

**Republic of Serbia**

**Ministry of Education**

**22–26 Nemanjina St, 11000 Belgrade**

Stakeholder Engagement Plan

for

Serbia Inclusive Primary Education

Improvement Project (IPEIP)

**November 2024**

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**Acronyms and Abbreviations**

|  |  |  |
| --- | --- | --- |
| CFD | - | Central Feedback Desk of the Grievance Mechanism |
| CFU | - | Central Fiduciary Unit |
| E&S | - | Environment and Social |
| ESCP | - | Environmental and Social Commitment Plan |
| ESF | - | Environmental and Social Framework |
| ESMF | - | Environmental and Social Management Framework |
| ESMP | - | Environmental and Social Management Plan |
| ESP | - | Environmental and Social Policy |
| ESS | - | Environmental and Social Standard |
| ESSI | - | Enriched Single-Shift Schooling Initiative |
| FGD | - | Focus Group Discussion |
| FPP | - | Focal Point Person |
| GBV | - | Gender Based Violence |
| GM | - | Grievance Mechanism |
| GoS | - | Government of Serbia |
| GRC | - | Grievance Redress Committees |
| GRM | - | Grievance Redress Mechanism  |
| GRS | - | Grievance Redress Service |
| IBRD  | - | International Bank for Reconstruction and Development |
| IEQE | - | Institute for Education Quality Evaluation |
| IIE | - | Institute for the Improvement of Education |
| IPF | - | Investment Project Financing |
| LGAD |  | Local Grievance Admission Desk of the Grievance Mechanism |
| LMP | - | Labor Management Procedures  |
| LSG | - | Local Self-Government |
| M&E | - | Monitoring and Evaluation |
| MF | - | Ministry of Finance |
| MoE | - | Ministry of Education |
| NGO  | - | Non-Governmental Organization |
| OIP  | - | Other Interested Party  |
| PAP | - | Project-Affected Party |
| PDO | -  | Project Development Objective |
| PMU  | - | Project Management Unit |
| PSEP | - | Project-level Stakeholder Engagement Plan |
| RPF | - | Resettlement Policy Framework |
| SEA/SH | - | Sexual Exploitation and Abuse / Sexual Harassment |
| SEP | - | Stakeholder Engagement Plan |
| SIA | - | Social Impact Assessment  |
| SIP | - | School Improvement Plans |
| SPSEPs | - | Sub-Project Level SEPs |
| ToR | - | Terms of Reference |
| TPD | - | Teacher Professional Development |
| WB  | - | World Bank |
| WDS | - | Whole Day Schooling initiative/model |

# INTRODUCTION/PROJECT DESCRIPTION

## Introduction

As outlined in the World Bank’s Environmental and Social Policy (ESP) for investment project financing, the Environmental and Social Standards (ESSs) are applied to projects for assisting Borrowers to avoid, minimize, reduce or mitigate the adverse environmental and social risks and impacts of projects. **ESS10 – Stakeholder Engagement and Information Disclosure[[1]](#footnote-1)** highlights the importance of open and transparent engagement between the Borrower and project stakeholders and that effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Thus, the Bank requires the Borrower to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts.

This SEP is prepared for the Serbia Inclusive Primary Education Improvement Project (IPEIP) in consistency with ESS10 for the purpose of engaging with stakeholders as an integral part of the project’s environmental and social assessment and project design and implementation, as outlined in ESS1 – Assessment and Management of Environmental and Social Risks and Impacts; thus, ensuring that the project preparation and implementation is undertaken in the environmentally and socially sustainable manner.

## Project Overview

The Project Development Objective (PDO) is to enhance the overall quality of learning conditions in targeted primary schools across Serbia. In targeted schools, improvements in the overall quality of learning conditions will be the result of the implementation of the Whole Day Schooling initiative (WDS) and will bring improvements in physical learning spaces for single-shift schools, as well as increased access to enriched learning programs that target cognitive and non-cognitive skills, better managerial and teaching practices driven by the implementation of school improvement plans. These efforts will be complemented by investments that will benefit a broader group of students and teachers. On the one hand, the introduction of learning assessments nation-wide will allow all schools to have better diagnostics of learning gaps and better target their efforts. On the other hand, improvements in the Teacher Professional Development (TPD) contents and structure will benefit all Serbian teachers in the long run, while in the short run, benefits will be concentrated in the enriched single-shift schooling initiative (ESSI) and WDS schools, where teachers will be trained as part of the project.

The project will be implemented over five years, with the Ministry of Education (MoE) as the key implementing agency acting as a focal point for reforms to be implemented by the MoE along with the Institute for the Improvement of Education (IIE), Institute for Education Quality Evaluation (IEQE), and selected local authorities. The existing PMU along with the Central Fiduciary Unit (CFU) will continue to be responsible for day-to-day project implementation, overall project coordination, monitoring and evaluation (M&E), Environmental and Social Framework (ESF), citizen engagement, and fiduciary functions.

**Summary of project components activities and targets**

**Component 1: Strengthening Assessment and Teaching in Primary Education**

This component is conceived as a system-level component, with two subcomponents: i) implement a national learning assessment and favour its use, and ii) strengthen teacher professional development.

**Component 2: Improving School Learning Conditions in Targeted Primary Schools to Enable Whole-Day Schooling**

The second component of the project will support a gradual rollout of the WDS model, that recognizes that schools differ in their initial conditions and require flexible implementation arrangements. Grants linked to the development and implementation of the School Improvement Plans (SIP) will be a key instrument to achieve autonomy. The objective is to operationalize a concept of a ‘model’ primary school that accommodates collaborative, interdisciplinary, and experiential learning, provides space for extracurricular and project-based activities strongly embedded within the broader community, with a potential to transition to a Whole Day Schooling model (at least where this is feasible in the short and medium term). All the interventions described below will be additional to those described under Component 1.

**Component 3: Improving Communication to foster inclusivity, System Monitoring, Evaluation, and Project Management**

The third proposed component will have two main objectives. First, it will contribute to improving communication among all the actors involved in the IPEP and raise awareness about its importance at the national level. Second, it will enhance the overall management of the project by financing quantitative and qualitative evaluations and project management activities.

## Purpose and justification of SEP

Operations and activities for which the World Bank`s Investment Project Financing (IPF) is sought after October 1, 2018, fall under the application of the Environmental and Social Framework (ESF)[[2]](#footnote-2). The ESF comprises, inter alia, ten Environmental and Social Standards (ESSs) which set out mandatory requirements for the Borrower and the project. Under the ESS10, a Stakeholder Engagement Plan (SEP) should be developed prior to Project appraisal that sets out the principles and procedures for stakeholder engagement in a manner that is consistent with ESS10. Where the design and location of the subproject cannot be known during project preparation, as is the case for this project, **a Project-level Stakeholder Engagement Plan (PSEP) – this document** should be prepared by the Borrower, reviewed and approved by the World Bank and publicly disclosed and consulted before Project Appraisal.

In response to the commitment of the Government of Serbia (GoS) to comply with the ESF and WB Requirements, the GoS has developed this PSEP, laying out the approach to meeting the objectives of the World Bank ESS10: Stakeholder engagement.

Stakeholder Engagement Plan (SEP) is designed to cover all components of the project, as well as all stakeholders from each project activity. Specificities such as project locations, precise municipalities and schools that will be included in the Project, technical and technological details, and other key factors are not known and will be decided at a future date, which is why a project level stakeholder engagement Plan (PSEP) is deemed appropriate. The PSEP will guide the development of sub-project specific SEPs, as soon as the specific locations, beneficiaries and schedule of activities are known*.* This is part of an iterative process in communicating with stakeholders who may be affected by or might be interested in the project throughout its life cycle. To allow uptake of stakeholders concerns and issues in the project planning stage, a fully functional Grievance Mechanism is developed and presented in details in Chapter 6.

In order to meet best practice approaches, the project, by implementing this PSEP and the SEPs, will apply the following principles for stakeholder engagement throughout the project cycle:

* + *Openness and life-cycle approach*: Public consultations for the project will be arranged during the whole life cycle of the project, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
	+ *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 communication and build effective relationships. The participation process is inclusive. All stakeholders at all times are 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 Roma population, students with disabilities, students from economically disadvantaged background, etc.

## Scope and structure of the SEP

Adequate stakeholder engagement is obligatory for estimating the project’s environmental and social performance and will be integrated into project design and implementation. The scope of the SEP follows the World Bank’s ESS10 requirements. The frequency and adequacy of the engagement methods will be part of the M&E follow up of the Project Summary of potential environmental and social risks and impacts.

##

1. **Exclusion and Marginalization**: There is a risk of excluding certain groups of students, such as those from disadvantaged social strata, disabled children, and minority children. Ensuring that all students benefit from the project requires careful planning and inclusive strategies.
2. **Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA/SH)**: The presence of construction workers in school premises, especially male workers, poses risks of GBV, SEA or SH. This necessitates robust measures to prevent and address such issues.
3. **Occupational Health and Safety**Construction activities may pose risk to all workers involved if adequate protection measures are not adequately communicated and implemented.
4. **Community Health and Safety**: Construction activities can lead to noise, air, and water pollution, which can affect the health and safety of students, teachers, and nearby communities. Traffic and road safety risks are also a concern during the implementation phase.
5. **Potential presence of encroachers and squatters in abandoned school premises.**Though rare, there is still a possibility of encroachers occupying old or abandoned school premises, especially in areas with a shortage of affordable housing or where informal settlements have developed. Further social assessment and additional information obtained during project preparation will determine the final approach regarding this matter.
6. **Cultural Sensitivity**: The project must consider cultural protocols and ensure that activities are designed to be inclusive of all cultural groups, particularly in community engagement and capacity training.
7. **Information Dissemination**: Poor or inadequate dissemination of project information can lead to the exclusion of intended beneficiaries. Ensuring effective communication and stakeholder engagement is crucial to mitigate this risk.
8. **Local instability Insecurity**: In some regions, insecurity and school-based violence can pose significant risks to the safety of students and staff, potentially disrupting project activities. This may be a potential risk.

The sub-project specific SEPs will elaborate on the details of impacts of relevance to affected and interested parties and will tailor messages accordingly.

## Project Locations

This project will be implemented countrywide. While some of the Sub-Project’s locations are generally known, a large number still remains to be decided identified together with their technical details.

## 1.6 Summary of previous stakeholder engagement activities

The specific nature of the Project required engagement with various project stakeholders with main discussions between the World Bank and the GoS, institutional and sector specific institutional stakeholders.

The specific stakeholder engagement activities that have taken place during the project preparation include:

* + Numerous discussions and communication exchange between the World Bank and government agencies at the national, regional and local level;
	+ Review of project preparation status with representatives from the MoE and including safeguard documentation;
	+ Multiple meetings and communication exchange with the IEQE and the IIE, as a main partner implementing agencies;

Constant on-line communication on weekly bases were held with the Institute for Education Quality Evaluation and the Institute for Improvement of Education, as main partner implementing agencies. Both Institutes' directors took part in the IPEIP's preparatory meetings with the World Bank in October 2023 and April 2024. The Working Group towards Preparation of the IPEIP has been established on July 19, 2024, in which both Institutes' directors were appointed as members, among others. Two meetings of the Working Groups were held since then, of which one was on-line, to discuss comments on the Project Appraisal Document, the other to review the IPEIP's development status ahead of the World Bank's mission in November 2024.

However, during the preparation phase there still has not been an active stakeholder engagement activity towards project-affected persons (PAPs). An active stakeholder engagement will be conducted following approaches provided in this SEP once the project implementation starts and their feedback will be incorporated into the design of project activities.

# REGULATIONS AND REQUIREMENTS

## Relevant National Laws and Regulations of the Republic of Serbia

The commitments and requirements of the Republic of Serbia to citizen engagement are not residing under a single self-standing law or regulation. However, the recognition of importance of citizen engagement is infused in the legal system and clearly recognized by mandatory procedures provided under individual laws. Having acquired the EU candidate country membership status, Serbia is taking a huge effort to reach performance standards in line with the EU acquis, which extends to issues of stakeholder and citizen engagement as well.

From the highest legal act down to an ample normative framework comprising the Serbian legal system, a strong commitment and openness to stakeholder engagement is evident. Key laws governing the stakeholder and citizen engagement activities include, but are not limited to the following:

T**he Constitution of the Republic of Serbia (2006).** It proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, and commitment to European principles and values.

* + Article 74 proclaims the right to healthy environment and grants the right to timely and comprehensive information on the state of the environment.
	+ Everyone shall have the right to education.
	Primary education is mandatory and free, whereas secondary education is free.
	All citizens shall have access under equal conditions to higher education. The Republic of Serbia shall provide for free tertiary education to successful and talented students of lower economic status in accordance with the law.
	… (Art. 71)
	+ Parents shall have the right and duty to support, provide upbringing and education to their children in which they shall be equal.
	... (Art. 65)
	+ The municipality shall, through its bodies, and in accordance with the Law:
	…
	be responsible for meeting the needs of citizens in the field of education,
	… (Art. 190)
	+ All are equal before the Constitution and law.
	Everyone shall have the right to equal legal protection, without discrimination.
	All direct or indirect discrimination based on any grounds, particularly on race, sex, national origin, social origin, birth, religion, political or other opinion, property status, culture, language, age, mental or physical disability shall be prohibited.
	Special measures which the Republic of Serbia may introduce to achieve full equality of individuals or group of individuals in a substantially unequal position compared to other citizens shall not be deemed discrimination. (Art. 21)

**The Law on Free Access to Information of Public Interest (2004)** states that governmental agencies, social associations and officials are required to provide each person with the possibility of receiving and becoming acquainted with documents of public interest, except in cases anticipated by law. This Law governs the rights of access to information of public importance held by public authorities, with a view to exercising and protecting the public interest to know and attaining a free democratic order and an open society. By virtue of this Law access to information shall be granted to all stakeholders, including every natural person or legal entity upon written request unless otherwise regulated by the Law. Within 15 days of receipt of a request at the latest, the authority shall inform the applicant whether the requested information is held, and grant him/her access to the document containing the requested information or issue or send to the applicant a copy of the document, as the case may be

**The Law on Planning and Construction**

Article 3: Planning, arrangement and use of space is based on the following principles:

…

10) public participation;

11) preservation of customs and traditions;

12) preservation of ambient values, integrity and specificity of the landscape.

Article 5: Unhindered movement and access for people with disabilities, children and the elderly

Gender equality Law (2021)

Anti-discrimination Law (2021)

**The Law on Public Information and Media (2014)** stipulates that public information is free and is not subject to censorship, that the public has the right and the interest to be informed on issues of public interest, that monopoly in the media is not allowed, that information on the media is public.

**The Law on Environmental Protection (2004, as amended in 2009)** is the main legislation relating to environment protection in the Republic of Serbia. It regulates management of natural resources, waste management, noise, vibration, and radiation protection, as well as measures and conditions for environmental protection, and environmental monitoring.

The Republic of Serbia ratified **the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters**, which links environmental and human rights and is based on the basic right of present and future generations to live in an environment that provides health and wellbeing. The convention is focused on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice.

Other stakeholder engagement, disclosure and transparency requirements within certain topics and sectors are embedded in the applicable laws regulating each of the treated subject. They are broadly compliant with the requirements of ESS10 but have certain shortcomings when it comes to active outreach and continuous engagement strategies.

## World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank’s Environmental and Social Framework (ESF) that came into effect on October 1, 2018, includes Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure. This ESS10 recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” that can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation (*ESS10 Par. 1*).

ESS10 applies to all projects supported by the Bank through Investment Project Financing, requiring the Borrower to engage with stakeholders as an inclusive process to be conducted throughout the project life cycle (*ESS10 Par. 2*). In conformance to the World Bank’s ESF, ESS10 prescribes the following ((*ESS10 Pars 6–9)*:

* **Borrowers will engage with stakeholders throughout the project life cycle**, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
* **Borrowers will engage in meaningful consultations with all stakeholders**. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
* **The process of stakeholder engagement will involve the following, as set out in further detail in the ESS**: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
* **The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement**, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

*ESS10 Par. 21* stresses the need for meaningful consultation “in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out.” *ESS10 Par. 21* elucidates **“meaningful consultation” as a two-way process, that**:

* 1. Begins early in the project planning process to gather initial views on the project proposal and inform project design;
	2. Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; on an ongoing basis as the nature of issues, impacts and opportunities evolves
	3. Continues on an ongoing basis, as risks and impacts arise;
	4. Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
	5. Considers and responds to feedback;
	6. Supports active and inclusive engagement with project-affected parties;
	7. Is free of external manipulation, interference, coercion, discrimination, and intimidation; and
	8. Is documented and disclosed by the Borrower

# STAKEHOLDER IDENTIFICATION AND ANALYSIS

ESS10 provides the definition of “stakeholder” that refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).

## Project-Affected Parties

**Project-Affected Parties** (PAPs) are those that are affected or likely to be affected by the project and because of their particular circumstances, may be disadvantaged or vulnerable. This group are likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of project’s benefits (*ESS10 Pars. 5&11*)

The Project Affected Parties of the IPEIP are likely to extend over the following groups of stakeholders:

* Teachers/school management/expert associates;
* Students;
* Persons residing in areas where sub-project specific works will be executed
* Parents/Parental Councils;
* School Boards
* Professional and advisory bodies of the school;
* Roma and other minorities students and parents;
* Students with disabilities;
* Parents with disabilities;
* Students and parents from low-income households;
* **Residents of remote and inaccessible areas: Children and families living in geographically challenging areas may have limited access to project interventions and resources.**

The sub-project specific SEPs to be prepared at later stages will expand the list of project-affected parties and include for each sub-project those likely adversely affected by the project activities. These may also include parties affected by beneficial impacts, but the focus of engagement shall lie on drivers of adverse impacts.

## Other Interested Parties

**Other Interested Parties** (OIPs) are those who may have an interest in the project and would have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement (*ESS10 Pars. 5&11*). Generally, OPIs are people, social groups, and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the project. They include project implementing agencies, project partners, state bodies and local administration, service providers, NGOs, religious institutions, political authorities, academic institutions, media and project beneficiaries.

## Disadvantaged/vulnerable individuals or groups

Of particular importance is to understand whether adverse project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, or they are likely to be excluded/unable to access project benefits. Such groups may often not have a voice to express their concerns or understand the impacts of a project. This PSEP shall ensure that disadvantaged or vulnerable individuals or groups, relevant to the project, are identified, that their particular sensitivities, concerns and barriers to project information are assessed and that they fully understand project activities and benefits and participate in consultation processes. The vulnerability may stem from person’s origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals in this project will require 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 specific details of groups and individuals vulnerable to impacts from the project are not yet known since the details of locations and technological issues of activities are still to be identified. The drivers of vulnerability will be assessed in detail and identified during development of the sub-project specific SEPs.

Based on the initial screening, some of the identified groups or individuals may include:

* + Roma and other minorities students, and their parents;
	+ Students and/or parents with disabilities and chronic disease, students from low-income households and their parents;
	+ Single-parent-headed households, male and female;
	+ Economically marginalized and disadvantaged groups (persons living below the poverty line);
	+ **Residents of remote and inaccessible areas**: Children and families living in geographically challenging areas may have limited access to project interventions and resources.

Vulnerable groups affected by the project will be further confirmed through the process of preparation of sub-project specific SEPs and consulted by designated means, as appropriate

## Stakeholder expansion

Each sub-project SEP will need to revisit the list of stakeholders and verify if there is a need to expand the list and engage with other stakeholders in the course of the project. This will be facilitated by filling out the stakeholder expansion questionnaire below at critical points during the project implementation but mandatory during preparation of respective sub-projects. A potential update will be part of the Monitoring & Evaluation (M&E) segment of the Project.

Table 1*: Expansion and update questionnaire*

|  |
| --- |
| STAKEHOLDER EXPANSION AND UPDATE NEEDS QUESTIONNAIRE |
| □ YES □ NO *If No, the project needs to expand the Stakeholder List*  | Is our current list focused on relevant stakeholders who are important to our current and future efforts? (*Answers should be based on the knowledge of the project, feedback received and grievances registered tackling inadequate outreach, real or perceived exclusion and feedback during their engagement.)* |
| □ Yes□ No*If No, the needs assessment should be revisited or a supplementary conducted and Stakeholder List revisited* | Do we have a good understanding of where stakeholders are coming from, what they may want, whether they would be interested in engaging with the project, and why?*(The answers should be based on the frequency of stakeholders approaching through communication channels other than the project’s, with suggestion for inclusion of groups or eligible activities etc.)*  |
| □ Yes□ No*If No, the Stakeholder List should be revisited and admission and evaluation criteria should be revisited*  | Does the current engagement strategy adequately engages vulnerable groups?*(Answers should be based on the result of the feedback received through on-going consultations, grievance log, and mid-term review of stakeholder engagement during project implementation)*  |

# STAKEHOLDER ENGAGEMENT PROGRAM

The Stakeholder Engagement Plan is an important component of the IPEIP ESF document, which takes into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. This will lay out the steps to engage all types of stakeholders in the project for the purpose of improving the environmental and social sustainability of the project, enhancing project acceptance, and making a significant contribution to successful project design and implementation.

The SEP activity types and their frequency are adapted to the three main project stages:

* + project design;
	+ project implementation/construction;
	+ post-construction/operation phase.

## Purpose and timing of stakeholder engagement program

The main goal of the stakeholder engagement program is to inform, disclose and consult on various project documents and activities early on to establish a dialogue with project stakeholders from project planning to implementation and operation. All safeguard documents prepared in anticipation and in expectation of the financing agreement from the World Bank will be disclosed and consulted on before Project Appraisal takes place. In anticipation of site specific SEPs drafts of ESF documents (i.e. ESMF, ESCP, LMP, RPF, and PSEP) will be publicly disclosed at least 15 days before Public Consultations on the websites of the implementing agency and WB. The disclosure packages will include:

* Project announcements,
* Brief description of the project,
* Description of public consultation arrangements (time, place…)
* Ways of submitting comments and feedback
* Key deadlines
* The respective draft ESF documents.

Project information and schedule of activities will be regularly updated, including details on periodicity and the decisions made in response to public comments and concerns. If decisions on public meetings, locations, and timing of meetings have not yet been made, specific information will be provided on how people will be made aware of forthcoming opportunities to review information and provide their views.

## Proposed Strategy for Disclosure

The proposed strategy for information disclosure includes a comprehensive approach to ensure that all relevant stakeholders are informed. Here are the key elements of the strategy:

* + Publication of Key Documents: Key project documents (ESMF instruments) will be published on the websites of the relevant authorities, such as the Ministry of Education, and the cities or municipalities involved.
	+ Community Meetings: Information will be disseminated through community meetings, ensuring that local communities are well informed about the project.
	+ Media Channels: Various media channels will be utilized, including newspapers, posters, radio, and television, to reach a broader audience.
	+ Information Centers in schools and/or municipalities’ premises will be set up to provide information in an accessible format.
	+ Printed Materials: Brochures, leaflets, posters, and non-technical summary documents will be distributed to provide detailed information about the project.
	+ Official Correspondence and Meetings: Formal communication through official correspondence and meetings will be used to share information with stakeholders.
	+ Social Media: Social media platforms will be leveraged to reach a wider audience and engage with stakeholders in real-time.
	+ Inclusive Communication: The project will collaborate with local community radio stations and government officials to hold community-level meetings in local languages, ensuring that information is accessible to all, including women and youth groups.
	+ Multimedia Content: Audio-visual materials, such as videos and infographics, will be used to present information in an engaging and easily understandable format.
	+ Workshops and Training Courses: Workshops and training sessions will be organized to provide detailed information and engage with stakeholders directly.
	+ Virtual Meetings and Newsletters: Virtual meetings and electronic newsletters will be used to keep stakeholders informed and engaged throughout the project lifecycle.

ESF documents (i.e. ESMF, ESCP, LMP, RPF, and PSEP) will be disclosed electronically on the websites of the PMU/MoE and selected cities/municipalities and will be available in Serbian and English:

* On the MoE website (<http://www.prosveta.gov.rs/>)
* On the PMU website (<https://ecec.rs/>)
* On notice boards and websites of selected LSGs and/or selected schools
* Through social media campaigns
* As printed copies available at the PMU and MoE premises and during public consultation.

The project will be announced on Radio, TV, in written and electronic media, as well as all available official social media accounts and PMU and MoE web pages.

During project implementation, any of the documents disclosed during preparation, if updated, shall be re-disclosed and public consultations held.

Site specific management instruments developed to manage environmental and social risk and impacts such as Environmental and Social Management Plans (ESMPs) will be disclosed.

Contractor’s documents related to management of environmental and social risks (these may include Traffic Management Plan, Emergency Preparedness and Response Plans, Codes of Conduct for Employees and Contracted Workers etc.) will be available on Contractors and MoE websites, and on the noticeboards in selected schools. Information on timing of project activities and related information will be published via various media, in newspapers and on radio at least two weeks prior to actual execution.

During the project development and construction phase, the Social and Environmental Specialist will prepare for the PMU and the WB monthly reports on E&S performance, which will include an update on implementation of the Stakeholder Engagement Plan. Monthly reports will be used to develop quarterly reports. The quarterly reports will be disclosed and made available on the project website.

## Proposed Strategy for Consultation

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about the project activities. The outreach and stakeholder engagement will be gender appropriate. Targeted messaging will encourage the participation of vulnerable population and highlight project characteristics that are designed to respond to their needs and increase their access to project benefits.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, school/educational facilities and services and other challenges they face in their communities related to this project.

Different engagement methods proposed, and approaches to be practiced for stakeholder engagement will include:

1. Face to face meetings with PAPs and OIPs;
2. Small groups consultations, or online meetings (e.g. Webex, Zoom, Skype etc.); where possible and appropriate, dedicated online platforms and chatgroups appropriate for the purpose will be created, based on the type and category of stakeholders;
3. Diversifying means of communication and relying more on social media, chat groups, dedicated online platforms & mobile apps (e.g. Facebook, Twitter, WhatsApp groups, ViberApp groups, project weblinks/websites etc.);
4. Employing traditional channels of communications, such as TV, radio, dedicated phone-lines, public announcements when stakeholders do not have access to online channels or do not use them frequently;
5. Public meetings in schools;
6. Trainings/workshops;
7. Public notices;
8. Electronic publications via social media and press releases;
9. Dissemination of hard copies at designated public locations; press releases in the local media;
10. Information leaflets and brochures; audio-visual materials;
11. Separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats;
12. Grievance мechanism;
13. Where direct engagement with PAPs or beneficiaries is necessary, the channels for direct communication will be identifies for each affected household via combination of e-mail messages, mail, online platforms, dedicated phone lines with informed operators.

## Proposed Strategy / Differentiated Measures to Include the Views of and Encourage Participation by Vulnerable Groups

Considering the extra burden and difficulty of Disadvantageous and Vulnerable Groups, ESS10 Par. 16 specifies that the “SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them.”

Focus group discussions (FGDs) tailored to the groups’ circumstances may also be envisaged as appropriate and information will be provided in the language that can be understood by them. Accordingly, people with restrictions on physical mobility (persons with disabilities, or limited mobilities), who may be affected even indirectly should be provided facilitation to voice out their opinions and their views appropriately considered. Targeted measures to ensure participation in stakeholder engagement will be used, such as organizing consultations at different times convenient for different groups, providing transportation arrangements if needed and reaching out to spatially isolated communities.

Project/MoE will engage qualified full time-social specialist, experienced in carrying out particularly sensitive focus groups with vulnerable groups. This specialist will ensure that engagement events are tailored to meet the specific needs of vulnerable individuals. He/she will also ensure that all comments from these individuals are appropriately addressed and that the feedback loop is effectively closed. He /she will also regularly report to the WB on vulnerable groups engagement activities.

**Summary of Stakeholder Engagement Needs and Analysis Interest and Influence**

Identified stakeholder groups and their level of influence cross-referenced with the interest they may have in the project will determine the type and frequency of engagement activities necessary for each group. Using the color coding of interest and influence matrix below will help determine where to concentrate stakeholder engagement efforts and why.

The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project, and is based on the color code in the matrix below.

Table : Influence and interest matrix

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Level of Influence** |    |   |   |   |
| **High** | **Involve/Engage** | **Involve/Engage** | **Partner** |   |
| **Medium** | **Inform** | **Consult** | **Consult** |   |
| **Low** | **Inform** | **Inform** | **Consult** |   |
|   | **Low** | **Medium** | **High** | **Level of Interest** |

Table : Level of stakeholder engagement based on their level of interest and level of influence

| Project Stakeholder Group | Nature of interest | Level of interest | Level of Influence | Level of engagement |
| --- | --- | --- | --- | --- |
| Project Affected People | Individuals | Students  | Interest in potential impacts during civil works (such as safety, noise, dust, etc) and the duration of civil works; interest in project activities which will affect their schooling (school grants, enriched programs, whole day schooling, etc).  | High | Low | Consult  |
| Teachers, expert associates, school directors | Interest in potential impacts during civil works (such as safety, noise, dust, etc) and the duration of civil works; interest in project activities which will affect school organization and management (school grants, teacher motivation measures, enriched programs, whole day schooling, etc). | High | Medium | Consult  |
| Community members; people residing in the area | Concerns about community health and safety, traffic construction related impacts (noise, dust, damages, emissions, vibrations) | High | Medium | Inform  |
| Parents | Interest in potential impacts during civil works on the children; interest in project activities which will affect schooling (school grants, enriched programs, whole day schooling, etc). | High  | Medium | Consult |
| Communities  | Local community | Concerns about community health and safety, traffic construction related impacts (noise, dust, damage, emissions, vibrations) | High  | High | Consult |
| Legal Entities | Teacher’s Trade Unions | Interest in impact of project activities on educational system and e.g. teacher’s salaries | high | medium | inform |
| School administration; School boardsProfessional and advisory bodies of the school | Interest in potential impacts during civil works, duration of civil works; interest in project activities which will affect school organization and management (school grants, teacher motivation measures, enriched programs, whole day schooling, etc). | High  | Low  | Inform |
| Other Interested Parties | Government Agencies and Institution | Ministry of Finance (MF) | Loan Agreement oversight  | High | High | Partner |
| Ministry of Education (MoE) | Main counterpart of the WB for Project implementation and Implementing Agency | High | High | Partner |
| PMU housed by MoE | Project management and implementation, oversight, reporting, financial, environmental and social risk management, grievance management, SEP implementation and coordination | High | High | Partner |
| Local Self-Governments (including line departments: land management, education department) | Interest in potential impacts during civil works, duration of civil works; interest in project activities which will affect school organization and management (school grants, teacher motivation measures, enriched programs, whole day schooling, etc); interest in the overall impact of project activities on local community | Medium | Medium | Consult |
| Institute for Education Quality Evaluation;Institute for the Improvement of Education | Interest in impact of project activities on educational system; interest in timely and effectively of project activities | High | High | Partner |
| The World Bank  | Interested in Project Development Objectives and compliance to E&S standards of the project | High | High | Partner |
| Academic institutions (e.g. Faculty of Education)  | Interested in changes in curriculum for teacher’s education | Medium | High | Consult |
| Potential Bidders | National and international contractors and engineering consultancies  | Interested in participating in various bidding procedure  | High  | Medium | Consult  |
| Public | General public, NGO | Interested in the overall project impact and results | High  | Low  | Inform  |
| Media | National media (radio, TV, newspapers) | Enables wide and regular dissemination of information related to the project, ensures its visibility and facilitates stakeholder engagement  | Medium  | Low  | Inform |
| **Vulnerable groups** | Individuals | Roma and other minorities students, and their parents; students and/or parents with disabilities and chronic disease; students from low-income households and their parents;single-parent households, male and female; economically marginalized and disadvantaged groups (persons living below the poverty line); residents of remote and inaccessible areas: children and families living in geographically challenging areas that may have limited access to project interventions and resources | Interested in accessibility of school/educational facilities during the construction, as well as how the project will affect them (e.g. are they going to receive some incentives and/or motivation measures for attending the school or not dropping out from school) | High  | Low | Consult |

Table 2: Proposed stakeholder engagement activities

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Project stage** | **Target stakeholders** | **Topic(s) of engagement** | **Method(s) used** | **Location/frequency** | **Responsibilities** |
|  ***Preparation phase*** | **Project Affected Parties** * Teachers/school management/expert associates
* Students;
* Parents/parental council;
* School boards
* Professional and advisory bodies of the school;
* Community members
 | * The project PDOs and planned project activities
* The project plan, including ESCP, SEP, ESMF, LMP and ESMP Check Lists
* Communication on project design (design for construction or reconstruction of school buildings)
* School grants
* Learning assessments
* Introduction of Whole Day Schooling model
* Enriched learning program
* Trainings for teachers and principals
* Regular updates on the project implementation
* Grievance mechanism
 | * Public meetings in schools
* Trainings/workshops
* Public notices;
* Electronic publications via social media and press releases;
* Dissemination of hard copies at designated public locations; press releases in the local media;
* Information leaflets and brochures; audio-visual materials,
* Grievance mechanism
 | * Project activities launche meetings at selected schools
* Communication through mass/social media (as needed);
* Bulletin boards of local councils and Information desks with brochures/posters in affected municipalities (continuous)
* Construction works – 4 weeks in advance notice
* Monthly meetings in selected municipalities
 | PMU/ESMP team  |
| **Vulnerable Project Affected Parties*** Roma students and their parents;
* Other minority sudents and their parents
* Students with disabilities and their parents;
* Students from remote, rural areas and their parents;
* Students from low income households and their parents;
* Squatters or encroachers;
* People residing in the project area;
* Vulnerable households
 | * Project activities affecting vulnerable students, such as school grants, whole-day-school or access to enriched learning program;
* Communication on project design (design for construction or reconstruction of school buildings) related to e.g. accesibility for disabled students
* Grievance mechanism
 | * Separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats (e.g. using language understandable for PAPs, providing transportation, etc.)
 | * Information desks in schools with brochures/posters in affected municipalities (continuous);
* Meetings and focus groups in schools;
* Meetings in PAPs homes, where appripriate
 | PMU/Social Specialist |
| **Other Interested Parties (External)*** Relevant institutes (IEQE and IIE);
* Local administration representatives;
* Teacher’s trade unions;
* Faculties educating teachers and expert associates;
* School administration units;
* National Government/Ministries;
* Press and media;
* NGOs;
* General public
 | * Communicate project PDOs and planned project activities
* Regular updates about the project
* Communicate project plan, including ESCP, SEP, ESMP Check Lists;
* Grievance mechanism
 | * Face-to-face meetings;
* Joint public/community meetings with PAPs;
* Dissemination of informative project activitie’s material and notices
 | * Project launch meetings;
* Monthly meetings inaffected municipalities;
* Communication through mass/social media (as needed);
* Information desks with brochures/posters in affected municipalities (continuous)
 | PMU /ESMP team |
| **Other Interested Parties (External)** * Suppliers;
* Contracting parties/consultants;
* Contractors;
* Workers
 | * Communication on project design (design of buildings for construction or reconstruction);
* Communicate project plan, including ESCP, SEP, ESMP Check Lists;
* Sub-projects development rationale and E&S principles;
* Grievance mechanism
 | * ESMP documents explained within Request for Proposals and Invitation to Bid in the course of procurement procedures;
* Public meetings;
* Face-to-face meetings;
* Information leaflets and brochures; audio-visual materials
 | * Project launch meetings;
* Information desks with brochures/posters in affected municipalities (continuous);
* Grievance mechanism (continuous)
 | PMU /ESMP team |
| **Other Interested Parties (Internal)*** + Other PMU staff;
	+ Supervision;
	+ Consultants
 | * Project information - scope and rationale and E&S principles;
* Training on sub-management plans;
* Grievance mechanism process
 | * Face-to-face meetings;
* Trainings/workshops;
* Invitations to public/community meetings
 | As needed | PMU/ ESMP team |
| ***Implementation phase*** | **Project Affected Parties** * Students;
* Teachers;
* Parents/parental council;
* School boards
* Professional and advisory bodies of the school;
* Roma students and parents;
* Roma girls;
* Students with disabilities;
* Students from low income households
 | * Continuing implementation of all methods of engagement initiated during preparation phase with PAPs;
* Environmental, social and safety standards in the local communities;
* Stakeholders opinion about the project;
* Emergency preparedness and response;
* Duration and scope of civil works;
* Other project activities (such as School Grants);
* Environmental and Social risks and mitigation measures
 | * Public meetings, trainings/workshops,
* Separate meetings specifically for vulnerable groups of students and their parents;
* Individual outreach to PAPs
* Mass/social media communication – Facebook, WhatsApp;
* Disclosure of written information –brochures, posters, flyers, websites
* Information desks – in municipalities and HQ;
* Grievance mechanism (GM)
* Citizen/PAP survey – upon completion of construction
 | * Quarterly meetings in all affected municipalities and with ongoing construction;
* Communication through mass/social media (as needed);
* Information desks with brochures/posters in affected municipalities (continuous)
 | PMU Supervision consultants; Contractors;GM teams |
| **Other Interested Parties (External)** * Teachers trade unions
* Academic institutions;
* National government ministries;
* School administration units
* Local government departments;
* Press and media;
* NGOs;
* General public
 | * Project information - scope and rationale and E&S principles;
* Coordination activities;
* Health and safety impacts;
* Employment opportunities;
* Environmental concerns;
* Social concearns;
* Grievance mechanism process
 | * Public meetings,
* Trainings/workshops;
* Mass/social media communication – Facebook, WhatsApp;
* Disclosure of written information – brochures, posters, flyers, websites;
* Information desks – in municipalities and selected schools;
* Grievance mechanism;
* Project tours for media, local representatives
 | * Monthly/quarterly meetings in all affected municipalities with ongoing construction and headquarters;
* Communication through mass/social media (as needed);
* Information desks with brochures/posters in affected municipalities (continuous)
 | PMU / E&S team |
| **Other Interested Parties (Internal)*** Other PMU staff;
* Supervision consultants;
* Contractor, sub-contractors, service providers, suppliers and their workers
 | * Project information – scope, rationale and E&S principles;
* Grievance mechanism process
 | * Face-to-face meetings;
* Trainings/workshops;
* Invitations to public/community meetings
 | As needed | PMU Contractors |
| ***Completion phase*** | **Project Affected Parties*** Teachers; Students;
* Parents/parental council;
* School boards
* Professional and advisory bodies of the school;
* Roma students and parents;
* Roma girls;
* Students with disabilities;
* Students from low income households
 | * Satisfaction with engagement activities and GM;
* Grievance mechanism (GM) process;
* Community health and safety measures during operation
 | * Public meetings,
* Trainings/workshops,
* Individual outreach to PAPs
* Mass/social media communication – Facebook, WhatsApp;
* Disclosure of written information – brochures, posters, flyers, websites;
* Information desks – in municipalities and selected schools;
* Grievance mechanism
 | * Communication through mass/social media (as needed);
* Information desks with brochures/posters in affected municipalities (continuous)
 | PMU  |
| **Other Interested Parties (External)** * Press and media; NGOs;
* Workers’ organizations;
* Teachers trade unions;
* Academic institutions;
* National government ministries;
* School administration units;
* Local government departments;
* General public
 | * Grievance mechanism process;
* Community health and safety measures during operation
 | * Mass/social media communication
* Disclosure of written information
* Disclosure of activities on the MoE website and of relevant municipalities/schools
 | * Communication through mass/social media (as needed);
 | PMU and public relations team |

At the early stage, the PMU will organize project launch meetings. Such engagement will then continue whenever new sub-projects are agreed to be developed and will be integrated into the sub-project SEPs development program. The PMU will rely on the support from the respective local self-governments (LSGs) and selected schools to help organize community meetings/sensitization sessions in all settlements throughout the project’s lifecycle. Launch meetings shall be the first step in the sub-projects preparatory activities. The project will include targeted outreach to disadvantaged groups ahead of these meetings to ensure their integration in the engagement activities.

**Mass/social media communication:** The PMU shall engage an Environmental & Social Specialist who shall be inter alia responsible for outreach and assisting the PMU in disclosure, dissemination of information and communication with the schools and local population. The media for communication shall be seen as fit for each community taking into consideration the type and sensitivity of stakeholders. The local context shall be taken into consideration. PMU will engage Communication Expert who will facilitate these activities, along with E&S Specialist.

**Communication materials**: Written information will be disclosed to the public via a variety of communication materials, including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. PMU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project’s environmental and social performance both in English and Serbian. The website will also provide information about the grievance mechanism for the project (see next sub-section).

**Grievance mechanism:** In compliance with the World Bank’s ESS10 requirement, a specific Grievance Mechanism (GM) will be set-up for the project. Details on the GM are presented in Chapter 9. Dedicated communication materials (GM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. A GM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality. In order to capture and track grievances received under the project, a dedicated GM Management Information System / database is planned. Internal GM training will also take place for LSG, school and contractors’ staff. The PMU`s website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GM committee works, both in terms of process and deadlines.

**Information desks:** Information desks will provide residents with information on stakeholder engagement activities, construction updates, contact details of the PMU. The PMU will set up such information desks in the premises of selected LSgs and schools where they can meet and share information about the project with PAPs and other stakeholders. Brochures and fliers on various project related social and environmental issues will be made available at these information desks.

**Citizen/PAP perception survey and feedback**: Six months after each launch meeting, the PMU will conduct sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (PMU, Contractor, GM etc) during construction works. The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. This will allow the PMU to identify potential design issues. The survey data will be disaggregated by age, gender and location). Survey results with proposed corrective measures will be published on MoE website and discussed at consultation meetings.

**Trainings, workshops:** Trainings on a variety of social and environmental issues will be provided to each contractor staff and possibly relevant local government stakeholder. Issues covered will include a sensitization to gender-based violence risks.

## Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of the Environmental & Social Specialist will help to ensure proactive outreach to all population groups. Focus groups dedicated specifically to vulnerable groups, including Roma students and parents, will be conducted to gauge their views and concerns, to identify any cumulative vulnerability stemming from their unintegrated status in the community and the project attributable impacts.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, facilities and services supported by the project and other challenges they face at home, at workplace and in their communities. Some of the strategies that will be adopted to effectively engage and communicate to vulnerable groups will be towards:

* Female students and parents: ensure that community engagement teams are gender-balanced and promote women’s leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate;
* Roma and other minorities students and their parents: provide information in minority language; schedule focus groups and meetings at appropriate time;
* Students with disabilities and their parents: provide information in accessible formats, like Braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology; meetings arranged at their homes or another accessible premises;

Based on further vulnerable groups identified during development of sub-project specific SEPs and identification of particular drivers of their vulnerabilities the strategy toward engaging with vulnerable groups will be adapted accordingly.

## Timeline

Sub-project specific SEPS shall be prepared once the details of sub-projects are known. The implementation timeline is still not set and details will be part of the disclosure and engagement activities.

## Review of comments

The comments on all disclosed data and ESF documents will be reviewed immediately upon arrival by the PMU E&S Specialist. Major comments will be incorporated in the final version of the ESF documents and disclosed, together with a report on the feedback, i.e. (i) list of media the announcement was disclosed, (ii) content of the announcement, (iii) time of publishing, (iv) list of received feedback.

## Future Phases of 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. During the project development and construction phase, the Social & Environmental Specialist will prepare monthly reports on E&S performance for the PMU and the WB, which will include an update on implementation of the SEP. Monthly reports will be used to develop quarterly and annual reports. The quarterly and annual reports will be disclosed on the project website.

## Development of Sub-Project Level SEPs (SPSEP)

This PSEP serves as a roadmap for the development of sub-project level SEPs (SPSEPs) to be prepared for sub-projects as soon as the specific locations, stakeholder groups, and specific type and schedule of activities for the sub-project are known. These will propose targeted stakeholder engagement programs, which largely depend on the sub-project details, including the footprint, location and timing of the project activities.

The scope and level of detail of the SPSEPs should be commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project and might be prepared for a certain group of project activities (e.g school grants etc).

The Development of the SPSEPs will be based on a screening to ensure relevant information that may be useful to understand the characteristics of people/communities that will be impacted by the project is included. This may for instance be: environmental data, census data, socio-economic data (information on income, employment…), gender data etc. and their implications from an environmental and/or social point of view will be explained. The project description shall be kept targeted and relevant to understand the types of stakeholder groups impacted by the project.

A detailed overview of key issues raised in previous stakeholder engagement activities and how early stakeholder input has influenced project design shall be included in the SPSEPs. Lessons learned on any prior stakeholder engagement activities from past projects or ongoing similar projects shall be taken into account and described as relevant.

Each SPSEP shall revisit the list of identified stakeholders and their analysis and will ensure that (i) those that are affected or likely to be affected by the project (project-affected parties) and (ii) those that may have an interest in the project (other interested parties), are adequately identified. Some groups may be interested in the project because of its sector (i.e. education sector), and others may wish to have information simply because public financing is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project – if the information is in the public domain, it should be open to anyone interested. Based on the analysis the PSSEPs adopt the engagement strategies based on stakeholder needs and analysis of their Interest and Influence.

The SPSEPs should be clear and concise and focus on describing the project and identifying its stakeholders. The focus will be on segregating what the key information will be in public domain, in what languages, and where it will be best accessible to allow inclusive access. The SPSEPs need to be targeted and should demonstrate a means of engagement that is stakeholder-specific, concise yet comprehensive, and should explain the opportunities for information access, public consultation, provide a deadline for comments, and explain how people will be notified of new information or have opportunities to provide feedback including how these will be assessed and taken into account.

The SPSEPs will expand on the GM identified in this PSEP and identify and advertise local grievance entry points as part of the awareness building campaign. Commitments to releasing routine information on the project’s environmental and social performance, including opportunities for consultation and how grievances will be managed, shall be made.

The drivers of vulnerability will be assessed in detail and identified during development of sub-projects, building upon the groups identified hereunder. The following can help outline an approach to understand the viewpoints of these groups:

* Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
* What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, disability, lack of understanding of a consultation process).
* How do they normally get information about the community, projects, activities?
* Do they have limitations about time of day or location for public consultation?
* What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.)
* If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
* What recent engagement has the project had with vulnerable stakeholders and their representatives?

A summary of stakeholder needs will be identified readying inter alia on the drivers of vulnerabilities but also other barriers requiring adaptation of the common communication and engagement tools.

The SPSEPs will summarize the main goals of the stakeholder engagement program and the envisaged schedule for the various stakeholder engagement activities: at what stages throughout the project’s life they will take place, with what periodicity, and what decision is being undertaken on which people’s comments and concerns.

The SEPs will briefly describe what information will be disclosed in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience.

A Strategy for Consultation will be adopted with methods varying according to targeted audience (e.g. interviews surveys, public meetings, participatory methods). A strategy to incorporate the view of vulnerable groups and how the views of vulnerable or disadvantaged groups will be sought will be developed.

Details of what resources will be devoted to managing and implementing the Stakeholder Engagement Plan and what budget is allocated to ensure implementation, including monitoring and evaluation activities, will demonstrate the capacity and commitment to implement the SEP and activities thereunder.

The SPSEPs shall be prepared in consultation with the stakeholder and disclosed and consulted on in line with the disclosure and consultation requirements outlined in this PSEP.

# RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

## Resources

Detailed budgets will be further specified in the SPSEPs and may include budget categories listed in table below. The SPSEPs will make a fair and accurate estimation on the required budget to ensure implementation of the engagement strategies.

Table 5: Tentative budget categories for effective implementation of engagement activities

|  |
| --- |
| **Budget categories** |
| **1. Staff salaries and related expenses** | **4. Trainings**  |
| *1a Environmental and Social Consultant*  | 4a. *Training on social/environmental issues for PMU and Contractor staff* |
| 1b. *e.g. Travel costs for staff* | 4b. *Training on SEA/HS for PMU and Contractor staff* |
| **2. Events** | **5. Beneficiary surveys** |
| 2a. *Project launch meetings* | 5a.  *Mid-project perception survey* |
| 2 b SubpProject launch meetings | 5b. *End-of-project perception survey* |
| 2b. *Organization of focus groups* | **6. Grievance Mechanism** |
| 2c Conducting surveys  | 6a. *Training of GM committees* |
| **3. Communication campaigns** | 6b Constitution of local admission points  |
| 3a. *Posters, flyers* | 6c.  *GM communication materials* |
| 3b. *Social media campaign* | **7. Other expenses** |
| 3c Workshops | 7a. … |

## Management Functions and Responsibilities

The PMU will be overall responsible for planning and implementation of stakeholder engagement activities, as well as other relevant outreach, disclosure and consultation activities, as well as for GRM functioning. The PMU will develop SPSEPs.

Table 6: Management functions and responsibilities

|  |  |
| --- | --- |
| **Actor** | **Stakeholder engagement responsibilities** |
| Ministry of Education  | High level promotion of the overall project as part of the ongoing outreach and information campaignPromotion of sub-project activities with relevant local self-governments Engage with other relevant ministries high level stakeholders  |
| Communication Consultant  | Develop a communications strategy covering the lifetime of the project Liaise with and manage the relationship with any contracted companies producing communication materials (posters, flyers, video/TV spots…)Plan and manage the project’s communications via all media channels (social media, TV, radio, written press…)  |
| Environmental and Social Consultant hired by PMU | Develop a communications strategy covering the lifetime of the project Liaise with and manage the relationship with any contracted companies producing communication materials (posters, flyers, video/TV spots…)Plan and manage the project’s communications via all media channels (social media, TV, radio, written press…)Maintain the Stakeholder Engagement Log (SEL) |
| Local Self-Governments andSchool Management | Build and maintain constructive relationships with all stakeholder groups in the respective municipality (local NGO, community organizations, Roma associations, parents’ associations, etc…)Identify any issue that may result in heightened concern to provide an early warning system on community issues and communicate these to the PMUReceive and register any grievance voiced by project-affected parties or other interested parties and communicate them immediately to the PMUSupport the planning and logistics for capacity-building and communication events at the local level  |

To ensure successful PSEP implementation and preparation of SPSEPs and their implementation, the PMU will engage full-time Social Specialists for the duration of the Project to support the project and will rely on existing information sharing avenues of the MoE.

# GRIEVANCE REDRESS MECHANISM

The implementing agency (MoE/PMU) does not have a grievance system in place and is using an ad hoc approach for any grievance that arrives using exiting contact information. Hence, project-level GRIEVANCE MECHANISM (GM) will be established under the IPEIP in Serbia. The GM will consist of a Central Feedback Desk (CFD) established and administered by the PMU with sub-project specific Local Grievance Admission Desks (LGAD) (collectively referred to as Grievance Mechanism (GM)) established in selected schools/municipalities. CFD shall be responsible for overall grievance administration. The LGAD will serve as local admission point for uptake of grievances and acknowledgment of grievance receipt through local avenues (in the value chain labeled as Step 1, Step 2, and Step 3).

The system and requirements (including staffing) for the grievance redress chain of action – from registration, sorting and processing, and acknowledgement and follow‐up, to verification and action, and finally feedback – are embodied in this GM. As part of the GM outreach campaigns, MoE will make sure that the relevant staff are fully trained and has relevant information and expertise to provide phone consultations and receive feedback. The project will utilize the existing system (hotline, online, written and phone complaints channels) to ensure all project‐related information is disseminated and complaints and responses are disaggregated and reported.

Initially, GM would be operated manually, however, development of an IT based system is proposed to manage the entire GM. Quarterly reports in the form of Summary of complaints, types, actions taken and progress made in terms of resolving of pending issues will be submitted for the review to the Head of PMU. Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then the GM would advise of their right to legal recourse.

The project GRM (Grievance Redress Mechanism) will be designed to accept and address anonymous complaints, ensuring inclusivity and confidentiality for all stakeholders. Complainants, whether identified or anonymous, will receive a response within a clearly defined period, typically no later than [insert timeframe, e.g. 15 working days] from the date the complaint is received.

The GM shall serve as both information center and grievance mechanism, available to those affected by implementation of all project sub-components and be applicable to all project activities and relevant to all local communities affected by project activities. The GM shall be responsible for receiving and responding to grievances and comments of the following three groups:

* A person/legal entity directly affected by the project, potential beneficiaries of the project;
* Other interested parties with interest in the project; and
* Residents/communities interested in and/or affected by project activities.

The CFD shall be effective immediately after appraisal of the project, in order to manage and appropriately answer complaints during its different phases while the LGAD shall be effective upon decision on each new sub-project has been taken. In addition to the GM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.).

The PMU will cooperate with LSGs in joint efforts to establishing functional GM and informing stakeholders about the GM role and function, contact persons, admission channels, and the procedures to submit a complaint in the affected areas. Information on the GM will be available:

* On the MoE website (<http://www.prosveta.gov.rs/>);
* On the PMU website (<https://ECEC.rs/>);
* On the notice boards and websites of selected LSGs and schools ;
* Through social media campaigns.

Although the Project’s Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH) risk was assessed as low (because of (i) the expected local employment and (ii) expected low number of workers on construction sites), the GM will, on a precautionary base, be enabled to recognize SEA/SH grievances. Such grievances will be managed separately by a trained expert, but will use the same process value chain and timeframes described below (chapter 4.8. Grievance admission and process value chain). The necessary training for the appointed staff member who is to deal with such grievances will be provided by a WB’s Social Specialist.

## Raising grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. All grievances can be filled anonymously. The access points and details on local entry points shall be publicized and shall be part of the awareness building once further micro locations of the sub-projects are known.

## Grievance administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the GM shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 5 days from logging in, it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then be investigated by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The GM will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and grievant be informed about the final decision not later than 30 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable manner, the grievant can resort to the formal judicial procedures, as made available under the Serbian national legal framework. Logging a grievance with the GM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by the Serbian legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the GM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the PMU’s website.

The GM shall keep a grievance register log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. However, the personal data of each grievant shall be protected under the Data Protection Law. Each grievance will be recorded in the register with the following information at minimum:

* Description of grievance;
* Date of receipt acknowledgement returned to the complainant;
* Description of actions taken (investigation, corrective measures);
* Date of resolution/provision of feedback to the complainant;
* Verification of implementation; and
* Closure.

To avoid duplication of grievances by the same person on the same matter, simply because different admission channels exist, the LGAD and the CGD shall weekly exchange information on grievances received and compare the grievance logs. The centralized log at the level of the CGD will contain notes on potentially duplicated submissions. Multiple submissions, on same events, by same grievant shall be resolved by one decision, which will be stated and the grievant appropriately informed.

In case a grievance cannot be resolved in manner satisfactory to the complainant, he/she has the right for an appeal. In such cases the resolution of the grievance will be reviewed by a commission at the level of the implementing agency (MoE). This will serve as second tier grievance level. The commission will consist of three appointed members that are not directly involved in project implementation. The commission will acknowledge the receipt of the appeal within 3 days and issue the final decision within 5 days of the receipt of the appeal. The decision of the commission will entail a detailed explanation of the grievance resolution process as well as the explanation of the final decision and guidance on how to proceed if the outcome is still not satisfactory for the complainant.

## Grievances reporting

The role of the GM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep the Central Grievance Log administered by the PMU. In order to allow full knowledge of this tool and its results, quarterly updates from the GM shall be available on the MoE website. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

## Grievance log

The PMU will maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

* Type,
* Category,
* Deadline for resolving the appeal, and
* Agreed action plan.

Each complaint should be assigned with an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

* Name of the grievant, location and details of the grievance;
* Date of submission and date when the Grievance Log was uploaded onto the project database;
* Details of corrective action proposed;
* Date when the proposed corrective action was sent to the complainant (if appropriate);
* Date when the grievance was closed out;
* Date when the response was sent to the grievant.

## Grievance admission and process value chain

The GM includes the following steps:

**STEP 1**: Submission of grievances: either orally, in writing via suggestion/complaint box, through telephone hotline/mobile, mail, SMS, social media (WhatsApp, Viber, Facebook etc.), e-mail, website, and the LGAD. The GM will also allow anonymous grievances to be raised and addressed. The site-specific SEPs shall include details of grievance entry points and focal points.

**STEP 2**: Recording grievance, classifying grievances based on the typology of complaints and the complainants in order to provide more efficient response, and providing the initial response immediately if possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with disabilities, people with language barriers, etc), and the nature of the complaint.

**STEP 3**: Acknowledgement of grievance within 5 days.

**STEP 4:** Investigating the grievance and due diligence – investigation involves gathering information about the grievance to determine its eligibility and to generate a clear picture of the circumstances surrounding the issue under consideration. This process normally includes site visits, document reviews, a meeting with the GM user (if known and willing to engage), and meetings with individuals and/or entities who can assist with resolving the issue. Reasonable efforts will be taken to address the complaint. If the grievance is vague and not clear enough, the GM is obliged to help and provide counsel and even help in redrafting the submission, for the grievance to become clear, for purposes of an informed decision by the GM, in the best interests of persons affected by the project. If the GM is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The decision shall give a clear assessment on the grievance/complaint, clear ruling and recommendations for fair remedy and propose measures to modify future conduct that caused the grievance as well as proposed measures to compensate if mitigation measures cannot remedy the harm or injury. The decision shall be in writing and shall be delivered to the person who filed the grievance as well as to any other person or entity to which the recommendation and measures shall apply or is under obligation by law. The person who filed the grievance can express his/her personal satisfaction to the outcome of the grievance resolution procedure. Unilateral decision shall be an exception, and resolution shall be sought through a dialogue between the GM and the grievant.

**STEP 5**: Communication of the decision within 30 days.

**STEP 6**: Complainant Response: either grievance closure or taking further steps if the grievance remains open. Before any closure of complaints/grievances, the GM shall:

* Confirm that the required GM actions have been enforced, that the grievance resolution process has been followed and that a fair decision has been made;
* Organize meeting(s) within 10 days of being contacted by the concerned parties to discuss how to resolve the issue, if not previously conducted;
* Recommend the final decision on the mitigation measure to the complainant/aggrieved party;
* Implement the agreed mitigation measure;
* Update the Grievance Report Form and have it signed by the complainant/aggrieved party;
* Sign the Grievance Report Form and log the updated information of the grievance into the Grievance Registry; and
* Send copies of relevant documents (e.g. completed Grievance Report Form, mitigation measure, minutes of the meetings, if appropriate) to the concerned parties.

The SPSEPs shall have details on each grievance admission points, grievance administration processes, timelines, investigation activities and closure conditions including the 2nd tier resolution instance.

Until such details are disclosed, stakeholders are encouraged to send all grievances, concerns and queries to the contact points below:

Table 3: GRM contact details

|  |  |
| --- | --- |
| **Description** | **Contact details** |
| Implementing agency: | Project Management Unit housed under the Ministry of Education |
| Main contact: | During the transitional period until the E&S Consultant is appointed the Head of PMU shall be the main contact person |
| Address: | TBD |
| E-mail: | TBD |
| Website: | www.prosveta.gov.rs |
| Telephone: | TBD |

Further details on local access details LGAD are to be known and disseminated at later stages and shall be part of the awareness raising campaign of the SPSEPs.

## Monitoring and reporting on grievances

The PMU will be responsible for:

* Collecting data from LGAD, serving as local admission points on the number, substance and status of complaints and uploading them into the single regional database;
* Maintaining the grievance logs on the complaints received at the regional and local level;
* Monitoring outstanding issues and proposing measures to resolve them;
* Disclosing quarterly reports on GMs;
* Summarizing and analyzing the qualitative data received from the local grievance admission points on the number, substance and status of complaints and uploading them into the single project database;
* Monitoring outstanding issues and proposing measures to resolve them.

The regular social monitoring reports to the WB shall be submitted through the PMU, which shall include a section related to GM, which provides updated information on the following:

* Status of GM implementation (procedures, training, public awareness campaigns, budgeting etc.);
* Qualitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances;
* Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
* Level of satisfaction by the measures (response) taken;
* Any corrective measures taken.

# WORLD BANK GRIEVANCE REDRESS SERVICE

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

# MONITORING AND REPORTING

Monitoring reports documenting the environmental and social performance of the project will be prepared by the PMU and submitted to the World Bank quarterly as part of the overall progress reporting requirements as set forth in the Loan Agreement (to be signed). These reports will include a section regarding stakeholder engagement and grievance management.

Table 8 proposes a comprehensive set of indicators related to stakeholder engagement performance at this stage. The achievement of indicators shall rely on information from the SEP and the Grievance Log.

Table 4: Monitoring indicators

| Indicator | How will it be monitored | Responsibility  | Frequency |
| --- | --- | --- | --- |
| Engagement with affected parties and vulnerable groups  |
| Number and location of formal meetings  | Minutes of Meetings | PMU’s Social Specialist | Quarterly |
| Number and location of informal/ spontaneous meetings | Minutes of Meetings | PMU’s Social Specialist | Quarterly |
| Number and location of community awareness raising or training meetings  | Minutes of Meetings | PMU’s Social Specialist | Quarterly |
| Number of men and women that attended each of the meetings above  | List of Attendees | PMU’s Social Specialist | Quarterly |
| For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the project environmental and social management system | Minutes of Meetings | PMU’s Social Specialist | Quarterly |
| Engagement with other stakeholders |
| Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs) | Minutes of Meetings | PMU’s Social Specialist | Quarterly |
| Grievance Resolution Mechanism |
| Number of grievances received, in total and at the local level, on the website, disaggregated by complainant’s gender and means of receipt (telephone, email, discussion) | Grievance Log | PMU’s Social Specialist, Grievance Focal Point | Quarterly |
| Number of grievances received from affected people, external stakeholders | Grievance Log | PMU’s Social Specialist, Grievance Focal Point | Quarterly |
| Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant | Grievance Log | PMU’s Social Specialist, Grievance Focal Point | Quarterly |
| Average time of complaint’s resolution process, disaggregated by gender of complainants and categories of complaints | Grievance Log | PMU’s Social Specialist, Grievance Focal Point | Quarterly |
| Number of LGD meetings, and outputs of these meetings  | Minutes of meetings signed by the attendees | PMU’s Social Specialist, Grievance Focal Point | Quarterly |
| Trends in time and comparison of number, categories, and location of complaints with previous reporting periods | Grievance Log | PMU’s Social Specialist, Grievance Focal Point | Quarterly |

**Note:** Minutes of formal meetings and summary note of informal meetings will be attached to the quarterly report. They will summarize the view of attendees and distinguish between comments raised by men and women.

## Reporting back to stakeholder groups – closing the feedback loop

The SPSEPs, after having been developed, will be periodically 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 also constitute a change calling for an reflection in the SPSEPs.

Periodic 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 responsible staff and referred to the senior management of the project. The 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 year may be conveyed to the stakeholders in two possible ways:

* Publication of a standalone annual report on project’s interaction with the stakeholders.
* Adopt software solutions to scale up the two-way interaction and feedback, by using survey platforms, preferable using one dashboard to make it easy to measure and understand the feedback (any platform in use and central governmental MoE level, or alternatively/in addition (as required) SurveyMonkey or alternative online platform can be applied), in order to meet citizens’ expectations for change created by their engagement, use their input to facilitate improved development outcomes;

**Monitoring of stakeholder/ citizen feedback indicator on a regular basis:** The indicators may include: number of consultations, including by using telecommunications carried out within a reporting period (e.g. monthly, quarterly, or annually); number of 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, regional, and national media.

Refinement of the stakeholder feedback methods will be outlined in the SPSEPs.

The Citizen Engagement indicator is defined as “The number of implemented school improvement plans that incorporate suggestions from participatory planning.” This indicator may optionally be complemented by another, such as “The percentage of project schools that disseminate results of school user surveys to their communities”. These indicators aim to measure the extent to which stakeholder feedback is integrated into school development processes and to ensure transparency and accountability by actively sharing results with the community. After establishing the baseline, these indicators will be regularly monitored, and progress will be reported to the World Bank (WB). This ongoing monitoring ensures that the project remains aligned with stakeholder needs and maintains an effective feedback loop throughout its implementation.

**Closing the Feedback Loop:** The project will ensure that feedback from students, parents, and teachers is not only collected but also actively considered in the implementation process. To close the feedback loop, the PMU will communicate how stakeholder input has influenced ongoing decisions. For example, the PMU will share updates and discuss project activities during roundtable meetings, emphasizing how feedback on extracurricular activities and school improvement plans has been integrated into their design and content. This approach ensures transparency, demonstrates the value of stakeholder contributions, and reinforces the commitment to incorporating their insights into the project's development.

# ANNEXES

## Annex 1. Outline of the SEP Report

A detailed list of stakeholders engaged, including their roles and relevance to the project.

Categorization of stakeholders (e.g., government agencies, vulnerable groups, NGOs, local communities).

1. **Engagement Activities**
	* Summary of all engagement activities conducted (e.g., meetings, workshops, public consultations).
	* Locations, dates, and formats of these activities.
2. **Key Issues and Feedback Received**
	* Overview of the main topics raised by stakeholders.
	* Summary of feedback, concerns, and suggestions.
	* Identification of recurring themes or significant stakeholder concerns.
3. **Response and Follow-Up Actions**
	* Explanation of how stakeholder feedback was addressed.
	* Actions taken or planned to incorporate stakeholder input.
	* Updates provided to stakeholders, including how the feedback loop was closed.
4. **Engagement with Vulnerable Groups**
	* Specific measures taken to engage vulnerable groups.
	* Summary of concerns and feedback from these groups and how they were addressed.
5. **Grievance Redress Mechanism (GRM)**
	* Description of how the GRM was implemented during engagement activities.
	* Summary of grievances received, categorized by type, and the resolutions provided.
6. **Challenges and Lessons Learned**
	* Any difficulties faced during stakeholder engagement.
	* Lessons learned to improve future engagement processes.
7. **Annexes**
	* List of attendees or participants in engagement activities.
	* Copies of materials shared during engagements (e.g. presentations, brochures).
	* Photos or other documentation from engagement activities.

This structure ensures the report is comprehensive, transparent, and demonstrates accountability in addressing stakeholder concerns.

## Annex 2. Example Grievance Form

|  |
| --- |
| **Grievance Form** |
| Grievance reference number (to be completed by GRM Focal Point): |
| Contact details(may be submittedanonymously) | Name (s): |
| Address: |
| Telephone: |
| Email: |
| How would you prefer to be contacted (check one) | By mail/post:☐ | By phone:☐ | By email:☐ |
| Preferred language | ☐ Serbian | ☐ English | ☐ other\_\_\_\_\_\_\_\_\_\_\_ |
| Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible. |
| What is your suggested resolution for the grievance, if you have one? Is there something you would like Employment services Center or another party/person to do to solve the problem? |
| How have you submitted this form to the project? | website☐ | email☐ | by hand☐ |
| in person☐ | by telephone☐ | other (specify)☐ |
| Who filled out this form (If not the person named above)? | Name and contact details: |
| Signature |  |
| Name of Focal Point person assigned responsibility |  |
| Resolved or referred to GRC1? | ☐ Resolved | ☐ Referred | If referred, date: |
| Resolved or referred to GRC2? | ☐ Resolved | ☐ Referred | If referred, date: |
| **Completion** |
| Final resolution (briefly describe) |  |
|  | Short description | Accepted? (Y/N) | Acknowledgement signature |
| 1st proposed solution |  |  |  |
| 2nd proposed solution |  |  |  |
| 3rd proposed solution |  |  |  |

1. Source (pp 53-64): http://documents1.worldbank.org/curated/en/383011492423734099/pdf/The-World-Bank-Environmental-and-Social-Framework.pdf [↑](#footnote-ref-1)
2. The ESF is accessible at <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>. Last access on July 21, 2020 [↑](#footnote-ref-2)