



# Stakeholder Engagement Plan Outline

LLF ESMS Annex P

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## ACRONYMS AND ABBREVIATIONS

<b>Name</b>	<b>Description</b>
E&S	Environmental and Social
ESMS	Environmental and Social Management System
FGD	Focus Group Discussion
GM	Grievance and Feedback Mechanism
IFC	International Finance Corporation
IP	Indigenous People
LAP	Land Acquisition Plan
LL	Legacy Landscapes
LLF	Legacy Landscapes Fund
LRP	Livelihood Restoration Plan
MoU	Memorandum of Understanding
ODA	Official Development Assistance
QA/QC	Quality Assurance/Quality Control
SEP	Stakeholder Engagement Plan
UN	United Nations
UNGP	United Nations Guiding Principles on Business and Human Rights
WB ESS	World Bank Environmental and Social Standards

**DOCUMENT HISTORY**

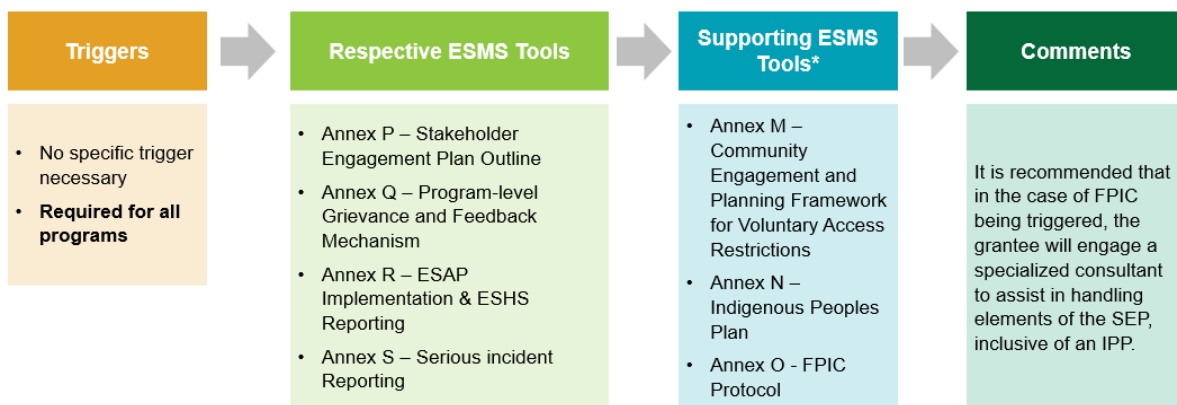
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## 1. INTRODUCTION

Each program funded by LLF requires that a stakeholder engagement plan (SEP) tailored to the program be established by a grantee. This guidance note does not aim to be prescriptive but rather serves as an outline for a SEP. Therefore, as an outline, text can be changed and adapted to program type and context to the legacy landscape (LL) as needed. Furthermore, should the grantee wish to use their own SEP template, it is suggested to conduct a check (gap analysis) against the key content of this outline; the grantee should then amend their own template as needed to ensure that the key aspects of this outline are duly addressed.

**Note:** This document provides a guidance and checklists that are aligned with the applicable standards listed in LLF ESMS manual. In all cases, the grantee and/or the party developing the SEP documents and/or procedures must comply with the local/national requirements; then, the guidance provided in this document (including the other recommended publications) should be utilised to determine how to align the LL program with the applicable standards. If the LL program (or the grantee organisation) already have similar SEP documents and/or templates developed and/or currently implemented, the grantee should conduct the gap analysis exercise between the existing template and/or document and this LLF guidance. The identified gaps should be closed following the rule – stricter applies.

The SEP is required to be developed and implemented by the grantee to each LL program that is receiving grant from LLF.



\* The „Supporting ESMS Tools“ are potentially applicable and/or could be used for support of the „Respective ESMS Tool“ but are not triggered by the same trigger. For the annex specific trigger refer to the respective annex document. For example, the SEP always applies, but FPIC may be a supporting document, but it is not triggered under the conditions of the first column (i.e., „Triggers“).

### 1.1 Purpose

The purpose of this guidance note is to guide the grantee in developing an effective and coherent SEP that in line with the applicable standards and international best practice, aims to ensure engagement that is meaningful, and free of manipulation, interference, coercion and intimidation in all LLF funded program. It also aims to ensure that stakeholder engagement is conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

### 1.2 Objective

The main objectives of stakeholder engagement are as follows:

- Identify relevant stakeholders for the LL program: Involving stakeholders to facilitate inclusive communication and capture a wide range of issues and concerns<sup>1</sup>.

<sup>1</sup> Please note that this sort of stakeholders is often to be found in public institutions related to indigenous people and local communities, as well as in universities.

- Promote cooperation and positive participation from stakeholders: Ensuring that an open, inclusive and transparent process of culturally appropriate engagement and communication is undertaken, to ensure that stakeholders are well informed about the LL program. Information shall be disseminated using the most effective methods and structures.
- Distribute accurate LL program information in an open and transparent manner: Ensuring that stakeholders, particularly those directly affected by the proposed development, have information at their disposal with which to make informed comments and enable them to plan. This reduces levels of uncertainty and manages expectations. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
- Form partnerships to promote constructive interaction between all parties, developing relationships of trust between the LL program and stakeholders: This will contribute to proactive interactions and avoid where possible, unnecessary conflicts based on rumour and misinformation. Identifying structures and processes through which to deal with conflicts and grievances, in contrast to attempting to quash any disputes, would afford the LL program a better understanding of stakeholder concerns and expectations thereby increasing the opportunities to increase the LL program value to local stakeholders.
- Record and address public concerns, issues and suggestions: Documenting stakeholder issues allows LL program decisions to be traced and motivated. This approach addresses potential concerns that stakeholder engagement may be a token gesture by the developer that meets requirements but that it is not taken seriously in the LL program planning.
- Manage stakeholders' expectations: Ensuring that the proposed LL program does not create or allow unrealistic expectations to develop amongst stakeholders about proposed LL program benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.
- Fulfil national and international requirements for consultation: Ensure compliance with both local regulatory requirements and international best practice. One of the key outcomes of engagement should be free, prior, and informed consultation (FPIC) of stakeholders. Thus, the engagement should be free of external manipulation or coercion and intimidation. FPIC (where the C stands for consent as opposed to consultation) is a mandatory process for all grantees where IP are involved and affected by the LL program. For further guidance on the FPIC process, please refer to the LLF ESMS documentation, **Annex O – FPIC Protocol**.
- Ensure that appropriate LL program information on environmental and social (E&S) risks and impacts is disclosed to stakeholders: In a timely, understandable, accessible, and appropriate manner and format.

## 2. APPLICABLE STANDARDS

The full list of applicable standards for developing the program-level SEP is indicated in the LLF ESMS Manual document. In addition, the following standards were used for the development of this guidance note and should be reflected in program-level SEP:

- The UN Guiding Principles on Business and Human Rights (UNGP, 2011), including
  - Guidance Note on Stakeholder Engagement (UNGP, 2020)<sup>2</sup>;

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[https://info.undp.org/sites/bpps/SES\\_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SES%20Stakeholder%20Engagement%20GN\\_Final\\_Dec2020.pdf](https://info.undp.org/sites/bpps/SES_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SES%20Stakeholder%20Engagement%20GN_Final_Dec2020.pdf)

- World Bank ESS10 on Stakeholder Engagement and Information Disclosure (WB, 2017)<sup>3</sup> including:
  - ESS10 Guidance Note (WB, 2016)<sup>4</sup>;
- Voluntary Principles for Security and Human Rights (VPSHR)<sup>5</sup>;
- A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007)<sup>6</sup>;
- Good Practice Note for the Private Sector: Addressing the Risks of Retaliation Against Project Stakeholders (IFC, 2021)<sup>7</sup>.

### 3. KEY TERMINOLOGY

Table 3-1 below elaborates on key terms used in this SEP guidance note.

**Table 3-1 Key Terminology**

Term	Definition
<b>Area of Influence</b>	The area within which a program’s activities has the potential to create environmental and social changes, including the: <ul style="list-style-type: none"> <li>■ Zone of direct impact, an area, often demarcated by a PA boundary, where land access restrictions will be in place and enforced, and where program facilities may be constructed.</li> <li>■ Zone or zones of indirect impact, areas where stakeholders affected by a program’s impactprogram’s reside, work or farm, including areas that experience economic growth, increased traffic or influx as a result of a program’s activities.</li> </ul>
<b>Community</b>	A group of people living in the same place or having a particular characteristic in common (e.g., sharing or having certain attitudes and interests in common). Indigenous people and local communities (IPLC) can be part of a community or build their own communities. For the purpose of this document the term communities entails IPLC.
<b>Free, Prior and Informed Consent</b>	Free, prior and informed consent (FPIC) is a collective human right of Indigenous Peoples <sup>8</sup> to give or withhold their consent prior to the commencement of any activity that may affect their rights, land, resources, territories, livelihoods, and food security. This right is exercised through representatives of their own choosing and in a manner consistent with their own customs, values, and norms. FPIC exists to promote, protect, and safeguard the full enjoyment and exercise of numerous underlying, fundamental human rights, including the rights to property, culture, and self-determination <sup>9</sup> .
<b>Grantee</b>	A NGO(-s) and/or party that is in contractual agreement with LLF and receiving grant funds through the Grant Agreement.

<sup>3</sup> <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=111&zoom=80>

<sup>4</sup> <https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

<sup>5</sup> <https://www.voluntaryprinciples.org/the-principles/>

<sup>6</sup> [https://www.ifc.org/wps/wcm/connect/affbc005-2569-4e58-9962-280c483baa12/IFC\\_StakeholderEngagement.pdf?MOD=AJPERES&CVID=jkD13-p](https://www.ifc.org/wps/wcm/connect/affbc005-2569-4e58-9962-280c483baa12/IFC_StakeholderEngagement.pdf?MOD=AJPERES&CVID=jkD13-p)

<sup>7</sup> [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_gpn\\_reprisalrisks](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_reprisalrisks)

<sup>8</sup> The LLF follows WB standard definition of IP (compare also FPIC guidance note) and requires the application of FPIC as defined per ESS 7. As best practice and also to avoid potential conflicts in communities where indigenous and non-indigenous people live in mixed settings, programs might and are encouraged to adopt FPIC to those mixed communities, as well as to other local communities and vulnerable groups affected by the program.

<sup>9</sup> For further elaboration on definitions and explanations of IP/LC: Accountability Framework Initiative. Operational Guidance on Free, Prior and Informed Consent. Accountability Framework, 2019.

Term	Definition
<b>Legacy Landscape Program/Program activity</b>	All activities <sup>10</sup> related to the legacy landscape and/or stakeholders that are planned, implemented and/or supervised by the grantee and/or their contractor.
<b>Legacy Landscape Staff</b>	All staff related to the legacy landscape program and/or program activity development and implementation (e.g., grantee, contractors, park management, etc.)
<b>Program Affected Person</b>	Any person experiencing loss of asset, access to income whether of a temporary or permanent nature due to the land acquisition process regardless of whether they are physically displaced or relocated or not
<b>Stakeholders</b>	Any and all individuals, groups, organisations, and institutions interested in and potentially affected by a program or having the ability to influence a program
<b>Vulnerable People and Groups</b>	Those who are less able to access a program benefits and/or more likely to experience adverse impacts from a program activities as a result of a given status, which may stem from their ethnicity, colour, gender, sexual identity, language, religion, political or other opinion, national or social origin, property, birth or perceived social status.

## 4. STAKEHOLDER ENGAGEMENT PLAN

### 4.1 Key SEP Elements

The following sub sections elaborate on key elements of an SEP that are as follows:

- Program context and overview;
- Legislative requirements;
- Stakeholder identification and mapping;
- Stakeholder engagement;
- Grievance management;
- Information disclosure;
- Monitoring and reporting.

#### 4.1.1 Program Context and Overview

The SEP should give a brief outline of the LL program, country context and provide an overview of planned program activities/components. This program context and overview are important to develop further stakeholder engagement steps.

It should be noted that there is not one way of conducting stakeholder engagement. Stakeholder engagement approaches should be context-specific and differ from program to program. Therefore, providing program context and overview is essential in picking the right tools to develop an efficient SEP.

#### 4.1.2 Legislative Requirements

In addition to the applicable standards mentioned above and international best practice, the SEP should review relevant national legislation that might entail provisions on stakeholder engagement for program purposes. In case national standards are more stringent than international requirements,

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<sup>10</sup> The program-level SEP must cover not only LLF funded activities for the program, but all activities in the program-specific legacy landscape and surroundings.

those standards must be met. In case that national provisions are less stringent than international requirements, international standards must be met.

### 4.1.3 Stakeholder Identification and Mapping

#### 4.1.3.1 Stakeholder Identification

As a first step for developing the SEP, a list with all relevant initial program stakeholders should be generated. This includes all relevant groups, individuals, and organizations etc. that are potentially directly or indirectly affected by the LL program. A systematic approach should be used for identifying all relevant stakeholders. It is recommended to consider not only LL primary program sites, but also associated facilities, transport and access routes, areas potentially affected by cumulative impacts or unplanned but predictable developments. This analysis will help to establish the programs area of influence (Aoi) and determine who will be affected in what possible ways. The list of stakeholders should be continuously updated with advancement of the program. If available, it should be referred to past stakeholder information and consultation materials.

The identification and verification of stakeholder representatives can be useful and efficient in distributing information to a large number of stakeholders and getting their input on LL program related activities. When identifying stakeholder representatives, it needs to be verified that these persons are indeed representing the views and interests of the broader stakeholder group. This can be done by talking to a sample of program affected persons (PAPs). Legitimate stakeholder representatives could be, but are not limited to:

- Elected representatives of regional, local, and/or village councils;
- Traditional leaders, such as village headpersons or tribal leaders;
- Religious leaders;
- School and university teachers;
- Chairmen, directors, etc. of local cooperatives, NGO's, women's and / or youth groups etc.

#### 4.1.3.2 Stakeholder Analysis

It is important to tailor the engagement methodology to the targeted stakeholders and their relationship to the LL program (their influence and interest). Stakeholder mapping seeks to understand stakeholders' level of interest in the LL program and influence in decision making as well as on other LL program stakeholders and will continue throughout the LL program lifecycle. It is also important to note that stakeholder interests and level of influence is dynamic and changes over time; hence the need to periodically update the stakeholder mapping as well as the wider SEP. Key stakeholder groups that are likely to be identified in each SEP are e.g., local communities, civil society, national and local government authorities etc. Mapping will also help identify stakeholders who may find it more difficult to participate in consultation activities and are affected by or interested in the LL program because of their marginalised or vulnerable status (such as disabled or elderly people).

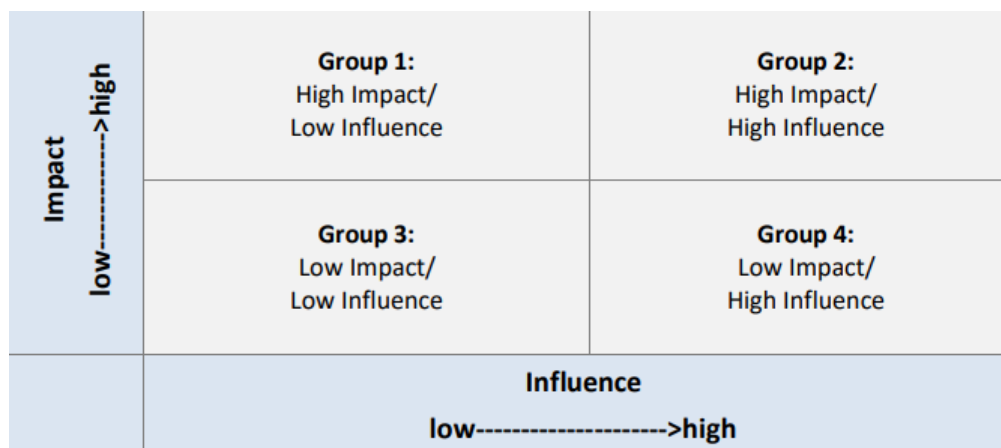
Stakeholder mapping considers:

- Who is affected by the proposed LL program and how;
- Who the formal and informal community leaders are and to what degree they are seen as representative;
- Whether the stakeholder supports, is neutral towards or is opposed to the LL program;
- Each stakeholder's interests and concerns in relation to the LL program; and
- How different stakeholders can influence the LL program and what risks or opportunities this presents.



### 4.1.3.3 Stakeholder Mapping

As a next step a summary of all stakeholders and their risk level should be provided, by mapping their level of influence against their level of importance. The final mapping outcome will affect how the LL program intends to engage (e.g., which techniques should be used, frequency of engagement etc.). Figure 4-1 below provides some guidance on how to map relevant stakeholders in the graph and establish respective stakeholder groups.



Source: UNDP, 2020.

**Figure 4-1 Stakeholder Mapping Tool**

### 4.1.3.4 Basic Principles of Stakeholder Engagement

The following principles should be incorporated in the development of each SEP. Good consultation and engagement should be:

- Targeted at those most likely to be affected by the LL program;
- Early enough to scope key issues and have an effect on the LL program decisions to which they relate;
- Informed as a result of relevant information being disseminated in advance;
- Meaningful to those consulted because the content is presented in a readily understandable format and the techniques used are culturally appropriate;
- Two-way so that both sides have the opportunity to exchange views and information, to listen, and to have their issues addressed;
- Inclusive to accommodate for various societal groups and their needs, e.g., age inclusive, addressing stakeholders of various age groups and accommodating their specific needs, gender-inclusive through awareness that men and women often have differing views and needs; inclusive towards people with physical and mental disabilities, marginalized groups etc.
- Localized to reflect appropriate timeframes, context, and local languages;
- Free from manipulation or coercion;
- Documented to keep track of who has been consulted and the key issues raised;
- Reported back in a timely way to those consulted, with clarification of next steps; and
- Ongoing throughout the life of the LL program.

Please note, that there is no one right way of undertaking consultation. Given its nature, the process will always be context-specific.

### 4.1.3.5 Setting up a Stakeholder Engagement Action Plan

For communicating relevant topics related to the LL program and defining communication requirements and how information will be shared, it is best to set up a concrete action plan for stakeholder engagement activities. Priority issues should be highlighted and treated with priority if they need special attention (e.g., topics of particular controversy, high risks stakeholder groups etc.). The plan should describe at minimum the following:

- Information that will be communicated including the level of detail and format;
- Who will be engaged with at what time;
- How often will engagement activities be conducted;
- How the information will be communicated – written documents, in email, telephone, web portal, messengers, toll free phone line, newspapers, website, radio etc.
- When information will be distributed, the frequency of program communication, both formal and informal;
- Who is responsible for communicating program information; Who will be responsible for which engagement activities;
- Communication requirements for all LL program stakeholders;
- How sensitive or confidential information is communicated and who must authorize this;
- How changes in communication or the communication process will be managed;
- Any constraints, internal or external, which may affect LL program communication; and
- The escalation process for resolving any communication-based conflicts or issues;
- How will results of the engagement be documented.

Table 4-1 below provides an example for a stakeholder communication plan. The plan should summarize all stakeholder engagement activities undertaken and outline how feedback will affect / influence program activities.

**Table 4-1 Stakeholder Communication Plan Template**

Stakeholder	Interest	Issues Raised	Communication Platform	Comments

### 4.1.3.6 Key Items for Communication

The following are some of the important messages that should be communicated to stakeholders:

- Background of the program (incl. objectives);
- Program description and location;
- Program activities;
- The potential benefits and impacts posed by the program;
- The process that will be followed to engage with stakeholders; and
- How and when stakeholders can participate in the program.

It is also important that the following information is communicated to the LL program stakeholders on a needs-basis:

- Construction activities;
- Any interruptions of service utilities;
- Potential impacts of construction and operation activities; and
- The list of grievances that have been received and resolved<sup>11</sup> – this would ensure that the stakeholders are not relying on rumours as their main source of program information.

Particularly, there will be need to inform the stakeholders of all planned LL program activities and potential risks and impacts on them, as well as opportunities. Program communication should be structured and offered regularly but with the flexibility of responding to issues as they emerge.

#### 4.1.3.7 Engagement Methods

Stakeholder engagement aims at making information about the program accessible to interested and affected parties. Communicating such information in a manner that is understandable to the program stakeholders is an important first (and ongoing) step in the process of stakeholder engagement.

A variety of communication methods are available to engage with stakeholders reflecting their level of authority, socio-economic context, and cultural and intellectual factors such as level of education and literacy. Therefore, the best communication method should be assessed during the stakeholder analysis and mapping process.

It is important, that relevant languages, especially local languages and dialects, will be considered for stakeholder engagement activities. Furthermore, illiterate persons should be identified and informed in a non-written way. Language used during stakeholder engagement should be kept simple and culturally appropriate.

Table 4-2 below provides an overview of common methods that can be used to disseminate information to stakeholders depending on the stakeholder group and literacy levels.

**Table 4-2 Common Stakeholder Engagement Methodologies**

Type	Types & Tools	Most Useful Where
Meetings	Public meetings with communities	The program needs to provide program information or feedback to a group, community etc.
	Individual or small group meetings with key stakeholder groups, government agencies, Key informant interviews	To provide or collect specific information from an individual (such as a regulator)
Surveys	Household questionnaires	Can help to establish a baseline data set when a program will have direct and indirect impacts on people or communities; will be used for monitoring well-being at a household level (e.g., to demonstrate livelihood restoration)
	Asset surveys	If a program will impact physical assets (e.g., structures, crops) and needs to assess these for compensation and to inform livelihood restoration and resettlement

<sup>11</sup> Please note that grievances could be presented in an aggregated and anonymous way.

Type	Types & Tools	Most Useful Where
Participatory Workshops	Focus group discussions	In order to provide opportunities for detailed discussion on issues outside the large group format; especially with stakeholders who may not participate in larger group formats (e.g., women, marginalized groups)
	Participatory rural appraisals, Poverty and vulnerability mapping, Wealth ranking and other forms of ranking for decision making	Few secondary sources of data are available. Local leaders and other stakeholders are willing to walk key areas and describe the social elements of these areas to program staff
	Workshops	These involve presentations on activities/progress when triggered by management of change. Should also be used as follow-up on public meetings and action measures arising therefrom.
Negotiating Forums	Committees with sitting members from affected communities, government, and civil society	A program proponent needs to negotiate a planned access restrictions to the certain area of the LL program.
Written materials	Community Noticeboards / Info centres Newsletters / info sheets FAQs	To provide regular program information in easily accessible locations
Media	Radio Print media Social media Toll Free Number Mailing List	To disseminate information across a wide area, including regional, national, and international audiences (often in a range of appropriate languages)
Participatory methods	Role play Historic timelines and trends Seasonal calendar Daily schedules Resource mapping and village maps	Stakeholders are unfamiliar with a program and the program is seeking to develop a good relationship with local communities by recognizing communities' own agency; building cooperation and community ownership over the program

#### 4.1.3.8 Special Considerations

There are several aspects that should be especially considered when developing the SEP. The following sub sections elaborate on those aspects that require special attention.

Please note, that while special attention should be placed on engagement with below-mentioned groups, generally stakeholder engagement activities should aim at including all stakeholder groups. However, due to the vulnerability of some groups, special engagement strategies might be necessary. Nonetheless, it should be stressed that engagement for land acquisition / resettlement purposes requires engagement with all PAPs in accordance with WB ESS5.

#### Engaging with Women

When developing the program-specific SEP, special attention should be paid to the inclusion of women. Depending on the program context, the societal and economic status of women can vary in relation to the status of men which should be considered by program staff. Furthermore, women and men who are affected by the LL program may have different interests in and abilities to influence the outcome of a program. The cultural context and the different barriers (geographical, physical, attitudinal, informational and communicational) that may undermine equal gender participation should be considered for all stakeholder engagement activities.

In order to overcome such barriers, women's participation needs to be facilitated and encouraged throughout stakeholder engagement activities. This includes organizing stakeholder engagement activities around women's daily routines and where their activities take place. The provision of childcare during meetings can be an important factor to increase women's participation. Program should therefore calculate budget for childcare for all meetings and involvement of women in program activities. In many countries of the world, meetings should not be planned for evenings, as women can feel insecure in the dark. Timing should be adapted to working schedules of men and women.

Some meeting locations may undermine women's participation because they may not be culturally appropriate. Women may not be allowed to stay in public places, or they may feel embarrassed or even threatened in some unfamiliar environments. Gender training or consultations should take place within the community to avoid women feeling threatened and to reduce the risk of male violence against women. The government and other important actors should be involved in finding solutions to increase women's participation.

The following methods can be used to increased women's participation in stakeholder engagement activities.

- Gender and age inclusive consultation methods;
- Women/elderly/youth-only interviews;
- Gender or age specific focus groups and group consultations;
- Use of gender-disaggregated data;
- Separate meetings with women's cooperatives or youth associations;
- Reserved seating in steering committees, decision-making & monitoring bodies for females, youth & elderly;
- Choosing consultation times & places that will increase gender and age inclusiveness;
- Providing childcare during consultations;
- Tailored capacity building sessions;
- Provide active intervention when needed to identify key aspects for women.

It should be remembered that women are not a homogenous group and that different women might have different views and opinions about the program at stake. Therefore, it is essential to ensure representation of different women perspectives during stakeholder consultation meetings, which can be achieved by including women from different socioeconomic backgrounds, castes, ethnicities and age, marital status or religious lines. It can be useful to consult with specialized women NGOs or community-based organizations that represent women from minority groups.

### *Engaging with Young People*

Another group that requires special attention depending on the LL context are younger people (children, teenagers, young adults) for which an appropriate consultation mechanism should be ensured. This is especially the case for program contexts in which younger people do usually not speak against elders (e.g., many traditional communities in Asian culture).

In order to overcome such barriers, younger people's participation needs to be facilitated and encouraged throughout stakeholder engagement activities. This includes organizing stakeholder engagement activities around their daily routines and where their activities take place (e.g., schools, universities etc.). Meetings should be adapted to their usual study and work schedule, e.g., take place after school and university opening hours, or usual working time and be in close proximity to relevant institutions, such as schools, universities etc.

Furthermore, respective mediums for engagement should be chosen, e.g., younger people might make more use of participation activities scheduled via social media in comparison to older generations.

The government and other important actors should be involved in finding solutions to increase the participation of young people.

### *Engaging with Marginalized and Vulnerable Groups*

Despite having certain gender sensitive consultation strategies in place, it might be necessary in some program to have distinct meetings with other vulnerable or marginalized groups, such as indigenous people, disabled people, LGBTQI+ community<sup>12</sup> etc. in order to ensure inclusion of marginalized and disadvantaged groups to program their safety and security if they are subject to forms of discrimination and harassment in the program areas. Examples for guaranteeing inclusion of such groups in the SEP activities are amongst other, but not limited to:

- Private meetings that ensure a degree of anonymity;
- Provision of information in accessible format;
- Easily accessible venues for disabled persons;
- Support for meals, transportation, accommodations;
- Provision of stipends for loss earnings may be necessary (e.g. due to long travel times, meetings);
- Provision of support workers for assisting participants with disabilities;
- Provision of simultaneous interpretation (language, signing).

### *Engagement with Indigenous People*

Some programs might affect indigenous people and customary communities. In such programs, stakeholder engagement requires some additional steps, such as obtaining free, prior and informed consent (FPIC) or the development of an indigenous peoples plan (IPP) or framework. For further guidance on this, please refer to the LLF ESMS documentation, [Annex O – FPIC Protocol](#) and [Annex N – Indigenous Peoples Plan](#).

### *Engaging in Challenging Environments*

LLF acknowledges that many LL program might be located in complex social and political settings and insecure environments. Furthermore, LL might be very remote and hardly to access or cover huge areas that will increase difficulty to grasp all social factors that are needed to develop a comprehensive stakeholder engagement plan, given limited resources.

In such cases program approaches will be governed by the context and available resources.

The grantee should consider the minimum engagement which can be undertaken in order to get as wide a representation of stakeholders as possible. This may include but not limited to:

- Undertaking engagements based on representative samples of communities or households;
- Undertaking remote engagements via telephone;
- Encouraging stakeholders to use the grievance mechanism as means of communicating their views, issues and perspective on impacts and risks;
- Developing and strengthening local community level committees that can be regularly engaged with program staff.

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<sup>12</sup> LGBTQI+ stands for “lesbian”, “gay”, “bisexual”, “transgender”, “queer” and “intersex and a plus sign or asterisk as a placeholder for other identities.

A high degree of sensitivity is required by all program staff involved regarding current and prior conflicts in the LL area in which the program is located. This is essential since unreflected stakeholder engagement has the potential of exacerbating inter or intra community conflicts, or government – community conflict. Also retaliation against those engaging with program staff should be anticipated, monitored and mechanisms should be put in place to prevent them (e.g., through staff training, and opportunities to raise confidential or anonymous grievances), and investigate and respond when required. For further reference the IFC’s Good Practice Note on Addressing the Risks of Retaliation Against Project Stakeholders<sup>13</sup> can be useful.

Stakeholder engagement in areas experiencing infectious disease outbreak require a careful risk assessment in order to protect program staff and stakeholders. All necessary measures have to be taken (if required, protective masks, social distancing, video consultations etc.) in order to guarantee the health and safety of program staff and stakeholders.

Further challenges related to stakeholder engagement might be caused by human wildlife conflicts or land access and use restrictions. For further guidance in these particular circumstances and what should be considered in such cases for stakeholder engagement activities, please refer to the LLF ESMS documentation, **Annex K – Human Wildlife Conflict Mitigation**, **Annex M – Community Engagement and Planning Framework for Voluntary Access Restrictions**, as well as **Annex H – Security and Human Rights in Protected Areas**.

### *Government Led Consultations*

In some LL program the government might lead independent stakeholder engagement activities. It is important for the grantee to monitor such meetings and keep informed about their content and outcomes. The grantee should seek to cooperate with the government conducting stakeholder engagement activities, in order to ensure that consultations comply with the applicable standards and if not do supplementary engagement activities. Whenever possible, the program should aim to advance a joint stakeholder engagement with the government, in order to avoid repetition, stakeholder fatigue and different agreements on the same issues.

Lastly, the government should be considered as a stakeholder on its own and be included in stakeholder engagement planning processes.

#### **4.1.4 Stakeholder Engagement**

Once all relevant stakeholders are identified, mapped and a communication and engagement strategy is developed, the actual stakeholder engagement can take place.

##### *4.1.4.1 Stakeholder Meetings*

Stakeholder meetings are the most important form of stakeholder engagement since they allow for direct exchange between LL program staff and relevant stakeholders, such as affected communities. Stakeholder engagement meetings should take place throughout the program life cycle. There should be various forms of stakeholder meetings, such as focus groups discussions with particular groups or broader community meetings. Generally, it should be considered, that the choice of a venue should fall on a location where stakeholders feel the most comfortable, which will be most likely a venue within the community. This is important to increase participation and engagement levels in stakeholder engagement meetings. By hosting stakeholder meetings within local communities, the important message is sent that program representatives value the community enough to travel there for obtaining important community insights. However, it is important to seek authorization and guidance from local authorities about local rules prior to holding such meetings within local communities.

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<sup>13</sup> Good Practice Note on Addressing the Risks of Retaliation Against Project Stakeholders, IFC, 2021. Available at: [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_gpn\\_reprisalrisks](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_reprisalrisks)



#### 4.1.4.2 Informed Participation

When a particular stakeholder group is exceptionally affected by the LL program, it is important to ensure the stakeholder is properly informed and encouraged to participate in matters relating to the issue causing the affect, including finding mitigation measures, proposed development benefits and opportunities etc. This more intense and active form of stakeholder engagement is called informed participation. It entails a more in-depth exchange of views and program information and tends to generate a sense of co-ownership between the PAPs and the grantee regarding the process and its outcomes. Informed participation should be used for sensitive topics and when a stakeholder group is materially more affected than others. Examples, where informed participation is useful might be in following program circumstances, but are not limited to:

- Physical and/or economical resettlement;
- Land access restrictions;
- Development of community development programs;
- Engagement with IP (please note that here additionally FPIC might be required).

In order to generate informed participation, the following tools, techniques and methods can be used:

- Participatory workshops;
- Key informant interview (KII);
- Focus groups discussion (FGD);
- Role plays;
- Historic timelines and trends;
- Participatory rural appraisal techniques;
- Resource mapping and village maps.

#### 4.1.4.3 Documentation

It is essential that all stakeholder engagement activities, in particular conducted stakeholder meetings, are documented properly. This should at least include format of the engagement (e.g., KIIs or FGDs), date of the engagement, location and venue, as well as the number of participants. Furthermore, there should be documentation of the main themes and key stakeholder issues/comments and concerns, main meeting outcomes and requirements for follow up actions. Table 4-3 and Table 4-4 provide guidance on how to conduct proper documentation of stakeholder engagement activities. These sheets are required as evidence of any stakeholder engagements and should be recorded verbatim. Photos or recordings of stakeholder engagements are also recommended where possible, considering the consent of stakeholders, however, it should be performed in culturally appropriate way.

**Table 4-3 Summary of Stakeholder Meetings Template**

Stakeholder	Engagement Date	Venue	Number of Participants
<b>Key Informant Interviews (KIIs)</b>			
<b>Focus Group Discussions (FGDs)</b>			



**Table 4-4 Key Stakeholder Issues Template**

Main Theme	Key stakeholders issues/ comments	Outcome of the Meeting/agreed actions	Follow up necessary? If yes, what?

#### 4.1.4.4 Continuous Engagement

It is important that stakeholder engagement is a continuous process, and that the LL program commits to continuous engagement with stakeholders throughout the program lifecycle.

Plans and activities implemented during all stages of the LL program planning and development will therefore feed into and inform on-going stakeholder engagement as the LL program moves into these stages, ensuring that two-way dialogue with those affected, both positively and negatively by the LL program is maintained.

The aim will be to ensure that the LL program remains in contact with all interested parties and cognisant of their concerns, and that these are addressed in an effective and timely manner. At each program stage a detailed schedule of activities and events will be developed and widely disseminated so that people know how to interact with and participate in the LL program. Table 4-5 below provides an example stakeholder engagement schedule template.

**Table 4-5 Stakeholder Engagement Schedule Template**

Proposed and Ongoing Engagement Schedule	
Topic	Frequency
<b>Formal Consultations</b>	
Briefing for Regional Minister	Quarterly
Briefing for Local Member of Parliament	Ad-hoc
Briefing for Municipal Chief Executive	Monthly
Briefing for Regional Ministries, Departments and Agencies	Bi-annually
Briefing for Municipal Ministries, Departments and Agencies	Bi-annually
Briefing for Unit Committee Members and Assemblymen	Quarterly
Briefing for Traditional Leaders	Quarterly
Briefings for Youth Leaders	Quarterly
Briefing for Community Youth Groups	Quarterly
Briefing for Religious Leaders	Quarterly
Focus group workshops with Farmers	Monthly
Focus group workshops with Youth groups	Bi-annually
Focus group workshops, training for media	Annually
Community Durbar to discuss current and upcoming activities	Monthly/As required
Civil Society Groups/NGOs	Schedule to be Determined
<b>Informal Consultation</b>	
Informal contacts with traditional leaders and other key community opinion leaders	As required
Informal contacts with other key government officials and regulators	As required
Dissemination of Information	

<b>Proposed and Ongoing Engagement Schedule</b>	
<b>Topic</b>	<b>Frequency</b>
Updates to public notice boards	Weekly or as needed
Program Newsletter	Bi-annually
Scheduled visits by Community Relations Staff to each community	Weekly
Program Progress Reports	Quarterly
<b>Committees</b>	
Community Consultative Committee	Quarterly
Women Consultative Committee	Quarterly
<b>Complaint Process</b>	
Grievance and Complaints (Information Center)	Daily, Mon to Fri, 8.30am to 3pm

Source: KfW, 2021.

#### **4.1.5 Grievance Management**

The grantee will need to establish a program-specific grievance and feedback mechanism (GM) for dealing with stakeholder grievances that is coherent with the overall LLF GM. A grievance is a complaint or concern raised by an individual or organisation who judges that they have been adversely affected by the LL program during any stage of its development. Grievances may take the form of specific complaints for actual damages or injury, general concerns about LL program activities, incidents and impacts, or perceived impacts.

For detailed guidance, please refer to the LLF ESMS documentation, [Annex Q – Program-level Grievance and Feedback Mechanism](#).

#### **4.1.6 Information Disclosure**

Making information available to interested and affected parties is essential in increasing transparency and accountability for program related impacts. All stakeholder engagement activities ranging from consultation, over informed participation to negotiation and grievance resolution will be more efficient if stakeholders have an accurate and timely information about activities and outcomes. Sensitive information (such as sensitive complaints submitted via the GM) should be handled with confidentiality. The following principles should be considered when disclosing information:

- Information should be disclosed as early as possible;
- Information disclosed should be objective (facts) and transparent;
- Information disclosed has to be accurate;
- Uncertainties should be explained (e.g., worst, best, most likely case scenario);
- Accessibility to retrieve disclosed information should be guaranteed.

#### **4.1.7 Monitoring and Reporting**

It is important to monitor and evaluate stakeholder engagement efforts to ensure that the desired outcomes are being achieved, and to maintain a comprehensive record of engagement activities and issues raised. Suggested monitoring and evaluation activities are outlined below:

- Monitor the grievance register<sup>14</sup> on a regular basis (monthly) in terms of response times to address complaints logged as well as the recurrence of complaints over time. This will inform the LL program risk assessment;
- Regular update of the stakeholder register whenever additional stakeholders are identified;
- Keep records of all stakeholder engagement activities: This will be populated with details on information presented, questions, responses and commitments made and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings;
- Keep a library (electronic or hard copy) of all communication material. This will include all communication received from the identified LL program stakeholders and also from media monitoring (press, radio stories relevant to the LL program);
- Develop and assess performance in terms of key performance indicators (KPIs) to be determined by the LL program team and/or equivalent personnel. For example: number of engagements held per month; timeliness of disclosure of LL program information; incorporation of stakeholder views into LL program design and relevant management plans; number of outstanding grievances / number resolved; number of grievances escalated for legal action (please also refer to the LLF key performance indicators to be provided as part of the annual reporting)<sup>15</sup>; and
- Annually review grievance mechanism performance and revise policies, procedures and actions accordingly, with the aim of reducing the number of grievances, improving the process of resolution and improving overall performance.

In order to measure these indicators, the following methods should be used:

- Minutes of meetings;
- Informal feedback from stakeholder groups;
- Grievance register;
- Accessibility dissemination and use of documentation;
- Effectiveness of engagement planning, tools and execution;
- Effectiveness of representation and participation in engagement;
- Effectiveness of environmental and social feedback process incorporating community needs into LL program design.

When reporting, it is essential that the grantee staff will report back to stakeholders and inform them about how feedback was incorporated in developing mitigation measures or conduct future assessments, etc. It is good practise and common courtesy, to follow up with stakeholders to inform them what happened after the initial consultation and it will increase trust in the grantee staff and the LL program.

#### *4.1.7.1 Promotion of Participatory Monitoring*

Effective monitoring regimes are closely linked to establishing good communications. Consultation should be undertaken to inform LL program management on the following:

- Community meetings will be held annually to monitor stakeholder perceptions; and
- Local stakeholders will be involved in monitoring impacts and in assessing their effectiveness.

Participatory monitoring goes a step further of just reporting back to stakeholders about the further process since initial stakeholder engagement activities, but it includes stakeholders in the monitoring

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<sup>14</sup> Refer to LLF ESMS documentation, [Annex Q – Program-level Grievance and Feedback Mechanism](#), for more guidance.

<sup>15</sup> Refer to LLF [Grant Implementation Guide](#) for further guidance

process. It requires that stakeholders are physically present when monitoring activities are conducted, and allows them to participate and evaluate indicators that are meaningful to them.

#### *4.1.7.2 External Monitoring*

External monitoring is recommended in order to increase both transparency and accountability of the program and its stakeholder engagement activities. Involvement of an external auditor for monitoring purposes will also increase the credibility of results. External monitoring can be done throughout the program activities, as part of the 5 year LLF milestone reviews foreseen and as a final audit upon completion of the LL program (e.g., under 15 year sustaining grants.)

#### *4.1.7.3 Resource Requirements*

Budget planning is essential in ensuring that adequate resources will be available for the SEP implementation. Therefore, the developed SEP should contain a section on resources that will be needed and respective costs for undertaking the planned stakeholder engagement. Possible sources of costs are outlined below. All resources should be evaluated against the engagement strategy to identify and allocate budget for those activities. The possible resource list could include but will be not limited to:

- Staff (e.g., community liaison officer);
- Engagement activities (government, community, NGOs/CBOs);
- Training;
- Media;
- Internal Coordination;
- Vehicles;
- IT & Communications.