

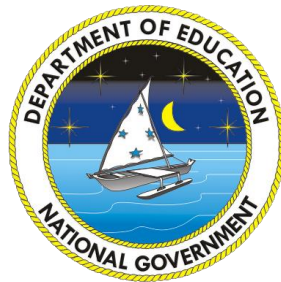
FSM Skills and Employability Enhancement Project (SEEP)

Federated States of Micronesia

STAKEHOLDER ENGAGEMENT PLAN

FINAL DRAFT

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ABBREVIATIONS

CBO	Community Based Organisation
CIU	Central Implementation Unit - DoFA
DoFA	Department of Finance and Administration
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	World Bank Environmental and Social Framework
ESMP	Environmental and Social Management Plan (for FSMSA)
ESS	World Bank Environmental and Social Standards
FSM	Federated States of Micronesia
GoFSM	Government of FSM
GM	Grievance Mechanism
KPI	Key Performance Indicators
NGO	Non-Governmental Organisation
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit within NDOE
PSC	Project Steering Committee
SEP	Stakeholder Engagement Plan (this document)
TOR	Terms of Reference
WB	World Bank

1. Introduction and Background

1.1 Environmental and Social Assessment of the Project

The Government of Federated States of Micronesia (GoFSM) has applied for financing from the World Bank (WB) for the FSM Skills and Employability Enhancement Project (SEEP) to improve the quality of and equitable access to secondary vocational education and skills trainings, and to improve access to and effectiveness of employment support programs. Part of the SEEP includes the assessment of environmental and social risks including:

- Preliminary Environmental and Social Management Plan (ESMP) for Federal States of Micronesia Skills Academy (FSA).
- Labor Management Procedures (LMP).
- Stakeholder Engagement Plan (SEP) – this document.
- Environmental and Social Commitment Plan (ESCP).

1.2 Stakeholder Engagement Plan

1.2.1 Purpose and Scope

This Stakeholder Engagement Plan (SEP) presents and describes the stakeholder engagement activities (primarily information acquisition, disclosure and consultations, dissemination of key issues/results and participatory design approaches) proposed for the Project. This SEP draws on experience of previous stakeholder engagement for Project activities in the FSM (including from the DIGITAL FSM, Prioritized Road Investment and Management Enhancements (PRIME) and Strategic Climate-Oriented Road Enhancements (SCORE) Projects).

The SEP is aligned with the provisions of the World Bank (WB) *Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure (WB, 2017)*¹, as well as other national and international standards (refer Section 3).

This is a “live document” that can be updated periodically to meet the changing demands of the Project and as further information becomes available. Works-specific or Technical Assistance (TA) -specific Stakeholder Engagement Plans may be prepared based on specific activity or stakeholder needs. For example, a specific Stakeholder Engagement Plan may be required for the project activities relating to FSA.

1.2.2 SEP Objectives

The purpose of this Plan is to ensure appropriate stakeholder consultation, participation and information sharing at all levels - including project sites and communities, with the goal of supporting Project decision-making and implementation. This Plan stresses the need for beneficiaries and other stakeholders to have ample opportunity to express their views on project objectives, activities and consequences. The SEP is an essential tool in effectively managing communication between the project, beneficiaries and stakeholders.

The objectives of this Plan are to:

¹ WB, 2017. “World Bank Environmental and Social Framework”. World Bank, Washington

- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice (IBP), including adhering to WB ESS10 and ESS7.
- Identify key Project stakeholders at the national level and within each State. This SEP considers indigenous people but notes that most FSM people are indigenous.
- Identify the most effective methods and structures through which to disseminate Project information, and to ensure regular, accessible, transparent and appropriate consultation.
- Support NDoE to build mutually respectful, beneficial and lasting relationships with stakeholders.
- Develop a stakeholder engagement process that provides stakeholders with an opportunity to influence Project planning and design.
- Ensure that the beneficiaries are engaged in the identification of issues and associated project benefits.
- Outline the Grievance Mechanism (GM) for implementation of the SEEP.
- Identify roles and responsibilities for implementation of stakeholder engagement activities.
- Describe means of reporting and disclosure of key information and instruments in a manner that can be readily understood by all key stakeholders (including the community and vulnerable groups).
- Identify potential communications challenges (e.g. over consultation, confusion with other Projects, etc) and opportunities (e.g. synergies with other consultation activities and facilitators known to the community).

1.3 Project Description

1.3.1 Project Context

The labor market of the Federated States of Micronesia (FSM) is characterized by relatively low formal employment, high unemployment, and a high share of migrant labor. The FSM labor market is further struggling with the challenges of high formal sector unemployment (especially among youth), largely driven by persistent skills gaps. The public sector is the main employer in FSM, with about 39 percent of formal employment located in public administration.

There are equity issues related to youth living in outer islands of FSM. Due to the significant distances between islands and lack of regular and reliable island connectivity, geographic barriers persist to those living in outer islands. In higher grades, students may need to relocate to attend school and are housed either in dormitories or with host families.

Technical and vocational education and training (TVET) options are both limited and fragmented. At the secondary level, TVET is primarily provided via the public school system, focusing on occupational preparation via theory and practical skills training. TVET programs were once available in high schools throughout the nation, but were discontinued in most of these facilities due to lack of teaching staff and outdated equipment.

At the post-secondary level, TVET is available through College of Micronesia (COM)-FSM and the affiliated FSM Fisheries and Maritime Institute (FMI). The COMFSM Career and Technical Education Centre (CTEC) continuing education classes in English, business management, building technology, customer service, computer skills and Micronesian History courses. Non-formal TVET is largely provided and managed by a multitude of NGOs, civil society organizations and faith-based organizations on an ad-hoc basis. Current communications between the private sector, government and educational providers is limited, and data on labor market needs, outcomes and skills gaps are unavailable or outdated.

The National Department of Education (NDOE) of the FSM works in collaboration with the four State Departments of Education (SDOEs) and is responsible for setting national standards around teacher certification and school accreditation; school curriculum standards and benchmarks; student assessments; special education; coordinating foreign assistance; providing training and other assistance to the states; and providing support to post-secondary education programs and projects.

SDOEs retain authority to set their own curricula, tests and standards and are responsible for instruction, while catering to linguistic and cultural diversity. There is currently no dedicated TVET board, and the TVET policy needs revision. Coordination between employers, TVET graduates and education providers is poor.

1.3.2 Project Summary

Against the background described above and its development objective, the Project will implement the following components:

Component 1. Improving equitable access to vocational education and training. The objective of this component is to ensure TVET access to all, especially the poor and vulnerable youth, women, persons with disabilities, and geographically disadvantaged groups such as students or trainees from outer islands. The component aims to achieve this by expanding the availability of quality skills training while providing information,

incentives and support to increase participation of under-represented and disadvantaged groups in TVET.

Component 2: Improving the relevance and quality of TVET. The objective of this component is to enhance the relevance and quality of training offered by TVET institutions by upgrading the training curricula and its standards; improving the quality of trainers; and making provisions for independent testing and certification of skills. The enhanced training will be delivered primarily through a high quality, flagship TVET institution—to be named the FSM Skills Academy (FSA)--that will be established in the premises of the now closed Ponape Agriculture and Trade School (PATS), building upon the infrastructure of the erstwhile school. The project will also help improve the relevance and quality of TVET in other high schools across the country that offer TVET courses, including the four schools targeted to receive performance grants under component 1.2, by giving them access to the enhanced training curricula, providing training opportunities to TVET teachers, and supporting the skills testing and certification of graduates. In parallel, it will also support NDOE in preparing a 10-year national TVET development strategic framework and plan for prioritizing and guiding the activities in this subsector (including an expenditure review and planning of sector financing to prepare for the post-2023 period).

Component 3. Improving labor market information and employment services in the FSM. This component aims to establish capacity within the government to provide labor market information and employment support services with a view to improve labor market outcomes among potential workers – including TVET graduates – in FSM. To this end, the activity will support FSA, other TVET institutions and relevant government units, including federal and state personnel offices and state departments of education, in their efforts to match jobseekers with appropriate vacancies through comprehensive job search assistance. Activities will be established with a primary focus on domestic jobs, but they will also facilitate jobseekers' access to labor migration opportunities. This component will further finance a comprehensive labor market assessment. It is expected that NDOE will implement this component in close partnership with National Division of Resource and Development (DR&D) within the Department of Transport, Communication & Infrastructure (DoTC&I).

The proposed Project is closely aligned with Regional Partnership Framework (RPF) for FY17-FY21 (extended through FY23) which outlines the World Bank Group strategic program for nine Pacific island countries including the FSM. The RPF identifies four areas of focus: (1) fully exploiting the available economic opportunities; (2) enhancing access to employment opportunities; (3) protecting incomes and livelihoods; and, (4) strengthening the enablers of growth and opportunities (macro-economic management, infrastructure and addressing knowledge gaps). The Project's scope is closely aligned with the second focus area, specifically objectives 2.1. (Broadened opportunities for access to labor markets) and objective 2.2. (Addressing education and skills gaps).

1.4 Environmental and Social Risk Classification

According to the Concept Environmental and Social Review Summary²(ESRS), the Project has a combined Moderate Environmental and Social Risk rating.

² WB Report No: ESRSC02310, dated 09/27/2021

1.4.1 Environmental Risks

Environmental risks are identified in the project's ESRS as Moderate and relate primarily to the design, construction and operation of the rehabilitation of FSA. The FSA campus is located in a rural area of Pohnpei Island, Pohnpei State, adjacent to a coastal and marine area of biological significance and heritage value (Nan Madol UNESCO site).

Environmental risks are building waste (hazardous and non-hazardous), pollutants such as stormwater and sediment discharges and health and safety risks from construction, and the management of water use, energy use and waste during building operations. Risks also may occur from the use of raw materials and creation of waste from vocational training facilities. The environmental risks relating to non-physical works, including downstream or future risks, are low.

A Preliminary Environmental and Social Management Plan (ESMP) has been prepared for the FSA renovation, which includes guidelines and good practice approaches to managing design and construction-related environmental, health and safety risks. The Preliminary ESMP has incorporated all relevant World Bank Environmental and Social Framework (ESF) requirements and will be cleared by the Bank prior to implementation. The preliminary ESMP will be updated (Final ESMP) once designs are known. All other environmental risks will be managed through actions in the ESCP. A moderate risk rating is proposed because the Project is not complex and / or large, does not involve activities that have a high potential to harm people or the environment, and is not likely to significantly adversely impact sensitive environmental areas. Furthermore, construction impacts are temporary, predictable and readily mitigated with well-proven controls.

1.4.2 Social Risks

The Project is expected to have overwhelming positive social and economic benefits through boosting the educational outcomes of young Micronesians by assisting them to obtain equitable access to market-relevant secondary vocational education, and skills training and employment support programs.

Assessment of capacity needs during project preparation and relevant social specialist resources will be identified in the Project Appraisal Document (PAD) and ESCP. Operational procedures for CIU/PIU coordination will be necessary in the Project Operational Manual (POM) and reinforced during engagement with the task team. Social risks relating to exclusion of vulnerable and marginalized people is addressed in the Project design itself.

During project preparation, gender gaps in participation and outcomes as well as the risks of increased Gender-Based Violence (GBV) as a direct or indirect impact of participation in the project will also be assessed and addressed in Project design and its Grievance Mechanism (GM). Stakeholder engagement will ensure that the beneficiaries are engaged in the identification of issues and associated project benefits. Institutional and specialist technical stakeholders will be involved in the design of component activities. Key stakeholders for information dissemination and beneficiary targeting is included in this SEP. The social risks relating to labor is associated to the rehabilitation activities associated with the FSA under Component 2 relates to workers Health and Safety (H&S).

Labor risks, including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) can be managed through effective codes of practice, training of workers and good supervision and oversight of mitigation measures.

Furthermore, the Project will support internships for students who will be placed in local businesses to gain training and experience. The labor, H&S and SEA/SH risks associated with this activity will be managed through clear communication of roles and responsibilities (for NDOE, employer and intern), transparent contract conditions, presence of a labor GM and active monitoring by NDOE. A Draft Terms of Reference (TOR) will be prepared for a final Environmental and Social Management Plan (ESMP) for the FSA renovation, which will contain guidelines and good practice approaches to managing design and construction-related social risks, particularly relating to labor management, worker and stakeholder feedback and grievances and the risks of sexual exploitation, abuse and sexual harassment.

All other social risks will be managed through this SEP, the LMP and actions in the ESCP. A moderate risk rating is proposed because the Project is not complex and / or large, does not involve activities that have a high potential to harm people or the environment. The moderate risk rating will be validated during project preparation, particularly to focus on integrating the mitigation of social harm and maximizing benefits into Project design.

1.5 Implementation Agencies

National Department of Education (NDOE) is the Project Implementing Agency (IA), with focus agencies being the four state education departments and education system which they run (NDOE does not run schools), and the Department of Finance and Administration (DoFA).

A Project Implementation Unit (PIU) will be housed within NDOE and will have responsibility for the day-to-day operations and supervision of project consultants and contractors. A Project Steering Committee (PSC) will be established with representation to be confirmed during Project Implementation. The membership of the PSC will be developed by NDOE. Membership may include:

- NDOE Secretary (Chair).
- DoFA Secretary.
- A representative for each of the four states (appointed by Governors).

The College of the Federated States of Micronesia (COM-FSM) is also a possible member.

Project environmental and social safeguard instruments have been prepared by the Centralized Implementation Unit (CIU) Safeguards Team who will play a key role in implementation and oversight of these procedures in collaboration with Project workers.

2. Stakeholder Identification and Analysis

2.1 Stakeholder Groups

To ensure relevant and meaningful engagement, project stakeholders can be divided into three main groups:

- Affected Parties:** Includes persons, groups and other entities who are directly influenced (actually or potentially) by the project and/or who are closely engaged in Project development and implementation, including decision-making on mitigation and management measures;

ii. **Other Interested Parties:** Includes individuals/groups/entities that may not experience direct impacts from the SEEP 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 (for example through an ability to influence and make decisions on the Project); and

iii. **Vulnerable Groups:** Includes persons who may be disproportionately impacted or further disadvantaged by the project (compared to other groups) due to their particular vulnerability, and who may require special efforts to ensure their equitable representation and participation in project planning and decision-making processes.

It is especially important to understand how a project can affect disadvantaged or marginalized groups of people (positively and negatively), who often do not have adequate voice to express their views or to benefit from project activities. Finding effective ways to engage with these people is critical to meeting the needs of the most vulnerable members of society.

SEEP stakeholders that fall into these categories are summarized below.

2.1.1 Affected Parties

Affected Parties include:

- Potential and participating students in FSM who will benefit from strengthened education and employment opportunities.
- Participating FSM employers who will benefit from an improved source of skilled labor including from intern placement as part of the SEEP. Private businesses and employers are represented by the FSM Chamber of Commerce and Chambers at the State level.
- State Departments of Education.
- Participating schools/education providers who have access to new curricula and other resources (this includes government and non-government secondary schools and training providers). This includes:
 - The College of Micronesia - Federated States of Micronesia (COM-FSM) (including its Fisheries and Maritime Institute (FMI) in Yap State and the Career and Technical Education Centre (CTEC)) in Pohnpei is the major tertiary education provider in the country. COM-FSM has a national campus located on Pohnpei Island and State Campuses in each of the FSM states. The COM-FSM offers associate degree and certificate-level programs in a range of subjects, as well as short training programs. COM-FSM has a Board of Regents where local contractors and different government agencies who inform implementation of contracts in the FSM meet.
 - Private high schools which exist in all states.
 - Current and potential new training providers. Non-formal TVET is largely provided and managed by a multitude of NGOs, Community Based Organizations (CBO), civil society organizations and faith-based organizations. For example, there are plans for the Catholic high school in

Yap to open a TVET school in 2024-5 and Micronesia Bound Inc., in the past was running the Aramas Kapw Training on local skills.

- Catholic Church: Tamworohi Parish and Vicariate, Roman Catholic Community of Pohnpei as owners of the FSMSA site (lower campus and upper campus respectively).
- Current occupiers/users of the FSA site (estimated at 7 families).
- FSM and State government personnel offices that assist in the placement of jobseekers in public sector employment. There is no comparable service for the private sector.
- Pohnpei State Environmental Protection Agency (for oversight of the FSA renovation).

2.2 Other Interested Parties

Other Interested Parties include:

- FSM Women's Association Network and State Women's Councils who are key stakeholder for progressing gender equality.
- National Department of Health and Social Affairs (DHSA), including Division of Youth & Social Affairs and Division of Women's Affairs.
- National Coalition of DPOs (Disabled Persons Organizations) in the FSM.
- Local NGOs.
- Parents.
- Foreign Missions in the FSM (Scholarships).
- Local agencies funding scholarships (FSM Development Bank, FSM Vital/Petroleum Corporation, Rotary Club of Pohnpei etc.).

2.3 Vulnerable Groups

Vulnerable groups of people could include, amongst others:

- Young people living in remote and isolated areas – islands other than Pohnpei.
- Young people who are living with disabilities, or whose families have disabilities.
- Young people experiencing hardship due to lack of income, adequate food, housing or care.

3. Stakeholder Engagement Program

3.1 Project Preparation Stakeholder Engagement Activities

SEEP has been developed to address a range of issues in the FSM education and employment sector that have been identified over a lengthy period and through a range of programs.

Specific stakeholder engagement for the preparation and implementation of the SEEP Project has occurred through meetings with TVET providers, TVET students, graduates &

alumni and chambers of commerce and business representatives. This engagement is summarized below:

3.1.1 World Bank TVET Providers Discussion

Mon 12th July 2021

In this meeting the World Bank team sought the insights for TVET providers to ensure that the World Bank's understanding reflects the actual circumstances in FSM of TVET in relation to the labor market. This engagement gathered stakeholder inputs about:

- TVET courses offered, and challenges to providing these courses.
- The structure of courses provided and relevant standards to be met.
- Identification of gaps in the current TVET training system.
- Any certification processes followed.
- Whether recognition of prior learning is offered.
- Short term courses offered for adult learners.
- Demand for TVET from the employment sector and ability to meet it.
- How the employment sector provides input into curriculum development.
- Employment growth areas that TVET training could target.
- Geographical access to TVET training (or other education).

This discussion provided useful information regarding the above points. It also highlighted cost as a barrier for student participation, identified a lack of skills in certain areas in FSM and a lack of teachers in some areas, and a lack of soft skills (e.g. resume writing) which can be a barrier to student graduates gaining employment. This stakeholder discussion identified a number of professions where there is a perceived need for more domestic workers. Another key issue raised was the need for much better communication between the private sector, government and educational providers. Furthermore, data on labor market needs, outcomes and skills gaps are unavailable or outdated.

3.1.2 World Bank-TVET Students, Graduates & Alumni Discussion

Tues 13th July 2021

In this meeting the World Bank team sought the input from a group of TVET students, graduates and alumni to inform the World Bank's understanding of the actual situation in FSM of TVET in relation to the labor market. This engagement gathered stakeholder inputs about:

- Experience with TVET courses including quality of the experience, skills learned and their role in providing a foundation for employment.
- Potential for improvement in TVET courses.
- The success of TVET courses preparing students for the domestic and international labor market.
- Gaining employment after graduation.

These discussions highlighted the following key issues:

- The importance of awareness raising among potential students about training opportunities.
- The role of Career and Technical Education.
- There is a language barrier when students move from neighboring islands to the main islands (where English is used in the classroom). More English is used on mainland than in outer islands.
- It is common for there to be a culture shock when students move to main island and live in unfamiliar surrounds, possible culture changes and stay with non-related hosts.
- Cost and quality of transport and accommodation is an issue, with transport (ships) often not reliable.
- There is a lack of student and community awareness about available training opportunities.
- There is a lack of help to find jobs and a lack of tracking of student outcomes after graduation.

3.1.3 World Bank Chambers of Commerce and Business Discussion

Fri 16th July 2021 1-3pm (PNI)

In this meeting the World Bank team sought the insights from a group of representatives from Chambers of Commerce and Business for further information about TVET regarding the labor market in the private sector. This engagement gathered stakeholder inputs about:

- Experience of TVET graduates.
- Specific gaps in TVET graduate knowledge/skills.
- Quality assurance and certification processes for TVET graduates.
- Opportunities for on-the-job training, certification and recognition of prior learning.
- Job training options to make FSM citizens more employable.
- How TVET graduates connect with employers.
- Availability of employment agencies.
- Communication between the private sector and DoE and COM-FSM.
- Services or institutions needed for more effective functioning of the labor market.
- Employment growth areas that TVET training could target.
- Barriers to TVET entry.
- Gaps or areas for improvement in current TVET training systems.

These discussions highlighted the following key issues:

- Skills and worker development has been an important issue over a long time in FSM, as recognized by State governments. Employment in the private sector is all about staff with technical skills.

- A significant proportion of school graduates are accepted into post-secondary program (e.g. COM-FSM).
- There is a mismatch between training needs and provision. COM-FSM provides a two-year college education, but a minimum qualification for many job vacancies is a four-year college degree.
- Once students leave, don't want to return due to work opportunities overseas.
- People do not have the skills to join the workforce but do have the will/support. There is a need for government to provide training opportunities for this – to train current graduates to be employable.
- Many businesses cannot afford to pay training expenses themselves. It would be useful if individual businesses could apply for funding and put on training for staff. However, there is generally scope for the private sector to pay to gain higher skills are they were used to paying the higher costs and wages for non-Micronesians (e.g. Filipino staff before the travel ban) – business would prefer to give locals higher salaries.
- The TVET program is not well known to the private sector, more information and awareness is needed. There is a lack of communication between schools/education providers and the private sector, and a lack of support for students to find work.

There was also feedback that the one successful school from the past, FSA that was a TVET focused school at high school level and really focused on vocational skills. People came in from all over the Pacific region to attend FSA. It was a boarding school run by the Jesuit program. There was a huge demand, and it was very competitive to get in. Many graduates are doing well now. The business sector has been lobbying for FSA to reopen.

Overall feedback from the three stakeholder groups consulted for was the identification of number of professions where there is a perceived need for more domestic workers: (i) mechanics; (ii) construction industry, including skilled carpenters, masonry, welding, electricians, plumbers; (iii) business management, especially accountants and middle managers; (iv) agriculture, including greenhouse operations and managers, livestock technicians, and (v) emerging technologies including renewable energy and IT.

3.1.4 World Bank - NDOE Meetings

A series of meetings were held between the World Bank and NDOE. These meetings covered a range of topics to inform further design of SEEP. This includes discussions of the following topics:

1. Performance grants for TVET institutions.
2. Independent certification of skills.
3. Short-term training availability and opportunities.
4. Specific considerations for FSA including potential volume of students, types of courses and works for inclusion in the renovation.
5. Details for support to be provided to students from low-income households. This includes options for tuition support, stipends and possible conditionalities, transport vouchers and health insurance.

6. Wage levels, including minimum wages, and potential subsidy arrangements.
7. Existing capacity of organizations, infrastructure and services.
8. Responsibilities and implementation arrangements for each component (NDOE units) and support required.
9. Analysis required for policy making and further Project design.
10. Potential involvement of government agencies outside NDOE (e.g. FSM Statistics).
11. Other specific considerations for each Project component to inform further Project design.

3.2 Summary of needs and methods, tools and techniques for stakeholder engagement

3.2.1 Timing of Engagement

SEEP stakeholder engagement has commenced during Project preparation as outlined above in Section 3.1. It is essential that effective stakeholder engagement continues and is maintained throughout the life of the Project. Affected and interested parties (including those who are vulnerable) will be made aware of upcoming Project activities, be provided with ample opportunity to ask questions and raise concerns; understand how to contact Project workers, obtain information or to lodge a complaint or grievance.

3.2.2 Stakeholder Feedback

Draft documents will be disclosed prior to Appraisal by the Bank, as outlined in Table 3-2. Feedback from stakeholders will be sought via meetings and websites (NDOE and DOFA) and a minimum period of two weeks will be allowed for comments to be received. A consultation report will be prepared at the end of this period to indicate how feedback has been addressed and where possible, comments will be addressed in the final documents and re-disclosed on both websites by the CIU and the NDOE PIU. Social media posts may also be used as required.

3.2.3 Language of Communication

Engagement is to be undertaken in a language appropriate for the broadest comprehension by stakeholders possible. While English is widely understood (both written and spoken) throughout FSM (being the official language of FSM), each State has one or more indigenous culture and their own official languages (e.g. Kosraean, Pohnpeian, Chuukese (Trukese) and Yapese as well as English), which may be more likely to be better understood amongst community stakeholders. Information, Education and Communication (IEC) materials will be prepared in English, or the language applicable in each state and community, as appropriate to circumstances. Literacy levels amongst stakeholders should also be considered when undertaking engagement.

3.2.4 Methods and Parties

Methods used to engage stakeholders will vary depending on the purpose and timing of the interaction, the number of people involved, and local circumstances. In selecting the best ways to connect, share information and receive feedback, accessibility will be a primary determinant. This means considering communication options including: use of mainstream and social media; distribution of print materials through schools, government and other networks; conducting community/school meetings; holding focus groups (female

and male) to ensure different perspectives are received and documented; choosing assessable meeting locations (including for people with disabilities) and suitable times of day when stakeholders are available.

PIU personnel, with assistance from the CIU, will contact stakeholder groups via phone, email, social networks and/or letter, as appropriate, to arrange meetings. If community meetings are required they will be also advertised on the radio.

This SEP will be used in conjunction with stakeholder engagement and community relations management tools including:

- **Project Summary Documents** – For each key stage of the SEE Project, a Project summary document is to be prepared or coordinated by the CIU to inform stakeholders of the stage of the Project and the purpose of upcoming consultation(s). Where consultation is focused on specific works an overview of the concept/preliminary design, potential environmental and social impacts and works schedule may be appropriate to be included in this document.
- **Consultation Materials** – Prior to consultation meetings agendas will be circulated to key stakeholders and PowerPoint presentation should be prepared (where appropriate). Project summary documents will be used to support these materials particularly in the absence of suitable facilities at the consultation meeting venue to allow the use of PowerPoint.
- **Engagement/Meeting Notes** – To ensure that an accurate and detailed record of information and views are gathered at every stakeholder meeting consultation meeting notes will be prepared after key stakeholder meetings throughout the Project. These notes will include comments, suggestions, clarifications and other information collected during these meetings. Photographs and attendee lists will be attached to the meeting notes.
- **Templates and checklists** – An example consultation template is provided as Appendix A and a checklist to confirm meaningful consultations is provided as Appendix B.

3.2.5 Addressing SEA/SH

Given the risks associated with Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SEA/SH), the project will engage with specialist support services in FSM to ensure responsible communication and awareness raising on this issue. This will include development of a plan for FSMSA renovation works (which will be prepared once details and timing are confirmed) as well as finalization of training arrangements associated with the code of conduct for workers. Finally, the Project will engage with services providers to support student or community members who report incidents of GBV/SEA/SH received through specific pathways within the Project's GM . Feedback from specialist service providers will be used to refine the GM process as necessary to ensure confidentiality.

A specific SEA and SH Grievance Mechanism including pathways and direct contacts at the national and states will be developed by the CIU Safeguard team in conjunction with project team and relevant sectors and be incorporated into the GM for SEEP. This is discussed in the Labor Management Procedures.

3.2.6 Documentation

Consultation and communication materials will be prepared in English and the applicable local language in each State (see 3.2.3), as appropriate, including:

- Agendas (where appropriate).
- PowerPoint presentations.
- Radio announcements and newspaper articles.
- Project Information Leaflet.

Following each consultation, meeting minutes will be prepared, with attendee lists attached, which will outline key feedback for consideration/incorporated in Project implementation. Attendee lists will be kept as project records, available for sharing as appropriate, noting that confidential information will not be included in distributed materials.

3.3 Strategy for Information Disclosure

The strategy for SEEP information disclosure is summarized in Table 3-1.

Table 3-1: Strategy for SEEP information disclosure

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing
Preparation prior to effectiveness	Government agencies; TVET providers, educational sector, youth/potential students, chambers of commerce and business sector.	Draft FSA ESMP, Labor Management Procedure (LMP), ESCP and SEP with draft Grievance procedures. Regular updates on Project development. Information on construction activities.	Disclosed prior to Appraisal. NDOE and DOFA website (and Facebook pages as appropriate). Radio and media communication.
Project Implementation	<ul style="list-style-type: none"> •National and State Education providers. •Potential students. •Participating students. •Employers and chambers of commerce input into training requirements. •Training providers. •Staff delivering the training. •FSA board. •Catholic Church: Tamworohi Parish and Vicariate, Roman Catholic Community of Pohnpei. •Current occupiers/users of the FSMSA site. •Service providers. •Job seekers. •Employers/business community. 	Final FSA ESMP. Final SEP. Final LMP. Project progress reports and periodic updates. Brochures and educational materials. Press releases.	Final ESMP, Final SEP and Final LMP to be disclosed within 30 days of effectiveness, incorporating feedback from disclosure: NDOE and DOFA website (and Facebook pages as appropriate). Broader community outreach via a stakeholder engagement specialist to be engaged by the PIU.

3.4 Planned Stakeholder Engagement

The following methods will be used to consult with various stakeholder groups, and will vary according to target audience:

- Interviews with stakeholders and relevant organization.
- Public meetings, workshops, and/or focus groups on specific topic.
- Specific measures to include vulnerable groups to ensure their views are incorporated into project decision making.
- Other traditional mechanisms for consultation and decision making, including engaging with traditional leaders.

Planned stakeholder engagement activities are summarized in Table 3-2.

Table 3-2: Strategy for SEEP Stakeholder Engagement Activities

Project stage	Topic of consultation/ message	Methods	Target stakeholders	Responsibilities
Preparation prior to effectiveness	The project, activities, potential E&S risks, benefits and impacts and mitigation measures.	Face to face meetings Information disclosure (see Table 3-1).	Government entities; private sector; educational sector; youth (students), impacted and interested communities.	PIU (with support from CIU) - stakeholder engagement specialist.
Project Implementation	Updated ESF instruments. Feedback from consultations. Information about project activities including curriculum.	Face to face meetings. Community engagement – see GM below.	National and State Education providers. Potential students. Participating students. Employers and chambers of commerce. Input into training requirements. Training providers. Staff delivering the training. FSA board. Catholic Church: Tamworohi Parish and Vicariate, Roman Catholic Community of Pohnpei. Current occupiers/users of the FSA site. Service providers. Job seekers. Employers/business community.	PIU (with support from CIU).
Component 1: Equitable access to skills training	Boosting the availability of quality skills training incentives and support to increase participation of under-represented and disadvantaged groups.	Face to face meetings. Student workshops.	National and State Education providers. Potential students. Participating students.	PIU
FSA renovation.	Land access	Methods to be outlined in the Abbreviated Resettlement Action Plan (if required).	Owners, occupiers and users (Project Affects Persons) of the FSA site and other stakeholders.	PIU

Project stage	Topic of consultation/ message	Methods	Target stakeholders	Responsibilities
FSA renovation.	Planned works, final ESMP.	Methods to be outlined in the final ESMP	Local communities and stakeholders near FSA.	PIU.
Component 2: Strengthening skills training.	Improved curriculum. establishing standards and quality assurance mechanisms. independent skills assessment and certification.	Face to face meetings. Staff workshops.	Employers and chambers of commerce. Training providers. Staff delivering the training.	PIU.
Component 3: Labor market services.	Job search assistance to potential workers. establishing a labor market information system. job skills certification.	Face to face meetings. Surveys. Employer workshops.	Service providers. Job seekers. FSM and State government personnel offices that assist in the placement of jobseekers in public sector employment. Employers/business community.	PIU.

Engagement for the FSA renovation

The FSA renovation will have a discrete list of stakeholders identified and engaged with as part of the land access procedure process which will be specifically focused on:

- Current occupiers of the site – called Project Affects Persons (PAPs) under ESS5.
- Owners of the site: Tamworohi Parish and Vicariate under advice of RCC – Pohnpei (Roman Catholic Community of Pohnpei).
- Local Communities (including nearby or indirectly affected villages, community interest groups, road users etc.).
- Relevant Municipal and State Government departments and agencies.
- Traditional – customary leaders as applicable (including groups classified as indigenous peoples under ESS7).
- Others (including NGOs, businesses, utility providers etc.).

A variety of mechanisms will be utilized to consult with the identified stakeholders throughout the Project including:

- (i) Village meetings involving women, men and youth from the following local communities nears the FSA site: Tamworohi Village (including Pahnios community), Pohnlangas and Temwen.
- (ii) Specific engagement with the Catholic Church regarding land ownership and access.

- (iii) Specific facilitated community meetings as required, depending on the final scale of works proposed.
- (iv) Separate meetings with specific interest groups, as required (including women, youth, religious, vulnerable households).
- (v) Key informant interviews with relevant government staff and community/traditional leaders.
- (vi) Specific surveys of occupiers of the FSA site with a focus on livelihoods.

3.5 Proposed strategy to incorporate the views of vulnerable groups

The Project will be inclusive of vulnerable, under-represented and disadvantaged groups (such as poor and vulnerable youth, women, people with disabilities, and Micronesians in remote areas see section 2.3) through targeted stakeholder engagement with beneficiaries and inclusive project design; and (iii) promoting transparency and public information disclosure.

4. Grievance Mechanism

The SEEP Grievance Mechanism (GM) will be a central part of stakeholder engagement and the environmental and social safeguard processes and will be available as a separate document. The key tenants of this instrument need to be fully integrated into stakeholder engagement and communications. A preliminary GM is provided in A preliminary Grievance Mechanism is provided in **Error! Not a valid bookmark self-reference..** This will be refined as required during project implementation.

- this will be refined during project implementation.

The objective of the GM will be to allow those who believe they are impacted by SEEP to express concern/issues and seek satisfactory resolution to grievances they may have relating to Project activities.

Grievances may include:

- **Environmental issues** – such as excessive noise generation or contractor malpractices, excessive vegetation clearance.
- **Social Issues** – such as insensitive social interactions by Contractor with local populations, gender-based violence (GBV) and other social and cultural issues.

The best methods to ensure that the GM is widely accessible, easy to understand (i.e. available in English, Chuukese (Trukese), Pohnpeian, Yapese, and Kosraean) and locally relevant to stakeholders in different locations will be identified during project start-up, before commencement of any activities. The project will also ensure regular review of the GM to ensure concerns are being identified and addressed proactively and effectively.

Any person may wish to find information about the project. They may also seek to express a dissatisfaction, concern, or complaint about the project because they believe they have been or will be negatively impacted by project activities. Concerns may be raised about facilities or services provided, or about actions or lack of actions taken, and concerns can be raised by individuals or groups.

Concerns may be raised orally or in writing via social media, email, phone call, in person or by letter, and may also include inquiries, recommendations, suggestions, or requests.

Labor-related Issues

A separate GM will be developed for the specific labor related issues. This process is set out in the Labor Management Procedure (LMP) which will be prepared for the Project prior to engagement of the Construction contractor.

GBV/SEA/SH Issues

As noted earlier, a specific GM pathway over and above the GRM processes detailed below will be established for GBV/SEA/SH complaints for the Project. This will ensure survivor-centered approaches are applied, including the involvement of local GBV service providers.

4.1 Preliminary Grievance Mechanism

A preliminary Grievance Mechanism is provided in **Error! Not a valid bookmark self-reference..** This will be refined as required during project implementation.

Table 4-1: Preliminary SEEP Grievance Redress Mechanism Process

Step	Process	Duration
1	The Aggrieved Party (AP) takes their grievance to the SEE Project Implementation Unit (PIU) State Focal Point, Contractor, or contact through the FSM DoFA website or email. Relevant case information is recorded (e.g. Grievance Form with all key details, maps, notes of meetings, photos, etc). All grievances (construction and non-construction related, and those related to GBV/SEA/SH) are to be forwarded to the PIU State Focal Point for screening and record keeping.	Any time
2	Upon receipt of the grievance the PIU State Focal Point is to screen the grievance to assess whether it is related to the SEEP, and environmental and social issues. Non-eligible grievances (i.e. those not Project related) are then to be referred to the relevant agency to follow up, if appropriate.	Within 1 day of grievance lodged
3	The PIU State Focal Point will endeavor to resolve any complaint/issue immediately. If satisfactorily resolved the incident and resultant resolution/corrective action will be logged and reported to the PIU Project Manager and copied to the Centralized Implementation Unit (CIU) (Program Manager and Safeguards Team).	Within 2 weeks of grievance lodged
4	If unsuccessful (i.e. AP is not satisfied), the PIU State Focal Point will refer the AP to the PIU Project Manager and the CIU Program Manager and Safeguards Team to address and resolve the complaint. The proposed corrective action is to be reported back to the AP for agreement.	
5	Where the complaint has not been resolved, the PIU Project Manager will refer the grievance to the NDOE Project Management Unit (PMU) Manager for his/her action/resolution. The PIU Project Manager will log the details of issue and resultant resolution status (copy CIU Program Manager and Safeguards Team).	

Step	Process	Duration
6	If the matter remains unresolved, or the AP is not satisfied with the outcome, the NDOE PIU Manager refers the matter to the Project Steering Committee (PSC) for a resolution, copying the PIU Project Manager. The PIU Project Manager will log details of issue and resultant resolution status (copying CIU Program Manager and Safeguards Team).	Within 1 month of grievance lodged
7	Once the agreed corrective actions are implemented, and the PIU Project Manager notifies the claimant of the result in writing.	Within 1 week of resolution
8	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the PSC, the AP may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.	Within 3 months of grievance lodged (where possible) or otherwise as agreed between parties during the process.

5. Resources and Responsibilities

The implementing arrangements described below are expected to be updated prior to project effective date; this document is a DRAFT ONLY and reflects the most updated and available information at the time of finalization.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of the Project Implementation Unit (PIU) with support from the Centralized Implementation Unit (CIU) Safeguards Team. Stakeholder engagement responsibilities will be incorporated into the PIU’s terms of reference. The CIU Safeguards Team will assist the PIU and NDOE to undertake stakeholder engagement and prepare the environmental and social risk instruments for Project appraisal. The CIU is also in the process of engaging State Focal Points, who will be a resource for this Project in supporting stakeholder engagement, Project monitoring and other activities in each State.

The relevant institutional structures to be either utilized (for existing institutions) or established for the SEEP including roles and responsibilities are shown in Figure 5-1.

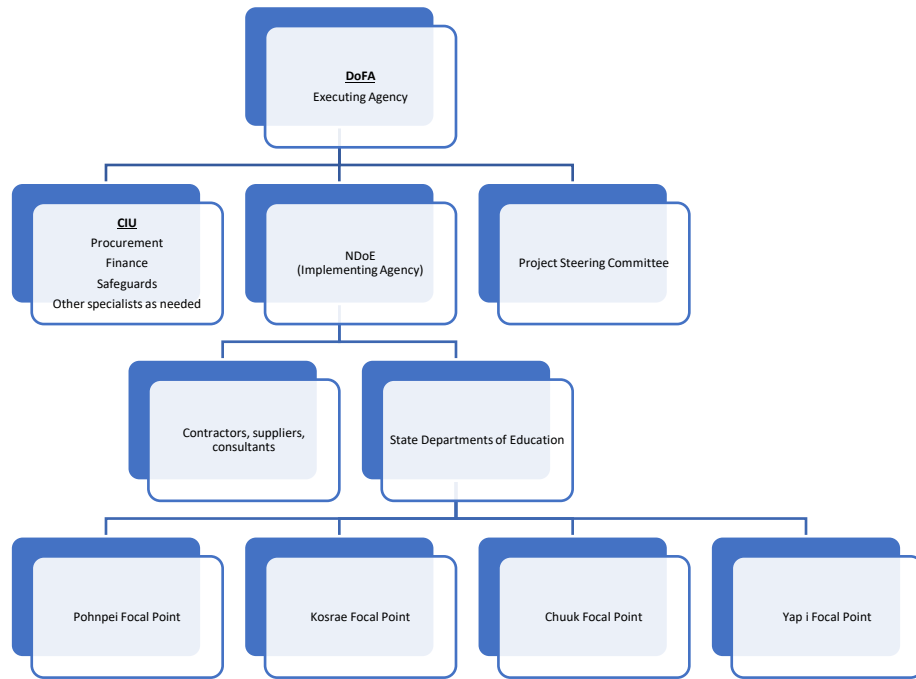


Figure 5-1: Implementation arrangements for the SEEP.

The proposed organizational structure and management functions for the stakeholder engagement function for SEEP are described below. While the NDoE and DoFA may decide to adapt this structure according to its needs and funding, it is emphasized that the various components listed and described below should be represented in the organizational structure in order to successfully implement the SEP:

- **PIU Project Manager** - responsible for overseeing and coordinating all activities associated with stakeholder engagement.
- **PIU Project Officer** - to provide assistance and support to the Project Manager.
- **PIU Stakeholder Engagement Specialist** – to provide technical advice, support and delivery for stakeholder engagement activities
- **PIU State Focal Points** – responsible for implementing State level stakeholder and community engagement activities. These positions will have a variety of activities to undertake – some activities will be associated with the safeguard team.
- **PIU Administration** - responsible for the management of all database, document control and logistics activities and integration/support/interaction between with other departments/agencies or projects.
- **CIU Safeguards Team** – in conjunction with the PIU PM are responsible for preparing and updating stakeholder engagement plans according to Annual Work Plans, preparing TOR for specialist support where required, support to PIU Project Manager to coordinate and deliver stakeholder engagement and public communications about the projects, GM, environmental and social assessments, support for participatory design approaches etc.
- **Design Team** – responsible for incorporating the principles of stakeholder-led design through participatory design approaches.

- **Technical Advisors** – all consultants are required to implement the SEP in relation to their own work program with the support of PIU and CIU.
- **Civil Works Contractors** – responsible for undertaking stakeholder engagement specific related to physical construction/renovation works at FSA.

5.1 Budget

SEP preparation and implementation will largely be coordinated and undertaken by PIU. Any additional costs for stakeholder engagement according to this plan would relate to incidental costs associated with meetings and preparation of materials for circulation. Incidental costs would include catering, venue hire, media, materials and staff travel. A provisional budget allocation for Stakeholder Engagement is: USD \$150,000.

6. Monitoring and Reporting

Monitoring and evaluation is essential to ensure successful implementation of this SEP. The SEP will be periodically reviewed and revised, as needed, to adjust the required activities for them to remain relevant and effective and to incorporate any lessons learned. Any major changes to Project related activities and schedules will be duly reflected in updated SEP.

Monthly summaries and internal reports will be collected and collated by CIU safeguard team and referred to the Project Manager covering the following:

- Stakeholder engagement activities conducted.
- Public outreach activities (meetings with stakeholders and newsletters).
- Entries to the grievance register.
- New stakeholder groups (where relevant).
- Planned stakeholder engagement activities planned for the next month.
- Status of implementation of associated corrective/preventative actions.

These monthly summaries will provide a mechanism for assessing the number and the nature of complaints, requests for information, as well as the Project's ability to respond in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders in quarterly progress reports.

A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including:

- Project stakeholders' level of understanding of the Project,
- Numbers of Grievances received within a given reporting period (e.g. monthly, quarterly, or annually).
- Level of involvement of PAPs and vulnerable groups.
- Frequency and type of public engagement activities and number of attendees (disaggregated by gender where possible); and

- Number and type of media materials published/broadcast/distributed on various communication outlets.

APPENDIX A: Example consultation template:

Meaningful Consultations Report Format

Date and Time:

Organizer:

Location:

TOPIC/OBJECTIVE

[Describe what is the purpose of the consultation, what information is being presented, what feedback is being sought, etc.]

SUMMARY OF INFORMATION PRESENTED

[Describe the format of the consultation, who facilitated/presented, the language used, brief summary of information presented, whether information had been shared in advance, etc. Please note information provided should cover project activities and expected environmental and social impacts, as well as proposed mitigation measures and project's grievance redress mechanism.]

SUMMARY OF PARTICIPANTS

[Describe the total number and type of stakeholders (e.g. % of female, % of ethnic minority people, rural/urban etc.) that are part of the consultations, how they were invited, any special measures that were taken to accommodate them, etc.]

FEEDBACK RECEIVED

Who	Description / Feedbacks/Inputs
	•
	•
	•
	•
	•
	•

NEXT STEPS

[Describe any next steps that may be relevant following this consultation, such as documents that may need to be updated, how participants will be informed whether their feedback was incorporated, follow-up meetings planned, etc.]

PARTICIPANT'S LIST AND PHOTOS

[Attach]

APPENDIX B: Checklist to confirm Meaningful Consultations

(For specific workshops or for a process of consultations)

As defined by the World Bank's ESS10, Meaningful Consultation is a two-way process, that:

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

Date: _____

Project: _____

Consultation (whether a process or a specific workshop): _____

Location: _____

A. Stakeholders:

What Stakeholders have been involved in consultations?

Questions	Y	N
1a. Did Project Affected Stakeholders (as defined by the Stakeholder Engagement Plan) take part in consultations?	<input type="checkbox"/>	<input type="checkbox"/>
2a. Were women present at consultations? Please note approximately what percentage were women.	<input type="checkbox"/>	<input type="checkbox"/>
3a. Were vulnerable members of the community (i.e. (i) single female-headed households with dependents and economic disadvantage such as widow or disabled husband; (ii) people with physical or mental disability (loss of working ability); (iii) the poor/ near poor under MOLISA standard; (iv) the elderly living alone; (v) ethnic minority people (men and women); (vi) social policy families and (vii) others as defined by a project) present at consultations?	<input type="checkbox"/>	<input type="checkbox"/>
4a. Did Project Interested Stakeholders (as defined by the Stakeholder Engagement Plan) take part in consultations?	<input type="checkbox"/>	<input type="checkbox"/>
5a. Did Interested Stakeholders outside of the public sector, such as NGOs, CSOs or other non-government organization, participate in consultations?	<input type="checkbox"/>	<input type="checkbox"/>
6a. Were participants free to decide whether or not to participate in consultations?	<input type="checkbox"/>	<input type="checkbox"/>
Comments. Annex at least a sample of participant's list to this form.		

B. Information

What information has been provided about the project?

Questions	Y	N
1b. Has information about the project, including at least detailed description, expected impacts, proposed mitigation measures, stakeholder engagement plan and grievance redress process been disseminated to project stakeholders?	<input type="checkbox"/>	<input type="checkbox"/>
2b. Was information disclosed in local language, including ethnic minority languages if appropriate? Please list dates.	<input type="checkbox"/>	<input type="checkbox"/>
3b. Was information disclosed in a location accessible to impacted people?	<input type="checkbox"/>	<input type="checkbox"/>
4b. Was information disclosed in various formats to account for the needs of affected people? For example, taking into account literacy, cultural norms, access to internet, etc.	<input type="checkbox"/>	<input type="checkbox"/>
5b. Did information disclosed include details about how communities can offer their feedback, suggestions and recommendations on project activities?	<input type="checkbox"/>	<input type="checkbox"/>
6b. Was information provided in line with the project's Stakeholder Engagement Plan?	<input type="checkbox"/>	<input type="checkbox"/>
Comments		

C. Consultations:

How, where and when did the consultations take place?

Questions	Y	N
1c. When was the first consultation for the project?		Date:
2c. How many consultations have taken place so far with these stakeholders?	<input type="checkbox"/>	<input type="checkbox"/>
3c. Is the consultation process in line with the project's Stakeholder Engagement Plan?	<input type="checkbox"/>	<input type="checkbox"/>
4c. Did consultations take place in local language, including, as appropriate, ethnic minority languages?	<input type="checkbox"/>	<input type="checkbox"/>
5c. Was the location of consultations easily accessible to people in the community?	<input type="checkbox"/>	<input type="checkbox"/>
6c. Was the location of consultations accessible to vulnerable people in the community, including women, people with disabilities, elderly people, single mothers, poor people, etc.?	<input type="checkbox"/>	<input type="checkbox"/>
7c. In general, were stakeholders notified about consultations more than one week in advance?	<input type="checkbox"/>	<input type="checkbox"/>
8c. Were stakeholders given sufficient time at consultations to ask questions and provide feedback?	<input type="checkbox"/>	<input type="checkbox"/>
9c. Were stakeholders provided with time after consultations to provide further feedback?	<input type="checkbox"/>	<input type="checkbox"/>

10c. Were stakeholders notified how (or whether) their suggestions have been taken into account?	<input type="checkbox"/> <input type="checkbox"/>
11c. Are there records of consultations, including dates, topics disclosed and participant's list (gender-disaggregated)?	<input type="checkbox"/> <input type="checkbox"/>
12c. Have records of consultations been translated into English and provided to the World Bank (such as part of monitoring reports, etc.)?	<input type="checkbox"/> <input type="checkbox"/>
13c. Were people freely able to express their opinion in consultations without fear of reprisals?	<input type="checkbox"/> <input type="checkbox"/>
14c. Who facilitated the consultation?	
Comments. Annex at least a sample of consultation records to this form.	