficiaries and at least 50% of beneficiaries of the C4W are women. In addition, the project includes an indicator under C4W for inclusion of the elderly, children, and disabled. Finally, the project mitigates these risks through robust engagement mechanism through a Stakeholder Engagement Plan. The risks related to Gender Based Violence (GBV), workers and COVID transmission are addressed under ESS1 and ESS2

Stakeholder Engagement Plan (SEP) Objective:

The overall objective of this Preliminary Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. To mitigate economic and social impacts, the project will provide cash support and short-term employment opportunities to vulnerable populations in the West Bank affected by COVID-19 and particularly impacted by the economic slowdown. Therefore, project implementation needs to ensure appropriate stakeholder engagement to (i) avoid conflicts resulting from false rumors, (ii) ensure that poor and vulnerable households affected by COVID-19 in the West Bank are accessing health and other social services (iii) to avoid raising expectations of beneficiaries by providing a clear explanation of the timeline of the emergency assistance.



A map showing the West Bank and Gaza

2. Stakeholder identification and analysis

Project stakeholders are ‘people who have a role in the Project, or could be affected by the Project, or who are interested in the Project’. Project stakeholders can be grouped into primary stakeholders who are “...individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly”... especially... “those who are directly affected, including those who are disadvantaged or vulnerable” and secondary stakeholders, who are “...broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them”.

Thus, Project stakeholders are defined as individuals, groups or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’). The project’s affected people include poor households affected by the COVID-19 crisis and vulnerable households and groups. Vulnerable groups include Bedouin communities that live in semi- permanent homes made of corrugated metal scattered all over the West Bank. Additional disadvantaged / vulnerable

- individuals or groups in the project area include poor women-headed households, widows and divorcees, people with disabilities, Covid-19 patients, sick and elderly; and
- (ii) may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way. Those may include NGOs, social services, local governments, etc.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liason link between the Project and targeted communities and their established networks.

The legitimacy of such representatives may stem both from their official elected status and their informal and widely supported standing within the community that allows them to act as focal points of contact in Project's interaction with its stakeholders. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

Project Beneficiaries:

The direct beneficiaries of the project are vulnerable populations affected by the COVID-19 crisis. The project will provide cash transfers to about 60,000 poor and vulnerable households and temporary employment support to around 5,200 vulnerable populations (who are unemployed) under the C4W component. The breakdown of beneficiary households is as follows: (i) 32,000 households of the CTP cash transfer program receiving temporary top-up payments to their current CTP benefits for three months; (ii) 28,000 additional poor households receiving temporary cash-transfers for three months; and (iii) 5,200 beneficiaries receiving cash for work benefits for six months.

Additional individuals will be affected by the project. Indirect project beneficiaries will include:

- a. Members of households benefiting from the cash transfer and C4W.
- b. Vulnerable people benefiting from services provided under C4W projects (e.g., those affected by the COVID-19 disease, those being the sick, the disabled, elderly, children, and women).

The estimated number of individuals benefiting (directly and indirectly) from the project is 326,000 (using an average family size of five).

2.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: consultations for the project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation. Stakeholder consultation and engagement activities should be designed to ensure

effective and meaningful consultations to meet the project and stakeholder needs and should be subject to the coronavirus situation in the country, and to restrictions put in place by governments on social distancing and reducing crowding as established in WHO-guidance notes;

- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth and elderly.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

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

2.2. Affected parties

The Project will provide cash support to about 65,000 poor and vulnerable households affected by the COVID-19 crisis. Affected Parties include poor households and individuals that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- (i) 32,000 households of the cash transfer program CTP receiving temporary top-up payments to their current CTP benefits for three months;
- (ii) 28,000 additional poor households receiving temporary cash-transfers for three months;
- (iii) 5,200 beneficiaries receiving cash for work benefits for six months;
- (iv) Members of households benefiting from the cash transfer and C4W (using an average family size of five);

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- (v) Vulnerable people benefiting from services provided under C4W projects (e.g., those affected by the COVID-19 disease, those being the sick, the disabled, elderly, children, and women).
- (vi) Palestinian Fund for Employment and Social Protection (PFESP/MoL) and MoSD staff benefiting from training and capacity building activities;

2.3. Other interested parties

The projects' stakeholders also include parties other than the directly affected beneficiaries, including:

- NGOs providing social services.
- Health services, including clinics and other health services;
- Education services, including psychosocial support, or child services;
- Agricultural services and Economic livelihood programs;
- Private Sector including private health facilities and factories;
- Business owners and providers of services, goods and materials in the West Bank;
- Government officials, permitting and regulatory agencies at the national and local levels, including Ministry of Finance, social protection and labor authorities;
- Communities and local authorities (municipalities and village councils);
- Mass media and associated interest groups, including local and national printed and broadcasting media, digital/web-based entities, and their associations.

2.4. Disadvantaged / vulnerable individuals or groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community.

Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. The project under component will target disadvantaged and vulnerable individuals and groups such as elderly people, women, disabled and children and their households. In order to ensure disadvantaged or vulnerable needs are taken into consideration, and that they are reached, the implementing entities (MoSD and MoL) will adopt several mechanisms; such as, publishing all information about the project in Arabic and reaching out to these groups. The implementing ministries will implement an outreach campaign (communications) to ensure that beneficiaries understand the temporary nature of this project. This is important to avoid raising expectations that this is a permanent project to increase benefit levels from the current cash transfer program.

As the project targets to hire at least 50 percent of women (approximately 2,600 short temporary employment opportunities for women) beneficiaries under the temporary work scheme, the implementing ministries will also include provisions to prevent and respond to sexual exploitation and abuse, sexual harassment or to the increase in domestic violence, and commensurate with the risks through formalizing referral pathways within the GRM.

MoSD and MoL will also use communications and outreach to address the increased risks of gender-based violence during crisis situations. As such, the project will embed messaging that accompanies the cash transfers and benefit top-ups to promote healthy conflict resolution and stress management at the household level. It will also explore the possibility of labeling the transfers and top-ups to recognize the importance of the redistribution of care work among household members. Such messaging will be culturally appropriate and could be delivered via SMS, online tools, or other more traditional means to be further detailed during implementation.

In addition, when designing the grievance mechanism, the ministries will take into account the availability of needed recourse for this group to give feedback, or send a complaint; for example, if internet option is not available to women at villages or Bedouin communities, the ministry will assign a mobile number and a contact person to who can be reached by these groups. Particular attention and efforts should also be given to the disadvantaged and vulnerable groups to ensure effective and efficient distribution of information and access of social services and avoid capturing of the rich, powerful and privileged, particularly at this time of short supply.

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

- Elderly persons and persons with pre-existing medical conditions
- COVID-19 patients;
- Persons with disabilities and their care takers;
- Women-headed households or single mothers with underage children;
- Unemployed and poor communities (i.e. refugee camps, Bedouin communities);
- Children.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

3. Stakeholder Engagement Program

- **3.1. Summary of stakeholder engagement done during project preparation**
During preparation, intensive consultations involving Ministry of Finance, Ministry of Social Development and Ministry of Labor have been carried out and their buy-in has been secured with regard to the proposed institutional and implementation arrangements. At this point, project's affected people are not identified, which explains the limited stakeholder engagement during project preparation. More inclusive consultations will be conducted with the project's beneficiaries, once they are selected, and will be arranged during the project life-cycle. Selection process will take place after the effectiveness of the project and will include different selection mechanisms such as Social Registry, application forms and screening.

The SEP will be updated by August 30th and will include details of more inclusive stakeholder engagement activities, engagement instruments and feedback. In order to control the risks of virus transmission, stakeholder engagement will be arranged and conducted within the covid-19 constraints and the national restrictions related to public gatherings. Such constraints will include conducting small-group consultation sessions, keeping social distancing, and using facemasks and sanitizers.

3.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement²

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Poor households benefiting of the cash transfer program (households) receiving temporary top-up payments to their current CTP benefits and new households receiving temporary cash-transfers)	Poor unemployed, works who lost their jobs due to Covid-19, patients of Covid-19 who are hospitalized or kept in isolation facilities, women, children and elderly	NA	Phone calls, WhatsApp app text messages and emails, local leaderships (for Bedouin women, children and elderly)	Daytime phone calls, text messages and emails
Beneficiaries receiving cash for work benefits and their families	Could include educated/skilled and lower-educated workers, youth and women (50%)	NA	Local radios and TV stations , public announcement in local governments and mosques, through NGOs and ministries district offices communication outreach, emails, phone calls, local leaderships (for Bedouin women, children and elderly), individual meetings (if	Daytime communication and outreach activities

² The implementing entities, will conduct face-to-face meetings, workshops and trainings with stakeholders beginning of July 2020. In order to respect the Covid-19 safety and social distancing measures, no more than 15 participants will be allowed to sit in a meeting room at a time. Meeting rooms should be large enough to respect the two-meter distance among participants.

			needed), media and written press, Facebook pages and social media, NGOs and implementing agencies websites	
Vulnerable people benefiting from services provided under C4W projects	people affected by the COVID-19 disease, persons with pre-existing medical conditions; Persons with disabilities and their care takers; Women-headed households or single mothers with underage children; Unemployed and poor communities in crowded areas (i.e. refugee camps); Elderly people, women and children in Bedouin communities	NA	Local radios and TV stations, phone calls and text messages, public announcement in local governments, groceries and mosques, through NGOs communication outreach	Daytime communication and outreach activities
Palestinian Fund for Employment and Social Protection (PFESP/MoL) and MoSD staff	The project will provide training and capacity building activities	NA	Official letters; emails, phone calls, meetings	During working hours
Government officials	This could include MoSD, MoL and MoF officials and PCU staff; local government Heads, governors	NA	Official letters; emails, phone calls, (virtual) meetings	Daytime (virtual) meetings
NGOs providing social services and Health, Education and Agriculture social service facilities	This may include non-governmental, non-profit, and non-partisan organization with offices registered in the Palestinian territories for at least five years and have a proven track record	NA	Official letters; emails, phone calls, (virtual) meetings, public announcements, official websites	During Working hours

	of working in poor and marginalized communities; Health services, including clinics and other health services; Education services, including psychosocial support, or child services; Agricultural services and Economic livelihood programs			
Private Sector	This could include private health facilities and factories	NA	Official letters, emails, phone calls and virtual meetings if necessary	Daytime communications
Business owners and providers of services and goods in the West Bank	Business owners and service providers will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future	NA	Official letters, emails and phone calls	Daytime communications
Mass media and associated interest groups	Including local and national printed and broadcasting media, digital/web-based entities, and their associations.	NA	Official letters, emails, and phone calls	

3.2. Proposed strategy for information disclosure

The MoL website <https://mol.ps/mol/>, the PFESP website <https://pfesp.ps/> and MoSD website <http://www.mosa.pna.ps/> will be used to disclose project documents including the SEP both in English and in Arabic. All future project related documents will also be disclosed on the project's webpage. Project updates and information will be posted on the websites. Details about the project Grievance Redress Mechanism will also be posted on the websites. Below is a table showing the proposed strategy to be adopted by the ministries for information disclosure.

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
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<p>Preparation Stage</p>	<p>The purpose of the project, Project components, project expected timeline, and type of activities, information about employment training activities and GRM information for filing complaints and providing feedback</p> <p>Health & safety issues including precautionary measures for protection from infectious diseases (i.e Covid-19) such as ensuring proper distancing and proper health screening for workers and the use of adequate PPE (particularly facemask, gowns, gloves, handwashing soap and sanitizer) at the workplace and project locations.</p>	<p>-Notification through Local Radio and TV News (ex. Radio 2000, Palestine TV. Mosques, leaflets, municipality's Facebook page, ministries websites and Facebook pages.</p> <p>- Official letters, emails, phone meetings with hierarchy (if needed)</p>	<p>Radio twice daily. TV all day. Leaflets at groceries, clinics and pharmacies, Website.</p> <p>Information to be disclosed 2 weeks before implementation</p>	<ol style="list-style-type: none"> 1- Poor households, workers, lower-skilled and higher-skilled youth, women, people affected by Covid-19, Bedouin communities and local governments 2- NGOs providing social services 3- Government agencies 4- Trained health care providers and volunteers 	<p>Radio, TV and Social Media News reaches 80% of population</p> <p>Poster and leaflets on bulletin board, ministries' websites and municipalities' Facebook pages reach another percentage of the population. What's app text messages reach 90% of beneficiaries and their families. Phone calls with community leaders reach 80% of remote Bedouin communities in the governorates.</p> <p>Official Letters and emails to reach 100% NGOs, social services, local governments and government agencies</p>	<p>MoSD and MoL/ PFESP</p>
	<p>Implementation information to include (i) the timeline of the intervention, (ii)</p>	<p>Notification through Local Radio and TV News (ex. Radio</p>	<p>Throughout the project's implementation period</p>	<ol style="list-style-type: none"> 1- Poor households, workers, lower-skilled 	<p>Radio, TV and Social Media News</p>	<p>MoSD and MoL/ PFESP</p>

<p>Implementation Stage</p>	<p>the targeting of the intervention, and (iii) the delivery mechanism.</p> <p>-GRM mechanisms including channels for accepting GBV and Sexual Harassment complaints, anonymous complaints and Workers grievances.</p>	<p>Bethlehem 2000, Palestine TV) Mosques, community outreach organizations, leaflets, municipalities' Facebook page, implementing entities website.</p> <p>- Official letters, emails, phone meetings with hierarchy and medical staff</p> <p>- Phone calls with Bedouin Community leaders, phone calls to women, disabled and elderly by local women associations and relevant CBOs.</p>		<p>and higher-skilled youth, women, people affected by Covid-19, Bedouin communities and local governments</p> <p>2- NGOs providing social services</p> <p>3- Government agencies</p> <p>4- Trained health care providers and volunteers</p> <p>5- Media</p>	<p>reaches 80% of population</p> <p>-Poster and leaflets on bulletin board reach another percentage of the population</p> <p>Whats'app text messages reach 90% of project beneficiaries and their families. Phone calls with leaders of remote Bedouin communities in the governorates reach 80% of the community members.</p> <p>-Official Letters and emails reach 100% of NGOs, social services, local governments and government agencies</p>	
<p>Supervision & Monitoring</p>	<p>Project outcomes, long-term expected outcomes such as improvements in delivery systems and the capacity of implementing ministries, GRM system</p>	<p>Notification through broadcasted and written media, press releases and conferences, ministries websites, governorates and</p>	<p>Throughout the project implementation period</p> <p>-1 week after project completion</p>	<p>1- Vulnerable Communities and beneficiaries in West Bank.</p> <p>2- NGOs and social services</p> <p>3- Government bodies including MOSD, MOL</p>	<p>80% of the stakeholders</p>	<p>MoF, MoSD and MoL/ PFESP</p>

		municipalities social media pages		and PFESP, governorates, and other relevant ministries. 4- Media 5- Local governments		
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3.3. Proposed strategy for consultation

The project intends to utilize various methods for consultations that will be used as part of its continuous interaction with the stakeholders. The format of every consultation activity should meet general requirements on accessibility. In order to control the risks of virus transmission, the PIA will be advised, when conducting stakeholder consultation meetings, to take into account the national restrictions regarding public gatherings during Covid-19 pandemic (conduct small-group consultation sessions, respect social distancing, use facemasks and sanitizers).

The table below provides various methods for consultations with the stakeholders.

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Preparation Stage	Project components and project timeline, Health & safety and sub-management plans, GRM tools for filing complaints and providing feedback	Correspondences (Phone, Emails, official letters)	PIA offices,	Selected beneficiaries, NGOs, social services	MoSD and MoL/ PFESP
	Important highlights of Project, announcements of planned activities, associated risks and mitigation measures	Emails, official letters and meetings (if needed) with relevant organizations	PIA offices.	Government agencies, NGOs, governorates, local governments, media, private sector	MoSD and MoL/ PFESP
Implementation Stage	1- Project status 2- Project progress 3- Risks and mitigation measures Communication campaign: written information will be disclosed including	- Formal meetings - Press releases - Press conferences - Communication materials - Reports (including number of	PIA offices	Selected beneficiaries, NGOs, social services, Government agencies, NGOs, General population, including	MoSD and MoL/ PFESP

	brochures, flyers, posters, etc. Website to be updated regularly	public grievances received within the reporting period (e.g. quarterly progress reports and semi-annual progress reports) and number of those resolved within the prescribed timeline		Vulnerable households, governorates, local governments, media, private sector	
	Information about Project development updates, health and safety issues and precaution measures related to infectious diseases, employment and procurement, environmental and social aspects, Project-related materials.	MoSD, MoL and PFESP Websites	MoSD, MoL and PFESP Websites	All stakeholders	MoSD and MoL/ PFESP
Supervision & Monitoring	Project's outcomes, overall progress and major achievements.	<ul style="list-style-type: none"> - Formal meetings - Press releases - Press conferences - Public meetings - Reports (including Number of public grievances received within the reporting period and number of those resolved within the prescribed timeline) 	PIA offices Governorate and NGOs Offices Local governments venues	Selected beneficiaries, NGOs, social services, Government agencies, NGOs, General population, including Vulnerable households, governorates, local governments, media, private sector	MoSD, MoL/ PFESP and MoF

3.4. Future of the project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

The CTP Unit at the MoSD will be responsible for implementing the stakeholder engagement activities for the Cash Transfer component. The MoL in concert with the Palestinian Fund for Employment and Social Protection (PFESP) will be in charge for the stakeholder engagement activities for Cash for Work component. The Project Coordination Unit at the MoF will coordinate project implementation including the SEP implementation with the two implementing entities.

The budget for the SEP is estimated to be around US\$20,000 included in the costing table under the operational expenses of the project.

4.2. Management functions and responsibilities

The MoSD and the MoL/PFESP will be the implementing agencies for the project activities. The MoF/PCU shall recruit an Environmental and Social Officer (ESO) throughout Project implementation. The ESO will be responsible for the implementation of the SEP. The Project Coordination Unit at the MoF will coordinate project implementation with the implementing entities and will provide financial management and consolidated reporting for the components, progress monitoring, and procurement.

Name of focal point at MoSD:

Mr. Ayman Swalha
General Director of Planning
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Name of focal point at MoL/PFESP:

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The stakeholder engagement activities will be documented through timely progress reports which shall also be included in the semi-annual reporting to the WB.

5. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

5.1. Description of GRM

Grievances will be handled at the project's level by the ESO at the PCU. A GRM email, telephone number and an electronic grievance form will be assigned for filing complaints and grievances and will be communicated to all project's stakeholders. The GRM will be accessible to all project's stakeholders, including affected people, community members, NGOs, media, and other interested parties.

Stakeholders can also use the MoSD and PFESP GRM systems to file grievances. For the Cash Transfer component, the MoSD is currently implementing GRM activities under the existing CTP. This mechanism will also be used to support the emergency cash transfer program in the proposed project. Grievances will be received through the GRM platform (digital) and MoSD's call centers. They will be documented in the MIS and reported to the ESO/PCU for follow up and handling. Participants in the Cash for Work program may use the electronic complaints system available at the PFESP website to submit complaints related to the Cash for Work activities and the overall management and implementation of the program. They can also send emails, sms and calls to file complaints.

The existing GRM systems have strong accountability mechanisms and have been rated highly effective and efficient in handling grievances and communicating with the public. However, the functionality of both systems shall be further reviewed in as part of the preparation of the ESMF/ESMP, to identify any existing gaps and introduce gap-filling arrangements. Such arrangements may include applying methods for a systematic identification of project related complaints, sorting them out in the system and reporting them to the PCU. The use of targeted communication tools to inform project beneficiaries of the grievance mechanism in addition to proper documentation and reporting channels may also be needed.

The GRM will include the following steps:

Step 1: Submission of grievances:

Anyone from the affected beneficiaries or anyone believing they are affected by the Project can submit a grievance:

- By completing a written grievance registration form that will be available in the Project Implementing Agencies (PIA) offices.
- Submitting the complaint electronically via a specific GRM email address or the electronic grievance form that will be available at the project's website.
- Telephone and mobile numbers assigned for complaints.

Where possible it is desirable that complaints are submitted in writing by the complainant. Should the complainant not wish to comply with this request and submit the complaint verbally, then the complainant information and the details of the complaint should be entered in the GRM log.

The Project Coordination Unit will assign a GRM telephone number, email address and website before the carrying out of the relevant Project activities. The ESO and the implementing agencies (The MoSD and the PFESP) will communicate GRM details to project affected parties during consultations meetings and through appropriate methods. All complaints will be documented and reported to the ESO/PCU for handling. Reports on grievances and complaints will be consolidated into semi-annual project progress reports prepared by the PIA for the World Bank.

Project affected parties can use the existing GRM channels at the MoSD and the PFESP to file grievances:

- Electronically: via the electronic complaints form available on the MoSD website: <http://www.mosa.pna.ps/ar/content/> or send an email to shakawi@mosa.gov.ps.
Also, by submitting a complaint via the PFESP website: <https://pfesp.ps/page/report/ar> or sending an email to info@pfesp.ps.
- By telephone: the affected person can call the MOSD Complaints Unit at +970 2 022948433 or call the PFESP office at +970 2 298 4184.
- In person: the affected person can file a complaint by filling a form at the Complaints Unit at the Ministry of Social Development offices in Ramallah, Ministries Complex.
Or at the PFESP offices in Al-Masyoun, Aljihad St., Adel Almasri Bldg., 4th Fl. 00972 Ramallah.

Step 2: Recording of grievance and providing the initial response:

The complainant fills in the designated form in writing and signs it, or fills it electronically including all personal information and details of the complaint. The complainant encloses all copies of documents that may support the complaint.

The ESO will ensure that the form is filled in accurately. The complainant receives a receipt or a confirmation email of acknowledgment with a reference number to track the complaint.

The following information will be registered in the Log:

- Complaint Reference Number
- Date of receipt of complaint
- Name of complainant
- Confirmation that a complaint is acknowledged
- Brief description of Complaint
- Details of internal and external communication
- Action taken: (Including remedies / determinations / result)
- Date of finalization of complaint

The ESO will inform the complainant that an investigation is underway within two business days. The complainant shall be informed of the estimated duration for resolving the complaint, which is no later

than seven business days from the date of receipt of the complaint. Where the complaint is unlikely to be resolved within the estimated duration, the staff must promptly contact the complainant to request additional time and explain the delay. In any event, the complaint must be resolved no later than fourteen days from the date of receipt of the complaint.

Step 3: Investigating the grievance:

The ESO will investigate the grievance by following the steps below:

- Verify the validity of the information and documents enclosed.
- Ask the complainant to provide further information if necessary.
- Refer the complaint to the relevant department.
- The relevant department shall investigate the complaint and prepare recommendation to the PMU of actions to be taken and of any corrective measures to avoid possible reoccurrence.
- The staff shall register the decision and actions taken in the GRM log.

Step 4: Communication of the Response:

The ESO shall notify the complainant of the decision/solution/action immediately either in writing, or by calling or sending the complainant a text message. When providing a response to the complainant, the staff must include the following information:

- A summary of issues raised in the initial complaint;
- Reason for the decision.

Step 5: Grievance closure or taking further steps if the grievance remains open:

A complaint is closed in the following cases:

- Where the decision/solution of complaint is accepted by the complainant.
- A Complaint that is not related to the project or any of its components.
- A Complaint that is being heard by the judiciary.
- A malicious complaint.

Step 6: Appeals process:

Where the complainant is not satisfied with the outcome of his/her complaint, the ESO shall advise the complainants that if they are not satisfied with the outcome of their complaint, they may re-address the issue to the Minister of Social Development or the Minister of Labor. In case the complainants are not satisfied with the internal procedures for handling complaints, the outcomes of the complaints or for any unhandled complaints, the complainants have right to refer their complaint to the Cabinet's Unit for grievances.

Once all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

5.2 Anonymous Complaints

The GRM system will include an anonymous complaint reporting process. Channels to accept and respond to anonymous grievances will be communicated to project affected parties during the consultation meetings and throughout project implementation. Anonymous complaints should provide factual details and specific allegations of misconduct or serious wrongdoing related to any of the project activities.

5.3. Recommended Grievance Redress Time Frame

Table 5.3 below presents the recommended time frames for addressing grievance or disputes.

Table 5.2: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 24 hours
3	Assess grievance	Within 24 hours
4	Assign responsibility	Within 2 Days
5	Development of response	within 7 Days
6	Implementation of response if agreement is reached	within 7 Days
7	Close grievance	within 2 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 7 Days
9	Implement review recommendation and close grievance	within 14 Days
10	Grievance taken to court by complainant	-

5.4. GBV Grievances

The GRM system will include special referral pathways for the GBV complaints and grievances including grievances on sexual harassment and sexual exploitation and abuse. Information about the existence of the GBV grievance mechanism will be communicated to all stakeholders through different methods (i.e. public consultations, posters and leaflets, local radios and social media). Training will also be provided by a GBV expert for the ESO on detection of cases of gender- based violence and handling of inquiries, complaints and grievances related to GBV. Staff assigned for handling complaints at the MoSD and the PFESP will also be trained on detecting, receiving and handling gender- based violence grievances. Relevant NGO staff, responsible for implementing Cash for Work activities, will also be trained.

5.5. Workers' Grievance Mechanism

The PIA and MoF will require contractors to develop and implement a grievance mechanism for their workforce prior to the start of civil works. The construction contractors will prepare their labor management procedure before the start of civil works, which will also include detailed description of the workers grievance mechanism. This grievance mechanism also addresses child labor, GBV and sexual harassment related grievances. As a result, it develops features to accept and respond to the anonymous complaints. The anonymity of the complains is communicated to all affected parties during the consultation.

The workers grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- an assigned staff to receive, record and track resolution of grievances.
- An anonymous feature that receives anonymous complaints and ensures privacy.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed. If civil works will be involved during the project’s lifetime, the implementing entities will monitor the contractors’ recording and resolution of grievances, and report these in the progress reports.

6. Monitoring and Reporting

6.1. Involvement of stakeholders in monitoring activities

The Project provides the opportunity to stakeholders, especially Project Affected Parties to monitor certain aspects of project performance and provide feedback. GRM will allow PAPs to submit grievances and other types of feedback. Frequent and regular meetings and interactions with the PAPs and other local stakeholders will be organized while respecting Covid-19 safety and distancing procedures.

6.2. Reporting back to stakeholder groups

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by the ESO and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the project’s life cycle may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project’s interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - Frequency of public engagement activities;
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
 - Number of press materials published/broadcasted in the local, and national media