

FEDERATED STATES OF MICRONESIA

DEPARTMENT OF RESOURCES AND DEVELOPMENT



ACCESS AND RENEWABLE INCREASE FOR SUSTAINABLE ENERGY (ARISE)

P181253

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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1 Introduction

The Government of the Federated States of Micronesia’s (GoFSM’s) is proposing the Access and Renewable Increase for Sustainable Energy Project (ARISE). The GoFSM is seeking finance from the World Bank’s (WB) International Development Association (IDA) for the Project. As part of project financing, the Project is required to comply with the requirements outlined in WB’s Environmental and Social Framework (ESF) and ten Environmental and Social Standards (ESSs). Per ESS10, the implementing agencies should 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, or intimidation. This Stakeholder Engagement Plan (SEP) has been prepared to meet the requirements of ESS10, Stakeholder Engagement and Information Disclosure, and to satisfy a project financing requirement. It is supported by the Project documents: Environmental and Social Commitment Plan (ESCP), draft Environmental and Social Management Framework (ESMF), Project Operational Manual (POM) (to be developed), and other specific plans that have been or will be prepared for the Project. The draft E&S instruments will be disclosed on the government websites and will be further workshopped with the Project Implementing Unit (PIU), state utilities, and other key stakeholders to ensure full understanding of the project E&S requirements including stakeholder engagement, communication and grievance process.

2 Project Description

ARISE will contribute to the achievement of the GoFSM’s energy sector goals by expanding (providing new or improved) access to electricity service, increasing renewable energy generation, and enhancing capacity of energy related entities in the four states of FSM. The development objective is (i) to increase access to electricity, (ii) improve the reliability of electricity service, and (iii) increase renewable energy generation in targeted project areas.

The Project activities are grouped into the following three components:

- **Component 1 - Electricity Service Expansion (US\$35 million)** will (i) increase the electricity access rate in Chuuk; (ii) improve the reliability and safety of power supply while enhancing resilience to climate & natural hazards and reducing technical losses in Pohnpei, Yap and Kosrae; and (iii) facilitate preventive grid maintenance for the four power utilities.
- **Component 2 - Renewable Energy Generation (US\$18 million)** will increase solar energy generation with storage and grid stability controls in Chuuk, Pohnpei, and Yap to reduce diesel generation costs and help achieve GHG emission reduction targets.
- **Component 3 - Institutional Strengthening and Implementation Support (US\$7 million)** aims to strengthen the capacity of key energy sector entities such as Department of Resources and Development (R&D), state power utilities, and the project implementation unit (PIU).

3 Objectives of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. Stakeholder engagement helps ensure that local impacts are identified and understood and that any gaps to inclusion in participating in project benefits are managed, including for any vulnerable and marginalized groups. 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 activities or any activities related to the project.

The SEP is a living document and will be updated once scope of works and project activities are further defined. The SEP will be updated thereafter throughout the Project implementation period as the project scope changes, and as new stakeholders are identified.

4 Stakeholder Identification and Analysis

Stakeholder analysis determines the likely relationship between stakeholders and a project and helps identify the appropriate consultation methods for each stakeholder group during the project's life.

Stakeholders of projects can typically be divided into the following categories:

- **Project Partners** – stakeholders that contribute to the execution and implementation of a project.
- **Affected Parties** – persons, groups and other entities within the Project Area of Influence that are directly influenced (actually or potentially) by the Project and/or have been identified as 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.
- **Other Interested Parties** – 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.
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Project. The vulnerability may stem from a person’s origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals or natural resources, etc.

Stakeholders identified for the Project and their interest in the project are provided in Table 1. Additional stakeholders may be identified during the implementation of the Project and this SEP will be updated accordingly.

Table 1: Stakeholders and their Interest in the ARISE Project

Groups	Organisation	Interest in the Project
Project Partners		
Implementing Agency	Department of Resources and Development (R&D) – Energy Division	Implementing Agency Member of the National Energy Workgroup (NEW).
FSM Government Agencies	R&D – Land Division	Interested in land access procedures.
	Department of Finance and Administration (DoFA)	Houses the Central Implementation Unit (CIU). Provides support to the R&D for Financial Management (FM), Environmental and Social (E&S),

		procurement etc. on World Bank financed projects.
	Department of Environment, Climate Change and Emergency Management (DECEM)	Permitting of select subprojects (if required). Liaises with R&D on climate change mitigation and adaptation and disaster management.
	Department of Transportation, Communications and Infrastructure	Member of NEW.
	Department of Health and Social Affairs including: Division of Youth & Social Affairs and Division of Women’s Affairs	Interested in project benefits and potential impacts on women and youth.
	Office of Statistics, Budget & Economic Management & Compact Management	Member of NEW.
	Office of Development Assistance	Member of NEW.
National Energy Workgroup	Key national departments, Office of Development Assistance, state energy work groups, state power utilities	Oversees all national efforts in the energy sector, including reviewing progress on the implementation of the energy policy and programs/projects, and coordinate overseas development assistance.
State Energy Workgroups	All four states State Energy Workgroups (SEWs)	Oversees and coordinates all state efforts in the energy sector. Implements the State Energy Action Plans. Member of NEW.
State Power Utilities	Chuuk Public Utility Corporation (CPUC) Kosrae Utility Authority (KUA) Pohnpei Utilities Corporation (PUC) Yap State Public Service Corporation (YSPSC)	Manages power at the State level Houses the state level Project Implementing Unit(s) (PIUs) that provide support to the R&D for implementing ARISE project activities. Members of State Energy Workgroup, Association of Micronesian Utilities (AMU), and NEW.
	Chuuk EPA	

State Environmental Protection Agencies (EPAs)	Kosrae State Environment and Resource Management Authority (KIRMA)	Statutory responsibilities for the protection of the environment. Permitting of subprojects at the State level (if required).
	Pohnpei State EPA	
	Yap State EPA	
Municipalities	Island level municipalities	Governs at the village level. Undertakes maintenance of local infrastructure and services. Manages local development plans.
Higher Education Providers	College of Micronesia	Member of NEW. Interested in education initiatives funded by the project. Interested in the solar technologies and the energy sector in FSM.
World Bank	IDA	Financing agency.
	Local Office	Providing on the ground support.
Other Development Partners	Asian Development Bank (ADB), Australian Department of Foreign Affairs and Trade (DFAT), European Union (EU), The Pacific Community (formerly South Pacific Commission) and Global Climate Fund (GCF)	Cross overs. May be interested in collaboration on activities.
Affected Parties		
People in the project area of influence/ General Public	Individuals, households and community groups/ organizations/ businesses that will directly benefit from or be affected by subprojects activities	Project beneficiaries e.g. communities impacted by the electrification of the outer Chuuk Islands. Opportunities to influence designs e.g. during focus group sessions. May be affected by the social impacts associated with the subprojects.
	Electricity consumers	Will benefit from a more reliable power supply.
	Pedestrians	Pedestrians interested in the timing of the road side works.
	Community members	May be interested in work opportunities, including internship opportunities provided under the project.

	Private landowners	Interested in land access arrangements. The consultation arrangement for land/asset owners is outlined in the Land Access Procedures (LAP), annexed in the ESMF.
	Churches, schools	Potential for land to be accessed, rooftops used for the project
State utility workers	Workers from PUC, CPUC, YSPSC, KUA	May be interested in participating in the apprenticeship program provided under the project, particularly women.
Students	Students from universities or training institutes	May be interested in participating in the internship opportunities provided under the project, particularly women.
State Owned Enterprises	Vital	Responsible for imports and sales of petroleum products in the four states. Supplies diesel to the state utilities for power generation. Have power purchase agreements with CPUC and PUC. Imports and sales may be impacted by project activities.
Business Sector	Commercial and industrial energy users	Will benefit from a more reliable power supply.
Local Businesses	Road side market vendors	Interested in the timing of road side works.
Contractors	Various civil works contractors	Potential to be contracted or subcontracted to construct subprojects.
Suppliers	Various suppliers	Supply of goods and materials to contractors and/or subcontractors constructing subprojects
Other Interested Parties		
Other Development Partners	New Zealand Ministry of Foreign Affairs and Trade (MFAT)	Interested in the outcomes and benefits of the Project.
	International Finance Corporation (IFC)	Interested in collaboration with activities.
	Asian Development Bank (ADB)	Potential concerns regarding environmental and social impacts.

Regional Organizations	Secretariat for the Pacific Regional Environment Programme (SPREP)	<p>FSM has in the past been a beneficiary of a number of SPREP-coordinated GEF or other donor funded projects.</p> <p>SPREP coordinated with FSM on an initiative to collect, export and recycle used oil from Pohnpei.</p>
Non-government and civil society organizations	<p>Organizations focusing on topics such as:</p> <ul style="list-style-type: none"> • Rural development • Agriculture • Climate change • Conservation • Environmental management • Woman, youth, and children’s rights • State-based gender-based violence (GBV) service providers 	<p>Interested in the outcomes and benefits of the Project.</p> <p>Interested in collaboration on activities.</p> <p>Potential concerns regarding environmental and social impacts.</p> <p>Potential educational/outreach opportunities to increase awareness and acceptance of the project.</p> <p>Collaboration with state-based GBV service providers for management of SEA/SH-related risks including implementation of grievance mechanism for SEA/SH-related grievances.</p>
Public Utility Providers	<p>Public Utility Providers;</p> <ul style="list-style-type: none"> • Water/Power • Telephone 	<p>Opportunities to influence designs to cause minimal impacts to these other services.</p>
Essential Service Providers	<p>Essential service providers such as:</p> <ul style="list-style-type: none"> • Hospitals • Medical Clinics • Schools • Fire services • Markets etc. 	<p>Opportunities to influence designs to cause minimal impacts to communities, including to vulnerable people.</p>
Vulnerable Groups		
Vulnerable or disadvantaged groups.	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> • Women • Children • Youth • Elderly • Poor households • Women-headed households • Households without electricity • Residents in remote areas • People with disabilities 	<p>These people/groups can be Project beneficiaries but project benefits may not reach such groups. However, they may be disproportionately affected by the social impacts associated with the subprojects and it is important to ensure such people/groups are included in the subproject planning process.</p>

	<ul style="list-style-type: none"> • People who are unable to read/write 	
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5 Stakeholder Engagement Program

5.1 Summary of stakeholder engagement done during project preparation

The design of ARISE builds on stakeholder engagement undertaken during the World Bank financed-Sustainable Energy Development and Access Project (SEDAP) under implementation in FSM since 2018. The outcomes of engagement undertaken for SEDAP have been used to inform the design of ARISE, and also on the experience of R&D and the state utilities relation to citizen involvement with the energy sector.

During project preparation, initial meetings were conducted between R&D, DoFA CIU, and the four state power utilities (CPUC, KUA, PUC, and YSPSC), as part of a World Bank Mission, 1-9 March 2024. The aim of these initial meetings was to identify the scope of the new energy project. Feedback received during consultations was taken into account and incorporated into the design of the Project components. A summary of the main recommendations received and integrated into the SEP is provided in Annex II - Table 1.

A high-level stakeholder consultation was held on 24 September, 2024. The purpose was to introduce the draft ARISE E&S instruments. A summary of the main recommendations received is available in Annex II - Table 1. Further consultation sessions are planned with high-level national government stakeholders during early October, 2024. These consultations will be run by R&D PIU and supported by the CIU Safeguards team. The purpose of these meetings is to introduce the Project and its activities, outline the potential environmental risks and impacts, and present the project’s E&S risk management instruments. The minutes or a summary of these consultations will be shared with the WB team once the consultations are carried out, and the minutes included in Annex II – Table 1, once available. A summary of the main recommendations received will be integrated into the SEP and other Project documents.

Table 2 - List of Stakeholders/Communities that have been consulted during Project and ESF Instrument Preparation

Description	Name/Group	Date/Time period	Meeting Purpose
World Bank Mission	R&D PIU, DoFA CIU, CPUC, KUA, PUC, YSPSC	1-9 March, 2024	Agree on scope of ARISE project
Stakeholder consultation	R&D Assistant Secretary, PIU, Yap State Utility, Director of Land Yap, CIU PM, WB Environmental Specialist.	24 th September, 2024	Meeting on key E&S risks and issues, discussion on draft E&S instruments for ARISE project

In addition to these meetings and site visits, the CIU, PIU, and state utilities have maintained ongoing engagement with key stakeholder agencies through implementation of SEDAP including staff from the state utilities. Consultations will be further undertaken, including with communities, as project activities are further defined.

The following environmental and social instruments will be disclosed prior to appraisal through the R&D and DoFA websites¹:

- Environmental and Social Commitment Plan (ESCP)
- Draft Environmental and Social Management Framework (ESMF) including the draft Labor Management Procedures (LMP) and draft Land Access Procedures (LAP)
- Draft Stakeholder Engagement Plan (SEP)

5.2 Stakeholder engagement strategy

Most public and community meetings will be facilitated by the R&D PIU, assisted by the DoFA CIU Safeguards Team. Site visits and focus group meetings/discussions will be conducted at the Island level to seek feedback on project activities. On Yap State, there is a clear traditional pathway for accessing stakeholders, especially communities, including respect for the council of Chiefs role, that must be followed.

To strengthen the Project’s transparency and accountability to community stakeholders, the Project will develop activity specific Stakeholder Engagement and Communications Action Plans (SECAPs), to support the implementation of the SEP and downward reporting to communities. The reporting must be done in a manner that can be understood by rural populations with low literacy levels (e.g., using infographics and simple language) and disseminated through a variety of methods including media releases, newspapers articles, brochures and radio stations, and face to face meetings, community consultations posted on the town/village/island level notice boards.

The R&D PIU will ensure regular updates via department/DoFA periodically with key project updates and reports on the project's environmental and social performance. The information on grievance procedure will also be informed through the web page.

¹ <https://rd.gov.fm/energy>, <https://dofa.gov.fm/world-bank-projects/>

The following engagement tools may also be developed for the Project:

- Flyers / brochures e.g. on the project activities, GM, etc.
- Project performance scorecards.
- Others to be defined during project implementation.

Engagement is to be undertaken in a language appropriate for the broadest comprehension by stakeholders possible. While English is the official language and widely understood (both written and spoken) throughout FSM, each State has an indigenous culture and its own official languages (e.g. Kosraean, Mehn Pohnpei, Chuukese and Yapese), which may be more likely to be better understood amongst community stakeholders. Literacy levels amongst stakeholders should also be considered when undertaking engagement. If needed, the Project will use interpretation in community meetings and meetings in remote islands.

5.3 Measures for engaging vulnerable and marginalized groups

When engaging with women, youth, people living with disabilities and other vulnerable groups including households without access to electricity supply, those unable to afford access and residents of remote and under-serviced areas, the project will identify and employ appropriate IEC strategies to reduce barriers to participation and ensure their views are heard and incorporated in activity planning and prioritization. Such arrangements could include:

- Hiring female staff to facilitate the engagement
- Engaging a CSO with expertise in participatory methods
- Conducting women and youth only consultations
- Scheduling community meetings at locations and times convenient for women, youth and people with disabilities/caretakers
- Using user-friendly communication methods and ensuring materials are language and literacy appropriate
- Liaising with women/youth/disability organizations and working through their networks to encourage involvement
- Sharing information through community and church leaders and local government officials.

5.4 Stakeholder engagement plan

An indicative stakeholder engagement plan is outlined in Table 3.

Table 3: Indicative Stakeholder Engagement Plan

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Planning and design of subprojects	Participatory planning for potential subprojects.	Focus groups Face-to-face meetings	Community (potential project beneficiaries) Relevant GoFSM departments	Design consultant(s) R&D PIU supported by DoFA CIU Safeguards team and State Focal Point

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Design and siting of subprojects	Siting of infrastructure-confirmation that subproject would not result in physical or economic displacement, or restriction of access to natural resources.	Face-to-face meetings and other methods such as focus group discussions and beneficiary surveys, as necessary to ensure vulnerable people are included ²	People residing in the project area, including vulnerable people	Design consultant(s)
Planning /design	Land access procedures and requirements	Face-to-face meetings	Individuals/groups who own land or occupy land that may need to be accessed for the project	R&D PIU supported by DoFA CIU Safeguards team and State Focal Point
Annually throughout implementation stage	Performance of the Project over the previous year.	Performance scorecard posted to notice boards, face-to-face meetings with community	Community (potential project beneficiaries)	R&D PIU supported by DoFA CIU Safeguards team and State Focal Point
Prior to, during and after construction of subprojects	Construction progress (timing, likely impacts, etc.), grievance mechanism.	Face-to-face meetings Flyers/brochures ARISE website	People residing in the project area, including vulnerable people	R&D PIU supported by DoFA CIU Safeguards team and State Focal Point
Six-monthly throughout the implementation phase	Key project updates and reports on the project's environmental and social performance.	ARISE website	All stakeholders	R&D PIU supported by DoFA CIU Safeguards team and State Focal Point

² Such arrangements could be hiring appropriate trainers scheduling community meetings/training at locations and times that are convenient for women and people with disabilities; providing on-site child care arrangements and ensuring adequate breaks during community meetings and trainings; using such as infographics, video, music, storytelling and other low literacy friendly communication methods; liaising with women/youth/disability organizations as part of project outreach strategies; incorporating messaging encouraging vulnerable groups to join the Project into community outreach strategies and communication brochures; use of communication and social networks (such as church, women’s, sports, and youth groups) to spread messages to community leaders and vulnerable groups to join the project; providing translation services for people with speech/hearing impediments during training if required; incorporating minimum quotas for women and youth community training and committees; socializing community leaders and male champions in the benefits of including vulnerable groups in project activities; and the mainstreaming of disability considerations into activity design.

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Six-monthly throughout the implementation phase	Implementation support missions	Face-to-face and teleconference meetings; site visits	Project Partners	R&D PIU supported by DoFA CIU Safeguards team and State Focal Point
Implementation	Environmental, Social and Health and Safety, Worker grievance mechanism	Formal and on-the-job training	Contract workers	R&D PIU supported by DoFA CIU Safeguards team
Implementation	Environmental, Social and Health and Safety related training, including WB ESF requirements	Face-to-face and teleconference meetings	PIU	R&D PIU Environmental and Social (E&S) Officer supported by DoFA CIU Safeguards Team.
Implementation	Environmental, Social and Health and Safety, Worker grievance mechanism	Disclosure of site based ESMP(Ss) in villages/towns/island level; Site visits and meetings	Works contractor(s)	R&D PIU E&S Officer supported by DoFA CIU Safeguards Team.
Implementation	Apprenticeship opportunities provided under the project	Face-to-face meetings	State utility workers	R&D PIU E&S Officer supported by DoFA CIU Safeguards Team.
Implementation	Internship opportunities provided under the project	Face-to-face meetings Flyers/brochures	Students	R&D PIU E&S Officer supported by DoFA CIU Safeguards Team.
Implementation	Sensitization campaigns on electricity connection requirements, electricity safety, and efficient use of electricity.	Face -to-face meetings Flyers/brochures DoFA web page	Project beneficiaries	R&D PIU E&S Officer supported by DoFA CIU Safeguards Team.

Table 4: Indicative Disclosure Plan

Project Stage	Target Stakeholders	List of information to be disclosed	Method Proposed
Prior to implementation	All	<ul style="list-style-type: none"> • Environmental and Social Commitment Plan • Draft Environmental and Social Management Framework including draft Land Access Procedures • Draft Stakeholder Engagement Plan (i.e., this document) • Draft Labor Management Procedure 	<p>High level stakeholder consultation.</p> <p>Once documents are approved by WB, upload them onto websites including relevant FSM government websites (https://dofa.gov.fm/world-bank-projects/), https://rd.gov.fm/energy. State utilities websites, the WB website www.worldbank.org) and others.</p> <p>Summary materials and hard copies made available in locally accessible places.</p> <p>Email copies to key individuals and organizations.</p>
Early in implementation phase	All	Clear information on how feedback, questions, comments, concerns, and grievances can be submitted by any stakeholder.	Website(s), face-to-face meetings with community (including vulnerable people), notice boards, flyers/brochures.
Early in implementation phase	Community	Inform public about works, likely disruptions to motorists and/or pedestrians, any planned power outages, traffic management issues etc. GM.	To be confirmed but may include notices on bulletin boards of Government offices, public buildings, local community halls and.
Implementation	Potential civil works contractors	Project bidding documents (including E&S related requirements).	Email and hard copy
Implementation	People residing in the project area(s) including vulnerable people	Subproject specific E&S management tools (C-ESMPs, LLDRs).	Face-to-face meetings

5.5 Key Messaging

The development of the key messaging will be developed as project activities within each component are further defined during project implementation, and will be included in the activity specific SECAP(s). However, throughout the Project the following messaging will be consistently provided to stakeholders:

General:

- ARISE is committed to the prevention of Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Violence Against Children (VAC), at all project locations.
- A GM is available to all affected and interested parties who may have a concern or question about the project or its activities.

Awareness raising may also include topics such as electrical safety and energy efficiency.

Solar power installations in Pohnpei, Weno (Chuuk), inner lagoon and outer Chuuk islands (Chuuk), Kosrae, and Yap:

- Solar power is renewable, clean and environmentally friendly.
- Solar energy is a local solution. It replaces imported diesel, promotes economic resilience and price stability.
- Roof-top solar installations save land. Where land is scarce, it's a win-win situation.
- The installation of panels should take a couple of months. There may be some construction noise and some more traffic during this time if you live or work near the site.
- A grievance mechanism is available for raising any questions or concerns and its use is welcomed and encouraged.
- Community support during project implementation is important.
- Environmental impacts during construction and when operational are minimum.

Distribution grid rehabilitations and upgrades in Kosrae, Pohnpei, and Yap:

- The project will improve the ability to produce electricity supply, improve reliability of supply, and reduce power outages.
- The supply of electricity to your business / home shouldn't change – you probably won't notice any difference.
- Potential Environmental Impacts – noise, air pollution, accidental spills – are minimal, often no different from before the Project.

Clean cooking program in outer islands:

- A healthier and fuel-saving alternative for rural households.
- Cookstoves are good for the environment.

6 Resources and Responsibilities for implementing stakeholder engagement activities

6.1 Resources

The R&D PIU, will be in charge of stakeholder engagement activities with support from the DoFA CIU and the State PIUs.

The budget for Citizen Engagement (including GM management, communication trainings, and outreach) is estimated at US\$120,000 (US\$20,000 per year x 6 years) and is included in component 3.3 – Project Implementation Support.

6.2 Management functions and responsibilities

The R&D PIU have the overall responsibility for ARISE project implementation. The R&D PIU will be supported by the DoFA CIU Safeguards Team, who will take a lead role in the implementation of the SEP and GM. Focal points in the State Utilities will be responsible for coordinating local community meetings and in engaging land owners on land access agreements.

The key parties involved in the stakeholder engagement process and their responsibilities are provided in Table 5.

Table 5: Responsibilities for Implementation

Party	Responsibilities
R&D PIU E&S Officer	Implementing the GM. Overseeing and coordinating stakeholder engagement activities. Preparing SECAPs for specific activities. Monitoring and reporting on E&S performance to the project team and the WB. E&S training.
DoFA CIU Safeguards Team	Implementing the GM. Supporting PIU to implement of stakeholder engagement activities. Overseeing the development of SECAPs for specific activities. Supporting monitoring and reporting. Support the provision of E&S training.
DoFA Communication Specialist	Finalize appropriate communication tools in consultation with Safeguard team, PIU, and State Focal Points. Develop and finalize key communication message to sensitize the community and enhance awareness. Make available communication materials in public events, consultation, meetings, and outreach programs.
State Energy PIUs	Focal point(s) for the GM at the State level. Implementing State level stakeholder and community engagement activities. Liaising with community members on the performance of the project. Providing updates on timing and locations of project activities.

Design Team(s)	Responsible for incorporating the principles of stakeholder-led design through participatory design approaches.
Civil Works Contractor(s)	Responsible for undertaking stakeholder engagement specific related to physical works construction (as needed).

7 Grievance Mechanism

The main objective of a GM is to assist the R&D to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM allows stakeholders to comment on or express concern on matters relating to project implementation, including concerns relating to environmental and social impacts and issues. It is intended to allow these various stakeholders to pass on important information to higher levels of project oversight and management in a neutral and, if necessary, anonymous way. The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

For consistency, the GM for the ARISE Project will be in-line with other GM instruments implemented in FSM under WB funded projects, such as the ARISE projects predecessor project SEDAP, but with the inclusion of reporting requirements for VAC incidents in line with the project ESCP.

This GM process for grievance redress of social and environmental matters relating to the ARISE Project is included as Annex III.

There will be a specific GM for project workers which considers culturally appropriate ways of handling the concerns of direct and contracted workers. The Project Workers GM is described in detail in the Labor Management Procedures (Annex VI of the ESMF).

8 Monitoring and Reporting

During project implementation, the R&D PIU, will prepare semi-annual project progress report. Implementation of Stakeholder Engagement including progress in environment and social performance will be incorporated into the progress report and submitted to the WB. The purpose of including E&S performance in semi- annual reporting is to monitor the implementation of this SEP e.g., to enable the PIU and CIU to respond to issues raised during consultations and to alter the schedule and nature of engagement activities to make them more effective etc. The report will include an update on the implementation of the SEP and GM. The report will be disclosed on Government and State websites and distributed to the stakeholders as requested). Table 6 shows SEP-related indicators used in project progress report.

The PIU will prepare Incident Notifications for the WB as detailed in the ESCP.

Table 6: Example SEP-related indicators for semi-annual Progress Reports

<p>Engagement:</p> <ul style="list-style-type: none"> • Number and location of community awareness-raising or training meetings. • Number of men and women that attended each of the meetings above. • Number, location, attendance, and documentation of the meetings held with the authorities and communities or other stakeholders. For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions. • Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, NGOs). Issues raised by NGOs and other stakeholders, actions agreed with them, and those actions' status. Minutes of meetings will be annexed to the six-monthly reports. • Number and nature of project documents publicly disclosed. • Number and nature of updates of the project website. • Number and categories of comments received on the website.
<p>Grievance Mechanism:</p> <ul style="list-style-type: none"> • Number of grievances received, in total and at the provincial and national levels, on the website, disaggregated by complainant's gender and means of receipt (telephone, e-mail, discussion). • Number of grievances received from affected people, external stakeholders. • Average time of complaint's redress process, disaggregated by gender of complainants and categories of complaints. • Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. • Trends in time and comparison of number, categories, and location of complaints with previous reporting periods.
<p>Workers Grievances:</p> <ul style="list-style-type: none"> • Number of grievances raised by workers, disaggregated by gender of workers and worksite. • Profile of those who lodge a grievance (gender, age, worksite), by category of grievances. • Average time of complaint's redress process, disaggregated by gender of complainants and categories of complaints. • The trend in time and comparison of number, categories, and location of complaints with previous reporting periods.

8.1 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Regularly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to senior management of the project. The summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways including through the project website and via flyers/brochures. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and GM, and on the project's overall implementation progress.

9 ANNEXES

ANNEX I. Abbreviations and Acronyms

ADB	Asian Development Bank
AMU	Association of Micronesian Utilities
ARISE	Access and Renewable Increase for Sustainable Energy
CIU	Central Implementation Unit
CPUC	Chuuk Power Utility Company
DECEM	Department of Environment, Climate Change and Emergency Management
DoFA	Department of Finance and Administration
DFAT	Department of Foreign Affairs and Trade (Australia)
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
FM	Financial Management
FSM	Federated States of Micronesia
GBV	Gender-based Violence
GoFSM	Government of the Federated States of Micronesia
GM	Grievance Mechanism
IDA	International Development Association
KPUC	Kosrae Power Utility Company
LAP	Land Access Procedures
LDDR	Land Due Diligence Report
LMP	Labor Management Procedures
MFAT	Ministry of Foreign Affairs and Trade (New Zealand)
NEW	National Energy Workgroup
NGO	Non-Governmental Organisation
PIU	Project Implementation Unit
POM	Project Operations Manual
PUC	Pohnpei Utility Company
R&D	Department of Resources and Development
SEA	Sexual Exploitation and Abuse
SECAP	Stakeholder Engagement and Communication Action Plan
SEP	Stakeholder Engagement Plan
SEW	State Energy Workgroups
SH	Sexual Harassment
SPREP	Secretariat for the Pacific Regional Environment Programme
VAC	Violence against children
WB	World Bank
YSPSC	Yap State Public Service Corporation

ANNEX II. Stakeholders Included in Pre-Appraisal Consultations

Table 1. Consultation Minutes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/ Next Steps	Timetable/ Date to Complete Follow-up Action(s)
R&D PIU, DoFA CIU, CPUC, KUA, PUC, YSPSC	1-9 March, 2024	Agreed on scope of the ARISE project.	Included feedback into development of project components	Incorporate into Project Appraisal documents (PAD etc.)	Complete
R&D PIU (Assistant Secretary, PM, Reene), Yap State Utility, Director of Lands - Yap, DoFA CIU PM.	24 September, 2024	<ol style="list-style-type: none"> 1. PIU advised to present the ESCP to the Project Steering Committee (PSC). 2. Status on the appointment/provisions of state focal person. 	CIU Program Manager and SEDAP PM responded, respectively.	<ol style="list-style-type: none"> 1. PIU to present the ESCP to the PSC. 2. State Utilities to appoint/provision focal point(s) 	Ongoing

ANNEX III. Grievance Mechanism

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1 Background

During the construction and implementation phases of the Access and Renewable Increase for Sustainable Energy (ARISE), a person or a group of people may be adversely affected, directly or indirectly, due to the projects activities. The grievances that may arise may be related to social issues such as eligibility criteria and entitlements, disruption of services, dissatisfaction regarding land and/or asset disturbance, entitlements or valuation, temporary or permanent loss of livelihoods Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Violence Against Children (VAC), and other social and cultural issues.

Grievances may also be related to environmental issues such as excessive dust or noise generation, damage to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestion, changes to land and property access, and other associated issues.

Should such a situation(s) and/or issue(s) arise, there needs to be a mechanism through which affected persons can lodge such issues in a cordial manner with ARISE personnel in an efficient, unbiased, transparent, timely, and cost-effective manner.

To achieve this objective, an updated Grievance Mechanism (GM) has been developed for the preconstruction, construction and operational phases of the project and specifically includes mechanisms for managing issues relating to GBV, SEA, SH, and VAC.

Managing complaints of GBV/SEA/SH/VAC requires different approaches to other types of complaints due to: sensitivity of the violence; the potential for survivors to experience stigma, rejection, retaliation, or harm; and because of the reluctance of many survivors to come forward. Additional pathways for submitting grievances are required to create safe, enabling spaces for survivors to report GBV/SEA/SH/VAC that offer a safe, ethical, survivor-centered response. Thus, survivor safety, choice, confidentiality and consent must be systematically applied to all complaints of GBV/SEA/SH/VAC. For this reason, the ARISE GM includes a specific pathway to receive and resolve complaints of GBV/SEA/SH/VAC related issues.

2 FSM Judiciary Level Grievances

The project level process will not impede affected person or persons access to the FSM legal system. At any time, a complainant may take the matter to the appropriate legal (Police) or judicial authority as per the laws of the FSM. These matters may include where an alleged crime had occurred such as illegal use of drugs, child labor, GBV/SEA/SH/VAC and so forth. ARISE will not interfere with any formal legal process relating to a complaint.

3 Grievance Mechanism (GM) – Complaints Process

3.1 Introduction – Functions and Benefits

The FSM ARISE project allows those that have a complaint or those feel aggrieved by the project’s activities to be able to communicate their concerns and/or grievances through an appropriate process. The GM set out below will be used as part of the ARISE project and will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable individual and/or group who often lack access to formal legal regimes.

While recognizing that many complaints may be resolved immediately, the Complaints Register (CR) and GM set out below encourages mutually acceptable resolution of issues as they arise. The CR and GM has been designed to:

- a) Be a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed in a confidential, fair and transparent manner;
- b) Allow simple and streamlined access to the CR and GM for all stakeholders and provide adequate assistance for those that may have faced barriers in the past to be able to raise their concerns;
- c) Provide clear and known procedures for each stage of the GM process, and provide clarity on the types of outcomes available to individuals and groups;
- d) Ensure equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that, is confidential, fair, informed and respectful to a complaint and/or concern;
- e) Provide a transparent and confidential approach, by keeping any aggrieved individual/group informed of the progress of their complaint, the information that was used when assessing their complaint and information about the mechanisms that will be used to address it; and
- f) Facilitate continuous learning and improvements to the GM. Through continued assessment, the learning's may reduce potential complaints and grievances.

3.2 GM Eligibility Criteria

Local communities and other interested stakeholders may raise a grievance/complaint at any time to the traditional leaders and/or government elected officials. Affected local communities should be informed about the environmental and social management risk management principles of the ARISE project, including its GM, and how to make a complaint. Specific awareness will be conducted with women and youth in local communities associated with the ARISE project on the process of lodging a grievance complaint related to GBV/SEA/SH/VAC to the GM, and on how to access other service providers; such as justice, health, counseling, safe accommodation. This will ensure the ARISE project provides a safe, confidential and enabling environment for women to access information and report an GBV/SEA/SH/VAC complaint. Eligibility criteria for the GM include:

- a) Perceived negative economic, social or environmental impacts on an individual and/or group, or concern about the potential to cause an impact;
- b) Clearly specified types of impact that has occurred or has the potential to occur and explanation of how the project caused or may cause such impact; and
- c) Individual and/or group filing of a complaint and/or grievance is impacted, or at risk of being impacted; or the individual and/or group filing a complaint and/or grievance demonstrates that it has authority from an individual and or group that have been or may potentially be impacted on to represent their interest.

3.3 Grievance Mechanism (GM) Pathways and Processes

The GM has been designed to be a problem-solving mechanism with voluntary good-faith efforts. The GM is not a substitute for the legal process. The GM will as far as practicable, try to resolve complaints and/or grievances on terms that are mutually acceptable to all parties, while recognizing that for some issues, such as GBV/SEA/SH/VAC, a mutual resolution is less likely. When making a complaint and/or grievance,

all parties must act at all times, in good faith and should not attempt to delay and/or hinder any mutually acceptable resolution. However, the GM also recognizes that for some complaints, such as those of GBV/SEA/SH/VAC, the survivor will likely face multiple barriers to making a complaint and access required support. Where such barriers exist, this is not construed as deliberate attempts to delay or hinder the resolution process.

The ARISE GM process includes two distinct grievance pathways which include a project general GM and a GBV/SEA/SH/VAC specific GM. The two pathways are detailed in the following sections.

3.4 General GM

The process for the GM is as follows:

- a) The Aggrieved Party (AP) takes their grievance to the ARISE Project Implementation Unit (PIU). In case of digital registration, i.e. through the DOFA website or email, the CIU Safeguard Specialist redirects it to the PIU E&S Officer, to initiate resolution process, in coordination with State Focal Points. In the pre-construction period, there will be no contractor as such the PIU will be the appropriate entity. Once construction commences, the contractor will become the focal point for initial information and/or grievance/complaint;
- b) During both pre- and post-construction periods, the PIU E&S Officer, on behalf of the Secretary of R&D, will endeavor to resolve any complaint - issue as soon as practical. Where the Aggrieved Person (AP) is not satisfied, the PIU E&S Officer will refer the Aggrieved Person to the ARISE Project Manager whom in turn will inform the Secretary of R&D and the DoFA Central Implementation Unit - CIU (Program Manager and Safeguards team), and State focal point(s). For complaints that were satisfactorily resolved the incident and resolution will be logged by the PIU E&S Officer and reported to the ARISE Project Manager, and copied to the CIU (Program Manager and Safeguards Team) and relevant State focal points. If unsuccessful, the ARISE Project Manager will notify the Secretary of R&D;
- c) The ARISE Project Manager endeavors to address and resolve the complaint and inform the AP. For complaints that were satisfactorily resolved by the ARISE Project Manager, the incident and resultant resolution will be logged by PIU E&S Officer and copied to the ARISE Project Manager, CIU (Program Manager and Safeguards Team), and relevant State focal points. Where the complaint has not been resolved, the ARISE Project Manager notifies the Secretary of R&D for his/her action/resolution;
- d) If the matter remains unresolved, or the AP is not satisfied with the outcome, the Secretary of R&D refers the matter to the Project Steering Committee for a resolution. The PIU E&S Officer will log details of the issue and resultant resolution status (copy to ARISE Project Manager, CIU Program Manager and Safeguards Team, and relevant State focal points); and
- e) If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the AP may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.

Steps “a” through “e” should be undertaken immediately. Where the matter is referred to the ARISE Project Manager, a resolution should be sought within two weeks. If unsuccessful and the matter is referred to the Project Steering Committee, this should occur within a month.

Each record is to be allocated a unique number, reflecting year and sequence of received complaint (for example 2021-01, 2021-02 etc.). Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy.

Any grievance related to corruption or another criminal offence, with the exception of complaints relating to GBV/SEA/SH/VAC (which should follow the GBV/SEA/SH/VAC specific GM outlined below), needs to be managed confidentially through the following process.

- a) The aggrieved party/ies takes their grievance to the relevant Municipal, State and/or National Police and notifies the PIU E&S Officer.
- b) The PIU E&S Officer notifies the ARISE Project Manager who notifies the Secretary of R&D, CIU (Program Manager and Safeguards Team), and relevant State focal points.
- c) If the grievance includes an alleged crime, with exception of GBV/SEA/SH/VAC, the PIU E&S Officer will notify the state and national legal offices (e.g., Police or Department of Justice) and report the incidence.
- d) Resolution of these grievances will be the responsibility of the legal systems within each state and/or national agencies as dictated by state and national law. In these cases, the projects GM will ensure the above due diligence is enacted and due process is documented with the grievance given a complaint number and recorded. Confidentiality associated with all criminal cases must be compliant and follow State and National laws.

3.5 GBV, SEA, SH or VAC Specific GM

Survivor-centered guiding principles will be systematically applied through all steps and actions. These guiding principles are as follows:

- The safety of the survivor shall be ensured at all times. Potential risks to the survivor will be identified and action taken to ensure the survivor’s safety and to prevent further harm including ensuring that the alleged perpetrator does not have contact with the survivor. If the survivor is an employee, reasonable adjustments may be made to the survivor’s work schedule and work environment to ensure their safety.
- All actions should reflect the choices of the survivor.
- All information related to the case must be kept confidential and identities must be protected. Only those who have a role in the response to an allegation should receive case-level information, and then only for a clearly stated purpose and with the survivor’s specific consent.
- The survivor must provide informed consent to progress with each stage of the complaints process. Survivors may withdraw their consent during the process at any time.

Any grievance related to a complaint of GBV, including but not limited to SEA and/or SH, domestic violence, or VAC, needs to be managed confidentially through the following process:

Step 1: Receive the complaints of GBV/SEA/SH/VAC

- a) Complaints of GBV/SEA/SH/VAC can be received by:
 - The existing channels of the GM.
 - The GBV service providers / trainers / women’s rights advocates who are women and experienced in responding to GBV.

- b) If the person making the complaint is the survivor (the person who the alleged violence was directed towards) and the complaint relates to SEA or SH, the person who received the complaint will:
- Tell the survivor about the closest GBV service providers including justice, health, safe accommodation and / or counseling (see Annex 1).
 - Document and register the allegation using Form A in Annex 2.
 - Explain the GM complaints and reporting process to the survivor including:
 - The process.
 - That they (the survivor) can choose whether they want to make a formal complaint to the project.
 - That if they choose to make a formal complaint to the project:
 - They control whether and how information about the case is shared with other agencies or individuals.
 - All information will be kept confidential. Only those who will respond to the case will be told about their complaint / situation.
 - If they agree, another person will contact them to talk with them more about their complaint and explain that they can choose whether this is a man or a woman. It should also be identified who these people are in case there are concerns about speaking to a specific person (for example, if they are related to / close to the alleged perpetrator).
 - They can change their mind and withdraw their consent at any time and the process will stop.
 - Information about the complaint will be kept confidential. Information captured on Form A in Annex 2, should not identify the survivor, perpetrator or include any other information that will identify the survivor of specific situation.
 - If the survivor chooses to make a formal complaint to the GM, communicate the allegation to PIU E&S Officer using Form B and providing a copy of Form A in Annex 2.
 - If the survivor chooses not to make a formal complaint to the GM, they should be reminded about the closest GBV service providers and told that if they change their mind, or if something else happens, they can always make a complaint in the future.
- c) If the survivor of the alleged violence is a child, under the age of 18 years of age, and where the alleged abuse is criminal, such as physical or sexual violence by project workers, or physical or sexual violence or neglect parents/caregivers, it should be reported to the police with the consent of the child and/or their guardian.
- d) If the person making the complaint is the survivor (the person who the alleged violence was directed towards) and the complaint relates to other forms of GBV, the person who received the complaint will:
- Tell the survivor about the closest GBV service providers (see Annex 1).
 - Document and register the allegation using Form A in Annex 2.
- e) If the person making the complaint is a third party (not the person who the alleged violence was directed towards such as a family member, community member, colleague, friend), the person who received the complaint will:
- In cases of **GBV/SEA/SH/VAC**:

- Document and register the allegation using Form A in Annex 2.
- Explain that the project cannot receive third-party complaints because we need to make sure the survivor is safe and that we are acting in their best interests.
- Ask them to tell the survivor about the available options for reporting or accessing support services.

Step 2: Communicate with the Survivor – Ongoing

- a) PIU E&S Officer should be the only person to communicate with the survivor. Where the survivor has chosen to speak to a woman, a woman (who has been trained in handling complaints of GBV – SEA/SH - VAC) will be delegated this role by the ARISE Project Manager.
- b) This communication should include:
 - Responding to any questions or concerns from the survivor.
 - Ensuring that the survivor has received appropriate support.
 - Asking for the survivor’s consent (using Form C in Annex 2) at each stage in the process.
 - Gathering any further information that may be required from the survivor.
 - Explaining that where the allegation involved a criminal offence the survivor should consider going to the police.
- c) The survivor will be provided ongoing feedback on the development and outcome of their case but especially when:
 - The complaint is received.
 - The case is referred to the PIU E&S Officer.
 - The verification process commences or when a determination is made that there is an insufficient basis to proceed.
 - The outcome of the verification process and any disciplinary action.
 - When disciplinary action has been taken.

Step 3: Assess if the Allegation is likely linked to the project

- a) The PIU E&S Officer will determine the likelihood of the allegation being linked to a project.
- b) If the allegation is determined to be likely linked to a project, the PIU E&S Officer will:
 - Inform the ARISE Project Manager who will inform the Secretary of R&D within 48 hours of the determination being made sharing only the following information:
 - The nature of the allegation;
 - If the alleged perpetrator is, to the survivor’s best knowledge, associated with the project (yes/no);
 - The survivor’s age and/or sex (if available); and
 - If the survivor was referred to services.
 - R&D must notify the World Bank (WB) Task Team within 48 hours of the incident being reported, sharing only the same information. No further information, including name and contact details of the survivor or alleged perpetrator should be shared with the WB Task Team (or anyone else, except in the context of referral for services or verification, with the consent of the survivor).

Step 4: Verify and Act

- a) If an allegation is determined to be likely to be linked to a project, the PIU E&S Officer will convene the ad hoc GBV Grievance Committee who will:
- Convene a meeting to review the complaint and decide on the verification process within 48 hours of determining that the allegation is likely linked to the project. The goal of the verification is to:
 - Determine the likelihood that the incident occurred.
 - Recommend disciplinary measures towards the alleged perpetrator of SEA/SH, VAC.
 - Interview all the people involved to gather as much information as possible about what happened. This will usually include interviewing:
 - The survivor.
 - Any witness(es).
 - If there are people that the survivor has informed about the incident.
 - Review any other evidence, if available, like text messages or social media posts.
 - The alleged perpetrator.
 - Sometimes there will only be limited information.³ Building trust with the survivor is very important because the more that they trust the project, the more that they might share about what happened which will help with the verification.
 - After gathering the available information, the GBV Grievance Committee should determine whether it is likely that the incident did or did not occur within and completed within 14 days of starting the verification process. It is not the role of the ad hoc GBV Grievance Committee or the project to investigate an allegation and determine if it did or did not happen. This is the role of the police and courts. The role of the ad hoc GBV Grievance Committee is to determine the likelihood that the incident occurred given the information available.
 - If it is determined that it was likely to occur, disciplinary action should then be agreed.
 - All verification steps and meetings must be documented with information kept confidentially.

³ In most SEA and SH cases:

- Often there are no witnesses to the alleged incident. Often the alleged perpetrator makes sure that no one sees or knows about the incident but this does not mean that the incident did not happen. Someone making a complaint of SEA or SH does not need to provide a witness or 'evidence' to prove their claim. Survivors face multiple barriers to reporting SEA and SH. When people overcome so many barriers to report SEA and SH, it is unlikely that they are lying. When people come forward, they are supported even if there is not clear evidence one way or another.
- The person alleged of the violence will often deny that they did what was/is alleged or might they will say it was consensual. Just because the person denied the allegation does not mean it did not happen.
- The survivor may not tell the whole story straight away. They might leave out parts of the story of what happened because they are afraid that they might not be believed or that they will be blamed for what happened. This does not mean the incident did not occur.

- The survivor can report the allegation to the police at any time and does not need to inform the PIU E&S Officer or GBV Grievance Committee that they are doing or have done this. If the survivor chooses to make a complaint to the police this process is separate to the GM verification.
 - The ad hoc GBV Grievance Committee may decide to suspend the alleged perpetrator from their employment while the police are investigating / court is hearing the case. However, in FSM the average time to resolve a sexual offence case is 2 years so this will likely not be practical in most situations.
- b) If the ad hoc GBV Grievance Committee decides that it is likely that the allegation occurred, the employer of the perpetrator implements the recommended disciplinary action, that is proportional to the nature and severity of the incident; in accordance with local legislation, the employment contract and the code of conduct.
- Sanctions applied by the perpetrator’s employer may include:
 - Informal warning.
 - Formal warning.
 - Additional training.
 - Loss of salary for a period of time.
 - Suspension of employment (without payment of salary), for a period of time.
 - Termination of employment.
 - Referral to the police or other authorities as warranted, with the consent of the survivor.
- c) Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.
- d) In cases of GBV related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.
- e) In cases of GBV related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

Step 5: Document and Monitor Complaints of GBV

- a) Each individual complaint of GBV will be documented and registered using Form A.
- b) Informed consent will be captured using Form C.
- c) Each record is to be allocated a unique number, reflecting year and sequence of received complaint (for example 2021-01, 2021-02 etc.).
- d) The PIU E&S Officer will compile quarterly reports to the ARISE Project Manager who will provide them to the R&D Secretary including:
 - The number of complaints related to GBV disaggregated by the number of complaints where:
 - That the survivor was referred to GBV services.

- The case was referred to authorities (with the participation and consent of the survivor).
- The survivor chooses not to make / withdraw a formal complaint.
- The project investigated and:
 - It was not linked to the project (but the survivor was referred to GBV services).
 - Did not determine that there was a breach of the Code of Conduct.
 - Took disciplinary action against the alleged perpetrator.

These reports should be numerical only and not contain any information with the potential of being identifying, including names and contact details of survivors, their families, or of alleged perpetrators.

All complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy in a confidential and secure location.

4 How to get in Touch with the Project

Anyone can ask for information on the project, express a concern, make a complaint (grievance) or get in touch with the project for any reason. Complaints/concerns can be anonymous, treated confidentially and the various ways to get in touch are provided in the tables below:

Table 1: FSM National Contacts	
General GM:	<p>PIU E&S Officer (to be appointed).</p> <p>OR</p> <p>FSM ARISE Project Manager</p> <p>All correspondence to: Mr. Andrew Daka, ARISE Project Manager By Phone: (691) 320-5133 By email: www.rebrand.ly/FSM-GRS or email via complaintsWB@gov.fm or feedbackWB@gov.fm or adaka@rd.gov.fm By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941 In person: Department of Resources and Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary. Website: www.dofa.gov.fm</p>
	<p>Department of Resources and Development</p> <p>All correspondence to: Mr. Faustino Yarofaisug, Assistant Secretary for Energy, Department of Resources & Development</p> <p>By Phone: (691) 320-5133 By Email: fyarofaisug@rd.gov.fm and copy to shiva.dhakal@dofa.gov.fm By Mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941</p>

	<p>In Person: Department of Resources and Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary.</p> <p>Website: www.fsmrd.fm or www.rebrand.ly/FSM-GRS</p> <p>Email: complaintsWB@gov.fm or feedbackWB@gov.fm</p> <p>OR use the below QR code:</p> 
<p>GBV specific GM:</p>	<p>All correspondence to:</p> <p>Mr. Stuart Penias Assistant Secretary of Social Affairs FSM Department of Health & Social Affairs (DHSA) By Phone: (691) 320-4682 By Email: spenas@fsmhealth.fm In Person: C/o Department of Health & Social Affairs, Room 5, Capital Suite, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Mr. Shiva Dhakal CIU Social Safeguard Specialist, Central Implementation Unit (CIU) FSM Department of Finance and Administration (DOFA) By Phone: (691) 320-2639 By Email: shiva.dhakal@dofa.gov.fm In Person: C/o Department of Department of Finance and Administration, FSM National Government, Palikir, Pohnpei Website: www.rebrand.ly/FSM-GRS/</p>
<p>Table 2: FSM State Contacts</p>	
<p>Pohnpei State</p>	
<p>General GM</p>	<p>PIU E&S Officer (to be appointed).</p> <p>OR</p> <p>FSM ARISE Project Manager All correspondence to: Mr. Andrew Daka ARISE Project Manager By Phone: (691) 320-5133 By email: adaka@rd.gov.fm, copy to shiva.dhakal@dofa.gov.fm</p>

	<p>By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941 In person: Department of Resources & Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary. Website: www.fsmrd.fm or www.rebrand.ly/FSM-GRS</p> <p>OR</p> <p>Pohnpei Utilities Corporation (PUC)</p> <p>All correspondence to: CEO Mr. Nixon Anson By Phone: (691) 320-2374 By email: nanson@mypuc.fm and adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box C, Kolonia, Pohnpei, FSM 96941 In person: PUC Main Office, Pohnpei State, Federated States of Micronesia. Give to the Office the CEO Website: www.pohnpeipuc.fm</p>
<p>GBV Specific GM</p>	<p>All GBV grievance correspondence to:</p> <p>Ms. Canita R Nakamura GBV Counsellor By Phone: (691) 320-2112 By Email: rilometoc@prel.org In Person: C/o PREL Office, Dolonier, Nett.</p>
<p>Chuuk State</p>	
<p>General GM</p>	<p>PIU E&S Officer (to be appointed).</p> <p>OR</p> <p>FSM ARISE Project Manager</p> <p>All correspondence to: Mr. Andrew Daka ARISE Project Manager</p> <p>By Phone: (691) 320-5133 By email: adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941 In person: Department of Resources and Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary. Website: www.fsmrd.fm or www.rebrand.ly/FSM-GRS</p> <p>OR</p> <p>Chuuk Public Utility Corporation (CPUC)</p>

	<p>All correspondence to: CEO Mr. Kasio “Kembo” Mida, Jr.</p> <p>By Phone: (691) 330-2400/2476 By email: kembo.mida@cpuc.fm and adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box 910, Weno, Chuuk, FSM 96942 In person: Weno Island, Chuuk State, Federated States of Micronesia. Give to the Office the CEO Website: www.cpuc.fm</p>
<p>GBV Specific GM</p>	<p>All GBV grievance correspondence to:</p> <p>Ms. Grace Poll-Serious Acting President – Chuuk Women Council By Phone: (691) 330-8397 By Email: gpserious@gmail.com In Person: CWC, Tongen Inepwinepw Counseling Center</p> <p>OR</p> <p>Ms. Achipen Martinez Anti-Human Trafficking Focal Point – Chuuk FSM Department of Justice (DoJ) By Phone: (691) 330-5977 By Email: martinezachipen.fsm@gmail.com In Person: FSM National Police Office, Weno</p>
<p>Yap State</p>	
<p>General GM</p>	<p>PIU E&S Officer (to be appointed).</p> <p>OR</p> <p>FSM ARISE Project Manager</p> <p>All correspondence to: Mr. Andrew Daka ARISE Project Manager</p> <p>By Phone: (691) 320-5133 By email: adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941 In person: Department of Resources & Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary. Website: www.fsmrd.fm or www.rebrand.ly/FSM-GRS</p> <p>OR</p> <p>Yap State Public Service Corporation (YSPSC)</p> <p>All correspondence to: General Manager: Mr. Victor Nabeyan</p>

	<p>By Phone: (691) 350-4427 By email: ynabeyan@gmail.com and adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box 667, Colonia, Yap State, FSM 96943 In person: YSPSC Office, Colonia, Yap State, Federated States of Micronesia. Give to the General Manager Website: www.yspsc.org</p>
<p>GBV Specific GM</p>	<p>All GBV grievance correspondence to:</p> <p>Ms. Rozanne Women Interest officer Women Interest Office By Phone: (691) 350-5973 By Email: pmitmow@gmail.com In Person: Women Interest Office, Yap State Government</p> <p>OR</p> <p>Ms. Linda Teteth Anti-Human Trafficking Focal Point – Yap FSM Department of Justice (DoJ) By Phone: (691) 350-2801 By Email: lmteteth@gmail.com In Person: FSM National Police Office, Colonia, Yap</p>
<p>Kosrae State</p>	
<p>General GM</p>	<p>PIU E&S Officer (to be appointed).</p> <p>OR</p> <p>FSM ARISE Project Manager</p> <p>All correspondence to: Mr. Andrew Daka ARISE Project Manager</p> <p>By Phone: (691) 320-5133 By email: adaka@rd.gov.fm copy to shiva.dhakal@dofa.gov.fm By mail: Post Office Box PS-12, Palikir, Pohnpei, FSM 96941 In person: Department of Resources & Development, National Government, Palikir, Pohnpei, Federated States of Micronesia. Given to the Department’s Office Secretary. Website: www.fsmrd.fm or www.rebrand.ly/FSM-GRS</p> <p>OR</p> <p>Kosrae Utilities Authority (KUA)</p>

	<p>All correspondence to: Customer Service Supervisor & Legal Counsel: Mr. Casey Freddy.</p> <p>By Phone: (691) 370-3799/3344</p> <p>By email: caseyfreddy9@outlook.com, KUA@mail.fm and adaka@rd.gov.fm copy to shiva.dhokal@dofa.gov.fm</p> <p>By mail: Post Office Box KUA, Tofol, Kosrae State, FSM 96944</p> <p>In person: KUA Office, Tofol, Kosrae State, Federated States of Micronesia. Give to the Office of the General Manager.</p> <p>Website: www.kosraepower.com</p>
<p>GBV Specific GM</p>	<p>All GBV grievance correspondence to:</p> <p>Ms. Beverly Wabol Council Member Kosrae Women’s Association</p> <p>By Phone: (691) 370-3008/3208</p> <p>By Email: beverlywabol@gmail.com</p> <p>In Person: Department of Education, Kosrae State Government, Tofol.</p> <p>OR</p> <p>Ms. Kenye C. Phillip Anti-Human Trafficking Focal Point - Kosrae FSM Department of Justice</p> <p>By Phone: (691) 370-3054</p> <p>By Email: kenye.phillip08@gmail.com</p> <p>In Person: Kosrae Anti-Human Trafficking Office, Tofol.</p>

5 Roles and Responsibilities

The following are persons involved in the complaints process and their supporting roles and responsibilities. All parties are expected to disclose conflicts of interest or potential conflicts of interest as new complaints arise, and recuse themselves accordingly. Should there be a conflict of interest with anyone in the following list, that individual will be placed with a designated alternative.

General GM:

- Focal Point for managing the FSM ARISE projects Complaints Process:
 - PIU E&S Officer (to be appointed).
 - OR
 - Andrew Daka, Project Manager for ARISE (adaka@rd.gov.fm).
- Person who will manage the database and record keeping:
 - PIU E&S Officer of the PIU.
 - OR
 - Andrew Daka, Project Manager for ARISE (adaka@rd.gov.fm).
- Person who will answer simple queries and manage simple complaints:

- PIU E&S Officer (to be appointed).
OR
- Andrew Daka, Project Manager for ARISE (adaka@rd.gov.fm).

- Person who will manage difficult complaints or grievances:
 - Andrew Daka, Project Manager for ARISE (adaka@rd.gov.fm) and Mr. Faustino Yarofaisug, Assistant Secretary for Energy, R&D (fyarofaisug@rd.gov.fm) with support from CIU.

- Person/organization who will prepare report/s for World Bank reporting:
 - PIU E&S officer with support from the CIU (DoFA) team.

- **Grievance Committee** will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Assistant Secretary level or above) from the following:
 - Department of Finance & Administration (DoFA) with support from CIU Safeguards Team;
 - Department or Office managing the project at which the complaint is aimed (FSM R&D); and
 - Department of Justice FSM National Government and/or State departments of Justice.

GBV Specific GM:

For all GBV (SEA/SH) grievance related issues the following are persons involve in the complaints process and their supporting roles and responsibilities.

- Focal point for managing the ARISE projects complaints process:
 - PIU E&S Officer (to be appointed).
OR
 - Andrew Daka, Project Manager for ARISE (adaka@rd.gov.fm) or a designee (who has been trained in handling complaints of GBV and HT) where there is a conflict of interest.

- Person who will manage the database and record keeping:
 - PIU E&S Officer

- Person(s) who will answer simple queries and manage simple complaints:
 - PIU E&S Officer (to be appointed).
OR
 - Andrew Daka, Project Manager for ARISE;
 - The GBV service providers / trainers / women’s rights advocates who are women and experienced in responding to GBV

- Person who will communicate with the survivor:
 - PIU E&S Officer or where the survivor has chosen to speak to a woman, a woman (who has been trained in handling complaints of GBV) will be delegated this role by the ARISE Project Manager

- Person who will assess if the allegation is likely linked to the project:

- PIU E&S Officer
- Person who will inform R&D and DoJ of the allegation:
 - Andrew Daka, Project Manager for ARISE.
- Person who will inform the World Bank Task Team of the allegation:
 - Andrew Daka, Project Manager for ARISE.
- Person(s) who will verify the allegation:
 - GBV Grievance Committee, led by PIU E&S Officer (to be appointed) or Andrew Daka, Project Manager for ARISE.
- Person(s) who will determine disciplinary action:
 - GBV Grievance Committee, led by PIU E&S Officer (to be appointed) or Andrew Daka, Project Manager for ARISE.
- Person(s) who will take disciplinary action:
 - Employer of the perpetrator.

GBV Grievance Committee will be formed on an ad hoc basis where verification and action is required. This will be made up of the following:

- PIU E&S Officer (to be appointed) OR Andrew Daka, Project Manager for ARISE.
- Senior officials (Assistant Secretary level or above) or designee from:
 - Department of Finance & Administration (DoFA) with support from CIU Safeguard Team;
 - Department or Office managing the project at which the complaint is aimed (R&D);
 - Department of Justice FSM national Government and/or State department of Justice.
- Representative of the employer of the alleged perpetrator;
- GBV service provider / trainer specialist.

6 The Complaints Process

All complaints or grievances will be entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation etc.) are stored both electronically and in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e., 2021-01, 2021-02 etc.).

Each complaint/grievance is assigned a specific person responsible for its management and close out.

If the complaint/grievance relates to a contractor activity, the project will ensure the Contractor remedies any damage, pays compensation for damage or loss, etc. In cases of GBV related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.

Use of community leaders and customary methods of conflict resolution is encouraged and utilized if and when appropriate – on a case-by-case basis. In cases of GBV related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

If an issue/complaint cannot be resolved on site, it is elevated to the PIU E&S Officer for resolution (with support from the ARISE Project Manager, CIU Program Manager and Safeguards Team, and relevant State focal points). If the PIU E&S Officer and CIU team cannot resolve the issue, it is referred to the R&D Secretary and Project Steering Committee. If the issue is not resolved then it is forwarded to the ad hoc Grievance Committee.

If a resolution cannot be found through the Grievance Committee, the next course of action is the state or national courts of the FSM or an independent mediator.

All simple complaints and grievances must aim to be closed out within 1 month.

Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.

All complainants have the right to use the state and national courts of the FSM at any time to seek resolution, if and when required.

The PIU E&S Officer will make adjustments to consultations, the GM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances if and when required.

7 Reporting and Evaluation

Complaints shall be reported in the regular project reporting to the World Bank. It should contain:

- Total number of complaints/grievances received.
- Total number resolved.
- Total number under investigation/not yet resolved.
- Total number not yet resolved and also exceeds the recommended close out time of 1 month or 3 months.

Short paragraph on any significant grievances currently not yet resolved and any risks to project implementation.

In the case of GBV/SEA/SH/VAC, reporting to the World Bank is required only after it has been determined if the allegation is related to the project.

If an allegation is determined to be likely to be linked to a project, R&D must notify the World Bank Task Team of the anonymized incident as soon as it becomes known to R&D. Only the following key pieces of data should be shared with the World Bank Task Team:

- The nature of the allegation;
- If the alleged perpetrator is, to the survivor's best knowledge, associated with the project (yes/no);
- The survivor's age and sex (if available);
- Confirmation that the survivor was referred to the appropriate services.

If there are more than 30 complaints/grievances recorded, the PIU E&S Officer may decide to investigate any patterns or repetition of issues that need addressing. The ARISE Project Manager may decide to get an independent consultant to review and provide advice.

In the case of third-party complaints of GBV, if there is a substantial number of consistent third-party complaints registered in relation to a specific incident or an alleged perpetrator or survivor the ARISE

Project Manager may decide to investigate but this must be done in a way that ensure the safety and confidentiality of the survivor, ideally through a GBV service provider who will be able to safely and sensitively contact the survivor involved.

8 Appendices

8.1 Annex 1: GBV Support service at each Project Site (State)

			SPECIALIZATION: GBV		GENERAL	
SERVICE			LOCATION			
			Chuuk State	Kosrae State	Pohnpei State	Yap State
ACCESS TO JUSTICE	Law enforcement and protection	Police	Emergency: 911		National Police: 320 2628	
			Chuuk Police: 330 3612	DV Taskforce: 320 2221	Pohnpei Police: 350 3333 / 2132	Yap Police: 350 3333 / 2132
				Kosrae Police: 370 3333		
		Maritime Police: 320 2700				
Legal aid	MLSC	legalhelp@mlscnet.org				
		330 2597 / 5597	370 3032	320 2404 / 3762	350 2193	
	Cutting Edge Advocacy			320 7400 / 922 3311		
MEDICAL	Basic and specialized medical care	State Hospital	330 7936	370 3012	320 2214 / 2215 320 2213 (emergency)	350 2110
COUNSELING	Counseling and referrals		CWC, Tongen Inepwinew Counseling Centre (TICC) 330-8397	Not Identified	Individual Counselors (female, Kolonia): Lululeen: 320 5142 Canita: 320 2112	Behavioral Health & Wellness, Yap State Hospital: 350 2110
SAFE HOUSE	Short / medium and long-term accommodation		FSM National Police and Human Trafficking Crisis Centre	Not Identified	None Yet Established	None Yet Established
	Emergency accommodation		Police: 330 3612 Chuuk State Hospital: 330 7936			

8.2 Annex 2: Forms to register the GBV/SEA/SH/VAC Complaint

Form A: Register the GBV/SEA/SH/VAC Complaint

There should be no identifying information included anywhere on this form including survivor and alleged perpetrators names and contact details.

1. Date complaint was received:

2. Person complaint was received by:

3. Was the person who made the complaint the survivor? Yes No

4. The nature of the allegation (what a survivor says in their own words):

If it was the survivor who made the complaint answer questions 5 -9 (if a third party made the complaint, only answer questions 1-4).

5. Is, to the best of the survivor’s knowledge, the perpetrator is associated with the project? Yes No
6. Age of the Survivor (if possible): _____
 Female Male
7. Sex of the Survivor (if possible): Other Choose not to answer
8. What Services was the Survivor Referred to (provide name of service):
- a. Justice Yes No Name of Service _____
 - b. Medical Yes No Name of Service _____
 - c. Safe House Yes No Name of Service _____
 - d. Counseling Yes No Name of Service _____
 - e. Other Yes No Name of Service _____
9. Does the Survivor consent to communicate the allegation to the ARISE Project Manager? Yes No
- a. If yes, complete Form B and give to the ARISE Project Manager along with a copy of this completed form.

Form B: Communicate the GBV/SEA/SH/VAC Allegation to the ARISE PROJECT MANAGER

This form should only be completed with the consent of the survivor to communicate the allegation to the ARISE Project Manager

1. Name of the survivor: _____
2. How does the survivor want the project to contact them to follow-up on the complaint? _____

Form C: Consent Form

DID THE SURVIVOR CONSENT TO:

SIGNATURE/THUMBPRINT OF SURVIVOR OR GUARDIAN (FOR CHILDREN UNDER 18)

DATE

Step 1. Receive the Complaint

- | | | | | |
|--------------------------------------------------------|--------------------------|--------------------------|-------|-------|
| 1. Have their complaint documented and registered? | <input type="checkbox"/> | <input type="checkbox"/> | | |
| | Yes | No | _____ | _____ |
| 2. Communicate their complaint to the PIU E&S Officer? | <input type="checkbox"/> | <input type="checkbox"/> | | |
| | Yes | No | _____ | _____ |

Step 2. Assess if the allegation is likely linked to the project

- | | | | | |
|-----------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------|-------|
| 3. Share information about the complaint with the contractor / alleged perpetrators employer? | <input type="checkbox"/> | <input type="checkbox"/> | | |
| | Yes | No | _____ | _____ |
| 4. Share information about the complaint with R&D and DoJ? | <input type="checkbox"/> | <input type="checkbox"/> | | |
| | Yes | No | _____ | _____ |
| 5. Share information about the complaint with the World Bank? | <input type="checkbox"/> | <input type="checkbox"/> | | |
| | Yes | No | _____ | _____ |

Step 3. Verify and Act

6. Be interviewed by the PIU E&S Officer about the complaint? Yes No

7. Share information about the complaint with the alleged perpetrator? Yes No

8. Share information about the complaint with the any witnesses? Yes No

9. Share information gathered by the PIU E&S Officer with other members of the ad hoc committee? Yes No

Step 4. Monitor, track, and provide regular reports of the allegation

10. Share which services they were referred to with the R&D and DoJ? Yes No

11. Share what action was taken to resolve the complaint with the R&D and DoJ? Yes No

Step 5. Communicate with the Survivor

12. Ongoing communication from the PIU E&S Officer about the complaint? Yes No