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Help or Harm in Times of Emergency?

The World Bank's Commitments to Stakeholder Engagement During COVID-19

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Executive Summary

The World Bank's support for COVID-19 emergency response projects has impacted millions of people in low-income countries who are experiencing the health and economic shocks of the COVID-19 pandemic. While these projects aim to deploy important health benefits and infrastructure, they risk harming marginalized groups who are more susceptible to COVID-19 and less likely to access project benefits.¹ Early and thorough stakeholder engagement with marginalized groups and other stakeholders, however, can help to identify potential risks of project implementation and allow stakeholders to provide input on plans to mitigate them.

BIC examined project documents from a sample of 11 of the 80 COVID-19 emergency response projects approved as of December 15, 2020, primarily focusing on the components of the Stakeholder Engagement Plan (SEP) and other stakeholder engagement requirements of the Bank and Borrowers' in the World Bank's Environmental and Social Framework (ESF). While the 11 sets of project documents we analyzed are not representative of documents the Bank has prepared beyond COVID-19 emergency response projects and are only a small sample of all of the COVID-19 emergency response projects, this analysis offers insight into requirements that the Bank and Borrowers may be at risk of failing to meet, and recommendations for how these actors can avoid such failure, both in emergency project situations and beyond. The main findings and recommendations include:

- The sample SEPs provided inconsistent definitions of "vulnerability" and "disadvantaged or vulnerable individuals or groups" and none reference all of the groups that meet the criteria of the Bank's definition of "vulnerable" per the ESF. Projects should include a clear and consistent definition of "vulnerability" in project documents that at a minimum matches and refers to the definition in the ESF.
- The majority of SEPs in the sample have not been disclosed in the official language of the projects' countries, and do not list specific accessibility needs for other information disclosure. Borrowers should do so, and the Bank should also disclose this information on its website.

- While about half of the SEPs indicate that there are plans to perform separate consultations with Indigenous Peoples, fewer than half list special accommodations that will be made for Indigenous People or other marginalized groups during consultations.
- None of the SEPs indicate that marginalized groups will be consulted about the design and implementation of the projects' Grievance Redress Mechanisms (GRMs) and only two state that they will include women on the committees that handle grievances. Fewer than half indicate that the GRMs will take "into account the needs" of Indigenous Peoples. Borrowers should seek input on the GRM design from marginalized communities before project implementation and prioritize representation in GRM function.
- While a majority of the sample project SEPs indicate that the project GRMs will be equipped to handle complaints related to gender-based violence (GBV), they do not consistently indicate that they will be equipped to handle complaints related to sexual exploitation and abuse and sexual harassment (SEA/SH), and project documents address these risks with inconsistent terminologies. GRMs should be equipped to handle GBV, and specifically SEA/SH, complaints. GRMs, especially those that are intended to handle SEA/SH grievances, should be set up in a child-friendly manner.
- Fewer than half of the SEPs in the sample provide a specific budget allocation for implementing stakeholder engagement activities.
- Despite the fact that every project committed to updating their SEPs within at least two months of taking effect, only two of the 11 projects in the sample disclosed a revised SEP in that timeframe. When it is not possible to develop a detailed plan for stakeholder engagement in advance of project approval, Borrowers should always commit to revising the project SEPs within a specific time frame after project approval. The commitment should be made explicitly and consistently across project documents.

1. Introduction

A. BACKGROUND AND MOTIVATION

In March 2020, the World Bank approved the creation of a COVID-19 Fast Track Facility that would quickly get money to low income countries around the

¹ Burton, "How Well Is the World Bank Implementing Its Environmental and Social Framework in COVID-19 Health Response Projects?"

world to fight the pandemic and respond to the “health, economic, and social shocks that countries are facing.”² Projects were designed to provide funds to countries to, among other things, improve the availability of medical supplies; strengthen disease surveillance systems; and implement public education and behavior change interventions to promote behaviors like hand-washing and social distancing. Emergency response projects were approved in twenty-five countries in a matter of weeks. As of December 2020, 80 have been approved by the Bank’s Board of Executive Directors to receive funding, yet some have still not moved into implementation.

These 80 emergency response projects are part of the \$104 billion commitment by the World Bank, which is one of the top funders for COVID-19 emergency response in low-income countries. How this funding is used during the pandemic has a huge, potentially life or death, impact on the millions of people that live in these countries. Typically, World Bank management and the Board of Directors have considered health projects to have a low risk of creating harm to affected parties and therefore require less rigorous up front assessment and scrutiny compared to higher risk projects, such as infrastructure where physical works are constructed. Yet, BIC’s work monitoring COVID-19 emergency response projects and other health projects shows that they risk harming marginalized groups who are more susceptible to COVID-19 and less likely to access project benefits.³ When marginalized groups and other stakeholders are included in project design and continue to be involved and engaged throughout the project life cycle, they can help to identify these risks and give input on plans to mitigate them.

In fact, the World Bank’s Environmental and Social Framework (ESF) requires that recipients of Bank financing for development projects (“Borrowers”) identify and mitigate any barriers to “disadvantaged or vulnerable groups” accessing these project benefits through stakeholder engagement. The Bank is required to support Borrowers in drafting and disclosing information about how they will conduct stakeholder engagement for Bank-funded projects in Stakeholder Engagement Plans (SEPs), which are the main vehicles for planning and documenting how Borrowers will engage stakeholders under the ESF.⁴ Bank guidance indicates the importance

of conducting stakeholder engagement as early as possible in the development of a project to make sure stakeholders receive credible information about it and can offer their views on project design.⁵ Borrowers are required to disclose information about the risks and impacts of projects in accessible formats and languages, and conduct consultations with stakeholders from preparation through the end of project implementation.⁶ [Annex 1](#) provides a full set of requirements of the Bank and Borrowers throughout different sections of the ESF that pertain to stakeholder engagement.

In the first wave of COVID-19 health response projects, however, BIC was told in conversations with Bank staff that due to the urgency of approving the emergency projects, Bank staff drafted the majority of initial SEPs. They also said that consultations, especially with marginalized groups, were impossible to conduct before project approval due to COVID-19 restrictions in most countries and because of the rapid response nature of project creation and approval.

Still, Borrowers were required to show in their SEPs how they plan to conduct meaningful stakeholder engagement throughout the project life cycles. To assess how the Bank and Borrowers planned to fulfill this commitment, BIC undertook an analysis of a sample of COVID-19 emergency response project SEPs to understand how governments planned to engage with stakeholders, particularly the most marginalized.

B. METHODOLOGY

BIC undertook an analysis of a sample of COVID-19 emergency response project SEPs to see how governments plan aligned with ESF policy requirements for stakeholder engagement detailed in [Annex 1](#).

BIC created a questionnaire to assess COVID-19 emergency response project SEPs based on the general components of the documents and ESF requirements. The full questionnaire used to assess each SEP is provided in [Annex 2](#). This review included the use of key-word searches to identify all of the relevant information across different sections of

must support countries in developing stand-alone Stakeholder Engagement Plan (SEP) documents, but depending on the risks associated with the project, the elements of the SEP can be included as part of the Environmental and Social Commitment Plan (ESCP) instead. See “Environmental and Social Framework,” 98, footnote 3. See also “Environmental and Social Framework,” 99, par. 14-17.

⁵ See 3g under [ESS10 in Annex 1](#); “Guidance Note: ESS10,” 1, par. 2.

⁶ See 3ci and 3dii under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 99, par. 19 and par. 22(a).

² “World Bank COVID-19 Response”; “How the World Bank Group Is Helping Countries with COVID-19.”

³ Burton, “How Well Is the World Bank Implementing Its Environmental and Social Framework in COVID-19 Health Response Projects?”

⁴ For projects with large-scale potential risks and impacts, the Bank

the document. In some cases, language found in a SEP that was identical to language found in every SEP in the sample per a template that was prepared for COVID-19 emergency response projects; in some cases, noted below, this template language was determined not to fulfill the criteria sought in questions from the questionnaire.

BIC also used key-word searches of the Environmental and Social Risk Summary (ESRS) and Environmental and Social Commitment Plan (ESCP) documents of the sample projects to identify content related projects': social risk ratings; gender-based violence (GBV) related risks and risks related to sexual exploitation and abuse and sexual harassment (SEA/SH); and commitments to update SEPs. The ESCP was also used to determine whether the ESF policy related to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities was applied to each project in the sample.

In total, our analysis included documents from projects in the following 11 countries (see [Annex 3](#) for more information about these projects and citations for the documents that BIC assessed):

- Burkina Faso
- Liberia
- The Gambia
- Uganda
- Bangladesh
- Nepal
- Sri Lanka

- Cambodia
- Philippines
- El Salvador
- Guatemala

The Analysis section below details our main findings from the assessment of these project documents, organized according to five focus areas that roughly correspond to the major components of SEPs:

- A. Stakeholder Identification and Marginalized Groups
- B. Information Disclosure and Accessibility
- C. Consultations and Feedback mechanisms
- D. Grievance Redress Mechanism (GRM)
- E. SEP implementation

[Annex 4](#) provides a more complete overview of the data collected based on the questionnaire in [Annex 1](#).

An updated SEP for the Liberia project was also assessed, but only the original SEPs disclosed for each country's project were included in the analysis below. See [Annex 5](#) for a deeper analysis and comparison of the original and updated SEPs for the Liberia COVID-19 Emergency Response Project.

Considering that the analysis includes documents for a sample of only 11 projects, the findings in this report cannot be generalized to all of the COVID-19



emergency response projects. Still, in conjunction with an analysis of the ESF, even the findings from these 11 projects and their documents show that the Bank and these 11 Borrowers did not and have not fulfilled their commitments to laying the groundwork for effective stakeholder engagement, leaving marginalized groups at greater risk of exclusion.

2. Analysis

A. STAKEHOLDER IDENTIFICATION AND MARGINALIZED GROUPS

1. Execution of stakeholder identification

Relevant ESF requirements for stakeholder identification

The Bank is required, according to the ESP, to use all relevant information about projects and their potential risks and impacts to classify them into one of four risk classifications: High, Substantial, Moderate, or Low.⁷ It is also required by the Directive to review Borrowers' SEPs "to verify that the SEP identifies the disadvantaged or vulnerable individuals or groups" of the project.⁸ The Bank can require Borrowers to use independent specialists to assist with identifying these "disadvantaged or vulnerable individuals or groups" and assessing the risks and impacts on them.⁹

Borrowers are required to carry out environmental and social assessments and to include stakeholder engagement as an integral part of them.¹⁰ For High or Substantial risk projects, Borrowers must use independent specialists to conduct the assessments.¹¹ They may be required to have independent third party specialists assist with identifying stakeholders "depending on the potential significance of environmental and social risks and impacts."¹²

Stakeholder identification in the examined SEPs

Of the 11 SEPs analyzed for this report, all but one received a "substantial" social risk rating in their Environmental and Social Review Summary (ESRS) documents (See Table 1: The Gambia's received a

"moderate" rating). Yet none of the SEPs indicate that an independent third party specialist was used to identify stakeholders, nor indicate that the Bank verified that Borrowers identified the "disadvantaged or vulnerable individuals or groups." Though it is not required, the SEPs do not provide explanations for why groups were listed as "affected parties," "other interested parties," or "disadvantaged or vulnerable groups," which makes it difficult to ascertain whether the Bank verified that all "disadvantaged or vulnerable groups" were listed in the SEP. Differences between the "disadvantaged or vulnerable groups" listed in the original and revised Liberia SEPs raises the question of whether any verification was done, and why some groups were not included in the original, and why others were removed from the original.¹³

BIC was told in conversations with Bank staff that the Bank itself drafted the majority of SEPs, and all but one (Sri Lanka) of the 11 SEP examined in fact appear to have been written by Bank staff. Still, it appears that these SEPs could have benefitted from having an independent specialist conduct social assessments and stakeholder identification — specifically identification of individuals or groups defined as "disadvantaged or vulnerable" according to the Directive — in projects with substantial social risks, or to verify all "disadvantaged or vulnerable individuals or groups" are listed.

2. Definitions of the terms "vulnerability" and "disadvantaged or vulnerable groups"

Relevant ESF requirements for defining "vulnerability" and "disadvantaged or vulnerable groups"

As described in the ESP, the Bank is required to follow the directions established by the "Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups."¹⁴ These directions pertain to "the identification of, and mitigation of risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable."¹⁵ The definition of "disadvantaged or vulnerable" in the Directive provides a list of characteristics that can lead groups or individuals to be negatively impacted by Bank-financed projects or limit their access to project benefits.¹⁶

13 Chisaka, "SEP - Liberia COVID-19 Project"; Srivastava, "Revised SEP - Liberia COVID-19 Project."

14 "Environmental and Social Framework," x, par. 7.

15 See [The Directive in Annex 1](#); "The Directive," 1.

16 Ibid. The characteristics included in the definition of "disadvantaged or vulnerable" in the Directive are: age; gender; ethnicity; religion; physical, mental or other disability; social, civic or health status; sexual

7 See 1a under [ESP in Annex 1](#); "Environmental and Social Framework," 6, par. 23

8 See 2b under [The Directive in Annex 1](#); "The Directive," 3.

9 See 2c under [The Directive in Annex 1](#); "The Directive," 3.

10 See 4ai under [ESS1 in Annex 1](#); "Environmental and Social Framework," 18, par. 24.

11 See 4aii under [ESS1 in Annex 1](#); "Environmental and Social Framework," 19, par. 25

12 See 3aii under [ESS10 in Annex 1](#); "Environmental and Social Framework," 98, par. 10.

Bank staff must review projects' environmental and social assessments to verify that they identify groups and individuals "affected by the project that may be disadvantaged or vulnerable."¹⁷ They must also verify that SEPs have identified "disadvantaged or vulnerable individuals or groups" among project stakeholders.¹⁸

Definitions of "vulnerability" and "disadvantaged or vulnerable groups" in the examined SEPs

Ten of the 11 SEPs analyzed provide definitions of "vulnerability" or "vulnerable status" that alludes to the characteristics listed in the definition of "vulnerable" from the Directive (The Gambia does not provide a definition: it simply includes a header for "vulnerable groups" and a list of stakeholders that fall into that category). None of them, however, include all of the characteristics that the Directive says can lead to vulnerability.

Furthermore, none of the analyzed SEPs has a list of "disadvantaged or vulnerable groups" that matches the list found in the Directive and, as stated in A.1, do not provide explanations for why groups were included or not. Table 1 shows which of the analyzed SEPs included a reference to groups listed in the Directive under stakeholders that are considered "disadvantaged or vulnerable" for the project. Only "people with disabilities" and "the elderly" are listed in every SEP. Only five of the SEPs list children or children-headed households. Three SEPs use a term to describe sexual orientation or gender identity as a reason a group is vulnerable: the Nepal SEP lists LGBTI people; Uganda's lists "sexual minorities;" and Cambodia's lists the term "SOGI" (sexual orientation and gender identity). Though groups that "depend on unique natural resources" may experience certain vulnerabilities or barriers to project benefits, none of the SEPs mention them.

Bank staff are bound by the definition and requirements listed Directive. The exact nature and context of the project might make some groups more vulnerable to harm than others, but it is important that each project reference the same definition of "vulnerable" that comes from the Directive so that it is clear all potentially marginalized groups have been assessed.

orientation; gender identity; economic disadvantages; indigenous status; dependence on unique natural resources.

17 See 2a under [The Directive in Annex 1](#); "The Directive," 2. See also "Guidance Note: ESS10," 4, GN10.1(a).

18 See 2b under [The Directive in Annex 1](#); "The Directive," 3.

B. INFORMATION DISCLOSURE AND ACCESSIBILITY

1. Languages and formats for project information disclosure

Relevant ESF requirements for SEP and project information disclosure

The Bank must, according to the ESP, require Borrowers "to provide sufficient information about the potential risks and impacts of the project" for consultations with stakeholders.¹⁹ The information must be in accessible forms and understandable languages so that stakeholders can "provide meaningful input into project design and mitigation measures".²⁰

Borrowers must disclose project information in "relevant local languages" and in formats that are culturally appropriate and accessible, such that they take into account specific needs "of groups that may be differentially or disproportionately affected by the project for reasons stemming from disability, literacy, gender, mobility, and differences in language."²¹ While Borrowers are not required to develop a stand-alone Stakeholder Engagement Plan (SEP) for every project, they are required to develop and implement the elements of an SEP for every project and include them in the Environmental and Social Commitment Plan if a stand-alone is not necessary.²² Still, they must engage with stakeholders and provide them with appropriate information throughout the project life cycle.²³ According to guidance on ESS10, drafts of the SEPs should be "made available to stakeholders in accessible formats and through channels that are appropriate for them."²⁴

Language and accessible formats for information disclosure in the examined SEPs

Despite these language requirements and guidance, seven of the 11 SEPs have not been disclosed on the World Bank's website in relevant local languages. As shown in Table 2, the Guatemala and El Salvador projects are the only ones that disclosed SEPs in non-English official languages of their countries.²⁵

19 See 1c under [ESP in Annex 1](#); "Environmental and Social Framework," 9, par. 50.

20 Ibid.

21 See 3ciii under [ESS10 in Annex 1](#); "Environmental and Social Framework," 99, par. 20.

22 See 3bii under [ESS10 in Annex 1](#); "Environmental and Social Framework," 99, par. 13.

23 See 3civ under [ESS10 in Annex 1](#); "Environmental and Social Framework," 100, par. 23. See also 2a under [ESS1 in Annex 1](#); "Environmental and Social Framework," 22, par. 51.

24 See 3n under [ESS10 in Annex 1](#); "Guidance Note: ESS10," 5, GN13.3.

25 A Spanish-language SEP for the Guatemala project was disclosed on the Bank's website on October 22, 2020, six months after the English-language SEP was disclosed. See "Disclosure Date" on the document landing

Table 1: Groups listed as “Disadvantaged or Vulnerable” for each Examined SEP’s Project*

Country SEP	Risk classification	Persons with disabilities	LGBTQI individuals	Elderly	Children	Women	Ethnic minorities	Religious minorities	People with disadvantaged social status	People with disadvantaged health status ³	Indigenous Peoples ⁵	Those living in remote or rural areas	Migrants ⁶	Refugees ⁷	Those who are economically disadvantaged ⁹	Those who depend on natural resources
Burkina Faso	Substantial	Yes	No	Yes	Yes ¹	Yes ²	No	No	No	Yes	No	Yes	No	Yes	No	No
Liberia	Substantial	Yes	No	Yes	No	Yes ²	Yes	Yes	No	Yes	No	Yes	No	Yes ⁸	No	No
The Gambia	Moderate	Yes	No	Yes	No	Yes ²	No	No	No	Yes	Yes	No	No	No	No	No
Uganda	Substantial	Yes	Yes	Yes	Yes ¹	Yes ²	Yes	Yes	No	No	Yes	Yes	No	Yes	No	No
Bangladesh	Substantial	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	No
Nepal	Substantial	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
Sri Lanka	Substantial	Yes	No	Yes	Yes	Yes	No	No	No	Yes	No	Yes	No	No	Yes	No
Cambodia	Substantial	Yes	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes	No	No	Yes	No
Philippines	Substantial	Yes	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	No	Yes	No
El Salvador	Substantial	Yes	No	Yes	No	Yes	Yes ³	No	No	No	Yes	No	No	No	Yes	No
Guatemala	Substantial	Yes	No	Yes	No	Yes	Yes ⁴	No	Yes	No	Yes	No	Yes	No	Yes	No
Total Yes		11	3	11	5	10	7	4	2	7	6	7	1	3	7	0
Total No		0	8	0	6	1	4	7	9	4	5	4	10	8	4	11

*As explained in [Annex 4](#), groups are referenced as being those that might be vulnerable in various definitions of vulnerability that are included in each SEP. A group has only been counted in this table if a SEP included it in a list of groups that are potentially vulnerable “within [a] project” and/or within a list that “may include but not limited to” a set of groups.

¹Does not list “children” but list “child-headed households”

²Does not list “women” but lists “female-headed households”

³Specifically lists “Indigenous Peoples”

⁴Specifically lists “Afro-descendent populations”

⁵“Yes” in this column indicates that the SEP either listed the term “Indigenous Peoples” or listed the specific names of Indigenous Peoples. For projects where the Environmental and Social Commitment Plan indicated that ESS7 applies but the SEP did not mention the term “Indigenous Peoples” or specific Indigenous groups, a “No” has been placed in this column.

⁶“Migrant status” is not listed as a factor that can make a person or group vulnerable per the Directive, but “civic status” is

⁷“Refugee status” is not listed as a factor that can make a person or group vulnerable per the Directive, but “civic status” is

⁸Lists “internally displaced people” rather than “refugees”

⁹Includes SEPs that list people who are unemployed

See “Definitions of ‘vulnerability’ in the examined SEPs” and “Groups identified as ‘disadvantaged and vulnerable’” in [Annex 4](#) for complete definitions of “vulnerability” used in the SEPs and a full list of which SEPs included each marginalized group.

All other projects disclosed their SEPs only in English, but of the countries with projects in this sample, English is only an official language in Liberia and Uganda. The Guatemala SEP is the only one that has been disclosed in English and Spanish, the country's official language — it was originally disclosed only in English in April 2020, and a Spanish version was made accessible in November 2020. In Burkina Faso, where the official language is French, all project documents, including the SEP, were disclosed only in English.

While it is outside the scope of this project to assess whether ESS7 should apply to projects, seven projects — including in Guatemala and El Salvador — recognize ESS7 as a relevant policy for the projects, and per their ESCPs recognize that there may be Indigenous Peoples among project stakeholders.²⁶ No SEPs have been disclosed on the Bank's website in Indigenous or local languages. As shown in Table 2, only the Guatemala and Sri Lanka SEPs mention a need for providing specific types of messages and materials in local languages, and the Sri Lanka project is not one of the seven projects for which ESS7 is being applied. The Guatemala SEP indicates that core messages from the World Health Organization and project implementing unit must be disseminated in Indigenous languages, and the Sri Lanka SEP says messages and materials, as well as outreach for stakeholder engagement, will be done in local languages including Sinhala and Tamil. Neither mentions that project information specifically must be disclosed in local languages.²⁷

Beyond disclosing information in relevant languages, all SEPs in this analysis except The Gambia also made a broad reference to providing information in an "appropriate format" and/or that the implementing agencies should provide information that is "understandable and accessible." Table 2 shows

page: The World Bank. "Stakeholder Engagement Plan (SEP) Guatemala COVID-19 Response (P173854) (Spanish)," n.d. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/619451603370586655/stakeholder-engagement-plan-sep-guatemala-covid-19-response-p173854>.

²⁶ Five projects' SEPs list "Indigenous Peoples" as stakeholders under "affected parties" or "disadvantaged or vulnerable" groups, and the Uganda SEP lists specific groups (Iks and Batwas) that are considered Indigenous as stakeholders. While the Bangladesh project ESCP indicates that ESS7 applies to the project and mentions that Indigenous Peoples might be affected by the project, the SEP only mentions "ethnic minorities" as a possible "disadvantaged or vulnerable" group. It is outside the scope of this report to assess whether relevant stakeholders are more appropriately labeled "Indigenous" or "ethnic minorities." The full list of project countries in BIC's sample for which ESS7 is relevant is based on their ESCPs: Bangladesh, Nepal, Cambodia, Philippines, Uganda, El Salvador and Guatemala. The ESRs of Bangladesh and Uganda contradict their ESCPs and indicate that ESS7 is not relevant.

²⁷ Cavagnero, "SEP - Guatemala COVID-19 Project," 8; Kak, "SEP - Sri Lanka COVID-19 Project," 11.

that only three SEPs in this analysis list specific "appropriate formats" that should be used: Sri Lanka, El Salvador, and Guatemala. The SEP for the project in Sri Lanka provides proposed strategies specifically for disclosing information to "vulnerable groups", including braille, large prints, text captioning, signed videos, online materials, and multiple forms of communication for persons with disabilities.²⁸ The El Salvador SEP says information should be provided using simple language, illustrations, and translations to make documents easy to understand.²⁹ The Guatemala SEP indicates that sign language, subtitles, and interpreters should be used to make sure patients and their families understand key messages about COVID-19 and the project.³⁰

Thus for all of the projects — except Liberia's, where the official language is English and for which ESS7 was not determined to be applicable — according to what we can see from the available disclosed documents on the Bank's website, the Bank and Borrowers have not met the requirements to provide stakeholders with access to project information from the SEP in languages that are relevant and culturally appropriate to them, and do not detail plans to do so for future project information. While almost all of the SEPs recognize the importance of Borrowers making information available in different formats so that they are understood by everyone, especially marginalized groups, all but three SEPs have not provided detail nor shown how this requirement will be met.

Groups that don't have access to information in their local languages may already be marginalized and potentially adversely affected by the projects, and when information is disclosed in languages that are not culturally appropriate for them, they may feel uncomfortable engaging with the project and subsequently may be unable to benefit from it. Per the Directive cited in section A.2, for instance, Indigenous Peoples may have difficulty accessing project benefits, which Borrowers must make accessible to them in an "equitable manner" according to ESS7. Accessing project benefits becomes even more difficult if project information is not offered in formats they understand or in ways that are culturally appropriate and make them feel comfortable engaging with project staff.

²⁸ Kak, "SEP - Sri Lanka COVID-19 Project," 13.

²⁹ Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 5.

³⁰ Cavagnero, "SEP - Guatemala COVID-19 Project," 7-9.

Table 2: Project Information Disclosure Language and Accessibility

Country SEP	Is ESS7 being applied, according to the ESCP?	Has a SEP been disclosed in the country's official language?	Does SEP indicate the need for messaging to occur in indigenous or local languages?*	Does SEP list specific accessibility needs for information disclosure? (e.g. sign language, Braille, large prints)
Burkina Faso	No	No	No	No
Liberia	No	Yes	No	No
The Gambia	No	No	No	No
Uganda	Yes	Yes	No	No
Bangladesh	Yes	No	No	No
Nepal	Yes	No	No	No
Sri Lanka	No	No	Yes	Yes
Cambodia	Yes	No	No	No
Philippines	Yes	No	No	No
El Salvador	Yes	Yes	No	Yes
Guatemala	Yes	Yes	Yes	Yes
Total Yes	7	4	2	3
Total No	4	7	9	8

*Most SEPs in the sample include a quote from World Health Organization guidelines that serves as the basis for Projects' stakeholder engagement. The quote asserts that "consistent messaging in local languages...is essential..." If this was the only reference to using "local languages," and the SEP does not provide additional information about using local languages in information disclosure or consultations, the SEP received a "No" in this column.

See "Additional language and formats for project information disclosure" in [Annex 4](#) for more information.

C. CONSULTATIONS AND FEEDBACK MECHANISMS

1. Special accommodations for meaningful consultations

Relevant ESF requirements for special accommodations for meaningful consultations

The Bank requires Borrowers to engage stakeholders through consultation and monitors consultations that Borrowers conduct.³¹

According to the ESF, Borrowers are required to develop the elements of a Stakeholder Engagement Plan which must "describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured."³² It must also include, when relevant, "differentiated measures to allow the effective

participation of those identified as disadvantaged or vulnerable."³³ As part of stakeholder engagement, Borrowers must "undertake a process of meaningful consultation" in a "culturally appropriate format, in relevant local language(s) and is understandable to stakeholders."³⁴ Meaningful consultation must also support "active and inclusive engagement with project-affected parties."³⁵ When relevant, Borrowers will, according to ESS7, conduct an engagement process with affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and meaningful consultations will involve their "representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members."³⁶ They must also

33 Ibid. See also 4aiv under [ESS1 in Annex 1](#) "Environmental and Social Framework," 20, par. 29.

34 See 3diii under [ESS10 in Annex 1](#); "Environmental and Social Framework," 100, par. 22(d).

35 Ibid

36 See 5d under [ESS7 in Annex 1](#); "Environmental and Social Framework," 79, par. 23(a).

31 See 1e under [ESP in Annex 1](#); "Environmental and Social Framework," 10, par. 53.

32 See 3biv under [ESS10 in Annex 1](#); "Environmental and Social Framework," 99, par. 16.

provide “sufficient time” for these communities to go through their decision-making processes.³⁷

Borrowers should also be aware that there are various strategies that can be used to mitigate barriers to engagements and participating in consultations “by focusing on issues of accessibility, communication, empowerment, and/or confidentiality.”³⁸ Borrowers may need to use separate consultation formats for “women, children, youth, and the elderly, or other groups” depending on the societal context.³⁹

Special accommodations for meaningful consultations in the examined SEP

As noted by the Bank’s Template SEP, there are many ways Borrowers can focus on issues of accessibility to mitigate obstacles to stakeholder engagement. Yet, the majority of SEPs did not provide any information about specific accommodations that people might need to effectively engage with the projects and participate in consultations.

Table 3 shows that only three SEPs in this analysis list special accommodations to help mitigate obstacles to participating in consultations: Sri Lanka, Guatemala, and the Philippines.⁴⁰ The SEP for the project in Sri Lanka provides proposed strategies specifically for engaging and disclosing information to each of five vulnerable groups, including designing surveys and “other engagement activities so that women in unpaid care work can participate.”⁴¹ Guatemala’s SEP says that there is a “need for interpreters for Indigenous languages, and sign language as necessary, in order to ensure patients and their families understand key messages” of the project.⁴² Yet, despite the reference to the need for interpreters in the Guatemala SEP, merely including this accommodation would not be sufficient to meet the ESS7 requirements, which call for consultations to involve representative bodies from Indigenous peoples, and to provide sufficient time to allow them to undergo their own collective decision-making processes.

The SEP for the Philippines project, on the other hand, indicates specifically it will conduct consultations in a way to meet the requirements of ESS7. It does not list specific accommodations that the project will use, but it states that it will conduct “targeted consultations with indigenous peoples’

representatives and organizations” by identifying appropriate Indigenous Peoples’ organizations and use “engagement approaches that are culturally appropriate that allow for sufficient time for feedback and decision-making processes.”⁴³ Without any updates to the SEP (discussed further in E.2 below), the Borrower has only asserted it intended to meet the ESS7 requirements, but does not indicate the modalities through which it will engage in a “culturally appropriate” manner.

In not providing documentation about the culturally appropriate formats they will use for consultations, the other eight projects appear to be out of compliance with Borrowers’ requirements to provide these formats and remove barriers to stakeholders participating in projects, especially those that are “disadvantaged or vulnerable.” If they cannot fully engage in consultations and other forms of engagement, stakeholders cannot provide their input about the project and its risks and benefits. It is also much more difficult for stakeholders to take advantage of project benefits if they do not fully understand them, or if information is presented in a way that is culturally inappropriate.

See “Special accommodations for meaningful consultations” in [Annex 3](#) for more information.

2. Clear timelines and personnel for consultations and feedback

Relevant ESF requirements and guidance for timelines and personnel for consultations

According to the ESF, the Bank is required to monitor stakeholder engagement and consultations by Borrowers.⁴⁴ If it is appropriate given a project’s particular context, the Bank may also participate in “the consultation activities of the Borrower, including with disadvantaged or vulnerable individuals or groups” to undertake “its due diligence of the project.”⁴⁵

Borrowers are required to “describe the timing and methods of engagement with stakeholders throughout the life cycle of the project” in the SEP.⁴⁶ Recognizing that stakeholder engagement is most effective when initiated early in the process of project development, Borrowers must begin consultation with stakeholders early to get their initial views, as well as disclose information about the time and

37 See 5e under [ESS7 in Annex 1](#); “Environmental and Social Framework,” 79, par. 23(b).

38 See 3m under [ESS10 in Annex 1](#); “Guidance Note: ESS10,” 4, GN11.1.

39 See 3l under [ESS10 in Annex 1](#); “Guidance Note: ESS10,” 4, GN10.2.

40 The El Salvador SEP does not detail special accommodations for conducting consultations, but as noted in B.1 above, it proposes special forms of information disclosure to publicize consultations.

41 Kak, “SEP - Sri Lanka COVID-19 Project,” 13.

42 Cavagnero, “SEP - Guatemala COVID-19 Project,” 7.

43 Demombynes, “SEP - Philippines COVID-19 Project,” 6.

44 See 1d under [ESP in Annex 1](#); “Environmental and Social Framework,” 9, par. 50.

45 See 2d under [The Directive in Annex 1](#); “The Directive,” 3.

46 See 3bi under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 98-99, par. 14.

venue for proposed public consultation meetings and how stakeholders will be notified about them.⁴⁷ They are also required to designate which personnel will implement and monitor consultations and other forms of stakeholder engagement.⁴⁸ When ESS7 is relevant, Borrowers must “prepare a consultation strategy” for Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities.⁴⁹ As noted above in C.1, they must establish a process of meaningful consultation that “provide[s] sufficient time for Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities’ decision making processes.”⁵⁰

The template SEP the Bank created for Borrowers also suggests that when key factors about a project are unknown during project preparation, the SEP needs to provide specific details about ways people can get more information when it is known.⁵¹ If locations and dates of meetings are not known, the SEP should provide a “general range” of the number of consultations that will occur and the way they will be conducted.⁵²

Timelines and personnel for consultations in the examined SEPs

Despite the requirement for consultations to begin early in the project process, we recognize that the Bank and borrowing countries may not have had enough information to create specific timelines for consultations given the difficulty of reaching stakeholders and setting up initial consultations in the midst of COVID-19 restrictions. As described in further detail below in section C.3, however, implementation has begun on the majority of projects, most of which have been effective since June 2020 and have now had several months to disclose more detailed information about the time and venues of consultations.

Generally, the SEPs in this analysis do not provide any specific timelines for when consultations will take place, beyond stating who and what will be consulted on during the preparation and implementation phases of the project. As indicated in Table 3, only five of the 11 SEPs indicate that project staff were able to conduct some consultations during the preparation

47 See 3cii and 3dii under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 99, par. 19(e); 99-100, par. 22(a) and 22(c).

48 See 3fi under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 100, par. 28.

49 See 5a under [ESS7 in Annex 1](#); “Environmental and Social Framework,” 77, par. 12.

50 See 5c and 5e under [ESS7 in Annex 1](#); “Environmental and Social Framework,” 79, par. 23, 23(b);

51 See 3h under [ESS10 in Annex 1](#); “Template for ESS10,” 8.

52 See 3g under [ESS10 in Annex 1](#); “Guidance Note: ESS10,” 8.

of the SEP, but due to COVID-19 restrictions, the project staff carrying out consultations met only with very select groups of stakeholders, including some government officials and health sector experts. They did not meet with project-affected parties, such as civil society and marginalized groups (of these, only the Nepal SEP indicates any specific feedback came from these consultations during preparation).⁵³

Four of the analyzed SEPs, including Guatemala’s, provide very few details on the approaches for consultation, and do not designate the personnel who will carry out their implementation. ESS7 is being applied for five of the projects, but Table 3 shows that the SEPs for two of them, Cambodia’s and Nepal’s, do not document plans for engaging and consulting with Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities, thereby not fulfilling the commitment to have consultation strategies for these groups.

Without evidence that the Borrowers are fulfilling their commitment to disclose information about consultations and set times for them, there is also no evidence that they are providing Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities enough time to make decisions about how their participation and views on project implementation. The Bank also needs access to the time and venues of consultations to fulfill its obligation to monitor consultations and participate in consultations with regards to marginalized communities. But as of now, the SEPs do not follow the guidance to, at the very least, provide a general idea of how many consultations will take place in a given time.

D. GRIEVANCE REDRESS MECHANISM (GRM)

1. Consultations about GRMs with representatives of marginalized groups

Relevant ESF requirements and guidance for consulting stakeholders on GRMs

The Bank must require Borrowers to provide a grievance mechanism to “receive and facilitate resolution of concerns and grievances of project affected parties.”⁵⁴

Borrowers are required to set up grievance mechanisms that are “expected to address concerns...in a transparent manner that is culturally appropriate and readily accessible to all project-

53 Bhattarai, “SEP - Nepal COVID-19 Project,” 5.

54 See 1h under [ESP in Annex 1](#); “Environmental and Social Framework,” 11, par. 60.

Table 3: Plans for and Execution of Meaningful Consultations

Country SEP	Is ESS7 being applied, according to the ESCP?	Does SEP document plans for separate consultations with Indigenous Peoples?	Does SEP list that special accommodations will be used for consultations?*	Does SEP describe consultations with government officials before project effectiveness?
Burkina Faso	No	No	No	Yes
Liberia	No	No	No	No
The Gambia	No	No	No	No
Uganda	Yes	Yes	No	No
Bangladesh	Yes	Yes	No	No
Nepal	Yes	No	No	Yes
Sri Lanka	No	No	Yes	Yes
Cambodia	Yes	No	No	Yes
Philippines	Yes	Yes	Yes	No
El Salvador	Yes	Yes	No	No
Guatemala	Yes	Yes	Yes	Yes
Total Yes	7	5	3	5
Total No	4	6	8	6

*Many of the SEPs in the sample explain that “engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at facilitation of their participation..” A “Yes” in this column, however, entails that the SEP gives at least one example of a “specific measure” that would serve as a way to accommodate stakeholders during consultations, including: interpreters; use of sign language; providing materials in accessible formats such as braille or large print. BIC has made a distinction between accommodations that only serve to make disclosed information understandable and accommodations that serve to facilitate stakeholder participation in consultations.

See “Special accommodations for meaningful consultations” and “Clear timelines and personnel for consultations” in [Annex 4](#) for additional data analysis.

affected parties.”⁵⁵ Guidance for Borrowers on how to implement ESS7 also indicates that Borrowers should design grievance mechanisms in consultation with project-affected Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities and that they should “take into account the cultural attributes” and the “traditional mechanisms for raising and resolving issues” in these communities.⁵⁶

Consulting stakeholders on GRMs in the examined SEPs

All projects’ SEPs describe their planned grievance redress mechanisms (GRM). Yet all of the GRMs could be improved to address concerns of marginalized communities and other project-affected groups in culturally appropriate ways by soliciting the feedback

55 See 3ei and 3eii under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 99, par. 27-27(a).

56 See 5f under [ESS7 in Annex 1](#); “Guidance Note: ESS7,” 14, GN34.2.

of Indigenous Peoples and other marginalized groups.

ESS7 is being applied for at least five of the projects that were analyzed.⁵⁷ Table 4 shows that three of those five projects’ SEPs, those of the Philippines, Cambodia, and Guatemala, indicate that the projects’ GRMs will take “into account the needs” of Indigenous Peoples.⁵⁸ The two other projects for which ESS7 is being applied do not mention making sure their GRMs take into account how to handle the grievances of Indigenous Peoples in a culturally appropriate manner.

None of the SEPs indicate that the projects

57 Project ESRs do not use the word “applied” and instead state whether ESS7 is “relevant” or not to a project. Determining whether ESS7 should be applied to projects beyond the five that explicitly state it is “relevant” is outside the scope of this report.

58 As an example, see: Demombynes, “SEP - Philippines COVID-19 Project,” 10.

Table 4: Involvement of Marginalized Groups in GRMs

Country SEP	Is ESS7 being applied, according to the ESCP?	Does the SEP indicate that the GRM will take "into account the needs" of Indigenous Peoples?	Does the SEP indicate that marginalized will be consulted about the GRM?	Will women be included on the project's Grievance Redress Committee?
Burkina Faso	No	No	No	No
Liberia	No	No	No	No
The Gambia	No	No	No	No
Uganda	Yes	No	No	Yes
Bangladesh	Yes	No	No	No
Nepal	Yes	No	No	No
Sri Lanka	No	No	No	No
Cambodia	Yes	Yes	No	Yes
Philippines	Yes	Yes	No	No
El Salvador	Yes	No	No	No
Guatemala	Yes	Yes	No	No
Total Yes	7	3	0	2
Total No	4	8	11	9

obtained any feedback from any other affected and marginalized communities or that grievances will be handled in a way that is appropriate to them. None stipulate that they should be set up in a child-friendly manner. Marginalized communities are already more susceptible than others to the negative health and economic impacts of the pandemic. Without having consulted these communities, such as children or illiterate individuals, they may not know the GRMs are in place nor how to utilize them. Children may be most likely to have trouble accessing or learning about the GRMs, so communities and child-focused agencies should know how to support children to utilize them.

Although none of the GRMs were designed with feedback from marginalized groups, Table 4 shows that the Cambodia and Uganda projects indicate that women would be included on the projects' Grievance Redress Committees, which handle grievances that are submitted about the projects.⁵⁹ This is a good practice that should be replicated and expanded in

59 Hyder, "SEP - Cambodia COVID-19 Project," 8; Borrowing Agency, "SEP - Uganda COVID-19 Project," 9.

other projects GRMs to include representatives from other marginalized groups, such as a member of Indigenous Peoples and child advocacy groups, who understand the possible concerns and grievances that project-affected communities might experience.

2. GRMs equipped to handle GBV/SEA/SH

Relevant ESF requirements and guidance for equipping GRMs to handle GBV/SEA/SH

Borrowers are required to set up grievance mechanisms in a way that is readily accessible and proportionate to the potential risks and impacts of projects.⁶⁰ They must address grievances "promptly and effectively, in a transparent manner" and "allow for anonymous complaints to be raised and addressed."⁶¹ They should also "require all grievances to be treated confidentially, impartially, objectively, and in a timely manner."⁶²

60 See 3ei under [ESS10 in Annex 1](#); "Environmental and Social Framework," 100, par. 27. If suitable for the project, "grievance mechanism may utilize existing formal or informal grievance mechanisms." See "Environmental and Social Framework," 11, footnote 41.

61 See 3eii and 5c under [ESS10 in Annex 1](#); "Environmental and Social Framework," 100, par. 27(a)-(b).

62 See 3p under [ESS10 in Annex 1](#); "Guidance Note: ESS10," 9, GN27.5.

In addition, according to the ESF Good Practice Note “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,” “all projects need to have a framework for properly handling SEA/SH allegations.”⁶³ A report from the Bank’s Global Gender-Based Violence Task Force also indicates that the GRMs for all Bank investment projects must have “mechanisms to track complaints specifically linked to SEA and GBV” incorporated into them.⁶⁴ Survivors that submit grievances about gender-based violence (GBV), especially sexual exploitation and abuse and sexual harassment (SEA/SH), may have “risks of stigmatization, rejection and reprisals.”⁶⁵ The Good Practice Note explains that “SEA and SH are manifestations of GBV,” which is “an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially-ascribed gender differences.”⁶⁶

Equipping GRMs to handle GBV/SEA/SH in the examined SEPs

Five of the examined SEPs — those of Liberia, Philippines, Sri Lanka, Burkina Faso, and Nepal — indicate that the GRMs used for the projects will be equipped to handle GBV or GBV/SEA/SH. Table 5 shows, however, that these five projects use different terminology to describe how they will equip their GRMs to handle different forms of gender or sexual violence. Three SEPs, those of Philippines, Burkina Faso, and Nepal, state that their GRMs will have procedures to handle “GBV” grievances.⁶⁷ The GRMs for both the Liberia and Sri Lanka projects will be equipped to handle allegations of “GBV/SEA/SH.”⁶⁸ The Uganda and El Salvador SEPs indicate that the Ministry of Health will make available resources to report cases of “GBV/SEA” and violence against children (VAC), but describe these resources as

hotlines separate from a GRM.⁶⁹

Though only five projects indicate that their GRMs will specially handle GBV/SEA/SH complaints, all 11 projects’ ESRs point to the fact that there is a potential risk of some combination of GBV/SEA/SH and VAC. Table 5 shows, however, that the risk comes up in different parts of the ESRs in different ways. Four of the projects’ ESRs mention the risk under “Social Risk Rating” in the “Environmental and Social Risk Classification” section as well as a risk in connection to “ESS1 Assessment and Management of Environmental and Social Risks and Impacts,” as something that could happen to women and children under self-isolation. Six projects mention the risks as being associated with ESS4 Community Health and Safety, and refer to the potential for GBV/SEA/SH to occur in workplaces. The Bangladesh project brings up GBV as a risk in the context of “ESS2 Labor and Working Conditions.”⁷⁰ Furthermore, some ESRs list “GBV/SEA/SH,” some just list “GBV/SEA,” and others list “SEA/SH.”

In addition to the irregularities across the 11 projects, different documents prepared for the same project do not refer to potential risks of sexual and gender-based violence in a consistent manner. For example, the Burkina Faso ESRs indicates that SEA/SH are risks, but the SEP only describes the project’s GRM being equipped to handle GBV complaints.⁷¹ Since the mechanisms for avoiding the risks and handling the grievances of each of these issues may differ, it is important that terminology is used precisely and consistently.

It is outside the scope of this report to assess whether all or parts of these projects are considered major civil works and whether the ESF Good Practice Note is applicable. It is also outside the scope of this report to assess whether or not they should have included fewer or more forms of sexual and gender-based violence as risks and whether or not the inconsistencies in terminology was intentional. Regardless, the Good Practice Note recognizes

63 See 6d under [GPN in Annex 1](#); Grown et al., “Good Practice Note: Addressing SEA/SH,” 44, par. 116. It is outside the scope of this report to assess whether all or parts of these projects are considered major civil works and whether the ESF Good Practice Note should be applied.

64 Sierra and Gupta, “Working Together to Prevent Sexual Exploitation and Abuse,” 41.

65 See 6c under [GPN in Annex 1](#); Grown et al., “Good Practice Note: Addressing SEA/SH,” 36, par. 87.

66 See 6a under [GPN in Annex 1](#); Grown et al., “Good Practice Note: Addressing SEA/SH,” 5, par. 12; 6, par. 16.

67 The Philippines SEP does not provide information specifically about how the GRM will be equipped to handle GBV complaints but says that a revised SEP will have further details. The Burkina Faso SEP indicates that the GRM will have “specific procedures in place for addressing GBV” and that the project will consider establishing a separate GRM to handle GBV complaints. The Nepal SEP says that the GRM for the project “will be used for addressing GBV-related issues.” See: Demombynes, “SEP - Philippines COVID-19 Project,” 10; Besarabic Bennett, “SEP - Burkina Faso COVID-19 Project,” 13; Bhattarai, “SEP - Nepal COVID-19 Project,” 11.

68 Chisaka, “SEP - Liberia COVID-19 Project,” 11-12; Kak, “SEP - Sri Lanka COVID-19 Project,” 15-16.

69 As an example, the Uganda SEP says, “[T]he MoH will collaborate with the Ministry of Gender and other relevant actors to ensure the dissemination of information on available services for SGBV, use of established response hotlines and community outreach” notably to report cases of VAC and SEA. See: Borrowing Agency, “SEP - Uganda COVID-19 Project,” 9; Gordillo-Tobar, “SEP - El Salvador COVID-19 Project,” 8.

70 The Bangladesh project only says that GBV issues will be addressed in the bidding process for contractors with regards to “ESS2 Labor and Working Conditions” under “Specific Risks and Impacts” and a separate GRM is required for potential complaints associated with ESS2. See: “Environmental and Social Framework,” 34, par. 21; Mohammed-Roberts, “ESRS - Bangladesh COVID-19 Project,” 7.

71 Besarabic Bennett, “SEP - Burkina Faso COVID-19 Project,” 13; Besarabic Bennett, “ESRS - Burkina Faso COVID-19 Project,” 4-5.

Table 5: Terminology and Policies Invoked Related to GBV/SEA/SH Grievances

Country SEP	Will the GRM specifically be equipped to handle GBV/SEA/SH-related grievances?	What forms of GBV/SEA/SH-related risk will the GRM be equipped to handle?	What forms of GBV/SEA/SH are included as possible risks in the ESRs?	Which policies or guidance are invoked with regards to the GBV/SEA/SH-related risks?
Burkina Faso	Yes	GBV	SEA/SH	Social risk rating and ESS1
Liberia	Yes	GBV/SEA/SH	GBV/SEA	Social risk rating and ESS4
The Gambia	No	-	SEA/SH	ESS4
Uganda	No*	GBV/SEA/VAC	GBV/SEA	Social risk rating, ESS1, ESS10
Bangladesh	No	-	GBV	ESS2
Nepal	Yes	GBV	SEA/SH	ESS2, ESS4
Sri Lanka	Yes	GBV/SEA/SH	GBV/SEA/SH	Social risk rating and ESS1
Cambodia	No	-	GBV/SEA/VAC	ESS2, ESS4
Philippines	Yes	GBV	GBV/SEA/SH/VAC	ESS2, ESS4
El Salvador	No*	GBV/SEA/VAC	GBV/SEA/SH/VAC	Social risk rating and ESS1
Guatemala	No	-	SEA/SH	ESS4
Total Yes	7			
Total No	4			

*The Uganda and El Salvador SEPs acknowledge a need for the availability of resources for people to report instances of GBV/SEA/VAC, but neither explicitly state that the project GRMs will be equipped to handle these grievances. Instead, they indicate that the Ministry of Health in each country will disseminate information about established hotlines to report these cases.

See “Grievance Redress Mechanism” in [Annex 4](#) for more data and information.

the importance of these issues, and the Bank has recognized the importance of handling these issues sensitively more broadly.⁷² It is therefore important that projects set up methods to handle grievances of all GBV/SEA/SH so all stakeholders have a single tool with which to submit complaints on these issues. All GRMs should be equipped to handle allegations of sexual and gender-based violence and harassment with respect to both children and adults, whether or not such violence and harassment was identified as a risk at the start of the project. Consultations with women and other expert groups about the projects and GRMs are a way for the Bank and Borrowers to design the best approach for GRMs to handle GBV/SEA/SH allegations. As discussed in the previous section, GRMs, particularly those that are intended

to handle grievances related to GBV/SEA/SH, should be set up in a child-friendly manner.

E. SEP IMPLEMENTATION

1. Budgets for SEP Implementation

Relevant guidance for budgets for SEP implementation

The Bank provides a template SEP for Borrowers to propose “sample approaches” for fulfilling the requirements of a SEP.⁷³ The template suggests that the resources for implementing stakeholder engagement should be included in the SEP, including confirmation that an adequate budget has been allocated for stakeholder engagement.⁷⁴

72 Sierra and Gupta, “Working Together to Prevent Sexual Exploitation and Abuse”; “Insights of the World Bank Inspection Panel: Responding to Project Gender-Based Violence Complaints Through an Independent Accountability Mechanism.”

73 “Template for ESS10,” 1.

74 See 30 under [ESS10 in Annex 1](#); “Template for ESS10,” 5 sec. 5.1.

Budgets for SEP implementation in the examined SEPs

Only three SEPs, The Sri Lanka, Cambodia, and Nepal SEPs, provide specific budgets for the SEP: USD 5 million for Sri Lanka, USD 300,000 for Cambodia and USD 200,000 for Nepal. Eight SEPs in this analysis are not consistent with the guidance to document resources that will be devoted to implementing the SEP or to confirm that the budget is adequate. Five do not provide any information about the resources that will be used to manage SEP implementation or where the funding will come from. Funding for projects is allocated to “project components,” which make up broad forms of related support, and three SEPs in this analysis — those of Liberia, Guatemala, and Burkina Faso — indicate that the SEPs will be funded under a specific project component. These countries’ SEPs, however, do not specify the amount of funding under that component that will be used for SEP implementation.

Implementing SEPs, including disclosing of information in appropriate languages and formats as described in B.1, is a requirement the Bank must

hold Borrowers to, and Borrowers are instructed to document that there is a budget to do so. Providing a line item budget explicitly for SEP implementation implies that the Bank and Borrowers have thought through the cost and effort that will be necessary to execute the required plans and activities outlined in the document, and that the Borrower will have enough resources to do so. The lack of any budget or mention of where SEP implementation funding will come from in five of the projects indicates that the Borrowers have not confirmed that they have an adequate budget to carry out the activities described in the SEP, which are important requirements for creating inclusive projects and addressing barriers to project benefits.

2. Commitments to revising SEPs

Relevant ESF requirements and guidance for revising SEPs

As noted in the Background, the Bank is responsible for assisting Borrowers in carrying out the ESSs, including ESS10.⁷⁵ The Bank must also “require the Borrower to implement the measures and actions identified” in the Environmental and Social Commitment Plan (ESCP), which forms part of a project’s legal agreement between a Borrower and the Bank.⁷⁶

Borrowers are required, per ESS10, to disclose an updated SEP if significant changes are made to it.⁷⁷ In cases when other plans, like a SEP, are required to capture all of the obligations of Borrowers beyond what is included in an ESCP, “the ESCP will set out timeframes for the completion of such plans.”⁷⁸ Borrowers will “implement diligently” the actions described in the ESCP, including the development of other plans, “in accordance with the timeframe[s] specified.”⁷⁹

Commitment to revising SEPs in the examined SEPs

As described in section C.2 many of the project SEPs do not provide details on disclosing information in appropriate languages and formats nor about the logistics of consultations, and almost none of them conducted consultations with civil society prior to beginning project implementation. Acknowledging

⁷⁵ See [ESS1 in Annex 1](#); “Environmental and Social Framework,” 3 par. 2.

⁷⁶ See 2b under [ESP in Annex 1](#); “Environmental and Social Framework,” 4 par. 3(d); 9 par. 46-47.

⁷⁷ See 3biii under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 99, par. 13.

⁷⁸ See 4ciii under [ESS1 in Annex 1](#); “Environmental and Social Framework,” 29, par. 8.

⁷⁹ See 4civ under [ESS1 in Annex 1](#); “Environmental and Social Framework,” 29, par. 10.

Table 6: Budgets for SEP Implementation

Country SEP	Did the SEP mention where money would come from for SEP implementation?	Did the SEP provide a specific budget allocation for SEP implementation?
Burkina Faso	Yes	No
Liberia	Yes	No
The Gambia	No	No
Uganda	No	No
Bangladesh	No	No
Nepal	Yes	Yes
Sri Lanka	Yes	Yes
Cambodia	Yes	Yes
Philippines	No	No
El Salvador	No	No
Guatemala	Yes	No
Total Yes	6	3
Total No	5	8

that the emergency nature of the project preparation led to the SEPs lacking details about these plans for stakeholder engagement and feedback from initial consultations, eight of the 11 original SEPs indicate that, beyond the requirement for Borrowers to disclose updated SEPs if they make significant changes to them, they would disclose revised versions of the documents with more information and detail about the plans for stakeholder engagement within 30 days of the projects' effectiveness.⁸⁰ The ESCPs,

80 Three of the 11 SEPs — The SEPs for The Gambia, El Salvador, and Cambodia — do not specify that a revised SEP will be prepared, and instead say, per ESS10 requirements, that the SEP will “be periodically revised and updated as necessary.” See: Mills, “SEP - The Gambia COVID-19 Project”; Gordillo-Tobar, “SEP - El Salvador COVID-19 Project”; Hyder, “SEP - Cambodia COVID-19 Project.”

which describe the timeframes on which Borrowers are required to carry out actions, for every project say that the SEPs will be updated in a set amount of time after their effectiveness — nine say within one month, and two say within two months.⁸¹

As of the writing of this report, two of the 11 projects — Liberia and The Gambia — have disclosed an updated SEP (The Gambia was one of the three countries that had not committed to disclosing an updated SEP).⁸² For seven of the nine projects that

81 Per [ESP in Annex 1](#), the ESCP “will form part of the legal agreement” and the Bank “The Bank will require the Borrower to implement the measures and actions identified in the ESCP diligently, in accordance with the timeframes specified.” See “Environmental and Social Framework,” 4 par. 3(d); 9 par. 46-47.

82 Another SEP was disclosed for the Guatemala project in October, but

Table 7: Projects' commitments to updating their SEPs

Country	Month project took effect	Commitment to update the SEP per the original SEP	Commitment to update the SEP per the ESCP	Has an updated SEP been disclosed?
Burkina Faso	June	Within 30 days of effectiveness	Within 30 days of effectiveness	No
Liberia	April	Within 30 days of effectiveness	Within 1 month of effectiveness	Yes (August)
The Gambia	April	None: “The SEP will be periodically revised and updated as necessary”	Within 2 months of effectiveness	Yes (October)
Uganda	August	Within 30 days of effectiveness	Within 1 month of effectiveness	No
Bangladesh	April	Within 30 days of effectiveness	Within 60 days of project implementation starting and as early as possible	No
Nepal	April	Within 30 days of effectiveness	Within 30 days of effectiveness	No
Sri Lanka	April	Within 30 days of effectiveness	Within 30 days of effectiveness	No*
Cambodia	April	None: “The SEP will be periodically revised and updated as necessary”	Within 30 days of effectiveness	No
Philippines	May	Within 30 days of effectiveness	Within 30 days of effectiveness	No
El Salvador	n/a	None: “The SEP will be periodically revised and updated as necessary”	Within 30 days of effectiveness	No*
Guatemala	n/a	Within 30 days of effectiveness	Within 30 days of effectiveness	No (a new SEP has been disclosed, but it is the original in Spanish)

*Note: These projects disclosed updated SEPs in January 2021, but the rest of this report only reflects information about project documents disclosed before December 20, 2021.

have not disclosed a revised SEP, Implementation Status & Results Reports (ISRs) show evidence that they have been effective since at least June.⁸³ These seven projects have not delivered on their commitment to revise their projects' SEPs within one or two months of effectiveness. A list of the month projects took effect; the commitment to update the SEP per the original SEP; the commitment to update the SEP per the ESCP, and whether an updated SEP has been disclosed for the projects is included in Table 7.

Regardless of any commitment made in the SEPs themselves to update within a specific time frame, at least 55 of the approved COVID-19 emergency response projects had been in effect for more than 30 days at the time of writing, which should be enough time for projects to undergo "significant changes" that the ESF requires to trigger an update.⁸⁴ Borrowers should have more detail about information disclosure and logistics of consultations, yet only only 13 of these 55 projects have disclosed revised SEPs.⁸⁵ They should have also had the opportunity to conduct more consultations for feedback on project design and stakeholder engagement. The lack of updated SEPs for these projects either means Borrowers have not changed the information in the SEPs and they are not adequately engaging stakeholders according to the requirements of ESS10, or they have changed the information but have not met their requirement to disclose updated SEPs if significant changes are made to them. In either case, the Bank has not taken the steps to support Borrowers in effectively carrying out ESS10.

it appears to be the original SEP translated into Spanish.

⁸³ Project effectiveness dates were determined by looking at the "effectiveness date" listed in on the first page of the most recent (as of December 2020) "Implementation Status and Results Report" (ISR) for the projects. For the projects analyzed in this report, see ISRs for each listed in Annex 3. As an example of a project that is effective, see: "Liberia COVID-19 ISR," 1. ISRs for the two projects that have not disclosed updated SEPs, Guatemala's and El Salvador's, do not include dates next to "effectiveness date." See Cavagnero, "ISR - Guatemala COVID-19 Project"; Gordillo-Tobar, "Disclosable Version of the ISR - El Salvador COVID-19 Emergency Response Project - P173872 - Sequence No : 01."

⁸⁴ As of December 27, 2020, BIC searched project documents to determine if updated SEPs had been disclosed for the 80 COVID-19 emergency response projects approved at that time, and if the approved projects had taken effect. Only 13 Borrowers of the 80 had disclosed updated SEPs. Of the 68 projects that have not disclosed updated SEPs, Implementation Status & Results Reports (ISRs) show evidence that at least 55 projects took effect before November.

⁸⁵ The countries whose projects have disclosed updated SEPs are: Liberia, Malawi, Georgia, Djibouti, The Gambia, Eswatini, Mali, Nicaragua, Sao Tome and Principe, Tunisia, Uganda, and Yemen.

3. Recommendations

The urgent and expedited manner in which project documents, including SEPs, were prepared for COVID-19 Emergency Response projects in the Spring of 2020 may have been necessary due to the emergency situation. But at a time when many countries were in lockdown and project staff were unable to perform in-person consultations, stakeholder engagement in some form should have been seen as more important than ever to help stakeholders learn about the projects and the potential benefits they offered.

Nevertheless, many of the SEPs in the sample we analyzed lack sufficient information and detail for comprehensive SEP implementation, which should include: disclosing project information, including the logistics of consultations, in easy to understand and culturally appropriate ways; conducting consultations early and often; providing culturally appropriate Grievance Redress Mechanisms; regularly updating SEPs as necessary. They have also not been updated as the project documents committed to and as the ESF requires.

The 11 sets of project documents we analyzed are not representative of documents the Bank has prepared beyond COVID-19 emergency response projects and are only a small sample of all of the COVID-19 emergency response projects. Still, we feel that the data and analysis above is instructive in considering best practices for SEPs. BIC makes the following recommendations for how the Bank and Borrowers can approach stakeholder engagement in line with the ESF and good practice. Borrowers should:

Stakeholder Identification and Marginalized Groups

- In emergency projects and projects classified as high or substantial risk, use an independent specialist with experience in the project context to conduct stakeholder identification. Hiring an independent specialist with specific expertise in identifying sensitivities around marginalized groups in that context will help to more comprehensively identify stakeholder groups and include "disadvantaged or vulnerable individuals or groups."
- Use a clear and consistent definition of "vulnerability" in project documents that at a minimum matches and refers to the definition in the Directive.

Information Disclosure and Accessibility

- In advance of stakeholder engagement

activities, disclose project information, including SEPs, in local and official languages and formats that will help marginalized stakeholders access and understand project information. The Bank should also disclose this information on its website.

Consultations and Stakeholder Engagement

- Plan for and describe specific timelines for consultations and the personnel that will carry them out.

Grievance Redress Mechanism

- Seek input on GRM design from marginalized communities before implementation.
- Set-up GRMs in a child-friendly manner.
- Describe GRCs and take steps to include women, representatives of children, and other marginalized groups.
- Use consistent terminology to describe GBV-related risks and how GRMs will handle them. GRMs should be equipped to handle GBV, and specifically SEA/SH-related, grievances.

SEP Implementation

- Include line-item budgets with adequate resources for comprehensive SEP implementation.
- Describe in SEPs and Environmental and Social Commitment Plans the entity that will be accountable for updating SEPs when a commitment to do so is made.
- For projects prepared on a rapid timeline such as emergency projects, disclose revised SEPs within 30 days of the project effectiveness and state a commitment to this requirement in the original SEPs and ESCPs.

communities.

The failure to meet these requirements conveys that the World Bank and Borrowers did not prioritize stakeholder engagement for these projects and means there are not proper accountability systems in place for governments to follow through with appropriate stakeholder engagement throughout project implementation. While the COVID-19 pandemic was an unprecedented health emergency, this is not the last time the World Bank and Borrowers will be faced with preparing and approving projects on a rapid timeline.

In fact, in October 2020, the Bank approved a \$12 million envelope to finance the purchase and distribution of COVID-19 vaccines in low income countries. This funding is being deployed as additional financing to countries that have COVID-19 response projects already. Many parts of the world still have COVID-19 restrictions in place that make normal stakeholder engagement hard, but that engagement is necessary to get vaccines to the most marginalized groups in a timely and effective manner. Yet, as implementation of vaccine purchase and distribution begins, most countries still have not disclosed updated SEPs that would take this additional component into account.

The recommendations in this report provide lessons for how future SEPs, and particularly SEPs prepared during an emergency, can be improved. Especially in the face of an emergency, the Bank must stand by its commitments to stakeholder engagement. If it does not, the projects and their information risk being inaccessible to marginalized groups, who will continue to disproportionately suffer.

4. Conclusion

This report shows that the Stakeholder Engagement Plans for the assessed COVID-19 Emergency Response projects do not meet the requirements of the ESF, including those detailed in the ESP, ESS10, ESS1, ESS7, and the Directive on “Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups”. While comprehensive and thorough preparation of project documents on urgent timelines, as with the response to the pandemic, is difficult, meaningful stakeholder engagement in these projects is still pressing and important, especially to connect the most marginalized communities with project information and benefits and to avoid potential harm to those

Annex 1: Environmental and Social Framework (ESF) Requirements Pertaining to Stakeholder Engagement

The section headers in this annex do not correspond to those in the main text, and thus have intentionally been numbered differently. See below for information about how the indices in this Annex are referenced throughout the report.

The World Bank's Environmental and Social Framework (ESF) governs how the World Bank addresses environmental and social harm associated with its projects. The ESF includes the World Bank's "Vision for Sustainable Development"; the "Environmental and Social Policy" (ESP), which details requirements that apply to the Bank; ten "Environmental and Social Standards" (ESSs), which details requirements that apply to Borrowers; and two mandatory directives for Bank staff.¹

Alongside the policy requirements of the ESF, the Bank issues non-mandatory resources that guide Bank staff and Borrowers in implementing the ESF. These resources include: "Guidance Notes for Borrowers" that explain how the carrying out the ESSs -- there is a Guidance Note for each ESS; template project documents; checklists for implementation; and Good Practice Notes that explain generally held good practice on topics such as "Gender", "Road Safety", and "Non-discrimination: Sexual Orientation and Gender Identity."²

The following ESF components are highlighted below to contextualize the "Analysis" section of this report and describe relevant requirements of and guidance for the Bank and Borrowers to carry out and support stakeholder engagement. Provisions are explained from the following policies and non-mandatory guidance resources:

1. The Environmental and Social Policy (ESP) ([see 1](#) below)
2. The "Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups" (from here forth referred to as "the Directive") ([see 2](#) below)

¹"Environmental and Social Framework," ix. See also: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>.

²"Environmental and Social Framework," ix. See also: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidance-notes>.

3. "Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure" ([see 3](#) below)
 - a. Guidance Note for Borrowers about ESS10
 - b. "Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework"
4. "Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts" ([see 4](#) below)
5. "Environmental and Social Standard 7 (ESS7): Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities" ([see 5](#) below)
 - a. Guidance Note for Borrowers about ESS7
6. Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works ([see 6](#) below)

Most of the policy requirements and guidance below are referenced in the "Analysis" section according to their indices. For example, "3ai" is used to identify a requirement under ESS10; it refers to the first bullet under "Stakeholder identification and analysis requirements" in the section below titled "Environmental Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure." Some requirements and guidance below are not explicitly referenced in the "Analysis" section, but have been included to help contextualize other requirements within each policy or guidance.

1. The World Bank Environmental and Social Policy (ESP)

The ESP is a component of the ESF that describes requirements the Bank must fulfill in relation to projects it funds through Investment Project Financing, which includes Bank loans and guarantees. The policy states that the "Bank is committed to supporting" recipients of project financing ("Borrowers") "in the development and implementation of projects that are environmentally and socially sustainable" and in improving their capacity to assess and mitigate project risks and impacts (3).³ In doing so, the Bank is responsible for

³"Environmental and Social Framework," 3 par. 2.

assisting Borrowers in carrying out requirements under the ten Environmental and Social Standards (ESSs), three of which are described below.⁴ The policy specifically says that the Bank is responsible for assisting Borrowers in implementing stakeholder engagement and consultation, and in providing grievance mechanisms for affected communities before and during the project cycle.

The policy sets forth several requirements of the Bank pertaining to projects it finances. The following are those that pertain to stakeholder engagement and components of the Stakeholder Engagement Plan (SEP):

- a. The Bank must use all relevant information about projects and their potential risks and impacts to classify them into one of four classifications of risk: High, Substantial, Moderate, or Low (6).⁵
- b. The Bank will “agree with the Borrower on the conditions under which the Bank is prepared to provide support to a project, as set out in the Environmental and Social Commitment Plan (ESCP)” which will “form part of the legal agreement” between Borrowers and the Bank about a project. The Bank must “require the Borrower to implement the measures and actions identified in the ESCP diligently.”⁶
- c. For projects classified as High or Substantial risk, the Bank is required to disclose documentation about the environmental and social risks so that they can inform decision making by the Bank and the design of stakeholder engagement.⁷
- d. For all projects, regardless of risk classification, the Bank must require the Borrowers to provide information about potential project risks and impacts to stakeholders in accessible forms and understandable languages so that they can “provide meaningful input into project design and mitigation measures.”⁸
- e. The Bank must require Borrowers to engage stakeholders “through information disclosure, consultation, and informed participation in a manner proportionate to the risks to and impacts on affected

communities.”⁹ The Bank must monitor stakeholder engagement and consultations by the Borrowers.

- f. The Bank will support Borrowers in carrying out ESS7, if determined to be applicable (ESS7 is described below).¹⁰
- g. The Bank will conduct a screening, including consultation with Indigenous Peoples and the Borrowers, to determine if ESS7 is applicable.¹¹
- h. The Bank must require Borrowers to provide a grievance mechanism to “receive and facilitate resolution of concerns and grievances of project affected parties.”¹²

2. The Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups (“the Directive”)

As noted above, in addition to the ESP, the Bank is bound by mandatory requirements of the Directive regarding how Bank staff identify “disadvantaged and vulnerable individuals or groups” and how differentiated means will be used to address their specific circumstances (x).¹³

The Directive defines the term “disadvantaged or vulnerable,” a term used throughout the components of the ESF, as the following:

“disadvantaged or vulnerable’ refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so...”¹⁴

In establishing this definition, the Directive also establishes responsibilities of World Bank task teams to support Borrowers in preparing and implementing

4 Ibid.

5 “Environmental and Social Framework,” 6, par. 23.

6 “Environmental and Social Framework,” 4 par. 3(d); 9 par. 46-47.

7 “Environmental and Social Framework,” 9, par. 51.

8 “Environmental and Social Framework,” 9, par. 50.

9 “Environmental and Social Framework,” 10, par. 53.

10 “Environmental and Social Framework,” 10, par. 54.

11 Ibid.

12 “Environmental and Social Framework,” 11, par. 60.

13 “Environmental and Social Framework,” x, par. 7.

14 “The Directive,” 1.

projects and fulfilling the requirements of the ESSs. Specifically with regards to stakeholder engagement, the Bank has the following responsibilities:

- a. Task teams review the environmental and social assessments of projects to verify that they identify groups and individuals “affected by the project that may be disadvantaged or vulnerable.”¹⁵
- b. Task teams review Borrowers’ Stakeholder Engagement Plans (SEPs) to verify that they identify the “disadvantaged or vulnerable individuals or groups,” include differentiated means for these individuals or groups to effectively participate in the projects, and that the Borrowers have engaged and consulted with these “disadvantaged or vulnerable” stakeholders.¹⁶
- c. The Bank can require Borrowers to use independent third party specialists to assist in identifying “disadvantaged or vulnerable” individuals or groups and assessing the risks and impacts on them.¹⁷
- d. The Bank may participate in “the consultation activities of the Borrower, including with disadvantaged or vulnerable individuals or groups” to undertake “its due diligence of the project with respect to” these individuals or groups.¹⁸

3. Environmental Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure

While the ESP describes requirements of the Bank pertaining to implementing effective stakeholder engagement in all IPF projects, ESS10 sets forth requirements for Borrowers, with which the Bank is responsible to assist in carrying out.¹⁹ ESS10 must be read in conjunction with ESS1 and, in cases of projects involving Indigenous Peoples, Borrowers must also apply the consultations and disclosure requirements described in ESS7 (Both ESS1 and ESS7 are further detailed below).²⁰

Under ESS10, the Bank is responsible for helping Borrowers carry out requirements that fall under the following categories: a) Stakeholder identification and analysis; b) Stakeholder Engagement Plans; c) information disclosure; d) meaningful consultation;

e) grievance mechanisms; f) organizational capacity and commitment. Requirements relevant to contextualizing the “Analysis” section of this report include:

- a. Stakeholder identification and analysis requirements
 - i. Borrowers must identify project stakeholders.²¹
 - ii. Depending on the social risks and impacts of a project, Borrowers “may need to retain independent third party specialists to assist in the stakeholder identification and analysis to support... the design of an inclusive engagement process.”²²
- b. Stakeholder Engagement Plan requirements
 - i. Borrowers will develop and implement a Stakeholder Engagement Plan (SEP), which “will describe the timing and methods of engagement with stakeholders through the life cycle of the project as agreed between Bank and Borrower.”²³
 - ii. Borrowers must develop and implement the elements of a SEP for every project, and these elements should be included in the Environmental and Social Commitment Plan (ESCP) if a stand-alone document is not necessary. The SEP should be “proportionate to the nature and scale of possible risks and impacts of the project.”²⁴
 - iii. Borrowers will disclose an updated SEP “if significant changes are made to the SEP.”²⁵
 - iv. SEPs will describe “the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured,” and, when relevant “include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.”²⁶
- c. Information disclosure requirements
 - i. Borrowers must disclose certain

15 “The Directive,” 3.

16 “The Directive,” 3.

17 “The Directive,” 3.

18 “The Directive,” 3.

19 “Environmental and Social Framework,” 97, par. 1.

20 “Environmental and Social Framework,” 97, par. 3.

21 “Environmental and Social Framework,” 98, par. 10.

22 “Environmental and Social Framework,” 98, par. 12.

23 “Environmental and Social Framework,” 99, par. 14.

24 “Environmental and Social Framework,” 98-99, par. 13-14

25 “Environmental and Social Framework,” 98, par. 13.

26 “Environmental and Social Framework,” 99, par. 16.

information so that stakeholders understand a project's risks and impacts, including "potential risks and impacts of the project on local communities...highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures" to mitigate them.²⁷

ii. Borrowers must also disclose information about the stakeholder engagement process, as well as "the time and venue of any proposed public consultation meetings" and how stakeholders will be notified about them.²⁸

iii. Information must be disclosed in "relevant local languages and in a manner that is accessible and culturally appropriate," such that they take "into account specific needs of groups that may be differentially or disproportionately affected by the project or groups...with specific information needs (such as disability, literacy, gender, mobility, and differences in language or accessibility)."²⁹

iv. Borrowers must continue to provide information in manners appropriate to the interests of stakeholders throughout the life cycle of projects.³⁰

d. Meaningful consultation requirements

i. Borrowers must "undertake a process of meaningful consultation" with stakeholders.³¹

ii. This process begins early in the preparation of a project to get initial views from stakeholders, and continues on an ongoing basis "as risks and impacts arise."³²

iii. Consultations with stakeholders must be "based on 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 languages."³³

iv. Meaningful consultation "supports active and inclusive engagement with project-affected parties."³⁴

e. Grievance mechanism requirements

i. Grievance mechanisms should be set up in a way that is "readily accessible to all project-affected parties" and "proportionate to the potential risks and impacts" of projects.³⁵

ii. Grievance mechanisms are "expected to address concerns promptly and effectively, in a transparent manner."³⁶

iii. They must "allow for anonymous complaints to be raised and addressed."³⁷

iv. Organizational capacity requirements

f. Borrowers must "designate specific personnel" to carry out "implementation and monitoring of stakeholder engagement."³⁸

In addition to the mandatory requirements under ESS10, the Bank issued guidance for Borrowers to help them apply the requirements. Relevant guidance from the "Guidance Note for Borrowers" about ESS10 and the "Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework" include:

g. Stakeholder engagement is most effective when initiated early in the process of project development.³⁹ People "make up their minds about a project" early in the process, so if they only receive limited information, people may form opinions from less credible information. Thus, it is "typically a mistake to delay providing information to stakeholders."⁴⁰

h. When key factors about a project are unknown during project preparation, the SEP needs to provide specific details about ways people can get more information once

27 "Environmental and Social Framework," 99, par. 19.

28 "Environmental and Social Framework," 99, par. 19(d)-(e).

29 "Environmental and Social Framework," 99, par. 20.

30 "Environmental and Social Framework," 100, par. 23.

31 "Environmental and Social Framework," 99, par. 21.

32 "Environmental and Social Framework," 99 par. 22(a); 100, par. 22(c).

33 "Environmental and Social Framework," 100, par. 22(d).

34 "Environmental and Social Framework," 100, par. 22(f).

35 "Environmental and Social Framework," 99, par. 27.

36 "Environmental and Social Framework," 99, par. 27(a).

37 "Environmental and Social Framework," 99, par. 27(b).

38 "Environmental and Social Framework," 100, par. 28.

39 "Guidance Note: ESS10," 1, par. 2.

40 "Template for ESS10," 8.

it is available, such as specific names of media and websites. If locations and dates of meetings are not known, the SEP should provide a general idea of the number of consultations that will occur and the way they will be conducted.⁴¹

- i. For projects with high and substantial environmental and social risk ratings, there should be “several formal points of engagement, as well as ongoing information dissemination.”⁴²
- j. Borrowers should develop lists of project-affected and other interested parties at the beginning of environmental and social assessments for projects, and should pay “special attention to identifying disadvantaged or vulnerable groups.”⁴³
- k. It is advisable to “conduct discussions with representatives of the stakeholders identified.”⁴⁴
- l. Depending on the context of the society, “women, children, youth, and the elderly, or other groups may need to be considered as stakeholder groups of their own” and may need to be engaged using “separate consultation formats.”⁴⁵
- m. Various strategies can be used to mitigate barriers to engagement by “focusing on issues of accessibility, communication, empowerment, and/or confidentiality.”⁴⁶
- n. Drafts of SEPs should be “made available to stakeholders in accessible formats and through channels that are appropriate for them,” and they should be notified of their publication through various channels.⁴⁷
- o. Borrowers should indicate the resources they will devote “to managing and implementing” the SEP, in particular that there is “an adequate budget...allocated toward stakeholder engagement” and the people that are in charge of the SEP.⁴⁸
- p. Borrowers should require “require all grievances to be treated confidentially, impartially, objectively, and in a timely manner.”⁴⁹

4. Environmental Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts

As noted above, ESS10 must be read in conjunction with ESS1, which establishes the Borrower’s responsibility for “assessing, managing, and monitoring environmental and social risks and impacts associated with each stage of the project.”⁵⁰

Within this broad responsibility, ESS1 sets forth several objectives that involve identifying environmental and social risks, minimizing them, and mitigating them. Stemming from these objectives to manage potential project risks and to engage with stakeholders that are “disadvantaged and vulnerable,” ESS1 details the following requirements that relate to undertaking stakeholder engagement more broadly:

- a. Environmental and social assessment requirements
 - i. Borrowers will carry out environmental and social assessments based on current information and “will include stakeholder engagement as an integral part” of them.⁵¹
 - ii. For High and Substantial Risk projects, Borrowers will “retain independent specialists to carry out the environmental and social assessment” for projects.⁵²
 - iii. The assessments will take into account “any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits” especially to “those who may be disadvantaged or vulnerable.”⁵³
 - iv. When individuals or groups are identified as “disadvantaged or vulnerable,” Borrowers will “propose and implement differentiated measures” so that these individuals or groups do not experience disproportionate adverse impacts and so that they share any development benefits that result from the project.⁵⁴

b. Stakeholder engagement and information disclosure requirements

- 50 “Environmental and Social Framework,” 15, par. 1
- 51 “Environmental and Social Framework,” 18, par. 24.
- 52 “Environmental and Social Framework,” 19, par. 25.
- 53 “Environmental and Social Framework,” 19, par. 28(b)
- 54 “Environmental and Social Framework,” 20, par. 29.

41 Ibid.

42 “Guidance Note: ESS10,” 2, GN6.1.

43 “Guidance Note: ESS10,” 4, GN10.1(a).

44 “Guidance Note: ESS10,” 4, GN10.1(c).

45 “Guidance Note: ESS10,” 4, GN10.2.

46 “Guidance Note: ESS10,” 4, GN11.1.

47 “Guidance Note: ESS10,” 5, GN13.3.

48 “Template for ESS10,” 5 sec. 5.1.

49 “Guidance Note: ESS10,” 9, GN27.5.

- i. Per ESS10, Borrowers will engage with stakeholders and provide them with “sufficient information...throughout the life cycle of the project.”⁵⁵
 - ii. For projects that are High or Substantial Risk, “Borrowers will provide the Bank and disclose documentation” on project risks and impacts “prior to project appraisal.” The documentation should be detailed enough to inform stakeholder engagement and decision making by the Bank.⁵⁶
 - iii. Borrowers will provide information on any significant changes to the project that might result in additional risks and impacts and “consult with project-affected parties as to how these risks and impacts will be mitigated.”⁵⁷
- c. Environmental and Social Commitment Plan (ESCP)
- i. The ESCP includes the “material measures and actions that are required for the project to achieve compliance with the ESSs over a specified timeframe in a manner that is satisfactory to the Bank.”⁵⁸
 - ii. The requirements in the ESCP “will be set out clearly, so that there is no ambiguity around compliance.”⁵⁹
 - iii. In cases when other plans besides the ESCP are required to capture all of the obligations of Borrowers, “the ESCP will set out timeframes for the completion of such plans.”⁶⁰
 - iv. Borrowers will “implement diligently” the actions described in the ESCP “in accordance with the timeframe specified.”⁶¹

These requirements apply to all projects supported by the Bank through Investment Project Financing, but the Guidance Note on ESS1 explains that the way and time in which Borrowers meet the requirements will be different for each project.⁶²

5. Environmental Standard 7 (ESS7): Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The objectives and requirements of ESS7 apply broadly, and in conjunction with ESS10, whenever Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities are “present in or have collective attachment to a proposed project area” as determined by the Bank during the environmental and social assessment.⁶³ The purpose of ESS7 is to make sure that Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities are fully consulted as stakeholders about project design and implementation.

To carry out this purpose, the Bank is responsible for assisting Borrowers fulfil various requirements aimed at engaging Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities and avoiding and mitigating any adverse impacts to these communities. These requirements include:

- a. Borrowers must “prepare a consultation strategy and identify” the ways in which Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities in affected areas “will participate in project design and implementation.”⁶⁴
- b. In cases “when Indigenous Peoples/ Sub-Saharan African Historical Underserved Traditional Local Communities are not the only beneficiaries of projects,” Borrowers must make project benefits accessible to these communities in an equitable manner.⁶⁵
- c. Borrowers will conduct an engagement process that includes “stakeholder analysis and engagement planning, information disclosure, and meaningful consultation, in a culturally appropriate and gender and inter-generationally inclusive manner.”⁶⁶
- d. Borrowers will conduct an engagement process with affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities, and meaningful consultations will involve their “representative bodies and organizations

55 “Environmental and Social Framework,” 22, par. 51.

56 “Environmental and Social Framework,” 22, par. 52.

57 “Environmental and Social Framework,” 22, par. 53.

58 “Environmental and Social Framework,” 28, par. 1.

59 “Environmental and Social Framework,” 28, par. 3.

60 “Environmental and Social Framework,” 29, par. 8.

61 “Environmental and Social Framework,” 29, par. 10.

62 “Guidance Note: ESS1,” 5, GN14.4.

63 “Environmental and Social Framework,” 76, par. 7.

64 “Environmental and Social Framework,” 77, par. 12.

65 “Environmental and Social Framework,” 78, par. 16.

66 “Environmental and Social Framework,” 79, par. 23.

(e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members.”⁶⁷

- e. Borrowers must provide “sufficient time” for these communities to go through their decision-making processes.⁶⁸

The ESS7 Guidance Note explains the following:

- f. Grievance mechanisms “should be designed in consultation with project-affected Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities” so that they take into account their cultural attributes and “their traditional mechanisms for raising and resolving issues.”⁶⁹
- g. Groups may be considered an Indigenous People/Sub-Saharan African Historical Underserved Traditional Local Community and covered by ESS7 policy in one region of the country but may not be covered in other parts of the country or neighboring countries where they are “more fully integrated with other communities and lack the defining characteristics.” As noted in the policy, the Bank makes the final determination about whether a group is considered an Indigenous People/Sub-Saharan African Historical Underserved Traditional Local Community.⁷⁰

F. Good Practice Note (GPN): Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works

Good Practice Notes are non-mandatory and advisory in nature, and serve to “help World Bank staff in providing implementation and support to Borrowers in meeting the requirements of the Environmental and Social Framework (ESF).”⁷¹ The Good Practice Note on “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works” is meant to “assist Task Teams in identifying risks of SEA/SH -- as opposed to all forms of GBV [gender-based violence] that can emerge in IPF involving major civil works contracts -- and to advise Borrowers on how to best manage such risks.”⁷²

The Good Practice Note explains that the ESF “does not explicitly mention SEA/SH” but “various ESSs are in alignment with the recommendations” of the document, including ESS1 and ESS10, described above.⁷³ The following definitions and guidance help contextualize the requirements of the Bank and Borrowers to carry out ESS1 and ESS10, specifically with regards to stakeholder engagement:

- a. Gender-based violence is “an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially-ascribed gender differences” and SEA and SH are “manifestations of GBV”.⁷⁴
- b. All IPFs must have a grievance mechanism (GM) “in place prior to contractors mobilizing.” If contractors or consultants operate a parallel GM, these mechanisms “should include processes to refer complaints to the project GM so as to ensure that an accurate understanding of the project complaints is always available.”⁷⁵
- c. Survivors that submit grievances about gender-based violence (GBV), especially sexual exploitation and abuse and sexual harassment (SEA/SH), may have “risks of stigmatization, rejection and reprisals” and multiple channels for submitting complaints are needed for them to “safely access the GM” in a “confidential manner.”⁷⁶
- d. All IPF “projects need to have a framework for properly handling SEA/SH allegations.”⁷⁷

67 “Environmental and Social Framework,” 79, par. 23(a).

68 “Environmental and Social Framework,” 79, par. 23(b).

69 “Guidance Note: ESS7,” 14, GN34.2.

70 “Guidance Note: ESS7,” 4, GN8.3.

71 Grown et al., “Good Practice Note: Addressing SEA/SH.”

72 Grown et al., “Good Practice Note: Addressing SEA/SH,” 2.

73 Grown et al., “Good Practice Note: Addressing SEA/SH,” 2.

74 Grown et al., “Good Practice Note: Addressing SEA/SH,” 5, par. 12; 6, par. 16.

75 Grown et al., “Good Practice Note: Addressing SEA/SH,” 36, par. 87.

76 Grown et al., “Good Practice Note: Addressing SEA/SH,” 36, par. 87.

77 Grown et al., “Good Practice Note: Addressing SEA/SH,” 44, par. 116.

It is outside the scope of this report to assess whether all or parts of these projects are considered major civil works and whether the ESF Good Practice Note should be adhered to.

Annex 2: Questionnaire for Analysis

Stakeholder Identification

1. Does the SEP specify how and by whom stakeholders were identified?
2. Was the stakeholder identification done by an independent party?
3. Are civil society organizations included as an interested stakeholder group?
 - a. How are CSOs discussed? Is CSO role as a stakeholder limited to their direct involvement as beneficiaries or are they discussed as having a broader contributing role (for example, in accountability)?
4. Are children engaged in stakeholder groups in a child-friendly manner?
5. Is age brought up as a way an individual can be considered “vulnerable?”
6. Does the SEP specify that engagement will be open to anyone interested?
7. Who is included in the list of groups or categories of stakeholders?
8. Are people with disabilities specifically identified as a “disadvantaged and vulnerable group”?
9. Are LGBTI people specifically identified as a “disadvantaged and vulnerable group”?
10. Elderly?
11. Children and youth (or child-focused agencies)?
12. Women?
13. Ethnic minorities?
14. Religious minorities?
15. Social, civic or health status?
16. Indigenous peoples?
17. Those living in remote or rural areas?
18. Migrants?
19. Refugees?
20. Economic Disadvantage?
21. Dependence on unique natural resources?
22. Any other groups that are listed as “vulnerable” that aren’t mentioned above?
23. Does the SEP identify specific needs of

different stakeholder groups (such as translation to a minority language, or accessibility)? If so, what is specifically identified?

Information Disclosure

24. Does the SEP mention additional languages and formats in which information will be shared with different groups of stakeholders?
25. Is there any mention of having documents in a format that is easy for stakeholders to read and understand?

Consultations/Stakeholder Engagement

26. Does the SEP lay out a clear timeline and plan for consultations with all identified stakeholder groups?
27. Does the SEP include plans to conduct separate consultations with women or separate consultations with any “disadvantaged and vulnerable group?”
28. Does the SEP identify specific civil society organizations that will be consulted?
29. Does the SEP identify safety as a concern for engaging stakeholders?
30. Does the SEP include the issues raised during consultations that have already been conducted, and the IA’s response to each issue? Is this information disaggregated by gender?
31. Are there plans for gender-disaggregated data collection about participants in consultations?
32. What information will be disclosed about SEP monitoring?

Grievance Redress Mechanism

33. Does the SEP include a description of the GRM?
34. Are women represented on grievance redress committees? Are any other “disadvantaged and vulnerable groups” represented? If so, how?
35. Is there any documentation that affected communities have provided input on the design of the GRM?
36. Are there any indicators of the GRM’s

functional independence from the project team? (E.g., GRM reports to someone not managing the project)?

37. Does the GRM provide for some form of appeal?
38. Does the GRM ensure that complainants are given a reason for the mechanism's decision in resolving their complaint?
39. Is information on the mechanism's performance made public? Is a summary of complaints and responses made public?
40. Are grievances disaggregated by the gender of the person who submitted them?
41. Can complaints be filed confidentially or anonymously?
42. Will the GRM be operationalized specifically to handle cases of GBV/SEA/H?

Appraisal Stage ESRS

43. ESS 1- which "disadvantaged and vulnerable groups" are mentioned if any and are their barriers to project benefit mentioned?
44. ESS 1- are the project's differentiated impacts on women mentioned?
45. What's the project's social risk rating?

COVID-19 specific questions and basic information

46. Does the SEP explicitly mention it will be revised within 30 days of the project's effectiveness?
47. Is there a specific amount of money allocated for carrying out the SEP?
48. Has the SEP been disclosed in English? In the native language of the implementing country?

Annex 3: COVID-19 Projects Included in Analysis

Below is a list of the COVID-19 emergency response projects whose Stakeholder Engagement Plans were included in this report's analysis. We provide relevant information about the countries -- such as the region in which they are located -- and the projects themselves, including URLs for project documents that were examined for each. "Project page" URLs link to the landing page for each project that includes complete project information. Full citations for the project documents can be found under [References](#).

1. Burkina Faso COVID-19 Preparedness and Response Project

- a. Country region: Africa
- b. Project approval date: April 28, 2020
- c. Project closing date: April 29, 2022
- d. Total project cost: USD 21.5 million
- e. Date original SEP was disclosed: April 8, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173858?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/526291586952381271/pdf/Stakeholder-Engagement-Plan-SEP-Burkina-Faso-COVID-19-Preparedness-and-Response-Project-P173858.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/460411586952388896/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Burkina-Faso-COVID-19-Preparedness-and-Response-Project-P173858.pdf>
- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/699381586952345322/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Burkina-Faso-COVID-19-Preparedness-and-Response-Project-P173858.pdf>
- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/270201600252911761/pdf/Disclosable-Version-of-the-ISR-Burkina-Faso-COVID-19-Preparedness-and-Response-Project-P173858-Sequence-No-01.pdf>

2. Liberia COVID-19 Emergency Response Project

- a. Country region: Africa
- b. Project approval date: April 9, 2020
- c. Project closing date: April 20, 2022
- d. Total project cost: USD 7.5 million
- e. Date original SEP was disclosed: March 27, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173812?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/800041585273362382/pdf/Stakeholder-Engagement-Plan-SEP-Liberia-COVID-19-Emergency-Response-Project-P173812.pdf>
- h. **Revised Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/106471597673054683/pdf/Revised-Stakeholder-Engagement-Plan-SEP-Liberia-COVID-19-Emergency-Response-Project-P173812.pdf>
- i. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/185141585273372787/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Liberia-COVID-19-Emergency-Response-Project-P173812.pdf>
- j. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/170111585273358137/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Liberia-COVID-19-Emergency-Response-Project-P173812.pdf>
- k. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/190751602711248004/pdf/Disclosable-Version-of-the-ISR-Liberia-COVID-19-Emergency-Response-Project-P173812-Sequence-No-01.pdf>

3. The Gambia COVID-19 Preparedness and Response Project

- a. Country region: Africa
- b. Project approval date: April 2, 2020
- c. Project closing date: March 31, 2022
- d. Total project cost: USD 10 million

- e. Date original SEP was disclosed: March 25, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173798?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/795671585162699097/pdf/Stakeholder-Engagement-Plan-SEP-The-Gambia-COVID-19-Preparedness-and-Response-Project-P173798.pdf>
- h. **Revised Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/460981604093982130/pdf/Stakeholder-Engagement-Plan-SEP-The-Gambia-COVID-19-Preparedness-and-Response-Project-P173798.pdf>
- i. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/529861585162707149/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-The-Gambia-COVID-19-Preparedness-and-Response-Project-P173798.pdf>
- j. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/680291585230449529/pdf/Environmental-and-Social-Commitment-Plan-ESCP-The-Gambia-COVID-19-Preparedness-and-Response-Project-P173798.pdf>
- k. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/545071597096275972/pdf/Disclosable-Version-of-the-ISR-The-Gambia-COVID-19-Preparedness-and-Response-Project-P173798-Sequence-No-01.pdf>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/668291600200833799/pdf/Stakeholder-Engagement-Plan-SEP-Uganda-COVID-19-Response-and-Emergency-Preparedness-Project-P174041.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/113411601400751361/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Uganda-COVID-19-Response-and-Emergency-Preparedness-Project-P174041.pdf>
- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/316281601400733073/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Uganda-COVID-19-Response-and-Emergency-Preparedness-Project-P174041.pdf>
- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/794341602796674222/pdf/Disclosable-Version-of-the-ISR-Uganda-COVID-19-Response-and-Emergency-Preparedness-Project-P174041-Sequence-No-01.pdf>

4. Uganda COVID-19 Response and Emergency Preparedness Project

- a. Country region: Africa
- b. Project approval date: July 15, 2020
- c. Project closing date: December 21, 2022
- d. Total project cost: USD 15.2 million
- e. Date original SEP was disclosed: September 15, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P174041?lang=en>

5. Bangladesh: COVID-19 Emergency Response and Pandemic Preparedness Project

- a. Country region: South Asia
- b. Project approval date: April 3, 2020
- c. Project closing date: December 31, 2023
- d. Total project cost: USD 100 million
- e. Date original SEP was disclosed: March 26, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173757?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/629021585239439178/pdf/Stakeholder-Engagement-Plan-SEP-COVID-19-Emergency-Pandemic-Preparedness-and-Response-Project-P173757.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/115851585239446154/pdf/>

[Appraisal-Environmental-and-Social-Review-Summary-ESRS-COVID-19-Emergency-Pandemic-Preparedness-and-Response-Project-P173757.pdf](#)

- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/668501585239435356/pdf/Environmental-and-Social-Commitment-Plan-ESCP-COVID-19-Emergency-Pandemic-Preparedness-and-Response-Project-P173757.pdf>

- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/834241595001687216/pdf/Disclosable-Version-of-the-ISR-Bangladesh-COVID-19-Emergency-Response-and-Pandemic-Preparedness-Project-P173757-Sequence-No-01.pdf>

6. Nepal: COVID-19 Emergency Response and Health Systems Preparedness Project

- a. Country region: South Asia
- b. Project approval date: April 3, 2020
- c. Project closing date: July 16, 2022
- d. Total project cost: USD 29 million
- e. Date original SEP was disclosed: March 30, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173760?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/465701585569525596/pdf/Stakeholder-Engagement-Plan-SEP-Nepal-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173760.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/624091585569534352/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Nepal-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173760.pdf>
- i. **Environmental and Social Commitment Plan:** [\[and-Health-Systems-Preparedness-Project-P173760.pdf\]\(#\)](http://documents1.worldbank.org/curated/en/290981585569521974/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Nepal-COVID-19-Emergency-Response-</div><div data-bbox=)

- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/514641599168894652/pdf/Disclosable-Version-of-the-ISR-Nepal-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173760-Sequence-No-01.pdf>

7. Sri Lanka COVID-19 Emergency Response and Health Systems Preparedness Project

- a. Country region: South Asia
- b. Project approval date: April 2, 2020
- c. Project closing date: December 31, 2023
- d. Total project cost: USD 128.6 million
- e. Date original SEP was disclosed: March 25, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173867?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/373631585174010238/pdf/Stakeholder-Engagement-Plan-SEP-Sri-Lanka-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173867.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/211581585174031771/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Sri-Lanka-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173867.pdf>
- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/633541585233921946/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Sri-Lanka-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173867.pdf>
- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/380071587807003915/pdf/Disclosable-Version-of-the-ISR-Sri-Lanka-COVID-19-Emergency-Response-and-Health-Systems-Preparedness-Project-P173867-Sequence-No-01.pdf>

8. Cambodia COVID-19 Emergency Response Project

- a. Country region: East Asia and Pacific
- b. Project approval date: April 2, 2020
- c. Project closing date: December 31, 2022
- d. Total project cost: USD 20 million
- e. Date original SEP was disclosed: March 31, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173815?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/472511585674629874/pdf/Stakeholder-Engagement-Plan-SEP-Cambodia-COVID-19-Emergency-Response-Project-P173815.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/540571585674653067/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Cambodia-COVID-19-Emergency-Response-Project-P173815.pdf>
- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/627261585674610338/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Cambodia-COVID-19-Emergency-Response-Project-P173815.pdf>
- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/908951592301862150/pdf/Disclosable-Version-of-the-ISR-Cambodia-COVID-19-Emergency-Response-Project-P173815-Sequence-No-01.pdf>

9. Philippines COVID-19 Emergency Response Project

- a. Country region: East Asia and Pacific
- b. Project approval date: April 22, 2020
- c. Project closing date: December 29, 2023
- d. Total project cost: USD 100 million
- e. Date original SEP was disclosed: April 8, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173877?lang=en>
- g. **Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/200461586368360614/pdf/Stakeholder-Engagement-Plan-SEP-Philippines-COVID-19-Emergency-Response-Project-P173877.pdf>

h. Environmental and Social Review

Summary: <http://documents1.worldbank.org/curated/en/555101586368375247/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Philippines-COVID-19-Emergency-Response-Project-P173877.pdf>

i. Environmental and Social Commitment

Plan: <http://documents1.worldbank.org/curated/en/220801586368351795/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Philippines-COVID-19-Emergency-Response-Project-P173877.pdf>

j. Implementation Status and Results

Report: <http://documents1.worldbank.org/curated/en/593671596191229921/pdf/Disclosable-Version-of-the-ISR-Philippines-COVID-19-Emergency-Response-Project-P173877-Sequence-No-01.pdf>

10. El Salvador COVID-19 Emergency Response Project

- a. Country region: Latin America and Caribbean
- b. Project approval date: April 17, 2020
- c. Project closing date: July 29, 2022
- d. Total project cost: USD 20 million
- e. Date original SEP was disclosed: April 10, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173872?lang=en>
- g. **Spanish Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/523241586551524591/pdf/Stakeholder-Engagement-Plan-SEP-El-Salvador-COVID-19-Response-P173872.pdf>
- h. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/384911586551537633/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-El-Salvador-COVID-19-Response-P173872.pdf>
- i. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/814431587147229251/pdf/Revised-Environmental-and-Social->

[Commitment-Plan-ESCP-Republic-of-El-Salvador-COVID-19-Emergency-Response-Project-P173872.pdf](http://documents1.worldbank.org/curated/en/570381595010471127/pdf/Commitment-Plan-ESCP-Republic-of-El-Salvador-COVID-19-Emergency-Response-Project-P173872.pdf)

- j. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/570381595010471127/pdf/Disclosable-Version-of-the-ISR-El-Salvador-COVID-19-Emergency-Response-Project-P173872-Sequence-No-01.pdf>

11. Guatemala COVID-19 Reponse

- a. Country region: Latin American and Caribbean
- b. Project approval date: June 26, 2020
- c. Project closing date: May 31, 2022
- d. Total project cost: USD 20 million
- e. Date original SEP was disclosed: April 19, 2020
- f. **Project page:** <https://projects.worldbank.org/en/projects-operations/project-detail/P173854?lang=en>
- g. **English Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/695391587328962676/pdf/Stakeholder-Engagement-Plan-SEP-Guatemala-COVID-19-Response-P173854.pdf>
- h. **Spanish Stakeholder Engagement Plan:** <http://documents1.worldbank.org/curated/en/619451603370586655/pdf/Stakeholder-Engagement-Plan-SEP-Guatemala-COVID-19-Response-P173854.pdf>
- i. **Environmental and Social Review Summary:** <http://documents1.worldbank.org/curated/en/668411587328970978/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Guatemala-COVID-19-Response-P173854.pdf>
- j. **Environmental and Social Commitment Plan:** <http://documents1.worldbank.org/curated/en/257691587328950151/pdf/Environmental-and-Social-Commitment-Plan-ESCP-Guatemala-COVID-19-Response-P173854.pdf>
- k. **Implementation Status and Results Report:** <http://documents1.worldbank.org/curated/en/403641598463256786/pdf/Disclosable-Version-of-the-ISR-Guatemala-COVID-19-Response-P173854-Sequence-No-01.pdf>

Annex 4: Additional information

Our analysis in the main text of this report of 11 original Stakeholder Engagement Plans (SEPs) for COVID-19 emergency project was meant to be a broader assessment of patterns and common themes regarding if and how the Bank and Borrowers met ESF requirements related to stakeholder engagement for these projects. This annex provides more detailed information and examples of the patterns addressed in the main text about the information that was or was not included in the 11 SEPs. In some cases, we explain additional patterns of information that was or was not included, but which the Bank and Borrowers do not have a legal requirement to include. Since this annex is only meant to supplement the main text and is not intended to assess whether SEPs met requirements of the ESF, we do not provide a summary of relevant ESF requirements for each topic nor an analysis of the implications of the patterns presented.

See [Annex 3](#) for links to the SEPs and other project documents referenced in this Annex, as well as information about the projects. See "[References](#)" for complete citations of the SEPs.

A. Stakeholder Identification and Marginalized Groups

1. Definitions of "vulnerability" in the examined SEPs

The three definitions of "vulnerability or "vulnerable status" in the analyzed SEPs are:

1. Under "Inclusiveness and sensitivity," one of the principles for stakeholder engagement that the documents describe in the "Methodology" section, a list of groups who need "special attention" to ensure there is "sensitivity" to their needs: "women, youth, elderly and the cultural sensitivities of diverse ethnic groups."
 - a. SEPs that provide this list: Liberia, Bangladesh, Philippines, Sri Lanka, Burkina Faso, Uganda, Cambodia, Nepal¹
2. A footnote to "vulnerable status," a term used to explain "vulnerable groups" as one of the core categories that stakeholders

1 Chisaka, "SEP - Liberia COVID-19 Project," 6; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 3; Demombynes, "SEP - Philippines COVID-19 Project," 4; Kak, "SEP - Sri Lanka COVID-19 Project," 3; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 8; Borrowing Agency, "SEP - Uganda COVID-19 Project," 2; Hyder, "SEP - Cambodia COVID-19 Project," 3; Bhattarai, "SEP - Nepal COVID-19 Project," 3.

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

- a. SEPs that provide this list: Liberia, Bangladesh, Philippines, Guatemala, Sri Lanka, Burkina Faso, Uganda, Cambodia, Nepal²
3. An explanation of from where vulnerability can stem that is included directly under the header "Disadvantaged / vulnerable individuals or groups" (or a variant of that header), that also includes bulleted lists of "vulnerable" groups specific to the projects: "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."
 - a. SEPs that provide this list: Liberia, Bangladesh, Philippines, Guatemala, El Salvador, Sri Lanka, Burkina Faso, Cambodia, Nepal³

2. Groups identified as "disadvantaged and vulnerable"⁴

Each SEP lists bullet points of stakeholders it includes (but are not limited to) within each of the three stakeholder categories: affected parties, other interested parties, disadvantaged / vulnerable

2 Chisaka, "SEP - Liberia COVID-19 Project," 6; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 4; Demombynes, "SEP - Philippines COVID-19 Project," 5; Cavagnero, "SEP - Guatemala COVID-19 Project," 4; Kak, "SEP - Sri Lanka COVID-19 Project," 4; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 8; Borrowing Agency, "SEP - Uganda COVID-19 Project," 2; Hyder, "SEP - Cambodia COVID-19 Project," 3; Bhattarai, "SEP - Nepal COVID-19 Project," 4.

3 Chisaka, "SEP - Liberia COVID-19 Project," 8; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 4; Demombynes, "SEP - Philippines COVID-19 Project," 5; Cavagnero, "SEP - Guatemala COVID-19 Project," 5; Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 4; Kak, "SEP - Sri Lanka COVID-19 Project," 5; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 9; Hyder, "SEP - Cambodia COVID-19 Project," 4; Bhattarai, "SEP - Nepal COVID-19 Project," 4.

4 For each mention of project SEPs in this section, see the following page numbers: Chisaka, "SEP - Liberia COVID-19 Project," 6; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 5; Mills, "SEP - The Gambia COVID-19 Project," 3; Demombynes, "SEP - Philippines COVID-19 Project," 6; Cavagnero, "SEP - Guatemala COVID-19 Project," 6; Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 4; Kak, "SEP - Sri Lanka COVID-19 Project," 5; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 9; Borrowing Agency, "SEP - Uganda COVID-19 Project," 3; Hyder, "SEP - Cambodia COVID-19 Project," 4; Bhattarai, "SEP - Nepal COVID-19 Project," 5.

individuals or groups (referred to by Uganda as “vulnerable and marginalized groups”).

Below is a list of marginalized groups that meet the characteristics included in the definition of “disadvantaged or vulnerable” in the “Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.” Below each group is information about which SEPs (if any) included the group in their lists of “disadvantaged or vulnerable individuals or groups” that might be affected by the project and may be “more likely to be excluded from/unable to participate fully in the mainstream consultation process.”⁵

Persons with disabilities

Every SEP lists people with disabilities or “disabled” (Cambodia).

LGBTQI people

Three SEPs use a term to describe sexual orientation or gender identity as a reason a group is vulnerable. The Nepal SEP lists LGBTI people. Uganda’s lists “sexual minorities” and Cambodia’s lists the term “SOGI” (sexual orientation and gender identity).

In the footnote explaining where vulnerability may stem from, “sexual orientation” is included in the Uganda SEP. References to SOGI do not appear anywhere else in Cambodia’s and Nepal’s SEPs -- do not include sexual orientation and gender identity in their general definition of vulnerability or vulnerable status.

Elderly

Every SEP lists the elderly.

Children and youth

Four SEPs list children as a “vulnerable group.” The SEPs for Sri Lanka and Cambodia list “children” and Burkina Faso’s lists “children under 7.” The Philippines’ lists “children, particularly those who are malnourished and have low immunity.”

Two SEPs list “Children-headed households” -- Burkina Faso’s and Uganda’s SEPs.

Liberia’s and The Gambia’s do not list children, but they list “single mothers with underage children,” as does Uganda’s.

Women

Only two SEPs -- Sri Lanka’s and Nepal’s SEPs -- list women as a group on their own.

“Women in economic and social vulnerability” or women as part of the larger grouping of those who

⁵ “Environmental and Social Framework,” x, par. 7.

are economically disadvantaged, is listed in three SEPs: the Philippines’, Guatemala’s, and El Salvador’s SEPs.

“Female-headed households” is listed in seven SEPs for Liberia, Bangladesh, The Gambia, Sri Lanka, Burkina Faso, Uganda, and Nepal.

“Single mothers with underage children” is listed in three SEPs: Liberia’s, The Gambia’s, and Uganda’s.

“Pregnant women” is listed in two SEPs: Sri Lanka’s and Uganda’s.

Ethnic minorities

Ethnic minorities are listed in the SEPs for five countries: Liberia, Bangladesh, Philippines, Uganda, and Cambodia.

Guatemala’s lists “Afro-descendent populations.”

In El Salvador’s, only “indigenous populations” (IPs) are listed under the heading of “disadvantaged / vulnerable individuals or groups,” but ethnic minorities and IPs are listed together in a table outlining plans for stakeholder engagement.

Terms related to “ethnicity” are not mentioned at all in The Gambia SEP.

Religious minorities

The SEPs for 4 countries, Liberia, Bangladesh, Uganda, and Nepal, list religious minorities. Nepal’s provides “Muslims” as an example.

People with disadvantaged social status

Nepal’s SEP specifically lists “Dalits,” the lowest caste in Nepal.

Guatemala’s lists women “in social vulnerability, especially those exposed to violent family members.”

People with disadvantaged health status

Four SEPs list people with pre-existing health conditions (or chronic disease and preexisting conditions): Bangladesh, the Philippines, Sri Lanka, and Nepal.

Two SEPs list people with chronic diseases or compromised immune systems: Liberia, The Gambia.

Burkina Faso’s only lists “people with chronic illnesses” and Uganda only lists “persons living with HIV/AIDS.”

Indigenous peoples

Four SEPs, those of the Philippines, Guatemala, El Salvador, and Nepal list “indigenous peoples.”

Uganda's SEP specifically lists Iks and Batwas, which are two IPs in Uganda.

The Gambia's lists "Disadvantaged groups that meet the requirements of ESS7" which refers to affected indigenous peoples.

Cambodia's SEP lists IPs as an affected party, but not as a "disadvantaged and vulnerable" group.

Those living in remote or rural areas

People or communities "in remote or rural areas" are listed in seven SEPs: Liberia, Bangladesh, Sri Lanka, Burkina Faso, Uganda, Cambodia, and Nepal.

Migrants

Migrants are listed only in the Guatemala SEP.

Refugees

Refugees are listed in two SEPs: for Burkina Faso and Uganda.

Liberia's lists "internally displaced people."

Those who are economically disadvantaged

Different terms are used to refer to people who are economically disadvantaged: "people living in poverty"; "poor, economically marginalized, and disadvantaged groups"; "people living below the poverty line"; and "poor households". Seven SEPs include one of these terms: Bangladesh, the Philippines, Guatemala, El Salvador, Sri Lanka, Cambodia, and Nepal.

The Gambia's lists "the unemployed" and Uganda lists "jobless people." (Sri Lanka's, in addition to listing "people living below the poverty line" lists "unemployed and homeless" and "daily wage earners")

Those who depend on unique natural resources

Though dependency on natural resources is listed as a cause of vulnerability in the documents' definitions of vulnerable status (except for The Gambia's SEP), no SEP includes those who have this dependency in its list of "disadvantaged / vulnerable individuals or groups."

Other groups

Liberia SEP: least educated people and drug addicts (also in Bangladesh)

Bangladesh SEP: people living en masse in close quarters (hostels and prisons) (prisons also mentioned in Uganda), illiterate people, drug addicts (also in Liberia)

The Gambia SEP: veterans of war, caregivers of

persons with disabilities (also in Uganda)

Sri Lanka SEP: Veddas (forest dwellers), daily wage earners, the homeless

Burkina Faso SEP: "people living with limited instruction"⁶

Uganda SEP: sex workers, people in prisons (also in Bangladesh), caregivers of persons with disabilities (also in The Gambia)

Nepal SEP: disaster-affected populations

B. Information Disclosure and Accessibility

1. Additional languages and formats for project information disclosure

While the SEPs that were examined went into different amounts of detail about the types of information that should be disclosed and how certain information should be targeted at different stakeholders, this report focuses on whether SEPs provided any indication that they would use additional languages and formats to share information to different groups, and if there would be an effort to have documents in a format that is easy for stakeholders to read and understand.

All SEPs except The Gambia made a broad reference to providing information in an "appropriate format" and/or that the implementing agencies should provide information that is "understandable and accessible."

Three SEPs identified specific languages and formats the projects would use to disseminate messages and disclose information:

1. The Guatemala SEP says it will provide messages in indigenous languages, subtitles for persons with disabilities, and sign language.⁷ It also notes that a team will work to ensure that communications are "culturally, socially and linguistically pertinent and effectively delivered" to indigenous peoples.⁸ The original SEP itself, however, was only in English. A Spanish version was disclosed in November, and was not disclosed in any indigenous languages.
2. The El Salvador SEP mentions that

⁶ The SEP does not provide any information about who is included in the definition of "people living with limited instruction." See Burkina Faso SEP, p. 9

⁷ Cavagnero, "SEP - Guatemala COVID-19 Project," 7-8.

⁸ Cavagnero, "SEP - Guatemala COVID-19 Project," 9.

information should be provided using simple language, illustrations, and translations to make documents easy to understand.⁹

3. The Sri Lanka SEP says that materials will be disseminated in local languages (Sinahala and Tamil). Accessible formats for persons with disabilities should include Braille, large prints, text captioning, signed videos, online materials, and multiple forms of communication.¹⁰

C. Consultations and Feedback Mechanisms

1. Special accommodations for meaningful consultations

Four SEPs (the Philippines, Guatemala, El Salvador, and Sri Lanka) provide at least some information about the special needs certain marginalized groups might require during stakeholder engagement.

The Philippines' notes that an updated SEP will have specific provisions for engaging with IPs and stakeholders in Bansamoro Autonomous Region of Muslim Mindanao (BARMM).¹¹

Guatemala's SEP says that there is "need for interpreters for Indigenous languages, and sign language as necessary, in order to ensure patients and their families understand key messages."¹²

El Salvador's SEP says that indigenous peoples might need special lines of communication to ensure they are engaged.¹³

Sri Lanka's provides a fairly detailed "proposed strategy to incorporate the views of vulnerable groups:"

- "Women: 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; consider provisions for childcare, transport, and safety for any in-person community engagement activities.
- Pregnant women: develop education materials for pregnant women on basic hygiene practices, infection precautions, and how and where to seek care based on their questions and

concerns.

- Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk & what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members, health care providers and caregivers.
- People with disabilities: 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.
- Children: design information and communication materials in a child-friendly manner & provide parents with skills to handle their own anxieties and help manage those in their children."¹⁴

2. Clear timelines and personnel for consultations and feedback

Generally, most SEPs do not provide any sort of clear timeline for when consultations with certain groups or on specific topics will take place beyond who and what will be consulted on during the preparation and implementation phases of the project. Guatemala's SEP says that "a series of phone interviews will be carried out with representatives from the different stakeholders" 30 days subsequent to effectiveness.¹⁵ Cambodia's SEP claimed that consultation meetings were expected to occur in March or April 2020, but no updated SEP has been disclosed to confirm those occurred.¹⁶ Every project describes at least some plans for how it will conduct consultations, specifically that telecommunications of some sort will be used in light of COVID-19 restrictions that may make in-person meetings impossible or difficult.

Four SEPs, those of Guatemala, Sri Lanka, Burkina Faso, and Cambodia, indicate that they were able to conduct some consultations during the preparation of the SEP, but due to COVID-19 restrictions and the emergency nature of the projects, they did not meet with any members of civil society and only met with different government officials and health sector experts.¹⁷ None of them provide any specific feedback that came from these consultations. The

14 Kak, "SEP - Sri Lanka COVID-19 Project," 13.

15 Cavagnero, "SEP - Guatemala COVID-19 Project," 6.

16 Hyder, "SEP - Cambodia COVID-19 Project," 4.

17 Cavagnero, "SEP - Guatemala COVID-19 Project," 6; Kak, "SEP - Sri Lanka COVID-19 Project," 6; Besarabic Bennett, "SEP- Burkina Faso COVID-19 Project," 10; Hyder, "SEP - Cambodia COVID-19 Project," 4.

9 Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 5-7.

10 Kak, "SEP - Sri Lanka COVID-19 Project," 11.

11 Demombynes, "SEP - Philippines COVID-19 Project," 7.

12 Cavagnero, "SEP - Guatemala COVID-19 Project," 7.

13 Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 7.

Nepal SEP, on the other hand, provides feedback received during consultations for what the project implementers should consider:

- The need for the federal government to support not just national, but provincial hospitals to be able to test and treat COVID-19 and other infectious diseases;
- The need to ensure laboratories and hub hospitals are adequately resourced to manage potential outbreak of the virus in the country; and
- The need to provide health staff with the necessary logistics and supplies (e.g. PPEs) to facilitate their work; and intensify public education and communication.¹⁸

Six of the 11 SEPs that were analyzed address the fact that precautions more broadly must be taken with stakeholder engagement to consider the safety of participants and prevent contagion: Liberia, Bangladesh, the Philippines, El Salvador, Sri Lanka, and Cambodia.¹⁹ Nepal's and Uganda's, as well as other aforementioned countries, say that "health and safety" will be a topic of consultations.²⁰ The SEPs for The Gambia and Guatemala don't seem to mention safety at all, and while the Burkina Faso SEP mentions that alternative engagement methods will be used during the pandemic, the use of them is not framed as a way to ensure safety to participants.²¹

Some SEPs go into more detail than others on the methods used for specific topics of consultation with different target stakeholders. Seven SEPs -- those of the Philippines, El Salvador, Sri Lanka, Burkina Faso, Uganda, Cambodia, and Nepal -- have tables in which this information is detailed.²² These tables, however, are laid out in such a way that the methods and target stakeholders for each topic of consultation are grouped together. For instance, a long list of outreach methods are listed for conducting consultations about the purpose and basis of the project to a range of stakeholders -- both government officials and vulnerable groups.

18 Bhattarai, "SEP - Nepal COVID-19 Project," 5.

19 Chisaka, "SEP - Liberia COVID-19 Project," 10; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 6; Demombynes, "SEP - Philippines COVID-19 Project," 7; Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 4; Kak, "SEP - Sri Lanka COVID-19 Project," 7; Hyder, "SEP - Cambodia COVID-19 Project," 6.

20 Borrowing Agency, "SEP - Uganda COVID-19 Project," 7; Bhattarai, "SEP - Nepal COVID-19 Project," 8-9.

21 Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 11.

22 Demombynes, "SEP - Philippines COVID-19 Project," 7 and 9; Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 8-9; Kak, "SEP - Sri Lanka COVID-19 Project," 11-13; Borrowing Agency, "SEP - Uganda COVID-19 Project," 5-6; Hyder, "SEP - Cambodia COVID-19 Project," 6-7; Bhattarai, "SEP - Nepal COVID-19 Project," 6-7.

The documents for Philippines, Sri Lanka, and Cambodia also explicitly indicate plans for separate consultations with certain marginalized groups: in the Philippines with IPs and stakeholders in BARMM; in Sri Lanka with women, pregnant women, the elderly, persons with disabilities, and children; and in Cambodia with IPs and ethnic groups.²³

3. Data and information reported about SEP monitoring and consultations

Every SEP says the projects will provide either quarterly or monthly summaries on grievances, "enquiries and related incidents," the "status of implementation of associated corrective/preventive actions" collected by staff. All of the SEPs, except that of Guatemala, say that information on public activities "may be conveyed in two ways: publication of a standalone report on projects' interaction with stakeholders" and a number of performance indicators monitored on a regular basis.

Eight SEPs provide examples of the types of data on performance indicators, but differ slightly between them. All include "number of consultation meetings and other public discussions" conducted on a regular basis, the number of public grievances, and the number of materials published or broadcasted. The other three SEPs, those of Liberia, Guatemala, and Burkina Faso, only say that performance indicators generally will be reported on.²⁴

None of the SEPs provided any plans for disaggregating data collected about participants in consultations by gender or by anything else. In fact, none of the SEPs made any plans to collect data about those who are consulted.

D. Grievance Redress Mechanism (GRM)²⁵

1. Descriptions of the GRMs

All of the SEPs include a section devoted to describing

23 Demombynes, "SEP - Philippines COVID-19 Project," 7; Kak, "SEP - Sri Lanka COVID-19 Project," 13; Hyder, "SEP - Cambodia COVID-19 Project," 9.

24 Cavagnero, "SEP - Guatemala COVID-19 Project," 11; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 14.

25 For each mention of project SEPs in this section, see the following page numbers: Chisaka, "SEP - Liberia COVID-19 Project," 12; Mohammed-Roberts, "SEP - Bangladesh COVID-19 Project," 8-9; Mills, "SEP - The Gambia COVID-19 Project," 4-6; Demombynes, "SEP - Philippines COVID-19 Project," 10; Cavagnero, "SEP - Guatemala COVID-19 Project," 9-10; Gordillo-Tobar, "SEP - El Salvador COVID-19 Project," 10-11; Demombynes, "SEP - Philippines COVID-19 Project," 14-17; Besarabic Bennett, "SEP - Burkina Faso COVID-19 Project," 12-13; Borrowing Agency, "SEP - Uganda COVID-19 Project," 9-11; Hyder, "SEP - Cambodia COVID-19 Project," 8-9; Bhattarai, "SEP - Nepal COVID-19 Project," 10-11.

the steps and components of the projects' GRMs. Each describes the steps of its GRM a bit differently, but notable perhaps is Liberia in how it lacks details about the process. Liberia's SEP doesn't specify that grievances are recorded or responded to, let alone how much time each of those steps should take. The Liberia SEP is also the only one that does not indicate that complaints can be filed anonymously.

The Uganda SEP is the only one that explicitly states that the Grievance Committee, that handles grievances from the project, must provide a reason for their decision about the grievance to the complainant. Bangladesh does not explicitly state that a reason must be provided, but says answers should be provided to any questions that arise about how grievances were resolved. The Philippines also does not indicate explicitly that a reason must be provided, but says that the GRM "provides transparent and credible processes for fair, effective and lasting outcomes."

Along with the Burkina Faso and Guatemala GRMs, the Liberia GRM does not provide a form of appeal. All of the other SEPs specify as a step or component of their projects' GRMs that there is an appeals process, and that if "all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse." Liberia and Burkina Faso only indicate that complainants will be advised on their right to legal recourse with no appeals process first.

2. Consultations about GRMs with representatives of marginalized groups and GRCs

None of the SEPs indicate that affected communities provided any input on the design of the GRMs, but those of the Philippines, Guatemala, and Cambodia indicate that the design will take into account the needs and concerns of Indigenous Peoples.

Six of the 11 SEPs indicate that an entity other than the project implementing unit (PIU) will manage grievances and handle the GRM, either through a dedicated grievance redress committee (GRC) or other departments or lower tiers of the Ministries of Health: the Philippines, El Salvador, Sri Lanka, Uganda, Cambodia, and Nepal. The other SEPs indicate that the PIU will handle grievances, or in the case of Liberia, there is no mention of who will oversee the GRM.

Only two SEPs provide criteria for the type of people that can compose their GRCs. Uganda's SEP says that

the "composition of GRCs will take account of gender composition" and Cambodia's SEP says that the GRC must include women.

3. Data and information reported about the GRM

None of the SEPs specify that grievances filed will be disaggregated by the gender of the person who submitted them.

Within the "monitoring" section, all of the SEPs indicate that at least some information about the GRM's performance will be made public, like the number of grievances received and the number resolved in a prescribed time. The SEPs for Sri Lanka and Cambodia more specifically say that they will publicize a summary of complaints, the actions taken (Cambodia says it will also report on the time it takes to close complaints).

4. GRMs equipped to handle GBV/SEA/SH

Five of the 11 GRMs are operationalized specifically to be able to handle cases of gender-based violence (GBV), sexual exploitation and abuse (SEA), and/or sexual harassment (SH): Liberia, Philippines, Sri Lanka, Burkina Faso, and Nepal. The Uganda and El Salvador SEPs indicate that the projects will make available information about GBV and hotlines that people can use to report GBV, but do not explicitly state that these hotlines are in any way connected to the project's GRM.

The terminology used to describe what types of cases the GRMs will be able to handle is different in the SEPs. Specifically, the Liberia and Sri Lanka SEPs indicate that the GRMs will be "strengthened with procedures to handle allegations of GBV/SEA/SH." The Philippines, Burkina Faso, and Nepal SEPs indicate that the GRMs will have processes to address GBV-related issues. The Uganda and El Salvador SEPs describe the fact that the Ministries of Health will disseminate information about services and hotlines that people can use to report cases of GBV/SEA/SH as well as violence against children (VAC).

Though only 5 projects indicate that their GRMs will specially handle GBV/SEA/SH complaints, all 11 projects' ESRs point to the fact that there is a potential risk of some combination of GBV/SEA/SH and VAC. The risk, however, comes up in different parts of the ESRs in different ways:

- The ESRs for El Salvador, Sri Lanka, Burkina Faso, and Uganda mention the risk under "Social Risk Rating" in the "Environmental and

Social Risk Classification” section as well as a risk in connection to “ESS1 Assessment and Management of Environmental and Social Risks and Impacts,” as something that could happen to women and children under self-isolation.²⁶ The El Salvador and Uganda ESRSs list “GBV/SEA”, the Sri Lanka ESRS lists “GBV and SEA/SH”, and the Burkina Faso lists “SEA/SH.”

- The Liberia ESRS points to the risk of “GBV/SEA” under “Social Risk Rating” and is associated with “ESS4 Community Health and Safety”²⁷
- The ESRSs for The Gambia and Guatemala list the risks as being associated with just ESS4, and both list “SEA/SH” as the risk.²⁸
- The Philippines, Cambodia, and Nepal ESRSs list the risk under ESS4 as well as “ESS2 Labor and Working Conditions”²⁹ The Philippines ESRS lists “SEA/SH/GBV/VAC” and the Cambodia ESRS lists “SEA/GBV/SH.” The Nepal ESRS lists “SEA/SH.”
- The Bangladesh ESRS lists GBV as a risk associated with ESS2.³⁰

E. SEP Implementation

With the exception of the Uganda SEP, all of the projects’ SEPs were disclosed in March or April 2020, within a month of the World Bank approving the Fast Track Facility. The Uganda SEP was disclosed in September, two months after the project’s approval. The Uganda and Guatemala projects were approved in July and June, respectively, and all of the other projects were approved in March or April.

Three of the 11 SEPs **do not** specify that a revised SEP will be prepared within 30 days of the projects’ effectiveness. The SEPs for The Gambia, El Salvador, and Cambodia all say simply that the SEP will “be periodically revised and updated as necessary.”

All of the projects Environmental and Social Commitment Plans (ESCPs) indicate that the draft SEPs will be updated either within 30 or 60 days of the effective date.

26 Gordillo-Tobar, “ESRS - El Salvador COVID-19 Project,” 5 and 7; Kak, “ESRS - Sri Lanka COVID-19 Project,” 8; Besarabic Bennett, “ESRS - Burkina Faso COVID-19 Project,” 4-5; Mensah, “ESRS - Uganda COVID-19 Project,” 5.

27 Chisaka, “ESRS - Liberia COVID-19 Project,” 4 and 9.

28 Mills, “ESRS - The Gambia COVID-19 Project,” 6; Cavagnero, “ESRS - Guatemala COVID-19 Project,” 10.

29 Demombynes, “ESRS - Philippines COVID-19 Project,” 9; Hyder, “ESRS - Cambodia COVID-19 Project,” 11 and 13; Bhattarai, “ESRS - Nepal COVID-19 Project,” 9.

30 Mohammed-Roberts, “ESRS - Bangladesh COVID-19 Project,” 7.

Annex 5: Analysis of Liberia SEP

1. Introduction

The original and revised Stakeholder Engagement Plans (SEPs) of the Liberia COVID-19 Emergency Response Project (LCERP) are two of 12 SEPs analyzed by BIC with a focus on five main areas: stakeholder identification and marginalized groups; information disclosure and accessibility; consultations and feedback mechanisms; grievance redress mechanisms; and SEP implementation. From conversations with World Bank staff, BIC was informed that the original SEP for LCERP was written by World Bank staff. The updated SEP, however, was prepared by the “Republic of Liberia Ministry of Health” and was disclosed about three months after the project took effect.¹

Our analysis in the main text of this report of all 11 original SEPs was meant to be a broader analysis of patterns and common themes across the SEPs. Below we have done a deeper assessment of the language in the revised Liberia SEP to see whether the updates were effective in addressing issues identified as patterns across the original analyzed SEPs. While the assessment is not necessarily representative of other SEPs, many of the emergency response project SEPs included similar language, and a closer examination allows for more nuanced analysis of how the revised SEP improved on the original, and what gaps still remain.

See “Liberia COVID-19 Emergency Response Project” in Annex 3 for links to the original and revised SEPs, as well as information about the project.

2. Data and Analysis

Below are assessments and comparisons of the original and revised LCERP SEPs based on the questionnaire provided in Annex 1. In most cases, the revised SEP expanded on or improved content found in the original, but in some cases, content included in the original SEP was omitted from the revised document without explanation. See the main text for the relevant requirements and guidance that correspond to each section.

A. Stakeholder Identification and Marginalized Groups

1. Execution of stakeholder identification

1 See “Effectiveness date”, Chisaka, “ISR - Liberia COVID-19 Project,” 1; Srivastava, “Revised SEP - Liberia COVID-19 Project.”

→ Neither the original nor revised SEP includes information about the use of an independent specialist

See [section A.1](#) in the main text for more information about relevant ESF requirements

As discussed in the main text, the Bank suggests that Borrowers hire a third party specialist to identify stakeholders for a substantial-risk project like the LCERP. Nevertheless, information about the stakeholder identification process remained the same between the original and revised versions and neither indicate that an independent third party specialist was used nor that the Bank verified the identification of “disadvantaged or vulnerable individuals or groups.”

2. Definitions of the term “vulnerability” and “disadvantaged or vulnerable individuals or groups”

→ The definition of “vulnerability” did not change from old to revised SEP, but the groups listed as “disadvantaged or vulnerable” did

See [section A.2](#) in the main text for more information about relevant ESF requirements

The definition of “disadvantaged or vulnerable” in the “Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups” provides a comprehensive list of characteristics that can lead groups or individuals to be negatively impacted by Bank-financed projects or limit their access to project benefits.² The Bank must use this definition to verify that SEPs have identified groups that may be “disadvantaged or vulnerable” in the context of the project.³

Neither the revised nor the original LCERP SEP, however, includes the same definition of “disadvantaged or vulnerable.” Specifically, none of the definitions in either document include sexual orientation, gender identity, or indigenous status as identities or characteristics that may cause vulnerability, despite the fact that the Directive lists them.⁴ Between the two SEPs, the characteristics listed as those that can lead to “vulnerability” are

2 The characteristics included in the definition of “disadvantaged or vulnerable” in The Directive are: age; gender; ethnicity; religion physical, mental or other disability; social, civic or health status; sexual orientation; gender identity; economic disadvantages; indigenous status; dependence on unique natural resources. See 2 under The Directive in Annex 1: “The Directive,” 1.

3 See 2b under [The Directive in Annex 1](#); “The Directive,” 3.

4 See Chisaka, “SEP - Liberia COVID-19 Project,” 6-8; Srivastava, “Revised SEP - Liberia COVID-19 Project,” 25-27.

mostly the same.⁵ The revised SEP, however, does not include a footnote that includes a longer list of characteristics from which vulnerability can stem.⁶ SEPs should all refer to the Bank's definition of "vulnerability" to verify that they are including relevant "disadvantaged or vulnerable" groups as stakeholders.

Furthermore, there is generally a lack of consistency of the groups listed as "vulnerable," even within the revised SEP itself. A section of the revised SEP titled: "Proposed strategies for incorporating the views of vulnerable groups" only includes three of the eight groups named in the section with a list of "disadvantaged or vulnerable individuals or groups." Women and pregnant women are not listed as "disadvantaged or vulnerable," but they are listed under the "proposed strategies" section. Four vulnerable groups listed in the Directive are not listed in either the original or revised SEPs: LGBTQI individuals, Indigenous Peoples, those who might be adversely affected due to their civic status, and those who are economically disadvantaged.⁷ It is important that SEPs identify and maintain a consistent list of marginalized groups so that it is clear that all potentially marginalized groups have been assessed and that those groups will continue to be considered in each component of the engagement process.

The original LCERP SEP says that a community engagement exercise would be carried out to confirm the groups that are listed, but neither SEP includes a description of this exercise. Furthermore, there is no explanation for why the list of "disadvantaged or vulnerable individuals or groups" in the revised SEP is different than that in the original SEP. Some groups were added in the revised SEP, such as ZOGOS (war affected children and persons) and "people living on the streets," and some groups were removed, such as ethnic and religious minorities, drug addicts,

5 Per the original SEP: "The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community." The original SEP also includes "dependence on other individuals or natural resources" in the listed characteristics. See Chisaka, "SEP - Liberia COVID-19 Project," 8; Srivastava, "Revised SEP - Liberia COVID-19 Project," 27.

6 The revised SEP lacks a footnote that provides a broader and more encompassing definition than those in the main text. The footnote in the original SEP states: "Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources." See Chisaka, "SEP - Liberia COVID-19 Project," 8.

7 For characteristics listed in the original and revised SEPs, see: Chisaka, "SEP - Liberia COVID-19 Project," 6-8; Srivastava, "Revised SEP - Liberia COVID-19 Project," 25-27. For characteristics listed in The Directive, see: "The Directive," 1.

and internally displaced people. While it is not required, the lack of an explanation for why groups were removed from the list of "disadvantaged or vulnerable individuals or groups" makes it difficult to ascertain if they were removed as a result of a verification exercise or due to negligence.

B. Information Disclosure and Accessibility

1. Languages and formats for project information disclosure

→ *The revised SEP updates the original by pointing to disclosing information in local languages through multiple forms of communication*

See [section B.1](#) in the main text for more information about relevant ESF requirements

Borrowers must disclose project information in "relevant local languages" and in formats that are culturally appropriate and accessible, such that they take into account specific needs "of groups that may be differentially or disproportionately affected by the project for reasons stemming from disability, literacy, gender, mobility, and differences in language."⁸ According to guidance on ESS10, drafts of the SEPs should be "made available to stakeholders in accessible formats and through channels that are appropriate for them."⁹

While the original LCERP SEP simply indicated that stakeholders should receive information that "timely, relevant, understandable and accessible" the revised SEP includes a table titled "Strategy for Information Disclosure for COVID-19" which provides a more detailed plan for what information will be disclosed when and by what means than the original SEP.¹⁰ Neither SEP specifies what languages or formats will be used to make information understandable and accessible, and therefore these types of details are more likely to be overlooked. Furthermore, neither SEP addresses the need for information to be disclosed in a "culturally appropriate" manner so that stakeholders feel comfortable engaging with the project information.

The revised SEP says that the project will take steps to incorporate the views of persons with disabilities by providing information "**in accessible formats**" and through "multiple forms of communication." Again, the revised SEP does not offer examples of

8 See 3ciii under [ESS10 in Annex 1](#); "Environmental and Social Framework," 99, par. 20.

9 See 3n under [ESS10 in Annex 1](#); "Guidance Note: ESS10," 5, GN13.3.

10 Chisaka, "SEP - Liberia COVID-19 Project," 1; Srivastava, "Revised SEP - Liberia COVID-19 Project," 33.

what formats and forms of communication will be used to make information accessible to persons with disabilities.

C. Consultations and Feedback mechanisms

1. Special accommodations for meaningful consultations

→ The revised SEP points to strategies to remove obstacles to participation for some marginalized groups

See [section C.1](#) in the main text for more information about relevant ESF requirements

Borrowers are required to explain the ways they will “remove obstacles to participation” in the project for stakeholders, and must conduct consultations in a “culturally appropriate format, in relevant local language(s) and is understandable to stakeholders.”¹¹ Meaningful consultation must also support “active and inclusive engagement with project-affected parties.”¹²

The revised LCERP SEP marked an improvement from the original SEP in identifying what different stakeholders need to participate in the project and consultations. It has a section titled “Proposed strategy to incorporate the view of vulnerable group [sic],” which provides strategies to “effectively engage and communicate” to “vulnerable groups”: women, pregnant women, elderly, people with disabilities, children, and street vendors commonly known as ZOGOs.¹³ The revised LCERP also notes that focus group discussions have already taken place during the beginning of project implementation in “different local languages (dialects)” and indicates that this will be an option for future consultations. It does not, however, specify which and how many languages were used.

Still, strategies are only listed for some of the groups categorized as “disadvantaged or vulnerable.” The project categorizes “people living on the streets” and “people living in informal settlement slum communit[ies] as “disadvantaged or vulnerable,” and these are both groups that may have particular difficulty accessing information about the project and consultations so that they can participate. Borrowers are required to remove obstacles to participation for all stakeholders, and by only listing strategies for

11 See 3biv and 3dii under [ESS10 in Annex 1](#): “Environmental and Social Framework,” 99, par. 16; 99-100, par. 22(a) and 22(c).

12 See 3diii under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 100, par. 22(d).

13 Srivastava, “Revised SEP - Liberia COVID-19 Project,” 39.

engaging some marginalized groups, project staff may ultimately prioritize engagement with those groups, thereby improving their access to project benefits and not others.

2. Clear timelines and personnel for consultations and feedback

→ The revised SEP includes more information about the topics of consultations and who will carry them out

See [section C.2](#) in the main text for more information about relevant ESF requirements

Borrowers are required to “describe the timing and methods of engagement with stakeholders throughout the life cycle of the project” in the SEP.¹⁴ They are also required to designate which personnel will implement and monitor consultations and other forms of stakeholder engagement.¹⁵ The Bank is also required to monitor stakeholder engagement and consultations by Borrowers.¹⁶

A template SEP the Bank created for Borrowers also suggests that when key factors about a project are unknown during project preparation, the SEP needs to provide specific details about ways people can get more information when it is known.

The original SEP did not provide descriptions or a timeline for consultations and engagement, and did not specify what personnel was responsible for carrying out consultations. It also provided very little information about the topics that would be addressed during consultations.¹⁷

The revised SEP, on the other hand, includes a table that explains the different types of consultations and messaging that will happen at different stages of project preparation and implementation.¹⁸ For each stage of the project, the table lists the agencies involved in conducting the consultations and messaging, and that an “Environment and Social Specialist” will be involved in carrying out the engagement. This SEP was disclosed about three months after the project took effect, and also describes consultations staff conducted during that time, primarily with government agencies and international institutions.¹⁹

14 See 3bi under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 98-99, par. 14.

15 See 3fi under [ESS10 in Annex 1](#); “Environmental and Social Framework,” 100, par. 28.

16 See 1d under [ESP in Annex 1](#); “Environmental and Social Framework,” 9, par. 50.

17 Chisaka, “SEP - Liberia COVID-19 Project,” 10.

18 “Revised SEP - Liberia COVID-19 Project,” 29.

19 “Revised SEP - Liberia COVID-19 Project,” 16.

Despite including much more information about consultations, the revised SEP does not meet the ESF requirement to describe the timing of engagement by providing a timeline for consultations.²⁰ As the template SEP suggests to Borrowers, if the Borrowers did not know when and where they would conduct consultations during project preparation, they should provide ways for stakeholders to get that information, but these ways are not made clear despite consultations having already begun at the time the revised SEP was disclosed. Without a timeline for consultations or ways to access the times in the future, stakeholders may not know when and where to go to participate in them. Furthermore, both the Bank and appropriate personnel cannot monitor that consultations are occurring and the Borrower cannot easily be held to account for conducting them.

D. Grievance Redress Mechanism (GRM)

1. Anonymous complaints and forms of appeal in the GRM process

→ *The revised SEP has a more thorough description of the GRM that allows for stakeholders to submit complaints anonymously and appeal decisions*

Borrowers are required to set up grievance mechanisms that “allow for anonymous complaints to be raised and addressed.”²¹ According to the annex of ESS10, the mechanism also “may include... an appeals process to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.”²²

The original LCERP SEP did not indicate that complaints could be filed anonymously. By not addressing anonymity of complaints, the SEP did not make clear that stakeholders have the choice to remain anonymous when submitting grievances. While it states that complainants will be “advised of their right to legal recourse” if they are not satisfied with the redress, it does not indicate that appeals are possible through the GRM. This obfuscates the way that complainants can seek legal recourse.

The revised SEP provides much more information about the grievance mechanism and process. Unlike the original, it addresses the requirement to “allow for anonymous complaints” and states that “in handling GRM matters, confidentiality will be

paramount.”²³ In Appendix 4 of the SEP, “Sample letter of acknowledgement of receipt of an ineligible complaint,” which states the name of the complainant is “not required if anonymous.”²⁴ The description of the grievance mechanism also explicitly includes a method for complainant to appeal the grievance process. Complainants “may appeal to the Minister for Health...and will be reassured of their legal rights under the national judicial process to go to court.”²⁵ With this additional information included about the GRM, Liberia’s Ministry of Health revised the description of the mechanism to meet these ESS10 requirements.

2. Consultations about GRMs with representatives of marginalized groups

→ *The revised SEP points to strategies to remove obstacles to participation for some marginalized groups*

See [section C.1](#) in the main text for more information about relevant ESF requirements

Borrowers are required to set up grievance mechanisms that are “expected to address concerns...in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties.”²⁶

Neither the original or revised SEP detail how the GRM will be set up to address complaints in a way that is “culturally appropriate.” As explained in the main text, guidance for Borrowers suggests that they should design grievance mechanisms in consultation with any project-affected Indigenous Peoples. While no Indigenous group is considered a project-affected stakeholder in the case of the LCERP, our analysis in the main text concludes that consultations with all marginalized groups would make it easier for these groups to know of the GRM’s existence and instruct Borrower’s in how to set up mechanisms in a “culturally appropriate” way that make stakeholders feel comfortable filing complaints. The analysis further concludes that it is good practice for projects’ Grievance Redress Committees (GRCs) -- which handle grievances that are submitted about projects -- to include representatives from marginalized groups. While it is not a requirement, the LCERP project staff consulting with all marginalized groups about their GRM and including representatives from these groups in its GRCs would help make

20 “Revised SEP - Liberia COVID-19 Project,” 29.

21 See 3eii under [ESS10 in Annex 1](#): “Environmental and Social Framework,” 99, par. 27(b).

22 “Environmental and Social Framework,” 101, par. 2(d)-2(e).

23 “Revised SEP - Liberia COVID-19 Project,” 41.

24 “Revised SEP - Liberia COVID-19 Project,” 48.

25 “Revised SEP - Liberia COVID-19 Project,” 41.

26 See 3ei and 3eii under [ESS10 in Annex 1](#): “Environmental and Social Framework,” 99, par. 27-27(a).

the mechanism “culturally appropriate and readily accessible to all project-affected parties.”

3. GRMs equipped to handle GBV/SEA/SH

→ Both the original and revised SEP indicate that the GRM will be equipped to handle GBV/SEA/SH

See [section D.2](#) in the main text for more information about relevant ESF requirements

According to the ESF Good Practice Note “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,”²⁷ “all projects need to have a framework for properly handling SEA/SH allegations.”²⁸

Both the original and revised LCERP SEPs indicate that the GRMs will be equipped to handle GBV/SEA/SH complaints. Both describe how the GRM will be equipped in this way differently. The original SEP states that “first responders will be trained with the basic skills to respond to disclosures of GBV” and that health workers will also be trained in the basic skills.²⁹ It also states that “psychosocial support will be available to women and girls who may be affected by the outbreak and are also GBV survivors.”³⁰ The revised SEP, on the other hand, simply says that the GRM will include “specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documenting of SEA/SH cases.”³¹

There are reasons why it might make sense that the original and revised SEPs do not use consistent language to describe how the project will be equipped to handle GBV/SEA/SH. Perhaps, for instance, consultations at the beginning of project implementation clarified what would be most useful to stakeholders in how GRMs are equipped. If the SEPs are not consistent in their description, however, it is good practice for the revised SEP to provide an explanation for why elements of the mechanism described in the original SEP are not longer considered necessary to include.

2. Budgets for SEP implementation

→ The revised SEP provides a specific budget for SEP implementation

27 It is outside the scope of this report to assess whether all or parts of these projects are considered major civil works and whether the ESF Good Practice Note should be applied.

28 See 6d under [GPN in Annex 1](#); Grown et al., “Good Practice Note: Addressing SEA/SH,” 44, par. 116.

29 Chisaka, “SEP - Liberia COVID-19 Project,” 12.

30 Ibid.

31 “Revised SEP - Liberia COVID-19 Project,” 32.

See [section E.1](#) in the main text for more information about relevant ESF requirements

The Bank provides a template SEP for Borrowers to propose “sample approaches” for fulfilling the requirements of a SEP.³² The template suggests that the resources for implementing stakeholder engagement should be included in the SEP, including confirmation that an adequate budget has been allocated for stakeholder engagement.³³

While the original LCERP SEP did not include a specific SEP budget, the revised SEP estimates in the “Resources” section of the document that the budget for implementing the SEP and the operational cost of the GRM is \$75,000. It specifies that this budget will come from the funding carved out for “component 4 (community engagement, risk communication and advocacy” for the project.³⁴ The revised SEP does not, however, provide an itemized budget for the costs of staff and different forms of engagement, such as information disclosure and consultation. While the revised SEP improves upon the original by providing a budget, the lack of an itemized budget obfuscates whether “an adequate budget has been allocated for stakeholder engagement” and if there is enough funding to perform the necessary tasks to implement the SEP.³⁵

32 “Template for ESS10,” 1

33 See 3o under [ESS10 in Annex 1](#); “Template for ESS10,” 5 sec. 5.1.

34 “Revised SEP - Liberia COVID-19 Project,” 39

35 See 3o under [ESS10 in Annex 1](#); “Template for ESS10,” 5 sec. 5.1.

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