



Democratic Socialist Republic of Sri Lanka

Ministry of Finance Economic Stabilization & National
Policies (MoF) and Ministry of Women, Child Affairs and
Social Empowerment (MoWCASE)

- DRAFT -

STAKEHOLDER ENGAGEMENT PLAN

for

SOCIAL PROTECTION PROJECT (P178973)



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ABBREVIATIONS AND ACRONYMS

CBO	Community Based Organization
CE	Citizen Engagement
CERC	Contingent Emergency Response Component
CPF	WBG's Country Partnership Framework
CKDU	Chronic kidney disease of unknown cause
CT	Cash Transfers
DB	Disability benefit
DCS	Department of Census & Statistics
DS	Divisional Secretary
EB	Elderly benefit
ECT	emergency cash transfer
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environment and Social Standards
SPP	Social Safety Nets Project
GDP	Gross Domestic Product
GN	Grama Niladari
GoSL	Government of Sri Lanka
GRC	Grievance Redress Committee
GRM	Grievance redress management
GRS	Grievance Redress Service
HIES	Household Income & Expenditure Survey
IA	Implementing Agency
ICTA	Information Communication Technology Agency
ID	National Identity card
IMF	International Monetary Fund
ISR	Implementation Status and Results Report
IWMS	Integrated Welfare Management System
MDS	Multi-deprivation score
MoDM	Ministry of Disaster Management
MoF	Ministry of Finance
MoHA	Ministry of Home Affairs
M&E	Monitoring and Evaluation
NSE	National Secretariat for Elders
NSPD	National Secretariat for Persons with Disability
PAI	Project Area of Influence
PDO	Project Development Objectives
PSC	Project Steering Committee
PTC	Project Technical Committee
SCD	Systematic Country Diagnostic
SEP	Stakeholder Engagement Plan
SMS	Short messaging service

SP	Social Protection
SRIS	Social Registry Information System
WB	World Bank
WBB	Welfare Benefits Board
WBG	World Bank Group
WDO	Women Development Organizations

1. PROJECT BACKGROUND & DESCRIPTION

1.1. Project Background

Sri Lanka's longstanding structural weaknesses, which were elevated by several exogenous shocks and ill-timed 2019 tax cuts plunged the country into a severe economic crisis. The crisis has exerted a particularly heavy toll on the poor and vulnerable, weakening resilience and leading to deterioration of human capital. Moreover, the country experienced a political crisis in 2018 and then the Easter bombings in 2019, followed by a 3.5 percent economic contraction amid the COVID-19 pandemic in 2020. Sri Lanka lost access to international financial markets in 2020 in the face of significant external debt services, following credit rating downgrades. Amid depleted reserves, Sri Lanka announced an external debt service suspension in April 2022, pending debt restructuring. In response to the deepening crisis, Sri Lanka sought support from the International Monetary Fund (IMF) and announced several important structural reforms. The IMF and Sri Lankan authorities reached a staff-level agreement (SLA) for a 48-month Extended Fund Facility (EFF) program of US\$2.9 billion in September 2022. Existing inequalities rapidly widened and, between 2021 and 2022, the poverty rate doubled from 13.1 to 25.6 percent, with many more vulnerable people falling into poverty.

Sri Lanka has an extensive but fragmented social protection system. The government's main social assistance program is *Samurdhi*, an integrated welfare program that provides cash transfers, microfinance, and various community and livelihood development activities. In 2020, the program covered 1.8 million families, approximately one-third of the population, with monthly cash transfers (CTs). In addition, there are three main categorical CT programs targeting low-income individuals over 70 (Elderly Benefit, or EB), persons with disabilities (Disability Benefit, or DB), and sufferers of chronic kidney disease of unknown cause (CKDU). The targeting performance of *Samurdhi* is weak and has worsened over time. Only 48 percent of the poorest income quintile received CTs in 2019, while close to 12 percent of the richest income quintile received CTs the same year (World Bank, 2022)¹. This limits the program's potential impact on poverty. The real value of the benefit amounts has been progressively eroded by inflation, making the already low benefit amounts even more inadequate, relative to the needs of the beneficiaries. On the other hand, each CT program operates separately without much coordination, leading to significant duplication in a number of key delivery functions (i.e., selection, registration, payments, grievances) and thus increased overall levels of operational spending and inefficiencies. There is also limited transparency in the process of selecting and registering CT program beneficiaries, as well as overall weak independent oversight and accountability. Finally, once CT program beneficiaries enter the programs, they receive support indefinitely. In the absence of robust economic inclusion programs there is limited or no space for potential new eligible beneficiaries to benefit from the country's social protection system.²

As a response to the Pandemic and the ongoing economic crisis, the government significantly increased the coverage and adequacy of benefits of all CT programs, partially mitigating the impact of the crises despite the social protection system's challenges. Unfortunately, the impact of the government's response to the crises was limited, primarily due to the pre-existing weaknesses of the country's social protection delivery system. This includes the lack of a social registry which, coupled with the absence of a government entity in charge of coordinating the Government's response, led to less-than-optimal targeting

¹ Sri Lanka Economic Update, October 2022, World Bank Publication.

² Jayathilaka, A., & Wijesinghe, M. D. J. W. (2020). Female headship and poverty in Sri Lanka: A household level analysis. *International Journal of Research and Innovation in Applied Science (IJRIAS)*, 5(9), 48-52.

(including exclusion of vulnerable populations like children, female headed households and households with irregular income) and duplication of benefits. Moreover, a number of implementation challenges in scaling up the cash transfer programs led to increased inefficiencies (i.e., the manual registration of beneficiaries), and delays in payments to vulnerable groups (i.e., moving, death, awareness of requirements to open a Samurdhi bank account). Given the growing frequency and magnitude of shocks experienced by the country, there is an emerging consensus on the need to make the social protection system more scalable and adaptive to shocks.

The IMF EFF³ and the pipeline World Bank’s Resilience, Stability and Economic Transformation (RESET) Development Policy Operation (DPO)⁴ seek to unlock the main policy-level constraints of the country’s CT programs, and help to establish a new social protection system that is transparent, well-targeted, effective and resilient. The policy reforms included in the EFF and RESET represent a major effort to “build back better,” insofar as they are supporting the establishment of a new social protection system that relies on the social registry, which is currently being operationalized⁵, and robust eligibility criteria⁶ as well as digital payments for the delivery of targeted CT programs.⁷ This, in addition to supporting the redesign of all four CT programs, in terms of people covered, size of transfers, and duration of payments⁹, as well as mandating adequate annual public budget for CT programs.¹⁰ The Welfare Benefits Board (WBB), established through the Welfare Benefits Act 2002, with a mandate for coordinating the management of data on welfare applicants and on the design and implementation of CTs, became operational in July 2022 and is leading these efforts⁸.

This social protection project seeks to operationalize the social protection reforms included in the EFF and the RESET DPO. This social protection project will finance a portion of the newly redesigned CT programs, thus enabling the operation to disburse fast and contribute to bridge the significant financing gap the country is facing, despite budget support from the EFF, the RESET DPO as well as other development partners, namely the Asian Development Bank. In addition, and leveraging the work and lessons learned of the soon-to-be closed Social Safety Net Project⁹, this social protection project will accompany the Government in its efforts to institutionalize the social registry, thereby contributing to the sustainability of the new social protection system. This project will also continue building the capacity of the Government in social protection, so that future reforms, including those supported by the above-referenced pipeline series of budget support operations, can be carried out satisfactorily.

1.2 Project Description

³The EFF was approved on 21st March 2023.

⁴ RESET is expected to be approved by the World Bank Board of Directors in June 2023.

⁵ Over 3.7 million families have registered in the social registry and are now being surveyed by local officials at their homes to validate registration data and determine their eligibility to receive cash benefits.

⁶ Included in the regulations “*Selection of Persons Eligible to Receive Payments*,” which were approved by parliament on February 9, 2023. These regulations are one of two policy reforms included in the EFF and RESET DPO.

⁷ While these policy reforms are essentially taking away from *Samurdhi* its role of delivering *Samurdhi* CTs, *Samurdhi* will continue to be responsible for the delivery of non-cash support to program beneficiaries, including for example livelihoods/economic inclusion services.

⁸ February 2016, Gazette No.1952/22 dated February 2, 2016.

⁹ The Social Safety Net Project was approved in 2nd December 2016, and sought precisely to *inter alia* establish a social registry, robust GRM and M&E mechanisms as well as improve the capacity of the Government to deliver CT programs. The Project also piloted graduation approaches. Unfortunately, many of these activities were not fully or adequately completed due to political economy reasons.

The proposed Social Protection project complements the World Bank support provided for key reforms in social protection (SP) under the RESET DPO. Specifically, the project seeks to mitigate the impact of the economic crisis on the poor and most vulnerable through the provision of income support and livelihoods opportunities, while strengthening the robustness and adaptability of the country's SP system. The project will comprise the following three components: Component 1 will finance targeted CTs to poor and vulnerable groups, using the newly established social registry and based on the new welfare benefit payment scheme. Component 2 will complement the CTs by financing a small-scale economic inclusion program for a selected number of poor and vulnerable people in selected geographic areas and sectors. Component 3 will finance activities to improve the management capacity of the project implementing agencies and accountability mechanisms for effectively delivering CTs and economic activities to the most in need. It will also support strengthening the main building blocks of a social protection system, with a specific focus on digital payments, financial inclusion, integrated information systems, and the adaptive social protection agenda. Finally, it will finance continued investments to inform the broader SP reform, such as social protection policy, strategy and analysis to inform the vision for a more sustainable social protection system. Implementation is planned for four years.

The project will have three components as follows:

Component 1: Cash Transfers (US\$185 million)

The objective of this component will be to provide income support to poor and vulnerable households in a time of crises. This component will finance targeted cash transfers to poor and vulnerable for a period to be determined based on identified financing gaps. Benefits will be paid directly into beneficiary bank accounts, and only to beneficiaries registered and verified by the WBB as being eligible according to the newly established social registry. The cash transfers will be paid to different eligible groups of beneficiaries as specified in the welfare benefit payment scheme regulations (see below). The direct deposit of cash transfers to beneficiary bank accounts will replace the existing payment methods of cash/ cheque-based payment systems, enhancing accountability, speed of payment, and financial inclusion of beneficiaries.

The Welfare Benefit Board has already received applications from nearly 3.7 million people to be considered for welfare benefit payments. Data validation is ongoing. The selection of beneficiaries will be made following the recently approved by Parliament *Welfare Benefit Payment Selection of Persons Eligible to Receive Payments Regulations No. 1 of 2022*. According to the Regulations, beneficiaries will be ranked and then selected using a Multi Deprivation Score (MDS) and district quota based. Given that the program will rely on an appeal system and that families will be able to apply throughout the year, each payment scheme would set aside a share of total financing as buffer for newly eligible beneficiaries. A Technical Team at the Presidential Secretariat is leading the drafting of the payment scheme, which is expected to be approved by the Cabinet and Parliament, in April / May 2023. This category of spending will only become eligible once the regulations for the new welfare benefit payment scheme are approved by Parliament and the selection of beneficiaries is made using the newly populated social registry. Retroactive financing will be considered for payments of cash allowances under the new scheme (estimated starting date June, 2023).

Component 2. Pilot to enhance opportunities for poor and vulnerable (US\$ 7 million)

The objective of this component will be to promote sustainable livelihoods among a selected number of cash transfer beneficiaries, in order to enhance their self-employment and economic opportunities. The final number of beneficiaries will depend on the project's overall financing envelope. This component will finance, on a pilot basis, the development and implementation of economic inclusion programs that strengthen resilience and opportunities for the poor and vulnerable. The design builds on previous and

ongoing experience in the country. As part of the Social Safety Nets Project (P156056), a graduation assessment and proposed strategy were drafted, and pilots were implemented in five Divisional Secretariat areas. However, due to COVID-19, the pilot could not be implemented as initially planned with intensive training and coaching ¹⁰.

Depending on the final design of the program, and building on the above-referenced pilots, as well as related efforts by the Asian Development Bank, the component may finance asset transfers, skills development training programs in specific sectors linked to the asset transferred, technical and business development support, coaching and mentoring, support for improved financial literacy and savings behavior, and assistance to build market linkages. Selected individuals will be provided with support for up to eighteen months. The component activities are expected to provide a pathway for poor and vulnerable beneficiaries to obtain skills and find employment that provides an adequate and sustainable income.

The component will attempt as far as possible, to tailor interventions to the specific profile of beneficiaries and local conditions. To this end, the selected interventions will be informed by a local market assessment, which will look into specific opportunities in the green economy. The economic inclusion programs will target areas with special needs, with high levels of poverty and vulnerability, in rural, estates, and urban areas. The selected beneficiaries are likely to be closer to the poverty line, with a stronger likelihood to graduate from social assistance programs, achieve a higher living standard and be on a sustainable path toward self-resilience. The targeting of beneficiaries will rely on the use of the recently completed poverty assessment and information in the Welfare Benefits Information System (WBIS). A special preference will be given to poor single parents/female headed households. Given the Government's intentions to scale up economic inclusion programming nation-wide, this component will be rigorously monitored and evaluated, tracking and monitor the effect and impact of program design and implementation choices.

Component 3: Project Management and strengthening SP systems (US\$8 million)

The objective of this component will be to ensure effective project implementation, while also investing in strengthening the country's social protection system and its key delivery systems. It will finance overall project management and capacity building, including incremental operating costs, for the Ministry of Finance/WBB and the MoWCASE, the project's implementing agencies, as well as technical assistance to develop and implement the social protection reforms program, including the continued strengthening and updating of the social registry, payment system, and social protection strategy.

Sub-component 3.1. Project Management and Strengthening SP systems

This sub-component will finance activities to strengthen the key building blocks of a social protection system and its capacity to adapt to shocks and promote increased resilience. Specifically, the component will support: i) the strengthening of the social registry, including the regular update and enhancement of data quality¹¹; ii) the development of additional modules for the integrated beneficiary registry and improvements to the Management Information System (MIS) while ensuring data protection; (iii) the modernizing of payments; (iv) the communication on cash transfer and social registry; (v) grievance and redress mechanisms (GRM); (vi) monitoring and evaluation activities; (vii) the adaptation of the delivery platforms to make it shock responsive (adaptive social protection (ASP) system); and (viii) investments in

¹⁰ Given the constraints faced during implementation, the evaluation could not be fully completed and is now being planned to be implemented in selected target areas with the support from ADB. The evaluation results will inform the design of the proposed interventions under this operation.

¹¹ Including the data protection enhancement needed to accompany larger scale data collection and sharing of data.

continued efforts for improvements in social protection functions and implementation and overall social protection reforms. It will also finance technical assistance, capacity building, specialized human resources, relevant equipment, and operating costs.

Sub-component 3.2. Project Management for Ministry of Women, Child Affairs, and Social Empowerment (MoWCASE).

This sub-component will finance the costs associated to the implementation of the productive inclusions pilot, additional specialized human resources, capacity building, needed equipment, technical assistance to develop and implement the productive inclusion program, development of an information system to follow up progress, M&E activities including a robust impact evaluation, and incremental operating costs.

Project Beneficiaries:

The number of direct total beneficiaries under the cash transfer component is estimated at approximately 2 million, with 3.71 million indirect beneficiaries covered by the updated social registry, and some 5,000 beneficiaries covered by pilot sustainable livelihoods scheme. Project beneficiaries is expected to include the most vulnerable groups including women headed households, low income individuals over 70 (Elderly Benefit) , persons with disabilities, sufferers of chronic kidney disease of unknown cause, pregnant and lactating mothers and households in the poorest income quintile.

1.3 Potential Social and Environmental Risks and Impacts

The **Environmental risks** under the project are considered 'Low'. The project will not support any civil works associated with rehabilitation or construction. The project is expected to provide cash and livelihoods grants for the most in need and strengthen the social protection system of the country. However there will be purchase of some IT equipment in limited numbers. This material will generate E-waste at the end of the use of their lifecycle of use , and will be managed by adopting existing country arrangements, with registered collectors and vendors put in place by the Central Environmental Authority of Sri Lanka. In addition, health and safety risks linked to COVID- 19 is not expected since the associated restrictions have been lifted. Therefore, interventions under this project are not expected to pose any adverse environmental impacts.

The **Social risks** are assessed as "Substantial" The social risks will include: (i) risk of exclusion of eligible beneficiaries due to exclusion/inclusion errors linked to targeting, inaccuracies in data submitted and errors not detected during verification, challenges faced by vulnerable groups to access and submit information to register into the program, open/operate bank accounts and withdraw cash, (ii) possible social unrest created by non-project beneficiaries & other interested groups due to lack of understanding and transparency in the processes, consultations and mechanisms to respond to appeals/grievances and opposition by local-level officers concerned of losing authority and influence; (iii) the limited capacity of the project implementing entities to mitigate these social risks, particularly risks related to the Stakeholder/Citizen's Engagement (CE/SE) process and respond to appeals/grievances; and (ivii) potential Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) incidents due to risk of abuse of authority by officials engaging with beneficiaries and domestic violence linked to household decision making on spending of cash received. Thus, the SEA/SH risks of the project are rated as 'Moderate' determined through the application of the World Bank's SEA/SH Risk Rating tool for Social Protection projects.

To mitigate these risks, this project will provide cash transfer (CTs) to beneficiaries included in the newly established social registry whose identity and eligibility are transparently verified. In addition, payment of benefits will be through electronic transfer into beneficiaries' personal bank accounts, to ensure thorough accountability and ease of access. In addition, the project will finance a comprehensive campaign of communications about the cash transfer (CT) also have a functional mechanism to respond to appeals and grievances timely. A behavioral standard clearly stating zero-tolerance for Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) with consequences will also be adopted and communicated to all project actors and there will be a mechanism to report and respond to SEA/SH related incidents in a confidential manner through qualified service providers.

1.4 Project Implementation Arrangements

The Project will have two implementing agencies (IAs). The project will be implemented by the Ministry of Finance, Economic Stabilization and National Policies (MoF) and the Ministry of Women, Child Affairs, and Social Empowerment (MoWCASE). The Welfare Benefits Board under the MoF will manage the day-to-day operations for Component 1, while the Department of Samurdhi Development (DSD) under MoWCASE will manage the day-to-day operations of Component 2. Under Component 3, sub-component 3.1 will be implemented by MoF and 3.2 by MoWCASE.

The Welfare Benefits Board established under the MoF will regulate and maintain the social registry/ Integrated Welfare Management System (IWMS). The WBB will generate eligible beneficiary lists for electronic payments to beneficiary bank accounts. The regulation¹² provides guidance for selection of beneficiaries. The payments will be processed based on the regulations relating to the Welfare Benefit Payment Scheme¹³. The WBB will lead communication, grievance redress, and monitoring and evaluation of activities. The Chairperson / Commissioner of the Welfare Benefits Board will function as the Project Director. A separate Project Director will also be appointed in MoWCASE for overseeing the implementation of Components 2 and 3.2. The WBB will have a project management team to conduct all required project implementation functions, with additional staff recruited and trained as required to perform the Financial Management, Procurement, Communication, Training, Grievance Handling, M&E, and Environmental/Social Framework obligations. Further, subject matter specialists will be hired as per the emerging needs of the project throughout the project duration.

MoWCASE will design and deploy economic inclusion programs and undertake monitoring and evaluation activities. MoWCASE will use the Department of Samurdhi Development (DSD) for implementation of activities and will form partnerships with other agencies for technical assistance during implementation. A project management team will also be appointed by MoWCASE for day-to-day administration of the project. Subject matter specialists will be hired as per the emerging needs of the project throughout the project duration. The project will also support MoWCASE to put together a team of technical experts who support the Ministry in designing and developing pathways for a future strategic vision of Samurdhi and MoWCASE.

A Project Steering Committee (PSC) will be established to guide the implementation of the Project. The PSC will be maintained throughout the project to ensure that project implementation follows both GoSL and Association rules and regulations. The PSC will be chaired by the Secretary to the Ministry of Finance with representatives from the Departments within the MoF, WBB, Department of National Planning,

¹² Welfare Benefit Payment (Selection of Persons Eligible to Receive Payments) Regulations No. 1 of 2022

¹³ The regulations are in draft form and expected clearance by Parliament in May 2023.

Department of External Resources, MoWCASE, Ministry in-charge of Home Affairs, Department of Samurahi Development, Information Communication Technology Agency (ICTA) and any other agencies as per the needs of the Project.

A technical subcommittee will also be established with representation from the MoF, MoWCASE, ICTA, and any other stakeholders, the role of which will be to review and discuss technical work, including, but not limited to, proposed economic inclusion program, social protection policy and strategy, and to advise the PSC on any other technical matters during project implementation.

1.5 Safeguards Implementation Experience with the Social Safety Net Project (SSNP):

The SSNP also supported the establishment of a Welfare Benefits Board (WBB) to develop Social Registry Information System (SRIS). The Welfare Benefits Board (WBB) established under the MoF will regulate and maintain the new social registry /SRIS and select beneficiaries. A communication strategy, a plan and GRM guidelines has been developed for the SSNP which is under implementation. The GRM module is not fully functioning at the moment, as it will be linked to the Integrated Welfare Management System (IWMS) that is being developed. As the island wide data validation survey for welfare benefits has been delayed, the GRM implementation was delayed. However, the GRM still operates manually by the respective divisional secretariats. Currently, the PMT has conducted training and awareness for the Social Service Unit of the Haputale Divisional Secretariat Office to pilot test software system based GRM. At Haputale Divisional Secretariat Officers are trained to maintain a call log (or information request log) and enter grievances in the GRM application system.

The Implementing entities, MoF and the MoWCASE, have experience working on the Bank's former safeguards policies, but limited experience on implementing the ESF. In addition, the safeguards implementation performance of the Safety Nets Project (SSNP), was rated as 'Moderately Satisfactory' owing to the lack of capacity of the implementing entity to effectively implement SE/CE processes and a functional GRM. Therefore, Environmental and Social Commitment Plan (ESCP) will include commitments to hire/allocate a team of dedicated and qualified staff to implement the Stakeholder Engagement Plan (SEP) including the GRM.

The MoF within the WBB and MoWCASE within the DSD will appoint qualified & full-time dedicated Social and Environmental Specialists in each Project Management Teams (PMT) to support management of E&S risks and impacts of the Project. The E&S specialist will be supported by other staff to carryout stakeholder engagement & communication activities and operation of the GRM based on their background and expertise, and relevant ToRs shall be issued to all focal persons accordingly. The Bank will provide the requisite capacity building on the ESF s and due diligence procedures as per the ESSs laid out in the Environmental and Social Commitment Plan (ESCP) to the PMT, WBB, and other staff involved in implementation of the Project.

2. OBJECTIVES, REGULATIONS & REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

2.1 Objective of the Stakeholder Engagement Plan

Since the Project is being prepared under the World Bank's Environment and Social Framework (ESF), as per the Environmental and Social Standard ESS 10 on "Stakeholder Engagement and Information Disclosure", the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Accordingly, the overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle.

Specifically, the SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

2.2 National Requirement for Stakeholder Engagement

People's access to information, consultation and engagement is recognized in both the Constitution of Sri Lanka as well as in the legal enactments described below.

Constitution of Sri Lanka

People's right to access information is enshrined in the Constitution of Sri Lanka (Chapter III, Section 14A) which advocates that every citizen shall have the right of access to any information as provided for by law, being information that is required for the exercise or protection of a citizen's right held by:

- (a) the State, a Ministry or any Government Department or any statutory body established or created by or under any law;
- (b) any Ministry of a Minister of the Board of Ministers of a Province or any Department or any statutory body established or created by a statute of a Provincial Council;
- (c) any local authority; and
- (d) any other person, who is in possession of such information relating to any institution referred to in subparagraphs (a) (b) or (c) of this paragraph.

No restrictions shall be placed on the right declared and recognized by this Article, other than such restrictions prescribed by law as are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals and of the reputation or the rights of others, privacy, prevention of contempt of court, protection of parliamentary privilege, for preventing the disclosure of information communicated in confidence, or for maintaining the authority and impartiality of the judiciary.

Right to Information Act No.12, 2016

The Act advocates that whereas the Constitution guarantees the right of access to information in Article 14A, and prescribes that every citizen shall have a right of access to information which is in the possession, custody or control of a public authority (Part 1 Section 3 (1) order to foster a culture of transparency and accountability in public authorities by giving effect to the right of access to information and thereby promote a society in which the people of Sri Lanka would be able to more fully participate in public life through combating corruption and promoting accountability and good governance.

2.3 World Bank requirements for stakeholder engagement

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 10).

2.4 Stakeholder Engagement Plan Disclosure

The draft SEP is being consulted with key implementation partners and project affected parties and will be disclosed publicly prior to the decision meeting. Draft SEP will be updated with the feedback received and final version of the SEP will be disclosed by project Approval. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with stakeholders, consider stakeholders' views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is

disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-projects.

This SEP is a living document and will be updated throughout the project lifecycle. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 10).

3. SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 Summary of stakeholder consultations during the Social Safety Net Project (SSNP)

The Social Protection Project builds upon the work already done under the existing World Bank-funded Social Safety Nets Project (P156056) project. For example, SSNP supported the establishment of a Welfare Benefits Board (WBB) at the Ministry of Finance in 2017, in accordance with the Welfare Benefits Act (2002) – with a mandate for coordinating the management of data on welfare applicants and on the design and implementation of cash transfers. The WBB became operational in July 2022 and is leading these efforts, that include overseeing the nationwide collection of data on poor and vulnerable households for the creation of an up-to-date social registry, that will enable better targeting of interventions and enhance the government capacity to respond to crises. Over 3.7 million families have registered for cash transfer benefits with the WBB through the Social Registry Information System (SRIS) and are now being surveyed by local officials at their homes to determine their eligibility. It is expected that the newly targeted cash transfers will commence by June 2023, with payments to be made electronically directly to beneficiaries' bank accounts.

The pilot testing of the SRIS, through the SSNP was done with the aim of validating Samurdhi recipients in Nuwara Gampalatha Divisional Secretariat (DS), Anuradhapura District, Madhu DS, Mannar District, Ratmalana DS, Colombo District and Haputale DS, Badulla District. The selected divisional secretariats were selected to represent four districts and three sectors (urban, rural, and estate). The validation included validation of existing beneficiaries by considering currently available lists provided by the implementing agencies (Department of Samurdhi, NSPD, and NSE). Grama Niladhari and Social Development Officer in the selected DS areas conducted awareness of the validation process in local languages.

The SSNP project developed a communication strategy for the island wide household validation and registration of new beneficiaries. The communication plan was shared with stakeholders to receive feedback and awareness at the central and divisional secretariat levels. The communication strategy was tested in 4 divisional secretariat areas, and was rolled out by WBB to announce social registry application process in 2022.

Therefore, these citizen's engagement activities and stakeholder consultations conducted under the SSNP project contributed to the preparation of the beneficiary registry and also provided inputs to the overall design of the improved integrated social protection system which will be supported by the new Social

Protection Project (SPP). As such, the Social Safety Nets Project has conducted several activities to create awareness and support implementation of social safety nets project related activities. The SSNP activities will lay the foundation for all ESSP activities.

Community consultations were conducted among approx. 20 households in the Divisional Secretariat Divisions (DSDs) of Haputale- Badulla District, Nuwaragampalatha East - Anuradhapura District, Madhu-Mannar District, and Ratmalana – Colombo District when carrying out the pilot data validation survey of SSNP during first quarter of 2022. The main objective of these surveys were to test the mobile application for digital data capture, ensure the smooth functioning of the institutional arrangements at field level – Grama Niladhari, Divisional Secretariat and Ministry level, and testing of data entry questionnaire. During these households surveys, the team conducted informal discussions in local languages with a cross section of households that included elderly, women headed households, Samurdhi beneficiary families, disabled persons, and the family of a CKD patient. Data captured through the pilot consisted of 22 indicators that covered poverty (i.e. family demography, employment, household income, expenditure, health, education, shocks and coping mechanisms etc) used to identify low income households. Key challenges noted by households interviewed were the lack of capital to expand existing businesses, requirement for livelihoods support (i.e capital to purchase equipment, skills development, financial literacy etc), women headed households in particular noted shocks such as the COVID 19 pandemic, the seasonality of their businesses (i.e. horticulture) , housework and child care duties, and sudden illnesses affected their ability to earn a regular income. Women who earned daily wages noted that illness, cost of living, and COVID 19 pandemic impacted their income. The loss of the main income earner has also affected families ability to ensure a steady income for household expenditures. For elderly receiving benefits, often times the allowance is not adequate to meet all monthly expenditures given rising cost of living. Similarly, for families with CKD patient, increased cost of medicine, hospital visits and transport costs cannot be covered through the government welfare benefits provided. Families must often bridge the gaps through loans from friends or families which adds to their debt burden.

Summary of stakeholder engagement activities under SSNP are as follows:

No	Activities	Propose/Objectives	Stakeholders Group
01	Formal meetings (Project Technical Committee meetings and Project Steering Committee meetings)	<ul style="list-style-type: none"> To Aware Project Objectives and Implementation Plan To Communicate Policy Decision of the project Present the mandate of the WBB, Social Registry design and implementation To assess feedback and comments To validate and review the New process and procedures 	Ministry of Home Affairs (OHA) MSD Information Communication Technology Agency (ICTA) National Secretariat for Elders (NSE) National Secretariat for Persons with Disabilities (NSPD) Ministry of Finance (MOF) Welfare Benefits Board (WBB) Ministry of Disaster Management (MoDM) Department of Census & Statistics (DCS)
04	Validation Workshop conducted with the Technical Committee & stakeholders (Internal)	<ul style="list-style-type: none"> To collecting comments and observation for Development of selection Criteria for WBB 	MOHA, MSD, ICTA, NSE, NSPD, MoF, DCS, WBB, Samurdhi Head Quarter Managers Samurdhi District Directors Staff officer in DSD level

05	Validation Workshop (External)	<ul style="list-style-type: none"> To review the Welfare Benefit Scheme (WBS) selection criteria for WBB 	Academia NGOS/INGOS/Donor Agencies/CBOS/CSR program Implementers Trade unions
06	Technical Training programs	<ul style="list-style-type: none"> To Inform the DS and Social Services Unit, Samurdhi Development Division about the SRIS and its New Process 	332 DSD level staff Social Service Unit Samurdhi Development Division in DSD Level
07	Consultative Workshop	<ul style="list-style-type: none"> To Develop a Data collection form and Guideline 	MOHA MSD/NSE/NSPD/ICTA/Department of Social Service DCS/WBB MOF
08	Field test of the application	<ul style="list-style-type: none"> Review the Application form and checked the user friendliness by field Level officer in Selected DSD. 	Kolonnawa DSD Social Service Officers Samurdhi Development Officers Development Officer Grama Niladari
09	Press Conference (Government Print/Radio /web)	<ul style="list-style-type: none"> To inform the State Media about the establishment of WBB and its Role 	Journalist of Government Media Ministry of Mass Media Department of Information
10	Addressed the District Secretariat forum	<ul style="list-style-type: none"> Awareness on Data Verification Process and Integrated Welfare Management Information System by addressing the District Secretaries monthly forum Requesting the views and suggestion of the District secretaries to prepare the Institutional arrangement plan required for the establishment of the Database at the Local Level 	All District Secretaries MOHA ICTA
11	Awareness and Technical Training program (Virtual)	<ul style="list-style-type: none"> Awareness on DSD Level a Beneficiaries In-field Data Verification module and Consultation with field officers 	SSOs DOs ERPOs in 332 DSD level Officers in Social Service Unit

12	Piloting of the Infield Data Verification Module	<ul style="list-style-type: none"> • Conducting a one-day workshop on program and Tablet Completer Usage • Create a Video to Collect the views and Suggestions of the officers involved in the program • Communication of the program to the beneficiaries via Village Level Government Officers • Establishment of the Help Desk • (Sinhala and Tamil Language) for inquires and technical assistance to field Officers • Establishment of a system (Online/Manual) for resolving complaint of the beneficiaries or affected Communities 	Divisional Secretaries ADS Samurdhi HQ Managers Samurdhi Bank managers Administrative Grama Niladari ERPOs SSOs DOs SDOs GNs Selected DSD Nuwaragampalatha – East Madhu Haputale Ratmalana
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3.2 Summary of consultations during project preparation relevant to Cash Transfer Component

WBB is in the process of conducting consultations with affected groups such as potential/existing categorical program beneficiaries, elderly, people with disabilities, CKDU patients, Female headed households (FHH), people living below the poverty line and other vulnerable groups for the cash transfer components. In addition, WBB will conduct consultations with interested groups including with state and non-state stakeholders. The consultations objectives are to receive feedback/views from stakeholders to inform project design, identify environmental and social risks, impacts and mitigation measures, understand and address stakeholder queries and concerns, operationalize the GRM and agree on plan for continued stakeholder engagement. The summary of the consultations conducted thus far have been included and the feedback from additional consultations will be included in the SEP prior to Project Approval and re-disclosed. *Refer Annex 3 for the questionnaire utilised to guide the consultations.*

Component	Dates, Location and Target groups	Feedback Received
Cash Transfer	<p>Dates: 10th and 11th April</p> <p>Locations: Ampara, Batticaloa and Anuradhapura Districts.</p> <p>Target groups: Participants represented from elderly, CKD Patients, Samurdhi recipients and waiting list persons and Divisional Secretariat Officers.</p>	<p>Impacts: Had reduced their food consumption due to economic hardships and struggle to eat 3 meals a day. Single mothers were mostly affected. Some who were above poverty line, have fallen below poverty line. Housewives had to take additional burden by helping their husbands economic activities.</p> <p>Government support : They are appreciative of government support during crisis. One participant received a grant to start a beauty parlor and now have graduated from the Sumurdhi program.</p> <p>Issues/concerns to be addressed: Some participants were not aware of the new scheme and the call for applications. Mentioned that some of the people who don't need assistance also had applied and</p>

	<p>Method: physical focal group</p>	<p>some people who need the financial support have been optout as they couldn't reach out to the Divisional Secretariat to submit their application.</p> <p>Recommendations: Strengthen communication and awareness about the new scheme, outreach and access to information to vulnerable groups, grievance redressal/appeals handling measures and beneficiary eligibility verification/validation processes.</p>
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3.2 Summary of consultations during project preparation relevant to the Livelihood Support Component

The project is in the process of conducting consultations with affected groups such as female headed households (FHH), Informal workers living in Estates , Export-Processing Zone (EPZ) workers, small-scale cash crop farmers, artisanal fishermen, subsistence farmers, and rural youth. Consultations for both components will aim to cover geographical areas that include urban, rural, estate sectors and have a good ethnic composition. The consultations objectives are to receive feedback/views from stakeholders to inform project design, identify environmental and social risks, impacts and mitigation measures, understand and address stakeholder queries and concerns, operationalize the GRM and agree on plan for continued stakeholder engagement. The summary of the consultations conducted thus far have been included and the feedback from additional consultations will be included in the SEP prior to Project Approval re-disclosed. *Refer Annex 3 for the questionnaire utilised to guide the consultations.*

Component	Dates, Location and Target groups	Feedback Received
<p>Productive Inclusion</p>	<p>Date: 31st March</p> <p>Locations: representatives from all 25 districts participated.</p> <p>Target groups: Participants represented by District Samurdhi Department and line agencies (VTA, NAITA, etc.)</p> <p>Method: Zoom/online discussion</p>	<p>Feedback received on target groups, design suggestions and delivery methods noted below:</p> <p>Suggested Target Groups</p> <ul style="list-style-type: none"> • The people just above the poverty line should be targeted: they are highly vulnerable in this economic crisis and disaster situation. They can manage themselves if everything is normal. However, data about this groups is not available. • Estate Sector: They were not given Samurdhi benefits as they receive a daily wage. However, new program should target this group as they are below poverty line. • War widows and persons who became disabled during the war: the impacts of war remain unaddressed, and their issues are growing day by day with the economic crisis. • Famers: require new technology, marketing and export facilities. • Fishermen: earnings from fishing are not sufficient. Support to develop another source of income connected to fisheries for this group. • Graduates from universities/ vocational training centers waits for years to get jobs. Mostly, in rural areas, there aren't any job opportunities. • Small-scale entrepreneurs are affected by the crisis – there already exists a registry which can be used to reach out to this group.

		<p>Design:</p> <ul style="list-style-type: none"> • Introduce new technologies, machineries and skills training in the agriculture and other sectors and capital to commence any small-scale businesses. In addition, marketing and export opportunities are required. • Select short-term projects that can uplift the income. Agree with Samurdhi grant receivers on a graduation strategy. • Should conduct a SWOT analysis to analyze the viability of the selected projects • The beneficiaries should have interest, capacity and commitment to implement the selected projects. <p>GRM : Public Relations Officers attached to DS offices could support to address grievances.</p> <p>Delivery:</p> <ul style="list-style-type: none"> • At present, Samurdhi Development Officer (SDO) support 6 families to enhance their economic status. A similar approach can be used for this new program, complementing the existing government program. • SDO and the community-based organizations should endorse the projects, and Zonal manager and the project manager should personally visit the projects and give recommendations. • Should decide a maximum number of projects per division/GND that can be feasibly monitored. There should be a robust monitoring mechanism and linked to SDO performance.
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4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Stakeholder Classification

For the purposes of the SEP, stakeholders of the proposed Project will be divided into the following core categories: (i) project-affected; (ii) other interested parties; and (iii) disadvantaged and vulnerable groups (Table 1). Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholders toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community’s and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

Table 1: Stakeholder identification and classification

Project affected parties	Other interested parties	Disadvantaged and vulnerable groups
<p>Cash Transfers:</p> <ul style="list-style-type: none"> Households living below the poverty line. Female Headed Households/Single headed households who are poor. Elderly, disabled, and persons affected with CKDU/Cancer/NCDs - who are reliant on the state system People in Estate Communities, underserved urban settlements & remote rural locations. <p>Livelihood:</p> <ul style="list-style-type: none"> Informal workers living in Estates Small scale cash crop farmers Artisanal fishermen Subsistence farmers EPZ workers Youth from poor households – urban and rural. People dependent on casual labor work Poor had lost their jobs due to crisis Micro/small/petty businesses/trade owners whose businesses were affected 	<p>State Sector:</p> <ul style="list-style-type: none"> Ministry of Finance Welfare Benefits Board Ministry of Women Child Affairs & Social Empowerment Ministry of Home Affairs Ministry of Plantations Ministry of Export Agriculture Grama Niladharis, Divisional Secretaries & District Secretaries National Secretariat of Elders (NSE) National Secretariat for the Persons with Disabilities. Department of Fisheries Department of Agriculture , Department of Agrarian Services Department of Health & Animal Production National Enterprise Development Authority (NEDA), Industrial Development Board Tertiary Education and Vocational Training Commission (TEVTC) National Apprentice Industrial Training Authority (NAITA) Industrial Technology Institute (ITI) Chamber of Commerce <p>Non-State</p> <ul style="list-style-type: none"> National, District and Divisional Samurdhi CBOs Trade organizations/Associations Community based organizations (CBOs)/Farmer Organisations – men and women (sithamu groups) Rural Fisheries Development Societies and Fisher Cooperatives Youth groups – both urban and rural Media Religious Institutions. Non-governmental organizations (NGOs), UN agencies & development partners including societies formed by elders, disabled, Samurdhi beneficiaries etc. 	<p>Poorest households affected by multiple vulnerabilities such as:</p> <ul style="list-style-type: none"> Families with elderly, disabled, and with CKDU/Cancer/NCDs patients. Living in vulnerable areas such as in estate sector, underserved urban settlements, and remote rural locations & Vedda communities. Female Headed Households/Single headed households. Families with young children including school dropouts, affected with food security and with malnourished children, affected with food security and with malnourished children. Affected/victims of SEA/SH/GBV including child abuse. Households affected by natural disasters.

4.2 Analysis of Project affected parties

‘Affected Parties’ are, persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as being most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Table 2 provides a preliminary assessment of the project’s benefits, risks and impacts on the project affected parties.

Table 2: Project’s perceived benefits, risks and impacts on project affected parties

Categories of project affected parties	Benefits, Risks and Impacts
<p>Cash transfers:</p> <ul style="list-style-type: none"> • Households living below the poverty line. • Female Headed Households/Single headed households who are poor. • Elderly, disabled, and persons affected with CKDU/Cancer/NCDs - who are reliant on the state system • People in Estate Communities, underserved urban settlements & remote rural locations. • Poor households affected by natural disasters . <p>Livelihood:</p> <ul style="list-style-type: none"> • Informal workers living in Estates • Small scale cash crop farmers • Artisanal fishermen • Subsistence farmers • Blue collar workers in EPZs • Unemployed youth from poor households – urban and rural. • People dependent on casual labor work • Poor who had lost their jobs due to crisis • Micro/small/petty businesses/trade owners whose businesses were affected 	<p>Benefits: The cash transfers will help meet basic living expenses of people living below the poverty line and affected by other vulnerabilities. The cash transfers will help to purchase food, health care, or and any item. In addition, livelihood support will provide a regular income to those affected by the economic crisis.</p> <p>Risk/Impacts:</p> <ul style="list-style-type: none"> • Exclusion of potential beneficiaries due to lack of equitable access to information, selection criteria, processes and outdated lists or due to financial constraints. • Protests by the non-beneficiaries demanding inclusion claiming economic hardships, highlighting errors in the Selection criteria for welfare benefit payments etc. • Rising cost of living results in cash transfers not being adequate to buy basic provisions. • Increased cost of living, loss of employment due to economic crisis leading to new groups falling below the poverty line. • Elderly, the disabled and other vulnerable groups may be challenged in terms of accessing information in a timely manner and inability to travel to DS offices to submit their applications or to receive cash transfers and may be risk of getting excluded. • Increase in GBV due to pressures related to rising cost of living especially among families who have lost businesses/employment. • Increase in cash injection into families resulting in wastage of money for example to purchase and consume alcohol leading to increased incidences of GBV. • Inability to handle all grievances on time due to increased number of grievances received.

The level of impact on affected parties

Table 3 provides an assessment of the project’s risks and impacts on individuals, groups, local communities, and other stakeholders that may be directly or indirectly or positively or negatively affected by the project. This assessment further extends to analyse the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes. The assessment is based on the impact and the influence of affected parties on the ESSP supported programs.

Table 3 Project impacts on Affected Parties and their level of influence

Affected parties	Impact level	Influence level
Households living below the poverty line.	High	Low
Female Headed Households/Single headed households who are poor.	High	Low
Elderly, disabled, and persons affected with CKDU/Cancer/NCDs - who are reliant on the state system	High	Low
People in Estate Communities, underserved urban settlements & remote rural locations.	High	Low
Poor households affected by natural disasters.	High	Low
Informal workers living in Estates	High	Low
Small scale cash crop farmers	High	Low
Artisanal fishermen	High	Low
Subsistence farmers	High	Low
Blue collar workers in EPZ	High	Low
People dependent on casual labor work	High	Low
Poor who had lost their jobs due to crisis	High	Low
Unemployed youth from poor households – urban and rural.	High	Low
Micro/small/petty businesses/trade owners whose businesses were affected	High	Low
People affected due to natural or human induced disasters (including economic shocks).	High	Low

4.3 Analysis of Other Interested Parties

'Other Interested Parties' constitute individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Interested parties would require engaging with the program for the following reasons:

- Provide inputs, suggestions and feedback to the project design and delivery of support.
- Understand project details including selection criteria, processes and implementation timeline.
- Understand measures taken to safeguard against project risks and impacts.
- Understand specific roles and responsibilities as per due procedures in place to implement the program.
- Partner, collaborate and support project implementation.
- Strengthen coordination to ensure there is no duplication of efforts but complementarities /synergies.
- Understand processes to raise appeals and submit grievances and ensure due processes are followed.
- Receive updates on the implementation to ensure good governance and accountability.

Table 4 presents the multiple interests and involvement and their level of potential influence over the Project.

Table 4 Interest and level of influence over the project

Other interested parties	Specific Interests / Involvement	Interest level	Influence level
<ul style="list-style-type: none"> Ministry of Finance MoWCASE 	Responsible for overall implementation.	High	High
Ministry of Home Affairs (MoHA)	To maintain voter lists, collecting statistics and conduct social welfare activities. Providing IDs for beneficiaries so that they can also open bank accounts.	High	High
District Secretaries	Approval of beneficiaries selected for the new cash transfer program. To ensure Divisional Secretaries follow due procedures to implement the program	High	High
<ul style="list-style-type: none"> Divisional Secretaries Field Officers at the Divisional Secretariat level 	To support enumeration, selection and implementation of the cash transfers & income assistance program and handle grievances.	High	High
Grama Niladharis	To collect data, provide updated electoral register, organize social welfare programs, support grievance handling, maintain transparency	Moderate	Moderate
Welfare Benefits Board	Mandated for coordinating the management of data on welfare applicants and on the design and implementation of cash transfer.	High	High
Department of Samurdhi Development	Implementation of activities and will form partnerships with other agencies for technical assistance during implementation	High	High
Managers of Regional Plantation Companies (RPCs) & small holder tea estates.	Verification of estate worker residents on plantations	Moderate	Moderate
<ul style="list-style-type: none"> National Secretariat of Elders (NSE) National Secretariat for the Persons with Disabilities 	To ensure eligible beneficiaries are included, update existing beneficiary list, verify/update applications to minimize double dipping.	High	High
<ul style="list-style-type: none"> Banks 	Provide the cash transfer and facilitate registration of bank accounts of beneficiaries that don't have bank accounts and those without ID cards.	Moderate	Moderate
Supporting Ministries/Departments <ul style="list-style-type: none"> Ministry of Export Agriculture. Department of Fisheries Department of Agriculture Department of Agrarian Services Department of Health & Animal Production 	Provides technical support, extension services including inputs for livelihood activities. Support with market linkages. Provides necessary approvals, ensures quality and compliance of livelihood activities as per acceptable standards. Supports with monitoring and evaluation of livelihood activities.	Moderate	Moderate
Technical agencies <ul style="list-style-type: none"> National Enterprise Development Authority (NEDA) 	Provides technical support and guidance. Provides resource persons for trainings and	Moderate	Moderate

<ul style="list-style-type: none"> • Industrial Development Board • Tertiary Education and Vocational Training Commission (TEVTC) • National Apprentice Industrial Training Authority (NAITA) • Industrial Technology Institute (ITI) 	conducts trainings programs, enables links with apprenticeships and employers.		
Chamber of Commerce	Provides technical support, access to business networks and markets.	High	High
National, District and Divisional Samurdhi CBOs	Support beneficiary enumeration progress and selection validation, social auditing, grievance handling, monitoring	High	High
CSO/NGOs/ CBOs and any other community groups focusing on the interests of elderly, disabled, patients with various chronic diseases	To represent communities and to assist with identifying the poorest, conduct outreach programs for communication of information and help in gathering feedbacks and grievances	Moderate	Moderate
Media	Receive updates on the project implementation for information disclosure and ensure transparency.	Moderate	Moderate
Religious leaders at community level	As means of outreach, mediation roles when there are conflicts, communicating information.	Moderate	Moderate

4.4 Analysis of Disadvantaged/Vulnerable Persons and Groups

‘Vulnerable Groups’ are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹⁴, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The proposed SPP will exclusively target the disadvantaged and vulnerable population in the country as shown in Table 5. Providing access to information and encouraging their participation in consultations require special measures such as face- to-face verbal communications, public address systems, help desks, and a modest travel allowance for their participation in consultative meetings. Table 5: identifies the communication methods and resources required for the engagement of vulnerable persons and groups in the project.

¹⁴ Vulnerable status may stem from an individual’s or group’s level of education, area of residence, 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, dependence on unique natural resources, and affected by natural and manmade disasters.

Table 5 Engagement of vulnerable/disadvantaged persons/groups

Stakeholder group	Limitations for affective engagement	Preferred means of notification/consultation	Additional resources required
Poorest households affected by multiple vulnerabilities such as:			
<p>Families with elderly, disabled, and with CKDU/Cancer/NCDs patients.</p>	<ul style="list-style-type: none"> • Restricted mobility to travel to meeting location due to disabilities. • Lack of caregiver to provide necessary support to participate in meetings. • Not able to access mainstream and social media due to disabilities to be informed about the program. • Excluded from participation at community meetings due to discriminatory practices or political influence. 	<ul style="list-style-type: none"> • Communication via village level government officers • Printed leaflets (Sinhala, Tamil, English) • Individual meetings • Outreach programs through local CBOs/CSOs/NGOs • Community & Individual meetings • Outreach programs through local CBOs/CSOs/NGOs • SMS services, Radio/ Television & Social Media <p>Divisional level field officers (Social Service Officers, Economic Development Officers, Women Development Officers etc) to reach out to vulnerable people in the area</p>	<ul style="list-style-type: none"> • Application submission offices & meeting venues selected should have universal access, located close by to ensure easy commute. • May require the help of a caretaker to accompany them to meeting venues. • Mobilize support of the National Secretariat for the Persons with Disabilities to organize consultations and information disclosure. • May require the services of sign language interpreters.
<p>Families living in vulnerable areas such in and estate sector, underserved urban settlements, remote rural locations including in Vedda communities.</p>	<ul style="list-style-type: none"> • Excluded due to lack of bank accounts and Identification documents. • Not able to afford costs of travel to meeting locations especially for those living in rural locations. • Lack of access to mainstream and social media to learn about the program. • Illiteracy and inability to understand and engage effectively in consultations. • Excluded from participation at community meetings due to discriminatory practices or political influence. 	<ul style="list-style-type: none"> • Public notices in local languages or announcements made using mobile units. • Communication via village level government officers • Outreach programs through local CBOs, CSOs/NGOs • Community & Individual meetings. • SMS services, Radio / Television & Social Media • Printed leaflets (Sinhala, Tamil, English) • Notice boards in local languages (Sinhala, Tamil, English) • Divisional level field officers (Social Service Officers, Economic Development Officers, Women Development Officers etc) to reach 	<ul style="list-style-type: none"> • Mobile offices or offices at the Grama Niladhari could be setup to submit application and appeals/grievances to ensure accessibility & lower travels costs especially for vulnerable groups living in remote locations. • Gender disaggregated consultations to enable women to participate in an inclusive manner. • Location and time of community meetings held at times convenient for vulnerable groups. • Refer to assistance programs to address starvation, homelessness, destitution and domestic violence etc. implemented by

		out to vulnerable people in the area	other ministries or CSOs
<ul style="list-style-type: none"> • Single parent households including Women Headed Households. • Families with young children including school dropouts, affected with food security and with malnourished children. • Affected/victims of SEA/SH/GBV including child abuse. 	<ul style="list-style-type: none"> • Not able to attend meeting due to household chores / childcare duties especially for Women Headed Households. • Restricted mobility due to health concerns of pregnant/lactating mothers. • Excluded from participation at community meetings due to discriminatory practices or political influence. • Risks of GBV 	<ul style="list-style-type: none"> • Public notices in local languages or announcements made using mobile units. • Communication via village level government officers • Outreach programs through local CBOs, CSOs/NGOs • SMS services, Radio / Television & Social Media • Printed leaflets (Sinhala, Tamil, English) • Notice boards in local languages (Sinhala, Tamil, English) • Women Development Officers to reach out to vulnerable people in the area. 	<ul style="list-style-type: none"> • Application submission offices & meeting venues selected should have universal access, located close by to ensure easy commute. • Mobilize support from CSOs working on women's/WHH issues and the Ministry of Women's Affairs District and Divisional level units. • Locations should be safe and easily accessible and access to GBV services should be provided. • Meetings held in child friendly locations to enable women (or single parents) who have no childcare support to attend. • Refer to assistance programs to address health & nutritional issues, domestic violence etc. and provide GBV services , psychosocial services , maternal care services.
<p>People affected due to natural disasters.</p>	<ul style="list-style-type: none"> • Inability to access meeting locations during a disaster. • Cut off from basic channels of communication such mobile/telephone & other media during a disaster. • Psychological trauma due to disaster impacts , hence not able to actively participate in consultations. • Loss of personal Identification documents. 	<ul style="list-style-type: none"> • Search and rescue teams communicating directly to vulnerable and affected households. • Loud speak and alternate ways of communication. • Radio, Television & Social Media 	<ul style="list-style-type: none"> • Locations accessible to affected people. • Ensuring temporary safe locations are available to conduct consultations. • Alternate means to disseminate information when usual communication channels are not functioning during disaster. • Ensure GBV services are available.

4.5 SUMMARY STAKEHOLDER NEEDS

Table 6 describes the needs of the key stakeholders who have been identified and their preferences/needs for engagement.

Table 6 Communication needs of stakeholders

Stakeholders	Key characteristics	Language needs	Preferred means of notification & consultation	Consultation & Special needs
<p>Affected groups - Cash Transfers:</p> <ul style="list-style-type: none"> Households living below the poverty line. Female Headed Households/Single headed households who are poor. Elderly, disabled, and persons affected with CKDU/Cancer/NCDs - who are reliant on the state system People in Estate Communities, underserved urban settlements & remote rural locations. 	<ul style="list-style-type: none"> Requires brief and clear, include all relevant details and information on project objectives, criteria, benefits and application submission, cash delivery, implementation & grievance handling & monitoring procedures. 	<p>Sinhala and Tamil</p>	<ul style="list-style-type: none"> Awareness through public gatherings, meetings and door-to-door awareness, information via traditional medial, information displayed in bulletin boards, project briefs etc. 	<ul style="list-style-type: none"> Location for meetings are accessible and safe for women and child friendly. Ensuring communication reaches location of vulnerable including elderly homes, safe houses etc. Ensuring communication use means. Use appropriate methods to communicate to people with disabilities.
<p>Affected Groups - Livelihood:</p> <ul style="list-style-type: none"> Informal workers living in Estates , Small scale cash crop farmers, Artisanal fishermen, Subsistence farmers , Blue collar EPZ workers, People dependent on casual labor work Unemployed youth from poor households – urban and rural. Poor had lost their jobs due to crisis 	<ul style="list-style-type: none"> Requires brief and clear, include all relevant details and information on project objectives, criteria, benefits and application submission, cash delivery, implementation & grievance handling & monitoring procedures. 	<p>Sinhala and Tamil</p>	<ul style="list-style-type: none"> Pre-arranged meetings, emails, virtual meetings, briefing notes, circulars , formal letters 	<ul style="list-style-type: none"> Location for meetings are accessible and safe for women and child friendly.

<ul style="list-style-type: none"> • Micro/small/petty businesses/trade owners whose businesses were affected 				
<p>Implementing Agencies and their departments/Boards</p> <ul style="list-style-type: none"> • Ministry of Finance - Welfare Benefits Board • MoWCASE - Department of Samurdhi Development 	<ul style="list-style-type: none"> • Requires brief and clear, include all relevant details and information on project objectives, scope, implementation procedures, commitments, monitoring and evaluation etc.. 	Sinhala and Tamil, English	<ul style="list-style-type: none"> • Pre-arranged meetings, emails, virtual meetings, briefing notes, circulars, formal letters. 	<ul style="list-style-type: none"> • Provide the relevant information , dates of launch, objectives, roles of all relevant ministries, line agencies. • Lessons learned, implementation arrangements.
<ul style="list-style-type: none"> • District Secretaries, Divisional Secretaries & Grama Niladharis • Divisional level field officers nominated to work in the Social Assistance Unit 	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information related to the selection of project beneficiaries and maintaining updated beneficiary lists 	Sinhala and Tamil, English	<ul style="list-style-type: none"> • Pre-arranged orientation programs, Guidance Handbooks, briefing Sessions, Guide video, circulars / formal letters. • Project operational guidelines/procedures 	<ul style="list-style-type: none"> • Provide the relevant information , dates of launch, objectives, roles of all relevant ministries, line agencies. • Lessons learned, implementation arrangements.
<ul style="list-style-type: none"> • National Secretariat of Elders (NSE) • National Secretariat for the Persons with Disabilities 	<ul style="list-style-type: none"> • Requires brief and clear, include all relevant details and information related to the selection of project beneficiaries and maintaining updated beneficiary lists 	Sinhala and Tamil, English	<ul style="list-style-type: none"> • Pre-arranged meetings, Training Programs, emails, briefing notes, circulars, formal letters, Guidance Handbooks 	<ul style="list-style-type: none"> • Provide the relevant information , dates of launch, objectives, roles of all relevant ministries, line agencies. • Lessons learned, implementation arrangements.
<ul style="list-style-type: none"> • National, District and Divisional Samurdhi CBOs • Elderly, disabled, women's Committees • Community groups representing elderly, disabled, patients with diseases, vulnerable communities /CSO/NGOs/ CBOs • Religious leaders at community level 	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information of project scope, targeted beneficiaries, selection criteria, implementation procedures 	Sinhala and Tamil	<ul style="list-style-type: none"> • Pre-arranged meetings, Training Programs, circulars, formal letters, Guidance Handbooks 	Communication products on project progress and impacts.
<ul style="list-style-type: none"> • Ministry of Export Agriculture • National Secretariat of Elders (NSE) 	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information of project scope, targeted 	Sinhala and Tamil, English	<ul style="list-style-type: none"> • Briefing notes, meetings, Government websites , email 	Communication products on project progress and impacts

<ul style="list-style-type: none"> • National Secretariat for the Persons with Disabilities. • Department of Fisheries • Department of Agriculture, Department of Agrarian Services • Department of Health & Animal Production 	beneficiaries, selection criteria, implementation procedures			
<ul style="list-style-type: none"> • National Enterprise Development Authority (NEDA), • Industrial Development Board • Tertiary Education and Vocational Training Commission (TEVTC) • National Apprentice Industrial Training Authority (NAITA) • Industrial Technology Institute (ITI) • Chamber of Commerce 	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information of project scope, targeted beneficiaries, selection criteria, implementation procedures 	Sinhala and Tamil, English	<ul style="list-style-type: none"> • Briefing notes, meetings, Government websites , email 	Communication products on project progress and impacts
Organizations that help to verify information (Department of Pensions, Regional Plantation Companies (RPCs) and Managers of small holder tea estates etc.)	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information of project scope, targeted beneficiaries, selection criteria, implementation procedures 	Sinhala/ Tamil, English	<ul style="list-style-type: none"> • Meetings, emails, phone, SMS 	Share database of beneficiary registry and all relevant information required for verification.
Banks, Media , General Public	<ul style="list-style-type: none"> • Require brief and clear, include all relevant details and information of project scope, targeted beneficiaries, selection criteria, implementation procedures 	Sinhala/ Tamil/ English ,	<ul style="list-style-type: none"> • TV / radio, newspapers, mobile service news alerts, websites 	Communication products on project progress and impacts

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Purpose and timing of stakeholder engagement program

The overall objectives of SEP as stated in the ESS-10 are:

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help the Project identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format with special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder.
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

Thus, SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10.

Information disclosure and consultation processes will continue with affected parties, other interested parties and vulnerable groups during (i) project preparation, (ii) project implementation, and (iii) project operational phases. A variety of methods such as group consultations, individual consultations, awareness raising meetings/gatherings and interviews through different offline and virtual mediums such as telephone calls etc. and communication through printed (newspapers, banners & posters displayed in community locations and at government offices) and electronic & social media (Facebook, Twitter, WhatsApp Groups etc.), appropriate to the target audience, will be used for information disclosure and consultation.

5.3 Information Disclosure

During project preparation and planning, information related to project scope and schedule will be shared with project affected persons and other stakeholders during consultations.

Information about each component and phase of the Project will be provided to the public through media briefings, targeted media articles, information sessions, television/radio programs etc. The Project will also provide up-to-date information in the Ministries websites and in social media.

At the appraisal stage, safeguard instruments including Environmental and Social Commitment Plan (ESCP) and SEP prepared for this project will be disclosed on the website of MoF, MoWCASE and on the World Bank's external website, after their clearance by the government and the Bank. Additionally, copies of the referenced documents will be kept at the Ministry of Finance for public reference. Any changes to the approved ESCP and SEP would have to follow the same clearance/ approval procedures and disclosure.

During project implementation, sub-project specific safeguard instruments will be publicly disclosed in-country as well as on the World Bank's external website. The documents and plans to be disclosed include:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Monitoring activities undertaken as per ESCP and SEP
- Project quarterly reports and annual reports

Translations of executive summary of all documents prepared by the project in Sinhala and Tamil will also be made available to the public through the website of Ministry of Finance. Information can also be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp/viber groups, and traditional means of communications (TV, newspaper, radio, phone calls and e-mails) with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

Table 7 provides a plan for information disclosure during project preparatory, implementation and operational periods.

Table 7: Information disclosure plan

List of information to be disclosed	Proposed methods	Time frame	Target stakeholders	Responsibility
Project preparation and planning phase				
ESCP & SEP including translated summaries.	Electronic copies published in Project websites & social media sites hardcopies available at MoF/WBB and MoWCASE/DSD. Notice sent to all District and DS offices to direct interested parties to the MoF/WBB and MoWCASE/DSD websites.	Before commencement of the project.	The public including eligible & vulnerable groups, government entities at national, district and divisional level and interested groups like media, NGOs etc.	MoF, MoWCASE, PMT-WBB, PMT-Department of Sumurdhi (DSD), District/Divisional Secretary (DS)

Project details, objective, duration, target population, selection criteria, and project implementation plans.	TV, radio, newspapers, website, social media platforms, mobile phone text messages, Community meetings, public notice boards, posters and leaflets.	Before commencement of the project.	The public, including eligible & vulnerable groups, government entities at national, district and divisional level and interested groups like media, NGOs etc.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Appeal & GRM process including GBV incidents.	Community meetings, public notice boards, posters and leaflets. Notifications based on WBB's Appeal Board minutes	Before commencement of the project.	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Project implementation phase				
Eligibility criteria, procedures to submit applications, beneficiary needs assessment & proposals for livelihood support & banks accounts, validation and monitoring processes.	Gazette, TV, radio , newspapers, website, social media platforms, mobile phone text messages, Community meetings, public notice boards, posters and leaflets.	During implementation on an ongoing basis.	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Progress reports of the project prepared by PMT & other partner agencies related to project performance.	Websites, social media, email , formal meetings, community meetings, DS level information boards.	Weekly, Monthly, quarterly & annual reporting	The public including eligible & vulnerable groups, government entities at national, district and divisional level and interested groups like media, NGOs etc.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Summary outcomes of consultation meetings.	Websites, notice boards at DS and District level, community meetings.	Quarterly	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Information on Help Desk, awareness on GRM & appeal processes and reporting on GBV related incidents and accessing GBV service provided.	Hotline number, Help Desk, SMS service, Divisional Secretariat, websites, social media, Community meetings, Notice Boards.	Continuous	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS

Status/progress of grievance resolution.	Feedback to complainant – manual, or via SMS service	Monthly/Quarterly	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Awareness raising/capacity building training programs planned & conducted.	Website, progress reports, meetings, emails.	Quarterly	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Project's key deliverables	Website, progress reports, emails	Monthly & Quarterly	Eligible & vulnerable groups, government entities involved in implementation.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS
Beneficiary feedback Surveys	Telephone, mobile phone - SMS feedback	At registration, cash transfer, and for training and productive inclusion.	Project beneficiaries.	MoF, MoWCASE, PMT-WBB, PMT-DSD, DS

5.3 Proposed Strategy for Stakeholder Engagement

The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, in order to elicit their views and feedback. Individual and group meetings, mini-workshops/focus group discussions, satisfaction surveys, social media, community monitoring, etc. will be used to facilitate the consultations on the following

- Project beneficiaries/target groups
- Beneficiary selection criteria
- Project deliverables
- Project implementation procedures
- Project's impacts and risks
- Project's safeguard measures including grievance redress
- Beneficiary satisfaction

Table 8 presents the strategy for stakeholder engagement.

Table 8: Strategy for Stakeholder Engagement

Target Stakeholders	Level	Topics of Engagement	When	Methods	Responsibility
<p>Affected groups - Cash Transfers:</p> <ul style="list-style-type: none"> Households living below the poverty line. Female Headed Households/Single headed households who are poor. Elderly, disabled, and persons affected with CKDU/Cancer/NCDs - who are reliant on the state system People in Estate Communities, underserved urban settlements & remote rural locations. Poor households affected by disasters . 	<p>National, and field level (District, Divisional Secretariat, and GN),</p>	<ul style="list-style-type: none"> Project objectives, intended benefits & cash transfer timeline. Beneficiary selection criteria Enrollment, validation and cash transfer procedures Project’s impacts and risks & mitigation measures Accessing project information Appeal Process and GRM Roles and responsibilities of Implementing Agencies. Beneficiary satisfaction/feedback survey process. 	<p>Before cash transfer - 0-3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media Community outreach – focus group discussions, interviews, Help Desks and Hotline. Piloting and field testing. 	<p>MoF, MoWCASE, PMT-WBB, PMT-Department of Sumurdhi (DSD), District/Divisional Secretary (DS)</p>
		<ul style="list-style-type: none"> Progress updates. Key challenges/issues and corrective measures. Best practices and lessons learnt. Any revisions to project design, program procedures and policy decisions. 	<p>During cash transfers - beyond 3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media, Community outreach – focus group discussions, interviews, Help Desks and Hotline. Feedback/Satisfaction surveys. 	
<p>Affected Groups - Livelihood:</p> <ul style="list-style-type: none"> Informal workers living in Estates , Small scale cash crop farmers, Artisanal fishermen, Subsistence farmers, Blue collar EPZ workers, People dependent on casual labor work Unemployed youth from poor 	<p>National, and field level (District, Divisional Secretariat, and GN),</p>	<ul style="list-style-type: none"> Project objectives, intended benefits & cash transfer timeline. Market assessment Beneficiary selection criteria Project’s impacts and risks & mitigation measures. Accessing project information Appeal Process and GRM Roles and responsibilities of Implementing Agencies. 	<p>Before cash transfer - 0-3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media, Websites and Social media. Community outreach – focus group discussions, interviews, Help Desks and Hotline. Piloting and field testing. 	<p>MoF, MoWCASE, PMT-WBB, PMT-DSD, DS</p>

<ul style="list-style-type: none"> households – urban and rural. Poor had lost their jobs due to crisis Micro/small/petty businesses/trade owners whose businesses were affected 		<ul style="list-style-type: none"> Beneficiary satisfaction/feedback survey process. 			
		<ul style="list-style-type: none"> Business Plan development. Progress updates. Key challenges/issues and corrective measures. Training, Monitoring & Evaluation Best practices and lessons learnt. Any revisions to project design, program procedures and policy decisions. 	<p>During cash transfers - beyond 3 months from project effectiveness</p>	<ul style="list-style-type: none"> Websites and Social media. Community outreach – focus group discussions, interviews, Help Desks and Hotline. Feedback/Satisfaction surveys. 	
<ul style="list-style-type: none"> Banks Community based organizations (CBOs) - National, District and Divisional Samurdhi CBO, Farmer Organisations – men and women (sithamu groups), Youth groups – both urban and rural, Rural Fisheries Development Societies and Fisher Cooperatives Non-governmental organizations (NGOs) including societies formed by elders, disabled, Samurdhi beneficiaries etc., UN agencies and development partners Religious Leaders, Media 	<p>National, and field level (District, Divisional Secretariat, and GN),</p>	<ul style="list-style-type: none"> Project objectives, intended benefits & cash transfer timeline. Market assessment Beneficiary selection criteria Project’s implementation arrangements Appeal Process and GRM Roles and responsibilities of Implementing Agencies. 	<p>Before cash transfer - 0-3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media, press conferences etc. Websites and Social media. Meetings (including online), conferences, webinars etc. 	<p>MoF, MoWCASE, PMT-WBB, PMT-DSD, DS</p>
		<ul style="list-style-type: none"> Business Plan development. Progress updates. Training, Monitoring & Evaluation Best practices and lessons learnt. Any revisions to project design, program procedures and policy decisions. 	<p>During cash transfers - beyond 3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media, press conferences etc. Websites and Social media. Meetings (including online), conferences, webinars etc. 	
<p>Other Interested Parties providing technical and implementation support:</p> <ul style="list-style-type: none"> Ministry of Home Affairs National Secretariat of Elders (NSE), National Secretariat for 	<p>National, and field level (District, Divisional Secretariat, and GN),</p>	<ul style="list-style-type: none"> Project objectives, intended benefits & cash transfer timeline. Market assessment, Beneficiary selection criteria Project’s impacts and risks & mitigation measures Project’s implementation arrangements 	<p>Before cash transfer - 0-3 months from project effectiveness</p>	<ul style="list-style-type: none"> Mainstream media, press conferences etc. Websites and Social media. Meetings (including online), conferences, webinars etc. 	<p>MoF, MoWCASE, PMT-WBB, PMT-DSD, DS</p>

<p>the Persons with Disabilities</p> <ul style="list-style-type: none"> • District Secretaries, Divisional Secretaries, Grama Niladaries. • Ministry of Export Agriculture, Department of Agriculture , Department of Agrarian Services • Department of Fisheries • Department of Health & Animal Production • Technical Agencies: NEDA, Industrial Development Board, TEVTC, NAITA, ITI. • Chamber of Commerce 		<ul style="list-style-type: none"> • Appeal Process and GRM • Roles and responsibilities of Implementing Agencies. • Beneficiary satisfaction/feedback survey process. 			
		<ul style="list-style-type: none"> • Business Plan development • Progress updates. • Key challenges/issues and corrective measures. • Training, Monitoring & Evaluation • Best practices and lessons learnt. • Any revisions to project design, program procedures and policy decisions. 	<p>During cash transfers - beyond 3 months from project effectiveness</p>	<ul style="list-style-type: none"> • Mainstream media, press conferences etc. • Websites and Social media. • Meetings (including online), conferences, webinars etc. 	

5.4 Proposed strategy to incorporate the view of vulnerable groups

The PMT along with the Divisional and District Secretary level officers for the Social Assistance Unit, Elderly Benefits, CKDU and Disability will ensure that Women Headed (or single parent) Households, elderly, disabled, CKDU patients, ethnic minorities, vulnerable communities living in urban, rural, and estate areas participate effectively and meaningfully in consultative processes and that their voices are heard. This may require measure and assistance to afford opportunities for meetings with vulnerable groups in addition to general community consultations. For instance, women may be more outspoken in women only focus group discussions or meetings than in general community meetings. In addition, it is important to rely on other consultation methods that do not require physical participation in meetings such as social media, email, virtual meetings to ensure groups that cannot physically be present at meetings can participate where feasible.

Working with community mobilizers, CSOs/ NGOs, disabled committees, women led committees, Elderly committees, religious leaders in the areas is critical. They will provide special encouragement and assistance where necessary to vulnerable and marginalized individuals/households to ensure that information reaches them and that they can participate meaningfully in consultations. To ensure community validation of beneficiary lists, sharing of beneficiary lists at community level meetings, posting on PMT project website, and at district, divisional secretariats will enable communities to contest, make queries if names are not on lists can actively participate.

To ensure gender equality and equity it is important to engage with women’s groups on an ongoing basis, including the participation of Women Development Organizations (WDO) throughout the life cycle of the project. Ensuring that female headed households and other beneficiary women are able to voice their concerns, contribute towards decision making and obtain benefits of the welfare programs should be encouraged especially in various fora that tend to include more men. WDOs, CSOs that engage with women will be an important asset to ensure women’s active participation as women are likely to make household decisions relating to food consumption, child rearing etc.

Table 9 presents a strategy for the engagement of vulnerable and disadvantaged groups in consultative processes.

- Living in vulnerable areas such as in estate sector, underserved urban settlements, and remote rural locations, Vedda communities.
- Female Headed Households/Single headed households.
- Families with young children including school dropouts, affected with food security and with malnourished children.
- Affected/victims of SEA/SH/GBV including child abuse.

Table 9: Strategies for the engagement of vulnerable and disadvantaged groups

Stakeholder group	Strategies
<p>Poorest households affected by multiple vulnerabilities such as:</p> <ul style="list-style-type: none"> • Families with elderly, disabled, and with CKDU/Cancer/NCDs 	<p>Accessibility:</p> <ul style="list-style-type: none"> • Meeting venues located close by to ensure cost effective commute in urban, rural, and estate settings. • Scheduling of meetings should not conflict ability to earn an income or

<p>patients.</p> <ul style="list-style-type: none"> • Living in vulnerable areas such as in estate sector, underserved urban settlements, and remote rural locations and Vedda communities. • Female Headed Households/Single headed households. • Families with young children including school dropouts, affected with food security and with malnourished children. • Affected/victims of SEA/SH/GBV including child abuse. 	<p>existing employment.</p> <ul style="list-style-type: none"> • Locations that are easy to access and non-intimidating and do not require long commutes. <p>Inclusion:</p> <ul style="list-style-type: none"> • Engage CSO/NGOs working with vulnerable groups who have more in-depth knowledge and research data on issues affecting them. • Cater to low literacy using graphic communication media that is easy to understand. • Prepare public awareness and dissemination materials in relevant languages, tailor messages to the cultural contexts and work with relevant institutions to engage this category of people and disseminate information. <p>Gender concerns:</p> <ul style="list-style-type: none"> • Targeted focus groups discussions and consider gender disaggregated consultations to enable women to participate, inclusion in project benefits. • Location and time of community meetings held at times suitable to women’s active participation, and easy to access and have gender-segregated toilets. • Design online and in-person surveys and other engagement activities so that women in unpaid care work can participate. • Consider the literacy levels of women while developing communications materials; consider provisions for childcare, transport, and safety for any in-person community engagement activities. <p>GBV prevention measures:</p> <ul style="list-style-type: none"> • Discuss measures to respond to GBV issues, about the available support systems & psychosocial services for survivors of GBV, SEA, SH • Make aware of behavioural standards in place and availability of support of GBV service providers. <p>Considerations for engaging with Vedhha communities</p> <ul style="list-style-type: none"> • Reach out to CSOs/CBOs working with such groups to engage Veddha community. • Address issues of language, physical distance, and other possible barriers towards inclusion of Veddha community with the support of local CSOs/CBOs.. • Use culturally appropriate communications & community outreach strategy • Ensure full participation and consultation of IPs throughout the project implementation. • Have in place culturally-sensitive mechanisms by which IPs can raise concerns or seek redress for project-related grievances.
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5.5 Public Comments and Feedback, Reporting to Stakeholders

The draft SEP is being consulted with key implementation partners and project affected parties and will be disclosed publicly prior to the decision meeting. Draft SEP will be updated with the feedback received and final version of the SEP will be disclosed by project Approval. The draft SEP can be emailed to relevant stakeholders requesting comments and suggestions and will also be published on the MoF and MoWCASE websites for public review and comments. The PMT will also seek to organize a one-day review meeting with community leaders, community organizations and CSO / NGOs working with vulnerable groups and to get their views and engagement. If significant changes are made to the SEP, the Borrower will re-disclose the updated SEP.

All comments received by the project will be reviewed by the PMT and any decisions made based on the comments made by the public and the stakeholders will be communicated to all relevant stakeholders after the review meetings. If the project had not been able to make any decision in response to public, stakeholder comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

6.1 Resources

As outlined below, resources required for implementation of the stakeholder engagement plan would include relevant project staff, costs of information disclosure and stakeholder consultations; and the cost of the grievance redress mechanism. The project cost tables and annual work plans and budget shall allocate costs for specific information disclosure and stakeholder consultation activities including: maintenance of preparation, printing and dissemination of information materials, and costs of stakeholder consultation workshops. In addition, the project cost tables shall include specific budget for the Grievance Redress Mechanism (GRM).

6.2 SEP Implementation Arrangements

The project will be implemented by the Ministry of Finance, Economic Stabilization and National Policies (MoF) and the Ministry of Women, Child Affairs, and Social Empowerment (MoWCASE). The implementing agency for Component 1 will be the MoF and for Component 2, MoWCASE. The Welfare Benefits Board under the MoF will manage the day-to-day operations for Component 1, while the Department of Samurdhi Development under MoWCASE will manage the day-to-day operations for Component 2. Under Component 3, sub-components 3.1 will be implemented by MoF and 3.2 under MoWCASE, with coordination established through MOF.

The Chairperson/Commissioner of the WBB will function as the Project Director and a project coordinator will be appointed at MoWCASE. The WBB will be staffed to carry out all required project implementation functions, with additional staff recruited and trained as required to perform the Financial Management, Procurement, Communication, Training, Grievance Handling, M&E, and Environmental/Social Framework obligations. Key staff will comprise a Communication specialist, and an Environmental and Social Specialist

(ESF specialist). The ESF specialist will be responsible for the overall coordination, implementation and monitoring of the SEP including the GRM with the support of the Communication Specialist.

The MoWCASE will design and deploy the productive inclusion programs and undertake monitoring and evaluation activities. MoWCASE will use the Department of Samurdhi Development under the ministry of implementation of activities and will form partnerships with other agencies for technical assistance during implementation.

The roles and responsibilities of the different stakeholders in SEP implementation are described in Table 10.

Table 10: Responsibilities of key stakeholders in SEP implementation

Stakeholder	SEP Implementation Responsibilities
Overall	
Project Steering Committee	Will ensure that project implementation follows both GoSL and Association rules and regulations. The PSC will be chaired by the Secretary to the Ministry of Finance with representatives from the Departments within the MoF, WBB, Department of National Planning, Department of External Resources, MoWCASE, Ministry in-charge of Home Affairs, Department of Samurdhi Development, Information Communication Technology Agency (ICTA) and any other agencies as per the needs of the Project
Cash Transfer	
Ministry of Finance	Establishment of the required institutional arrangements to establish the WBB which will be responsible for SEP implementation.
WBB	Responsible for implementation of the SEP, specifically ensuring that due procedures are followed by Divisional Secretaries in SEP implementation.
PMT of SSNP	Implementation of SEP, training of key stakeholders, preparation of necessary communication tools, carrying out of stakeholder consultations, monitoring and reporting of SEP implementation.
SSNP PMT – Project Director	Provides overall direction to SEP implementation to achieve the expected objectives and manage staff responsible for SEP implementation.
SSNP PMT – Communications Specialist	Preparation and implementation of the communication and information disclosure activities of the SEP and responsible for the develop IEC materials and conducting of awareness programs.
WBB – E&S Specialist	Implementation of activities in the SEP specifically related to stakeholder engagement and GRM. Also working closely with the Communications Specialist to implement information disclosure activities.
GRM Call Center Staff	2 to 3 responsible to answer calls in local languages.

SSNP PMT – M & E Specialist	Monitoring and evaluation of implementation of the SEP and responsible for conducting phone and in-persons feedback & satisfaction surveys and preparation of progress reports.
ICT Unit / ICT Specialist	Development of software to automate GRM and preparation of IT based survey.
Project implementing partner agencies	Responsible for supporting PMT to implement the SEP, specifically to conduct consultations and do awareness programs and support PMT to implement the SEP under the guidance of the PMT. The partner agencies that could assist the PMT include the MoHA, NSE, and NSPD
Livelihood program	
MoWCASE	Supervise the implementation of the SEP related to the livelihood component.
Department of Samurdhi Development	Implementation
Department of Samurdhi PMT – Project Coordinator	Provides overall direction to SEP implementation to achieve the expected objectives and manage staff responsible for SEP implementation.
Department of Samurdhi – E&S Specialist	Preparation and implementation of the communication and information disclosure activities of the SEP and responsible for the develop IEC materials and conducting of awareness programs.
Department of Samurdhi – Communications Specialist	Implementation of activities in the SEP specifically related to stakeholder engagement and GRM. Also working closely with the Communications Specialist to implement information disclosure activities.
Department of Samurdhi – M & E Specialist	Monitoring and evaluation of implementation of the SEP and responsible for conducting phone and in-persons feedback & satisfaction surveys and preparation of progress reports.
ICT Unit / ICT Specialist	Support with remote communications and consultation activities using ICT tools and social media.
District Samurdhi Director	Responsible for supervising consultation activities.
District Level Livelihood Development Manager	Responsible for conducting consultations at district level and creating awareness at DS level and responsible for handling all grievances.
Committee Leader & GRM committee – Samurdhi CBOs – Village, Divisional, District and National .	Complaint handling at community level and supports with community outreach & consultation.
Held Desk at DS	Manages all appeals and grievances at the office of the Divisional Secretaries.
Grama Niladharis	Support the officials at the Divisional Secretaries to conduct awareness programs and engage eligible beneficiaries.

Smaurdhi Zonal Manger	Overall coordination of consultations among divisions.
Village Samurdhi Development Officer	Conducts Village level consultations and support community mobilization.
Project affected parties	Participate in consultations, access information to know about the program, application and cash transfer processes, share views, feedback & concerns.
Other interested parties	Access project information to learn about the program, participate in consultations and provide feedback & concerns to ensure activities are implemented in an equitable and a transparent manner.

6.3 Estimated Budget

The costs associated with the implementation of the SEP will be provided by the Ministry of Finance. A budget for SEP implementation in Table 11. The below estimates for the SEP implementation for Social Safety Nets Project (SPP) is prepared based on the costs incurred under the Social Safety Nets Project (SSNP). Therefore, the project will review the SEP quarterly to determine whether any changes to stakeholder classification or engagement are required including the project implementation period. If any significant changes were observed, the SEP will be updated and disclosed, and the budget will be revised accordingly.

Table 11: Estimated budget for stakeholder engagement plan

Activity	Amount (LKR) – Cash Transfers	Amount (LKR) – Livelihood Support
PERSONNEL <ul style="list-style-type: none"> Communications Specialist and Environment & Social Specialist Hired consultants to prepare communication products and support in the implementation of SEP. 	TBD	TBD
INFORMATION DISCLOSURE <ul style="list-style-type: none"> Preparation of communication products Maintaining the websites, media time on TV, radio, publish advertisement on newspapers etc. 	TBD	TBD
STAKEHOLDER ENGAGEMENT <ul style="list-style-type: none"> Consultative meetings, training and orientation workshops and awareness programs. Community based outreach activities. 	TBD	TBD
GRIEVANCE REDRESS MECHANISM <ul style="list-style-type: none"> Operation and management of the GRM system including costs for awareness, training, record keeping and organizing committee meetings. 	TBD	TBD
TOTAL	TBD	TBD

6.4 Reporting

All consultation sessions, findings, and recommended actions will be documented and presented to the WBB. The findings will be documented, and summary reports will be presented to the WBB Board, PSC, and Progress Review Meetings. The Environmental & Social Safeguards Specialist will be responsible to maintain records.

7. GRIEVANCE REDRESS MECHANISM

7.1 GRM Objective

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences.

Specifically, the GRM:

- Provides project stakeholders including project affected persons, to submit complaints, grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances;
- The GRM will endeavour to resolve the grievances locally, and to avoid lengthy court procedures.

The project will have two GRMSs:

- 1) GRM for the cash grant component, which will be managed and coordinated by the PMT of the WBB. The Environmental and Social Specialist with the PMT of the WBB for the project will act as GRM focal for the project.
- 2) GRM for the livelihood support component, which will be managed and coordinated by the PMT of the Department of Samurdhi Development (DSD). The Environmental and Social Specialist with the PMT of the DSD for the project will act as GRM focal for the project.

7.2 GRM of the Cash Transfer Program

In the initial stages of the Social Protection Project (SPP), all appeals and grievances will be handled by the existing GRM at the Divisional Secretariat level. However as the SPP progresses, the WBB will establish a dedicated grievance redress management (GRM) system for emergency cash transfer. This GRM is expected to be automated using the software developed under the Social Safety Nets Project (SSNP) which

will be adopted for the ESSP project. Further, the project affected persons as well as other interested parties will be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultation meetings and other stakeholder engagement activities.

The impacts of the Project may raise grievances and complaints on the part of affected persons in relation to: (i) exclusion of persons from eligibility lists; (ii) improper targeting; (iii) inequitable delivery of project benefits (if different benefit amounts given within the same program); (iv) exclusion of some sections of the communities benefiting from the project; (v) accessibility to services and facilities; (vi) inadequacy of benefit amount; and (vii) payment related issues.

The GRM will operate under the oversight of the Welfare Benefits Board (WBB) at the Ministry of Finance (MoF). Given the emergency nature of the cash transfer program, all grievances will be handled at the Divisional Secretariat level. However, there will be multiple focal points to report grievances as shown below:

GRM Structure – Cash Grants:

The SSNP GRM involved a hotline number established at the PMT to provide feedback on enquiries made regarding the social registry process. The WBB Act provides an appeals mechanism that enables potential/existing applicants to submit an appeal once the list of beneficiaries are publicly disclosed. Help Desks established at the Divisional Secretariat will be established to manage all appeals and grievances at the divisional level. The officers have been trained to document calls received and enter GRM information to the GRM software application. However, while the software is still being piloted, the existing GRM at the divisional level will function in the immediate phase to respond to appeals and grievances. Accordingly, the proposed GRM structure is as follows:

- 1) Village level: Grama Niladrari
 - Grama Niladrari of the respective area will log the complaints. Once system is available, complaints will be forward to the DS to uploaded to the MIS system.
- 2) Divisional level: Divisional Secretary of the area will be the responsible officer.
 - Help Desks at the Divisional Secretariat will log the complains and enter into the MIS.
- 3) National level: Welfare Benefits Board at the Ministry of Finance will be the responsible body.
 - A Call Center will be operational. At the moment, the hotline is operational.

Complaint Handling Process – Cash Grants:

- **Recording and acknowledging:** All grievances received by the focal points mentioned above will register the grievances and forward them to the relevant Divisional Secretaries for resolution according to service standards, where majority would be within 2 days. The DS will acknowledge the receipt of grievances by the aggrieved parties within 2 days of receiving the grievance.
- **Resolution:** The Divisional Secretary (DS) will assign a relevant officer or appoint Committee to assess the case by conducting a field visit and meeting the aggrieved parties. Subsequent to the field visit, the relevant officer or committee will submit a report of their assessment and their recommendations to the DS. The DS will review the report and decide whether to approve the recommendations given in the report.
- **Reporting:** Accordingly, the Complainant will be informed in writing about the decision of the DS within a period of 3 weeks.
- **Escalation:** Aggrieved parties, who dissatisfied with the decision of the DS will resort to appeal

process of WBB stipulated in the WBB Act. All grievances received, resolved, escalated to the next level has to be documented and summary has to be included as part of progress reports prepared monthly/quarterly/annually.

7.3 GRM of the Livelihood Program

GRM Structure – Livelihood Support:

The MoWCASE, under the Department of Samurdhi Development has staff at the Divisional Secretariat level assigned to receive grievances relating to productive inclusion activity. The Existing Samurdhi CBOs at the Village, Divisional, District and National will be used and strengthened by providing clearly defined roles and responsibilities operate a GRM. A committee represented by the respective Government officials including those from the local Mediation Board together with the CBO leadership will review grievances and resolve grievances. Periodic review and reporting of grievances will be done at the Divisional & District Secretariat levels and all reports shared with the central level. Performance and effectiveness of this GRM will be measured by the percentage of grievances recorded and resolved in the system. The timely resolving of complaints will also be a key indicator in the RF for the project. A detail GRM guideline will developed and all stakeholders and committee members will be briefed on the processes.

Accordingly, the proposed GRM structure is as follows:

- 1) Village Grievance Redressal Committee (GRC) – will comprise of: Grama Niladari (will function as Chair/Advisor), Sumurdhi Development Officer, Development Officer, CBO President & one CBO representative.
- 2) Divisional GRC – will comprise of: Divisional Medication Board Officer, Headquarter manager – Samurdhi, Divisional Secretary (will function as Chair/Advisor), Administrative Grama Niladari (represents all the GNs), 3 members of other relevant government officers, CBO President, Treasurer and Secretary.
- 3) District GRC – will promise of: District Secretary (will function as Chair/Advisor), District Medication Board Officer, Livelihood Manager, CBO Manager, CBO President, Treasurer and Secretary, Director Planning, Director Samurdhi,
- 4) National GRC – Director General (will function as Chair/Advisor), Director Livelihood, Director-CBO, Director–Social Development, Director–Marketing, CBO President, Treasurer and Secretary.

Complaint Handling Process – Livelihood support:

- **Recording and acknowledging:** Respective officers attached to the Department of Samurdhi Development at Village, Divisional, District and National levels will be responsible for registering the complaints and forwarding them respective GRM committees for resolution.
- **Resolution:** The respective committees at Village, Divisional, District and National levels will assess the cases to provide a resolution. The village committee will meet weekly, divisional committee bi-weekly, district committee monthly and national committee quarterly.
- **Reporting:** Accordingly, the Complainant will be informed in writing about the resolution process and the final decision to resolve the complaint.
- **Escalation:** Aggrieved parties, who dissatisfied with the decision can appeal report to the

respective Ministry Secretary. All grievances received, resolved, escalated to the next level has to be documented and summary has to be included as part of progress reports prepared monthly/quarterly/annually.

Please refer Annex 1 for the flow chart of the planned digital design of the GRM.

7.4 Handling Gender Based Violence (GBV) issues

Project'S SEA/SH rating: The SEA/SH risk of the project is rated as 'moderate' determined by the World Bank's SEA/SH Risk Rating tool for Social Protection. The project does not support any rehabilitation or construction activities, hence there is no risks associated with labor influx. However, there could be potential risks of SEA/SH/gender-based violence, linked to household decision making on spending of cash received given the heightened stress levels of families in the crisis situation. Further there could be SEA/SH risks due to abuse of authority especially during selection of beneficiaries and during home visits, especially in homes without any male presence. There is also a probability of women with disabilities and elderly women would be more prone SEA/SH. To mitigate these risks, a behavioral standard clearly stating zero-tolerance for Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) with consequences will be adopted and communicated to all project actors. Any SEA/SH related incidents that are reported to the GRM will be referred to a qualified service provider to respond while maintaining survivor confidentiality.

SHE/SH complaint reporting channels:

- SEA/SH related grievances are handled through a survivor-centered approach. The grievance uptake channels to be used to report on SEA/SH issues will be through the designated focal points (Village level – Grama Niladhari, Divisional level – Divisional Secretary, and National Level focal point of Welfare Benefits Board who will undergo a training on how to respond and refer grievances relating GBV in a confidential manner).
- No grievance uptake mechanism can reject such grievances, and all focal points directly receiving grievances will be trained in the handling and processing of SEA/SH-related grievances. Complainants are also free to directly submit their complains directly to GBV service providers – please see recommended GBV service providers.

GBV Service Providers: The GRM of the project will assist SEA/SH survivors by referring them to the following qualified GBV services providers, institution, NGO for support immediately after receiving a complaint directly from a survivor:

- Women Development Officers, Social Service Officer and Counselor at the Divisional Secretary offices.
- National Women's Helpline (no. 1938) managed by the Ministry of Women,
- Mithuru Piyasa from Ministry of Health, which are available at most State Hospitals,
- Women In Need etc. to handle SEA/SH incidents.
- Women's Unit established at the closest Police Station.

Details on the GRM and GBV reporting mechanism and channels will be displayed at the GN, DS and Welfare Board ; and on the Finance Ministry Website in Sinhala, Tamil and English.

Registering SEA/SH related grievances: When taking information and registering grievances of a SEA/SH nature the following steps will be strictly followed:

- No identifiable information on the survivor shall be stored in the Grievance Mechanism (GM)
- The GM should **not** ask for, or record, information on more than the following related to the SEA/SH allegation:
 - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - If, to the best of the survivor’s knowledge, the perpetrator was associated with the project;
 - If possible, the age and sex of the survivor; and
 - If possible, information on whether the survivor was referred to services.
- The SEA/ SH services provider will use its own case management system to respond to the case.
- The above services will be offered even if a survivor does not wish to file a formal complaint or if the complaint is not related to the project before closing the case.
- .

Ensuring Confidentiality and obtaining Consent:

- Absolute confidentiality will be maintained for all grievances related to SEA/SH issues to prevent any risks of stigmatization and reprisals against the survivor.
- This means that no information shall be disclosed at any time to any party without the informed consent of the person concerned. The survivor’s consent will also be sought for undertaking any action on the grievance. Under no circumstance should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which they do not feel comfortable. In the case of children, informed consent is required from a parent or legal guardian and the children.
- A survivor can withdraw such consent at any time as well. If a survivor does not consent to sharing information, then only non- identifying information can be released or reported on.
- WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies:
https://www.who.int/gender/documents/OMS_Ethics&Safety10Aug07.pdf will be adopted.

SEA/SH incidents linked to project workers: Where SEA/SH grievances have been allegedly committed by project workers¹⁵, the grievance will also be reported and registered. The PMT social specialist will follow up and determine jointly with the GRM focal point of the respective partner agency (Village level, Divisional Secretary levels) the likelihood that the allegation is related to the Project. The PMT social specialist will follow up to ensure that the complaint was addressed appropriately and complainant was provided guidance on obtaining the services of the above listed GBV service providers. The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with the local legislation, labour laws, and employment contract. The PMT social specialist will report back to the survivor on any steps undertaken and the results.

Reporting to World Bank

The GRM is required to inform the PMT Social Specialist and TTL within 24 hours of receiving the complaint. The TTL is required to notify PM, Sector Director and CMU (including CD and CM/Rep) by sending first draft

¹⁵ Project workers refers to people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers) – Environmental and Social Framework, ESS2 – Labour and Working Condition, World Bank, page 31.

of the ESIRT within 24 hours of receiving the details. If the incident is a severe one eg: sexual abuse, rape, human trafficking, senior management and the VP of SAR must be notified. Survivor confidentiality should be always protected to prevent any risks of stigmatization and reprisals against the survivor. A corrective action plan must be developed to mitigate the risk of a similar re-occurrence and the TTL is required to monitor the implementation of the agreed actions.

7.7 Awareness raising on GRM

Information about the grievance handling system will be distributed to all project affected people and other stakeholders through regular information channels used by the project including initiating meetings at the start of the project, public consultations held, public meetings during project implementation, brochures, pamphlets in local languages, posting on notice boards and online. The Communications Specialist and the Environmental and Social Specialist of the project together with officials at the district and divisional secretariats will play a lead role in awareness building and information sharing on the GRM. Moreover, the stakeholder engagement program of the project will be used by the PMT to encourage the use of the GRM. When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. Information to be disseminated will include the scope of the GRM, focal points for receiving grievances, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints. Furthermore, the project will provide orientation and training to the members of the GRC on effective grievance handling procedures.

7.8 GRM Monitoring and Reporting

The PMT at the WBB will assess the functioning of the GRM. The PMT will be responsible for regular reporting of the GRM status including those grievances received, resolved, and pending. The GRM coordinator will: (i) ensure accurate entry of GRM data into the online log-sheet (data base); (ii) include details of GRM on project quarterly reports; and (iii) review the status of complaints to track which are not yet resolved and suggest any needed remedial action. The GRM monitoring reports will be presented at the daily/weekly/monthly progress meetings to help make timely decisions. Resolution of timely grievances will help to avoid possible unwarranted protests etc.

The quarterly and annual progress reports will include updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc.).
- Quantitative data on the number of complaints received, the number that were eligible, and the number resolved
- Qualitative data on the type of complaints and answers provided, issues that are unresolved
- Time taken to resolve complaints
- Number of grievances resolved and raised, appealed to higher levels
- Summary of resolutions, decisions made
- Satisfaction with the action taken
- Any particular issues faced with the procedures, staffing or use
- Factors that may be affecting the use of the GRM, beneficiary feedback system
- Any corrective measures adopted

Reporting To World Bank: The World Bank will be kept informed and where necessary consulted on World Bank requirements, during the process of grievance resolution, and also on the outcome of the process. A summary sheet of all complaints received and resolved will be shared with the World Bank Task Team. Any complaint or incident categorized as high risk should be reported to the World Bank Task Team immediately.

GRM Contact Information: Aggrieved parties can approach and use the following contacts for any inquiries regarding their grievances, complaints and feedback (table 12). The contact details will be updated once the Project Management Team of WBB formed and the required staff is appointed.

Table 12: Details of contact person/s at the national level:

Description	Cash Grants	Livelihood Support
Project implementing Agency:	Ministry of Finance - WBB	MoWCASE – Ministry of Samurdhi Development. Sri Lanka
Address:	1 st Floor, New Building, Lotus Road, Colombo 1	4th floor, Sethsiripaya, Battaramulla, Battaramulla
Email:	info@iwms.wbb.gov.lk	Jeevanopaya@gmail.com
Website:	https://wbb.gov.lk/	https://www.samurdhi.gov.lk/web/
Telephone:	+(94)112 484 600 (ext: 4117)	0112 887722 / 0112 872202 / 0112 873802

Note: Details of focal contact persons at the Divisional Secretariat level will be posted on the WBB (MoF) website.

8. MONITORING AND REPORTING

8.1 Involvement of Stakeholders in Monitoring Activities

The Project will have two implementing agencies (IAs). The project will be implemented by the Ministry of Finance, Economic Stabilization and National Policies (MoF) and the Ministry of Women, Child Affairs, and Social Empowerment (MoWCASE). The Welfare Benefits Board (WBB) under the MoF will manage the day-to-day operations Cash Grant Component, while the Department of Samurdhi Development (DSD) under MoWCASE will manage the day-to-day operations of Livelihood component. Hence, WBB and DSD will be responsible for monitoring and evaluation of the stakeholder engagement plan of the SPP. The WBB & DSD will be fully staffed to roll out the stakeholder engagement activities.

The project will establish multiple mechanisms for monitor and evaluate the SEP implementation. They would include the following arrangements.

1. Overall monitoring and evaluation by the PMT-WBB and PMT-DSD.
2. Engagement of officials from district and divisional secretariats to monitor and receive feedback from the relevant stakeholders.
3. Engagement of the project affected parties, vulnerable groups, and media to monitor and report on the adequacy and usefulness of (i) information disclosure programs; (ii) consultations; and (iii) stakeholder engagement activities via their participation in individual, group consultations, and in the GRM. This should be undertaken during project mid-term and during project closure.

The project will use a variety of methods and tools for monitoring and evaluation. They will include review of project documents and progress reports, stakeholder interviews and group discussions, feedback surveys, site visits etc. SEP implementation team of two PMTs at the WBB and DSD will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations, meetings, public comments, feedback received for disclosed documents, informal feedback, decisions made, and reporting back to the stakeholders.

Monitoring responsibility: Environmental and Social Specialists together with the Monitoring & Evaluation Specialist with the two PMTs will be responsible for monitoring the implementation of the SEP.

The following monitoring framework in Table 13 provides a set of indicators that could guide the monitoring processes.

Table 13: Monitoring requirements of SEP

Monitoring Indicators	Methods	Timeframe
No. of affected parties, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly
Type of information shared, disclosed	Review of information material shared and their content	Quarterly
Type of methods used for information dissemination and their effectiveness	Review of communication methods used, observations and feedback interviews and consultations with information recipients	Quarterly
Accessibility to information and language used for communication	Records of persons who sought information; observations and feedback interviews and FGDs with stakeholders, feedback survey (annual)	Quarterly
Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential impacts	Focus group discussions and individual interviews with a cross-section, feedback survey (annual)	Bi-annually

No. consultations conducted with affected parties, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partners	Bi-annually
Type of issues, concerns raised and discussed at consultative meetings	Review of reports on consultations	Quarterly
Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly
Feedback sessions conducted with affected parties, other stakeholders and vulnerable groups to report on the decisions made	Review of progress reports, and focus group discussions and individual interviews with a cross-section	Bi-annually
Level of satisfaction among affected groups, other stakeholders and vulnerable groups on the consultative process and its outcomes	Feedback surveys, focus group discussions and individual interviews with a cross-section	Annually
No. grievances, complaints received and resolved	Review of progress reports and GRM database	Quarterly
Level of efficiency and responsiveness of the GRM	Review of the records of GRC meetings and decisions made	Bi-annually
Level of satisfaction among affected parties, other stakeholders and vulnerable groups on the overall performance of GRM	Focus group discussions, feedback surveys and individual interviews with a cross-section of parties who reported grievances	Annually

(Note: Based on the types of grievances, continuous daily/weekly/monthly monitoring of grievances will be required to avoid any unwanted protests)

Reporting back to stakeholder groups: The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through website and/or formal communications.

Reporting to the World Bank: The PMTs will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank. SEP monitoring will be part of the project monitoring reports submitted to WB.

8.2. Beneficiary Feedback Indicators

As part of the Strategic Framework for Mainstreaming Citizen Engagement (CE) in World Bank Operations, the Bank made a commitment to mainstreaming citizen engagement (CE) into operations. Accordingly, the Projects Results Frameworks must include at least one beneficiary feedback indicator to monitor CE throughout project implementation (as a PDO or intermediate outcome indicator); and Projects must report on beneficiary feedback indicators in Implementation Status and Results Reports (ISRs) by the third year of implementation or demonstrate credible progress towards reporting.

As such, the project has included the following Beneficiary Feedback Indicators to meet this Bank requirement (table 14):

Table 14: Indicators included in the Results Framework (suggested)

Indicator	Definition	Source
Number of beneficiaries satisfied with training and coaching (Number)	<p>Numerator: Number of beneficiaries that report they are satisfied with the training and coaching offered</p> <p>Denominator: Total number of beneficiaries responding to the satisfaction survey</p>	Survey
Grievances addressed within a stipulated standard for a response	<p>Numerator: Total number of grievances cases from the WBPS addressed in accordance to established protocol.</p> <p>Denominator: Total number of grievances cases received from the WBPS.</p> <p>Stipulated service standards for response times will be outlined in WBB GRM Manual.</p>	GRM system

Note: The SEP will be a living document and updated.

Annex 1 - Stakeholder consultations – Questionnaire / Protocol

On Cash transfer component

	Vulnerable groups	Other stakeholders (CSOS, Union reps, interest groups etc.)
Impact of current crisis / Challenges / Needs	<ol style="list-style-type: none"> How have you been impacted by the economic crisis (2022)? How did manage the impacts - what changes you made in your life? (ask about anything that changed in education, health, food, other expenses, choices?) 	<ol style="list-style-type: none"> What are the urgent needs or challenges people are facing during this economic crisis (2022)? <ol style="list-style-type: none"> What impacts are you seeing in areas where you work? Has the crisis impacted your work??
Perceived benefits and disadvantages of the existing welfare benefit programs	<ol style="list-style-type: none"> How can the state help you to manage this current shocks? What do think about the current social safety nets programmes like Samurdhi, support to elderly, CKDu patients and the Disabled programs <ol style="list-style-type: none"> Are they easy to access? How do they help? 	<ol style="list-style-type: none"> Have the existing social safety nets programs supported people to deal with hardship? (Samurdhi and assistance programs to elderly, CKD patients and the Disabled programmes)? What do you think about the delivery of the existing safety nets programmes?
Perceptions/views/ suggestions on the Newly proposed programs	<ol style="list-style-type: none"> What do you know about the new social safety nets project? <ol style="list-style-type: none"> Do you see anything different from previous programmes? What is good about this programme? What can be improved? 	<ol style="list-style-type: none"> What do you know about the new social safety nets project? <ol style="list-style-type: none"> Do you see anything different from previous programmes? What is good about this programme? What can be improved?
Process (Targeting/Inclusion of Vulnerable,	Access <ol style="list-style-type: none"> How did you get information on the application process for the new programme? 	Access <ol style="list-style-type: none"> Were you involved in informing communities/HHs about the new project? What did you think of the application process?

<p>Delivery and Graduation)</p>	<p>a. Did you apply for welfare benefits in 2022? (check if they got a QR code)</p> <p>b. What did you think of the application process?</p> <p>7. Were there some people who were not able to apply for this new programme? Why?</p> <p>a. What can be done to include them?</p> <p>8. Who in the household, should get the cash transfer?</p> <p>Delivery</p> <p>9. What is your preferred payment method to receive assistance? (bank transfer/Samurdhi account/post office)/ why?</p> <p>Graduation</p> <p>10. Is graduation out of the programme necessary?</p> <p>11. How should graduation be determined?</p>	<p>a. Were there some people who were not able to apply for this new programme? Why?</p> <p>8. Given the financial constraints, what can the project do to ensure that the most vulnerable groups are not left out?</p> <p>9. How can the application process be improved? (can probe for how to improve access and transparency)</p> <p>Delivery</p> <p>10. Do you know about the Registry?</p> <p>11. What do you think will change in how this programme is delivered?</p> <p>12. How can it be monitored better?</p> <p>Graduation</p> <p>13. Do you think there should be a system of graduation out of the program?</p> <p>14. How should the graduation be done?</p>
<p>Grievance Redressal Mechanism</p>	<p>12. Do you know of the GRM in social safety nets programmes?</p> <p>13. Have you used it?</p> <p>a. What was your experience?</p> <p>14. How should GRM best operate? (re: channels to submit and receive resolutions?)</p>	<p>16. Do you know of the GRM in social safety nets programmes?</p> <p>17. What is your experience?</p> <p>18. How should GRM best operate? (re: channels to submit and receive resolutions?)</p>
<p>Gender & (Gender based violence) GBV</p>	<p>19. Are there any specific concerns for women during this crisis? (probe for employment, security, GBV issues in the community/in homes)</p> <p>20. Will there be any impact on women from the new Welfare Benefits Payment Scheme? In what way?</p>	<p>19. What are the specific needs/issues and concerns women during this crisis?</p> <p>20. Are there any GBV issues that have arisen in relation to safety nets projects?</p> <p>a. What has been done?</p> <p>b. What can be done?</p>
<p>Risk & mitigation</p>	<p>21. What are the risks and challenges that arise from the new social safety net project for:</p> <p>a. People /communities</p> <p>b. for implementers</p> <p>22. What measures can be taken to avoid/mitigate any risks/negative impacts from a new social protection program interventions?</p>	<p>21. What are the risks and challenges that arise from the new social safety net project for:</p> <p>a. People /communities</p> <p>b. for implementers</p>

		22. What measures can be taken to avoid/mitigate any risks/negative impacts from a new social protection program interventions?
Stakeholder / Citizens Engagement	<p>23. What are the best ways for you to receive information and updates about the new social safety nets project?</p> <p>24. What are the best ways government should engage with you?</p>	<p>23. What are the best ways for the project to communicate and engage with communities/other groups over the course of the project?</p> <p>24. What are the best ways the project can engage with project a) beneficiaries and c) with other interested groups like CSOs?</p>

On the Livelihoods component

	Vulnerable groups	Other stakeholders (CSOS, Union reps, interest groups etc.)
Impact of crisis	<p>1. How has the crisis impacted your income generation activities? (probe for challenges in sourcing input, increased costs of electricity, fuel etc., labour availability, access to formal finances, market linkages, quality assurance)</p>	<p>1. What are the big challenges for Sri Lanka under the current economic conditions?</p> <p>2. What sort of impact do these larger challenges have on your livelihoods/sector? (probe for challenges in sourcing input, increased costs of electricity etc., labour availability, access to formal finances, market linkages, quality assurance)</p>
Existing livelihood programs.	<p>2. What form of support are you receiving now or have received in the last three years – state or non state (including for COVID 19)?</p> <p>3. Who do these support programmes reach?</p> <p>4. What is your feedback on this support?</p> <p>5. What aspects have been useful?</p>	<p>6. What form of support programmes have been available in the last three years in your sector– state or non state (including COVID 19)?</p> <p>7. Who do these support programmes reach?</p> <p>8. How were these beneficiaries selected?</p> <p>9. What is your feedback on this support?</p>
Process (Accessibility, Delivery – of the new programme)	<p>10. What form of technical and business development support, do you feel is most useful? (i.e coaching and mentoring/skills, technology, tools)?</p>	<p>12. Which technical areas do you think are most appropriate to include in a livelihoods programme for this sector/livelihood (i.e coaching and mentoring/skills, technology, tools)?</p>

	<ul style="list-style-type: none"> a. as a short term measure? b. as long term measures? <p>11. What can be done to improve access to livelihoods assistance programmes?</p> <ul style="list-style-type: none"> a. How can delivery be improved? 	<ul style="list-style-type: none"> a. What is needed in the short term? b. What is needed in the longer term? <p>4. What are the accessibility issues to livelihood support programmes? (eligibility, types of assistance, coverage)</p> <ul style="list-style-type: none"> a. How can delivery of / implement such programmes be improved?
Grievance Redressal Mechanism	<p>13. Have you used any form of grievance redress mechanism in relation to livelihood assistance?</p> <p>14. What is your experience?</p> <p>15. How should GRM best operate? (re: channels to submit and receive resolutions?)</p>	<p>11. Are there any form of grievance redress mechanism in relation to livelihood assistance?</p> <p>12. What is your experience?</p> <p>13. How should GRM best operate? (re: channels to submit and receive resolutions?)</p>
Gender & (Gender based violence) GBV	<p>12. What are the specific needs and concerns for women and livelihoods during this crisis? (probe for both women in the work force and unemployed women, potential increase in unpaid care burden, mental health issues due to stress and GBV)</p> <p>13. What has been done so far to address issues of GBV or work related issues for women?</p> <p>14. What can the project do to engage and empower women?</p>	<p>14. What are the specific needs and concerns for women and livelihoods during this crisis? (probe for both women in the work force and unemployed women, potential increase in unpaid care burden, mental health issues due to stress and GBV)</p> <p>15. What has been done so far to address issues of GBV or work related issues for women?</p> <p>16. What can livelihoods assistance programmes do to engage and empower women and increase women's participation ?</p>
Risks and mitigation measures	<p>15. What are the risks and challenges that arise from the livelihoods component of the new social safety net project for:</p> <ul style="list-style-type: none"> a. People /communities b. for implementers <p>16. What measures can be taken to avoid/mitigate any risks/negative impacts from the livelihoods component a new social protection program interventions?</p>	<p>17. What are the risks and challenges that arise from the livelihoods component of the new social safety net project for:</p> <ul style="list-style-type: none"> a. People /communities b. for implementers <p>18. What measures can be taken to avoid/mitigate any risks/negative impacts from the livelihoods component a new social protection program interventions?</p>
Stakeholder engagement	<p>17. What are the best ways for you to receive information and updates about the social protection project?</p>	<p>19. What are the best ways for you to receive information and updates about the social protection project?</p>

	18. What are the best ways the project can engage with project a) beneficiaries and c) with other interested groups like CSOs?	20. What are the best ways the project can engage with project a) beneficiaries and c) with other interested groups like CSOs?
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