



**The World Bank**

Lebanon Emergency Crisis and COVID19 Response SSN Project, Stakeholder Engagement Plan

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Government of Lebanon  
The World Bank

Lebanon Emergency Crisis and COVID19 Response  
Social Safety Net Additional Financing (P178075)

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

April 21 2022



## ABBREVIATIONS AND ACRONYMS

AF	Additional Financing
CBO	Community Based Organization
CDC	Community Development Center
CIO	Central Inspection Office
CMU	Central Management Unit
CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
EU	European Union
GM	Grievance Mechanism
GOL	Government of Lebanon
HBS	Household Budget Survey
IGO	International Organization
IMC	Inter-Ministerial Committee
IMPACT	Inter-Ministerial and Municipal Platform for Assessment Coordination and Tracking
IPF	Investment Project Financing
MEHE	Ministry of Education and Higher Education
MoPH	Ministry of Public Health
MoSA	Ministry of Social Affairs
NGO	Non-Governmental Organization
NPTP	National Poverty Targeting Program
OIP	Other Interested Party
PAP	Project-Affected Parties
PCM	Presidency of the Council of Ministers
PDM	Post Distribution Monitoring
PMT	Proxy-Means Testing
PMU	Project Management Unit
SDC	Social Development Center
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SPIS	Social Protection Information System
SSN	Social Safety Net
TPMA	Third Party Monitoring Agent
VaSyR	Vulnerability Assessment of Syrian Refugees in Lebanon
WFP	World Food Program



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## 1-Introduction/Project Description

Lebanon's compounding crises pose long-term challenges for the country. In 2019, Lebanon faced an economic and financial crisis due to a stop in capital inflows, which led to systemic failures across the banking sector, debt, and the exchange rate. A shortage of United States dollars (US\$) in the market resulted in multiple exchange rates, as well as informal restrictions and control mechanisms on deposits held in US\$ and on transfers out of the country. The Port of Beirut explosion in August 2020 had significant negative economic impacts and loss of livelihoods, placing further strain on the economy. The SARS-CoV-2 (COVID-19) pandemic and subsequent lockdowns exacerbated the crises, affecting people's health, livelihoods, and food security. In the face of the crisis, Lebanon's Gross Domestic Product (GDP) plummeted from close to US\$52 billion in 2019 to a projected US\$21.8 billion in 2021, marking a 58.1 percent contraction. The compounding nature of the crises makes recovery challenging, with long-term consequences on the welfare of Lebanese households.

Poverty and vulnerability have increased significantly, as has unemployment. Poverty was already increasing before the crisis, from 25.6 percent in 2012 to 37 percent in 2019. Tentative projections from the World Bank suggest that well over 50 percent of the population was likely to be under the national poverty line in 2020 (World Bank, 2021). The 2019 Multidimensional Poverty Index (MPI) for Lebanon reveals that 53.1 percent of the residents in Lebanon are multidimensionally poor, with the highest incidence among children ages 0-4 years, at 66.8 percent. This further highlights the vulnerability of households with young children and the severe implications that the current crises pose on their human capital.

In response, the GoL is expanding the coverage of social safety net programs, and has recently started implementing the Emergency Crisis and COVID-19-Response Social Safety Net Program (ESSN) which is a three years \$US\$ 246 million World Bank financed project. The ESSN provides cash transfers and access to social services to extreme poor and vulnerable Lebanese populations affected by the economic and COVID-19 crises in Lebanon, while building the national social safety net system. The ESSN builds on and expands Lebanon's main social safety net, the National Poverty Targeting Program (NPTP).

Supported by the ESSN, in mid-2021, the GOL took the first steps in the development of a Social Protection Information System by launching a web-based intake and registration platform (IRP) – DAEM - on the Inter-ministerial and Municipal Platform for Assessment Coordination and Tracking (IMPACT) under the Central Inspection Office (CIO). Launched on December 1, 2021, DAEM is designed to receive online applications from any Lebanese citizen interested in receiving social assistance<sup>1</sup>. By January 31, 2022, around 583,000 households had registered on DAEM. As of February 2022, household verifications visits carried out by the World Food Program (WFP) started

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<sup>1</sup> Registration on DAEM was open for two social assistance programs: (1) the ESSN and the (2) Broad Coverage Cash Transfer Program (BCCT) which is the GOL program designed in mid-2020 in preparation for the Foreign Exchange subsidy removal aiming to provide temporary relief to Lebanese households - excluding the affluent - as subsidies are lifted. The program was designed by the GOL based on technical assistance provided by the World Bank. On July 16, 2021, the Lebanese Parliament ratified Law 230, which outlines the parameters of the BCCT program. Implementation and governance.



to 200,000 households who met the initial screening criteria (see section 3.1 below). The households' verification visits aim to collect additional information on the households' conditions and assess their welfare using Proxy Means Testing (PMT) criteria. Households who are confirmed to be living in extreme poverty are eligible to receive benefits under the ESSN. As of March 2022, payments to eligible households have started. A Grievance Mechanism (GM) has also been put in place and has been actively receiving citizen questions and feedback.

## 1.1 Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) lays out the strategies to be applied by the Government of Lebanon (GoL) as part of the 2016 World Bank's Environmental and Social safeguard requirements. The SEP is recognized under the World Bank's Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure. According to ESS10: "Stakeholder engagement is an inclusive process conducted throughout the project life cycle. In consultation with the Bank, the Borrower will develop and implement a SEP proportionate to the nature and scale of the project and its potential risks and impacts. The Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP." Therefore, the SEP shall remain a living document.

This document seeks to define a technically and socially appropriate approach to consultation and information disclosure. The objective of the SEP is to raise awareness in relation to the Emergency Social Safety Net (ESSN) program, hereinafter the "Program" or the "Project", to identify stakeholders, and to ensure that the stakeholders are provided sufficient opportunity to voice their opinions and concerns which are addressed in a timely manner.

The objectives of the SEP are outlined as follows:

- Understand stakeholder engagement requirements for the Project and identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Outline the stakeholders' consultation process and communication activities throughout the duration of the Project;
- Identify the most effective methods, timing and structure through which to share Project information, and to ensure regular, accessible, transparent and appropriate consultation that meet standards of international best practice;
- Develop a stakeholders' engagement process that provides external stakeholders with an opportunity to voice their opinions and concerns in a timely manner and take part in the decision-making process in accordance with and to the extent foreseen by the applicable laws & regulations;
- Identify resources needed for stakeholder engagement activities and define roles and responsibilities for the implementation of the SEP;
- Establish formal grievance mechanisms (GMs);
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and define periodical reviews of the SEP.



For the purpose of this SEP, “stakeholder” refers to individuals or groups who: i) are affected or likely to be affected by the Project (project-affected parties or PAPs); and ii) may have an interest in the project (other interested parties or OIPs).

**This SEP under the parent project has been prepared and disclosed in December 2020. Inclusive stakeholder engagement could not be conducted due to the urgency of the project and COVID19 restrictions. However, the Government of Lebanon (GoL) will update the SEP during project implementation following inclusive stakeholder consultations within a timeframe agreed with the Bank. This updated SEP will apply to both the parent project and the Additional Financing.**

## 1.2 Project Overview and Description

**The ESSN Project has four components:**

Component 1 - Provision of Cash Transfer for Basic Income Support (US\$204 million): this component will help arrest the increase in extreme poverty by providing cash transfers to around 150,000 Lebanese households, scaling up from the NPTP from a pre-crisis caseload of 15,000 households who received e-card food voucher. The scale-up would result in an enhanced coverage of Lebanon’s targeted SSN from 1.5 percent (pre-crisis) to around 15 percent of Lebanese households with the ESSN. Donor support to the NPTP which is expected to add an additional 75,000 households would further increase SSN coverage of households by 7.5 percentage points, bringing the total number of households supported to 225,000 that is, 22.5 percent of the Lebanese resident households.

Component 2 - Provision of Cash Transfer for Students-at-Risk (US\$23 million). The objective of this component is to preserve the human capital of poor households by supporting the retention of students who are at risk of dropping out of school due to socio-economic reasons. The component will provide a top-up cash transfer to around 87,000 students between the ages of 13 and 18 years currently enrolled in public school identified from households benefiting from component 1. The purpose of the cash transfer is to support continued investments in children’s schooling and reduce the extent of dropout and discontinuation of schooling that may be induced by the economic and financial crisis.

Component 3 - Provision of Social Services (\$10 million): this component will work on strengthening the capacity of the Ministry of Social Affairs (MOSA) Social Development Centers (SDCs) to provide quality social services and increase access of vulnerable individuals from both the hosting and refugee communities.

Component 4 - Enhanced Social Safety Nets Program Delivery (US\$9 million): The objective of this component is to ensure an efficient and effective implementation of the ESSN program and lay the foundations for a sustainable SSN delivery, including the building blocks of a National Social Registry. To achieve this objective, the component will support the financing of:

- a. Development of a robust Grievance Redress Mechanism, and Communication and Outreach
- b. Monitoring and Evaluation (M&E), Verification System, External Technical Audit
- c. Building blocks of a National Social Registry and National Payment System
- d. Project Management and Implementation Support



Component 5 - In recognition of Lebanon’s current significant vulnerability to shocks, a Contingent Emergency Response Component (CERC) with no funds is included. This component will allow the Government of Lebanon to request the World Bank for rapid reallocation of the Project funds to respond promptly and effectively to an eligible emergency or crisis that is a natural or manmade disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact

**Implementation Arrangements:**

The current NPTP Central Management Unit (CMU) at the Presidency of the Council of Ministers (PCM), which was established in November 2008, will act as the Project Management Unit (PMU) of the ESSN Project. The CMU is responsible for implementation of the program, including managing several key functions such as managing the central targeting database, M&E functions, financial and technical audit, in addition to the fiduciary aspects of the project through the Fiduciary Operations Team (FOT). The MOSA will manage the implementation of the Social Services (Component 3) through SDCs, while MEHE will be responsible for providing attendance and academic performance data of students supported by top-up cash transfers (Component 2). In addition, the CIO will be responsible for the overall oversight of the DAEM platform, while ensuring and preserving data protection aspects.

**Additional Financing:**

Due to the increase in inflation and rapid deterioration of the value of the Lebanese Pound, the ESSN project is disbursing cash transfers to beneficiaries in US\$ at an adjusted transfer value<sup>2</sup> which has resulted in a financing gap. The financing gap amounting to approximately US\$16 million will partially be offset by a proposed (US\$ 4 million) Additional Funding (AF). The remaining gap after the reallocation and the AF grant will stand at US\$12 million. This amount is expected to be filled through additional grants. The proposed (US\$4 million) AF Grant is funded from the Lebanon Syria Crisis Trust Fund (LSCTF)<sup>3</sup> and will be used to supplement existing financing under Component 1. Similar to the ESSN parent project, households will receive US\$20 per household member per month, to cover basic survival food needs, in addition to a flat amount of US\$25 per month per household to meet fixed costs and economies of scale incurred by households for non-food basic expenditures.

The additional financing will be implemented according to the World Bank fiduciary procedures and guidelines. The Presidency of the Council of Ministers (PCM) will be the implementing agency of the AF and will follow the same implementation arrangements of the initial financing.

It is worth noting that the AF does not include new additional activities. The proposed grant amount will be used to supplement existing financing under Component 1. As such, and similar to the parent project,

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<sup>2</sup> Food assistance per capita increased from LBP 100,000 (\$16 at an Exchange Rate of LBP \$1 = LBP 6,240) to \$20 (paid in US\$), and the Flat amount per household adjusted from LBP 200,000 (\$32 at an Exchange Rate of LBP \$1 = LBP 6,240) to \$25 (paid in USD). It is worth noting that The Exchange Rate discussed with the borrower at the time of negotiations (December 2020), being the highest regulated exchange rate in relation to the US dollar, plus 60 percent, BDL’s Sayrafa electronic platform is much lower than the market value in 2021 and 2022 – currently standing at US\$1 = LBP 20,000).

<sup>3</sup> The LSCTF is a multi-donor trust fund designed to support Lebanese communities hosting Syrian refugees established by the World Bank in 2013. The World Bank is administering the LSCTF in accordance with the institution’s policies and procedures, including fiduciary policies and the framework regarding governance and anti-corruption

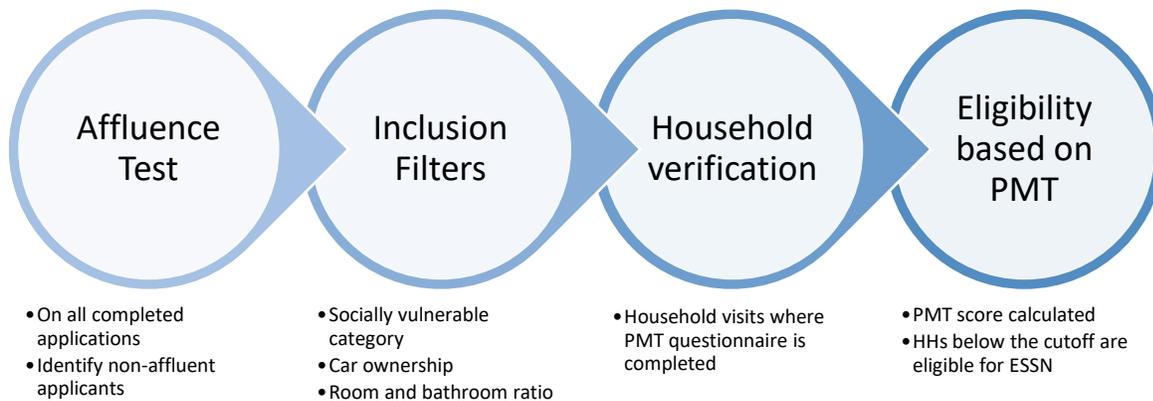


the social risk for the AF remains substantial and the environmental risk is low. Stakeholders will remain the same as the initial parent project.

**Beneficiary Identification & Targeting:**

The scale-up components identified above address the NPTP’s limited coverage characteristic and provide a reliable social safety net that effectively protects the most vulnerable segments of the population, in line with the GoL’s objectives. Furthermore, in order to conduct a solid identification of potential beneficiaries, the ESSN project adopts a hybrid targeting methodology; eligibility is determined based on households who applied on the DAEM platform based on a prioritization approach and simultaneously satisfy two conditions: (a) their verified (PMT) scores are below the eligibility cut-off corresponding to the extreme poverty line, and (b) they belong to defined socially vulnerable categories: (i) Female headed household, (ii) At least one member in household is aged above 64, (iii) At least one member in household has severe disability, (iv) At least one member in household is below 18 years. The prioritization approach adopted is based on initial screening criteria set and implemented throughout a fully automated process, is further explained in diagram 1 below.

*Diagram 1: The Four Stages to Identifying ESSN Beneficiaries*

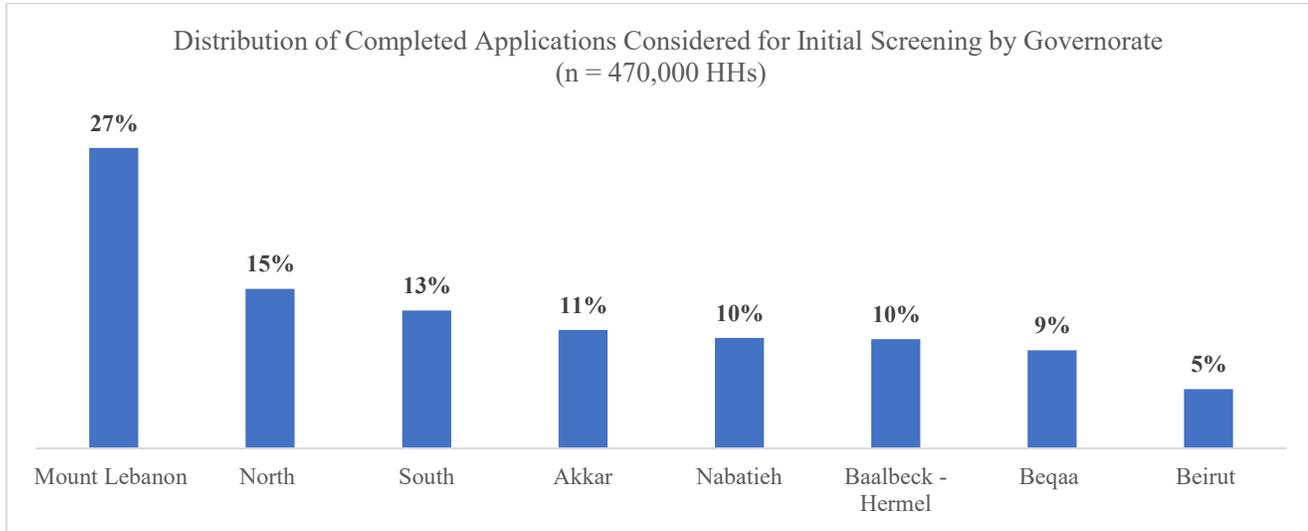


583,000 household level applications were received during the registration phase on DAEM of which, around 470,000 households were completed and therefore selected for further processing (Figure 1). Following the identification and exclusion of duplicate cases, public sector personnel, and NPTP recipients (who are eligible to receive under both programs), and the implementation of the Affluence Testing<sup>4</sup> criteria a pool of 365,000 non affluent households is identified. Subsequently, the ESSN initial

<sup>4</sup> as per the Ministerial Decree (September 30, 2021, Ration Card):



screening criteria, being the socially vulnerable categories, car ownership and room and bathroom ratio are applied to identify 200,000 that are prioritized for households’ visits.



Source: DAEM Database

## 2-Brief Summary of Previous Stakeholder Engagement Activities

While no consultations with Project beneficiaries have taken place under the parent project, previous stakeholder engagement activities that targeted beneficiaries from the NPTP program turned successful. These included several public hearing events and workshops that were held across different geographic regions in 2015 and in 2019 after the recertification of NPTP beneficiaries.

Under the parent project and given the urgency of the project and COVID-19 constraints, consultations were limited to those undertaken under the NPTP program. The parent project recently started implementation of project activities and the social specialist was only recently hired in March 2022. The GoL has updated this SEP which will apply to both the parent project and the AF. The borrower will further update the SEP following inclusive stakeholder consultations with all stakeholders identified in this SEP, including project affected parties, other interested parties and disadvantaged / vulnerable

- All household members currently residing outside Lebanon for a period exceeding 90 days from 1 June 1, 2020, to July 30, 2021 (except members below 23 years of age, or those undergoing medical treatment)
- Households whose total annual income is more than US\$10,000 (fresh1 - or its equivalent at Sayrafa platform rate)
- Households whose total bank deposits (in Lebanon or aboard) on June 30, 2021, in the banks is above US\$10,000 (fresh) - or its equivalent in local USD2 or LBP at Sayrafa platform rate
- Households whose annual rent is US\$3,500 or above (fresh - or its equivalent at Sayrafa Platform rate)
- Households who own three or more cars registered after 2018 (2017 make year or after)
- Households who employ one or more foreign domestic workers. One foreign domestic worker is allowed in case there is a need – for households who have elderly or disabled members.
- Households who benefit from NPTP program “Hayat” - filter



groups. These consultations will take place in line with the provisions of the Environmental and Social Commitment Plan (ESCP) which has been updated for the Additional Financing.

### 3-Stakeholder Identification and Analysis

This section of the SEP identifies the PAPs, the OIPs, and other disadvantaged or vulnerable group. The project-affected parties include those likely to be affected by the Project because of actual impacts or potential risks to their physical environment, health, security, or well-beings. OIPs include individuals, groups, or organizations with an interest in the Project, which may be because of the Project location, its characteristics, its impacts, or matters related to public interest. The disadvantaged or vulnerable are defined as individuals or groups who may be disproportionately impacted by the Project, who may have been unfairly excluded from the Project, or who may have limitations in participating and/or understanding project information due to lack of understanding of a consultation process or a lack of means to access Project information.

The following stakeholders will be informed and consulted about the project accordingly.

#### 3.1 Identified Stakeholders and Affected Parties

Within the scope of this Project, the main categories for PAPs are identified as follows:

- **Beneficiaries of basic income support through cash transfers:**

The Emergency SSN Project's first component will scale up the NPTP from its pre-crisis coverage of 15,000 households to approximately 150,000 households. The scale-up would result in an enhanced coverage of Lebanon's targeted SSN from 1.5 percent to around 22 percent of the Lebanese resident households. Simulations conducted by the WB using now casted HBS 2011/12 data show that the scale up will reduce the extent of extreme poverty from 21.8 percent in the post-crisis simulation for 2020 to 12.9 percent, reflecting 8.9-percentage points decrease in the extreme poverty rate.

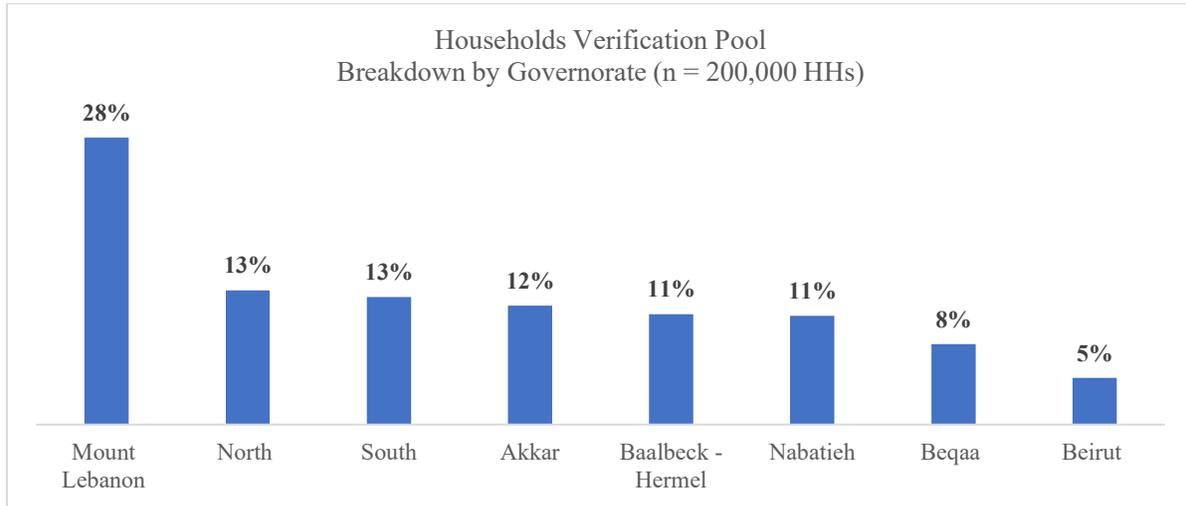
The proposed scale up is currently taking place on a rolling basis. Verification, determination of eligibility and payments to beneficiaries are happening in parallel. The full verification process is expected to be concluded by June 2022, and the entire caseload of approximately 150,000 households will be reached by end June / July 2022.

In order to understand this stakeholder group and identify any special needs that they may have with respect to their engagement in the Project, a geographic and demographic analysis of the potential beneficiaries currently being visited is provided below. The analysis is based on registration records of the 200,000 households who applied on DAEM, and of whom the 150,000 beneficiary households will be selected. This analysis will be further updated once the full caseload is reached to provide a more precise profile of the targeted population.



The data finds that the sample population is scattered across the country (Figure 1 and figure 2) and has diverse demographic characteristics (table 1), and therefore distinct information disclosure and communication needs (table 4).

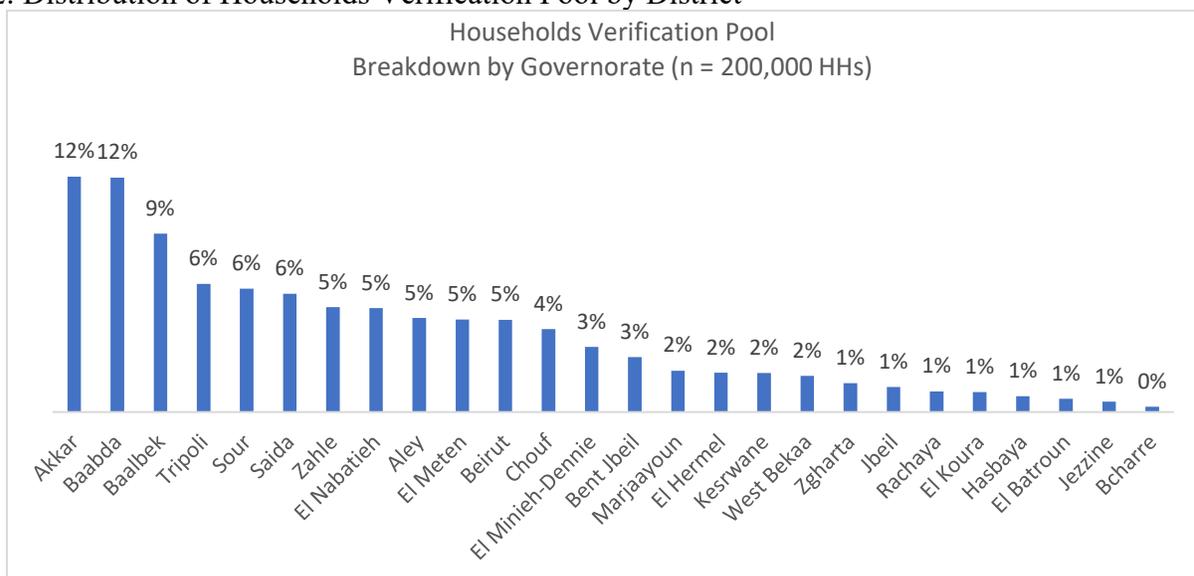
Figure 1: Distribution of Households Verification Pool by Governorate



Source: DAEM Database

Similar to the completed registration applications, households who meet the initial screening criteria and are therefore eligible for verification are located in Mount Lebanon (28%) followed by North (13%), South (13%) and Akkar (12%) governorates whereas the least number of households is found in Beirut (5%).

Figure 2: Distribution of Households Verification Pool by District



Source: DAEM Database



At the district level, households who meet the initial screening criteria and are therefore eligible for verification have the highest percentages in Akkar (12%), Baabda (12%), followed by Baalbeck (9%) districts whereas the least number of households is found in Jezzine and Becharre (+/- 1%).

Table 1: Demographic Characteristics of Households Verification Pool by Governorate

Region	Percentage of Household (N=200,000)	Percentage of female HoH (30% of the total pool)	Percentage of HHs with Disabled Members (32% of the pool)	Percentage of HHs with Elderly (26% of the pool)	Percentage of HHs with children below 18 (66% of the pool)
Akkar	12%	13%	13%	9%	13%
Beirut	5%	6%	6%	7%	4%
Bekaa	8%	8%	7%	8%	8%
Baalbeck - Hermel	11%	13%	9%	10%	11%
Mount Lebanon	28%	27%	28%	33%	26%
Nabatiyeh	11%	9%	10%	10%	11%
North Lebanon	13%	14%	16%	11%	14%
South Lebanon	13%	12%	11%	11%	13%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

*Source: DAEM Database*

The Households Verification Pool shows that 30% of the selected households are female headed households, 32% have members with disabilities, 26% have elderly members, and 66% are with at least one child below 18 years old. It is worth noting that 45% of the Households Verification Pool present from 2 to 4 overlapping criteria.

- **Students aged 13-18 in households under component 1 enrolled in public schools:**

Component 2 will provide a top-up cash transfer to around 87,000 students between the ages of 13 and 18 years currently enrolled in public school identified from households living in extreme poverty and benefiting from component 1 of the program. The targeted students constitute 67 percent of the total number of children ages 13 to 18 years enrolled in public schools.

- **Social Workers:**

A successful implementation of the SSN Project and all its components would require building capacity of all staff involved in the project, and particularly the social workers at MoSA. As the social workers benefit from trainings on case management, GM, Gender Based Violence or Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and communication under



the Project’s component 4, they will be directly affected. The size of this stakeholder group is estimated at around 462 individuals.

- **Syrian Refugees:**

Component 3 of the Project involves Syrian refugees who will benefit from social services provided through Community Development Centers (operated by NGOs) and/or MoSA’s SDCs. The final number of refugees who will benefit from this program has not been determined.

### 3.2 Other Interested Parties

Other parties interested in the Project are identified as individuals, groups, or organizations who may not be directly affected by the Project but who can help play a role in identifying potential risks, impacts, and opportunities for the Borrower to consider and address in the assessment process and throughout project preparation. The following OIPs have been identified as stakeholders in the Project:

Table 2: Other interested parties

Category	Institution	Interest
<b>Government agencies</b>	CMU at the Presidency of the Council of Ministers	Overseeing the implementation of the Project, acting as the Project’s Management Unit (PMU) of the ESSN. The CMU will be responsible for the implementation of the Project, including managing several key functions related to the management of the targeting database (scoring and confirmation of eligibility, cross-checking, referrals to WFP for payments) and managing other M&E activities.
	Ministry of Social Affairs MoSA	Responsible for delivery of the social services and linkages with the households receiving the cash transfers via its SDCs and/or community centers/NGOs; assign GM focal point who will be in charge of overlooking the GMs at the local level in SDCs and coordinate with both the GM firm and the CMU.



	Ministry of Education and Higher Education MEHE	Implementing and monitoring component 2, coordinating with CMU on operations, responsible for providing attendance data of the students supported by top-up cash grants; assign GM focal point who will be in charge of overlooking the GMs at the local level in schools and coordinate with both the GM firm and the CMU. The schools are expected to be the first avenue to receive grievances. However, there will be 87,000 beneficiary students. This will require a robust roll-out program including training for principals and teachers to manage grievances.
	Central Inspection Office	Responsible for the supervision of the DAEM platform as well as safeguarding data protection aspects.
<b>International organizations, donors, investors</b>	World Food Program	Implementing cash-based assistance of components 1 and 2, and monitoring matters related to food security
	European Union	Donor – providing grants
	Germany	Donor – providing grants
<b>Implementing entities</b>	Contracted schools	Collecting school registration fees, enrolling children in schools. Monitor enrollment, attendance, and attainment.
	Banks and financial intermediaries (Money Transfer Operators)	Provide assistance to beneficiaries in cash and coordinate with the GOL on policy guidelines.
	Communication and outreach firm	Designing and implementing a comprehensive communication strategy for the Program
	Monitoring and evaluation firm	Monitor and evaluate components 1, 2, 3, 4.
	GM firm	Assigning a GM manager; assigning a GM coordinator; developing a logging protocol and MIS program,



		setting up a GM operational manual, establishing an automated tracking system, developing FAQs, ensuring timely response system, collection of information, monitoring, providing multiple channels to report SEA/SH that include anonymous reporting and referral to GBV support services
	Development firm	Specialized firm developing and maintaining the DAEM Social Protection Information System
	Third Party Monitoring Agent (TPMA)	Third party conducting technical audit of the Project
	Verification/new intake firm	Conducting verification, recertification, and accepting new applications for beneficiaries.
	External auditing firm	Perform auditing activities and reporting to stakeholders
<b>NGO Partners</b>	MoSA’s NGO partners, namely: Anera, Oxfam, Save the Children International, Secours Islamique France, Caritas Lebanon, Caritas Switzerland, Action Contre la Faim ACF, Relief International, Mercy Corps	May have in-depth knowledge about the environmental and social characteristics of the beneficiaries in some areas and the nearby populations. They can play a role in identifying risks, potential impacts, and opportunities to be addressed
	Other potential contracted NGOs involved in social support services that will contribute to component 3 of the Project	Interaction with the public through community development centers (CDCs)
<b>Press and Media</b>	All communication channels identified in section 4 of this SEP including TVs, radios, newspapers	Inform the public about project implementation and planned activities and GRM

### 3.3 Disadvantaged/Vulnerable Groups

While the Proxy-Means Testing (PMT) formula used for targeting of the NPTP has strong analytic foundations, possible measurement errors during initial intake, changes in households’ composition and the economic conditions between the Household Budget Survey (HBS)’s date (2011-12) and the time of scale-up, and inflation could have potentially led to a certain extent of exclusion errors.



Based on a screening for the Project and discussions with key stakeholders, the disadvantaged/vulnerable groups identified in the Emergency Social Safety Net Program are:

- Elderly and disabled groups who may have additional needs for care and support and who may not be captured by the existing PMT formula. The PMT eligibility cut-off score for such households can be increased to allow some intake from non-extreme poor households that belong to these categories
- Small-sized families that are typically excluded under the current PMT mechanism which determines households' eligibility for assistance;
- Extreme poor Lebanese households who may not be able to register online for the program;
- Extreme poor Lebanese households who come from certain regions in which contrasting patterns of poverty exist, leading to the lack of appropriate communication.
- Syrian refugees: The influx of Syrian refugees in Lebanon since 2011 led to one of the world's highest concentration of refugees in any country, themselves affected by high poverty. The total population of Lebanon increased by more than 38 percent between 2010 and 2019, rising from 4.9 million to 6.6 million. As of early 2022, 839,086 registered Syrian refugees are in Lebanon. The socio-economic situation of Syrian refugees has been deteriorating over the years with close to 91 percent of the population falling below the poverty line (less than USD\$4 per day per person) and 88 percent below the extreme poverty line (less than USD\$3 per person per day), as per data collected in June – July 2021 for the annual UNHCR, UNICEF and WFP Vulnerability Assessment of Syrian Refugees in Lebanon (VaSyR).

While female-headed households do not seem to be disadvantaged by the current PMT system, the current system does not take into account social pressure on females heading households just above the extreme poverty line, especially when a member of those household or the spouse is deceased or incarcerated. Additional “filters” may need to be integrated in order to ensure that the engagement process is inclusive.

Throughout the Project's preparation and implementation, the Project's central management unit (CMU) at the PCM will coordinate with the stakeholders and make efforts to provide all means necessary to best engage the disadvantaged or vulnerable groups identified in this document through proper communication means and additional selection filters.

### 3.4 Summary of Project Stakeholder Needs

Table 3 below summarizes the stakeholder categories identified in this SEP and reviews the preferred means of communication with these stakeholders and the frequency of engagement.



Table 3: Summary of Project Stakeholder Needs

Stakeholder group	Key characteristics	Preferred notification means	Language needs	Specific needs (accessibility, large print, daytime meetings)
<b>Affected Parties</b>				
<b>Beneficiaries of basic income support through cash transfers</b>	<p>Group includes the targeted extreme poor beneficiaries who applied on the DAEM platform</p> <p>Size of the stakeholder group is estimated at 150,000 households (over 630,000 individuals). Group engages in providing feedback about the Project.</p>	<p>Normal notification channels include: SDCs (in person), schools (for education component), mass and social media, call centers, website, emails (generated by communication firm), word of mouth, and mail boxes set up at SDCs, schools, and mail address also provided by the firm. While the initial Project design planned to conduct face-to-face interviews at the households’ dwellings using a defined survey instrument provided by the survey firm, such process would have to be adjusted amidst the outbreak and spread of the COVID-19 coronavirus. In line with Bank requirements (see: technical note on public consultations and stakeholder engagement), stakeholder consultation and engagement activities should not be deferred but rather designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. As such, the CMU is required to review the country COVID-19 spread situation in the project area and to include public hearings, workshops, and meetings between Project agencies and beneficiaries while avoiding public gatherings. Additionally, the task team is required to diversify the means of</p>	<p>Official language (Arabic)</p>	<p>As needed per household.</p> <p>Some individuals from this group:            May not know how to read;            May not have access to the internet;            May not have access to TV;            May not have the means to buy newspaper</p>



		communication and rely more on social media and online channels where possible and appropriate. When stakeholders do not have access to online channels or do not use them frequently, the task team is required to employ traditional channels of communications.		
<b>Students aged 13-18 in households under component 2 enrolled in public schools</b>	87,000 students from 150,000 households receiving top-up cash transfers.	Through the PCM and MEHE websites	Official language (Arabic)	TBC
<b>Social workers</b>	Around 462 social worker spread over 114 SDC	Through MoSA	Official language (Arabic)	N/A
<b>Other Interested Parties</b>				
<b>Government stakeholders</b>	PCM; MoSA; MEHE.  Those include ministers, director generals, advisors, staff, personnel at the CMU, technical team at the IMC.	Written information, emails, telephone, fax.  Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually in line with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Official language (Arabic)	N/A
<b>IGOs, donors, and investors</b>	EU; WFP; Germany;  Stakeholders engage in technical and non-technical (operational management) assistance.	Written information, emails, telephone, fax.  Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually in line with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Language alternative (English)	N/A



<b>Implementing entities</b>	Contracted schools, banks and financial intermediaries (MTOs), grocery stores.	Written information, emails, telephone, fax.  Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually in line with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Official language (Arabic); language alternative (English)	N/A
<b>Third party implementation firms</b>	Third party firms for: communication and outreach, monitoring and evaluation, GRM, external audit, verification.	Written information, emails, telephone, fax.  Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually in line with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Official language (Arabic); language alternative (English)	N/A
<b>Partnering organizations, CBOs, CSOs, NGOs</b>	NGOs who may have in-depth knowledge about the social characteristics of the project and can help in identifying potential risks, impacts, and opportunities.	Written information, emails, telephone, fax.  Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually in line with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Official language (Arabic); language alternative (English)	N/A
<b>Press and media</b>	TV and radio channels, newspapers, online blogs	Written information, press releases, emails, telephone, websites, direct communication between firm and media outlets	Official language (Arabic); language alternative (English)	N/A
<b>Disadvantaged/Vulnerable Groups</b>				



<b>Disadvantaged and vulnerable groups</b>	Poor and extreme poor Lebanese households who might be eligible beneficiaries but are currently excluded from the Program, such as the elderly, small-sized families, extreme poor Lebanese households from certain regions; and female-headed households just above the extreme poverty line. No data is currently available to estimate the size of this stakeholder group.	All channels identified in the communication strategy targeting extreme poor households and the program's beneficiaries.	Official language (Arabic)	As needed per households: Some individuals from this group: May not know how to read; May not have access to the internet; May not have access to TV; May not have the means to buy newspaper
<b>Vulnerable women and groups advocating for women, children, and adolescent girls</b>		Effective and meaningful consultations are needed to ensure that the views of women are sought and incorporated.	Official language (Arabic)	May need female representatives to coordinate consultations.



## 4-Stakeholder Engagement Program

### 4.1 Purpose and Timing of Stakeholder Engagement Program

The main goal of the stakeholder engagement program is to ensure inclusive engagement of all relevant stakeholders that have been identified in this document. This is important because it allows the stakeholders and partners in the Project to feel consulted, which can help promote better development outcomes, mitigate potential risks and impacts, and lead to long-term sustainability. In addition, having discussions with the stakeholders throughout the Project will allow the relevant parties to provide input and agree upon the best way to move forward so that actions are unified. As such, the stakeholder engagement program would lay out a map that the staff and partners can refer to throughout the Project's development stages.

Provided below are the stakeholder engagement program activities through which the stakeholders will be informed of forthcoming opportunities to review information and provide their views. While decisions on the specific type of communication, locations, and timing of meetings have not yet been finalized and highly depend on decisions that are in discussion as of this writing, in addition to Lebanon's status in fighting the COVID19 outbreak, that information will be incorporated in future versions of this document.



Table 4: Purpose and Timing of Stakeholder Engagement Program

Project Stage	Target Stakeholders	Topic(s) of engagement	Method(s) used	Frequency	Responsibilities
<b>Launch of component 1: Provision of food support</b>	150,000 beneficiary households from the extremely poor	Announcing the launch of the scale-up and providing details on the Project	All communication channels identified including mass media, social media, websites, brochures, SMS	One-time campaign during launch, for 4 weeks	Communication and outreach firm, MoSA, WFP, CMU
<b>Implementation of component 1]</b>	150,000 beneficiary households from the extremely poor	Provision of cash for basic income support.	Through direct engagement	Continuous engagement	MoSA, PCM, WFP, Banks and financial institutions
	150,000 beneficiary households from the extremely poor	Communication and outreach	Communication channels, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement (frequency of each communication activity can vary)	Communication and outreach firm, MoSA, CMU
	150,000 beneficiary households from the extremely poor	GM	Communication channels TV, radio, leaflets, flyers, websites, word of mouth, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement	GM Firm and focal point at MoSA CMU
	Vulnerable Groups including women and groups advocating for women, children, and adolescent girls	GM and SEA/H	Communication channels, mass media, social media, websites, SMS, virtual and in-person consultations	Periodic engagement: monthly or quarterly reporting	MoSA, GM Firm, CMU, other identified women NGO groups and associations



			depending on COVID19 public health guidelines		
<b>Launch of component 2: Provision of education cash grants</b>	- 87,000 Lebanese students between the age of 13 and 18	Announcing the launch of the scale-up and providing details on the Project	All communication channels identified including mass media, social media, websites, brochures, SMS	One-time campaign during launch, for 4 weeks	Communication and outreach firm, MEHE, CMU
<b>Implementation of component 2]</b>	- 87,000 Lebanese students between the age of 13 and 18	Provision of education cash grants and support	Through direct engagement	Continuous engagement	MEHE; UNICEF
	- 87,000 Lebanese students between the age of 13 and 18	Communication and outreach	Communication channels, virtual and in-person consultations depending on public health guidelines	Periodic engagement (frequency of each communication activity can vary)	Communication and outreach firm, MoSA, MEHE, CMU
	- 87,000 Lebanese students between the age of 13 and 18	GM	Communication channels TV, radio, leaflets, flyers, websites, word of mouth, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement	CMU, GM Firm, and focal points at MoSA and MEHE,
	- Vulnerable Groups including women and groups advocating for women, children, and adolescent girls	GM and SEA/SH	Communication channels, mass media, social media, websites, SMS, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement: monthly or quarterly reporting	CMU, MoSA, MEHE, GM firm, other identified women NGO groups and associations



<b>Launch of component 3: Access to crisis-relevant social support services</b>	<ul style="list-style-type: none"> <li>- Syrian refugees<sup>5</sup></li> <li>- Lebanese beneficiary households</li> </ul>	Announcing the launch of the scale-up and providing details on the Project	All communication channels identified including mass media, social media, websites, brochures, SMS	One-time campaign during launch, for 4 weeks	Communication and outreach firm, MoSA, CMU, NGOs hired by MoSA, other international NGOs dealing with Syrian refugees
<b>Implementation of component 3 </b>	<ul style="list-style-type: none"> <li>- Syrian refugees</li> <li>- Lebanese beneficiary households</li> </ul>	Providing crisis-related social support services	Through direct engagement (at SDCs and CDCs)	Continuous engagement	NGOs hired by MoSA; MoSA (through SDCs); any NGO involved in CDCs
	<ul style="list-style-type: none"> <li>- Syrian refugees</li> <li>- Lebanese beneficiary households</li> </ul>	Communication and outreach	Communication channels, virtual and in-person consultations depending on public health guidelines	Periodic engagement (frequency of each communication activity can vary)	Communication and outreach firm, MoSA, CMU, NGOs hired by MOSA, and other international NGOs dealing with Syrian refugees
	<ul style="list-style-type: none"> <li>- Syrian refugees</li> <li>- Lebanese beneficiary households</li> </ul>	GM	Communication channels TV, radio, leaflets, flyers, websites, word of mouth, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement	RM Firm and focal point at MoSA, CMU, NGOs hired by MOSA, and other international NGOs dealing with Syrian refugees
	<ul style="list-style-type: none"> <li>Vulnerable Groups including women and groups advocating for</li> </ul>	GM, SEA/SH	Communication channels, mass media, social media, websites,	Periodic engagement: monthly or quarterly reporting	GM Firm and focal point at MoSA, CMU, NGOs hired by MOSA, and

<sup>5</sup> While Syrian refugees are identified as stakeholders/vulnerable groups in this SEP, engagement, communication campaigns and consultations with this group under component 3 of the project will be through international NGOs– the CMU will document details of these engagements in their progress reporting



	women, children, and adolescent girls		SMS, virtual and in-person consultations depending on COVID19 public health guidelines		other international NGOs dealing with Syrian refugees
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## 4.2 Proposed Strategy for Information Disclosure

Throughout the preparation and implementation phases, the outcomes of the Project and any unforeseen changes or updates will be disclosed to the stakeholders in a technically and socially appropriate approach and in a timely manner.

The preliminary list of information and documents that will be disclosed by the GOL about the project includes, but is not limited to, the following:

- General information about the Project;
- Overview of the services and benefits;
- The Program's eligibility requirements;
- Instructions on the application process;
- Information on recertification process;
- Locations and contact information of SDCs and application points, municipalities, and MoSA;
- Application timeline;
- Information on the post-application process;
- Information on meetings and consultation sessions;
- Information on GMs;
- Relevant environmental and social systems assessment reports to CMU;
- Other due diligence and tasks to be completed in the appraisal period;
- Distribution of project responsibilities among GOL and parties involved in technical assistance;
- The Project's timeline and key dates (to relevant stakeholders);
- Monitoring and Reporting (M&E) information;
- Social and environmental documents including the Environmental and Social Commitment Plan (ESCP), the Social Impact Assessment (SIA), the Gender-Based Violence (GBV) Action Plan, and the Labor Management Procedures (LMP) which apply both to the Parent Project and the Additional Financing;
- This SEP document which is applicable to both the Parent Project and the Additional Financing, and to welcome any comments or suggestions for improvement.

The channels through which information disclosure will take place include:

- MoSA's website ([www.socialaffairs.gov.lb](http://www.socialaffairs.gov.lb)) and NPTP website ([www.nptp.pcm.gov.lb](http://www.nptp.pcm.gov.lb))
- PCM website ([www.pcm.gov.lb](http://www.pcm.gov.lb))
- MEHE website ([www.mehe.gov.lb](http://www.mehe.gov.lb))
- Central Inspection Office website (<https://impact.cib.gov.lb/home?dashboardName=ration-card> )
- Emails, fax, and telephone
- Short Message Service (SMS)
- Social media platforms: WhatsApp, Facebook, Instagram, Twitter
- Traditional/Mass media platforms: TV, radio, newspapers and magazines
- Online blogs
- Print media: brochures, posters, and leaflets



- If safe, household visits if and when recertification process is going to take place
- Outreach through third-party stakeholders

Other documentation will be provided to the appropriate stakeholders upon availability and as needed. Part of the information disclosure strategy will also include means necessary to consult with project-affected stakeholders if any significant changes to the project resulting in additional risks and impacts arise.

It is very important to understand how target stakeholders usually receive important information and how this information is interpreted. As such, the communication team should tailor the message to the beneficiaries in order to potentially reach all individuals in a family so that a family member above the age of 18 can easily apply to the Program.

Table 5: Summary of Notification Plan throughout Project Cycle

<b>Project Stage</b>	<b>List of information to be disclosed</b>	<b>Target stakeholders</b>	<b>Responsibilities</b>	<b>Methods proposed</b>
Pre-application outreach	General information about the Project; overview of the services and benefits; application timeline; information on meetings and consultation sessions; relevant environmental and social systems assessment reports; distribution of Project responsibilities; the Project’s timelines and key dates; M&E information; environmental and social systems assessment report, GRM procedures.	Potential and existing beneficiaries; Government stakeholders; IGOs, donors, and investors.	MoSA; MEHE; CMU at PCM; SDCs; communication firm	MoSA website; NPTP website; MEHE website; PCM website, emails, fax, telephone, SMS, word of mouth, social media, traditional media, online blogs, print media.
Implementation phase: opening applications for beneficiaries	Program’s eligibility requirements; instructions on the application process; information on recertification process; locations and contact information of SDCs and application points as well as schools.	Potential and existing beneficiaries.	MoSA; social workers; SDCs; third-party stakeholders (NGOs, IGOs, CSOs, CBOs) including WFP on component 1, UNICEF on component 2, and NGOs hired by MOSA on component 3.	MoSA website; NPTP website; PCM website; MEHE website; WFP, and NGOs websites; emails, fax, telephone, SMS, word of mouth, social media, traditional media, online blogs, print media.



Future phase: household visits and post-application	Information on post-application process; timelines; guidance on next steps.	Applicants and beneficiaries.	Social workers; SDCs; third-party stakeholders (NGOs, IGOs, CSOs, CBOs), verification firm.	Household visits.
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### 4.3 Proposed Strategy for Consultation

Consultations with stakeholder groups were initially planned to take place through face-to-face interviews and through meetings and workshops with the CMU, in collaboration with the World Bank and other donors, investors, and interested stakeholders.

However, with the outbreak and spread of COVID19, people have been advised by the Government to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. The general public has also become increasingly aware and concerned about the risks of transmission particularly through social interaction. These restrictive measures will affect the World Bank’s requirements for public consultation and stakeholder engagement in the Project.

As such, and as per the World Bank’s “technical note on public consultations and stakeholder engagement when there are constraints on conducting public meetings”, all stakeholder consultation and engagement activities should not be deferred, but rather designed to ensure effective and meaningful consultations to meet project and stakeholder needs. Moreover, depending on how the coronavirus situation develops in Lebanon, the task team and the CMU should review this draft SEP, particularly its approach, methods, and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting the engagement activities.

With respect to component 3 of the Project and the engagement of Syrian refugees, the involvement of the NGOs hired by MOSA to support SDCs and their coordination in conducting consultations with refugees remains in discussion. Best practice in line with the Bank’s requirements will be ensured during implementation of this component.

Also depending on how the coronavirus situation develops in Lebanon, public hearings, workshops, and community meetings should be avoided, and direct interaction between project agencies and beneficiaries / PAPs should be minimized. If permitted, consultations should be conducted in small-groups, such as focus group meetings.

With respect to means of communication, they should be diversified with more reliance on social media, online channels, and possibly chat groups, in addition to the traditional channels of communication like TV, newspaper, radio, public announcements and mail. Such channels can be highly effective in conveying relevant information to stakeholders, and would allow them to provide their feedback and suggestions.



Where large meetings are essential, online communication and virtual workshops through WebEx and Skype are recommended. The format of such workshops could include the following steps:

- Virtual registration of participants
- Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires, and discussion topics
- Review of distributed information materials
- Discussion, feedback collection and sharing
- Conclusion and summary

If online interaction is challenging, information can be disseminated through digital platforms like Facebook, Twitter, WhatsApp groups, Project websites, etc.

#### 4.4 Proposed Strategy to Incorporate the View of Vulnerable Groups

In addition to overlooking a proactive and well-targeted communication outreach campaign (see sections 4.1 and 4.2), CMU will ensure that the views of vulnerable or disadvantaged groups will be sought during the consultation process. These measures may include engagement through proactive communication and outreach campaigns (by the channels identified in this SEP).

In addition, filters to include some disadvantaged groups who might have been excluded in the initial screening process but who may be eligible for the Program will be implemented by the CMU. This can potentially address the issue of exclusion of vulnerable groups identified in this SEP to a certain extent.

The CMU at the PCM will also continue to carry out data re-checking procedures for vulnerable groups that submit complaints to through the GRM system put in place.

#### 4.5 Timelines

Under the parent project and the AF, information on timelines for project phases and key decisions will be disclosed to the appropriate stakeholders as soon as possible and once available. The deadline for comments will also be determined and shared with the stakeholders by the CMU.

#### 4.6 Review of Comments

The CMU, MoSA, and MEHE will identify staff within each organization to help develop a team who will be responsible for addressing complaints, concerns, and suggestions. The team will be comprised of staff members that will be specified at a later stage and who will be trained to respond to all incoming complaints, concerns, and suggestions in a technically and socially adequate and efficient manner, and who will have knowledge of the appropriate departments or authorities to divert the complaints to as necessary.

All complaints, concerns, and suggestions must be reviewed, and all cases must be closed within a reasonable timeframe that will be communicated in advance, but that will not exceed 7 days. A summary of the review of comments must be disclosed and reported back to stakeholders periodically.



#### 4.7 Future Phases of Project

All stakeholders will be kept informed of key Project decisions and phases as it develops. The relevant GOL authorities, including the Project’s CMU at the PCM, MEHE, and MoSA, will regularly report to stakeholders on specific matters, and disclose any changes or updates in a timely manner and in a technically appropriate approach that will be determined in the project preparation/appraisal phase.

### 5-Resources and Responsibilities for Implementing Stakeholder Engagement Activities

#### 5.1 Resources

The CMU will allocate all necessary resources including staff and budget for the management, implementation, and monitoring of the SEP during the duration of the Project. Once available, the CMU will disclose a description of those resources to the relevant stakeholders, including the names and contact information of the staff in charge and specifying who will be responsible for carrying out each of the stakeholder engagement activities. This information will be reflected in this SEP and updated as soon as it is disclosed by the Borrower.

#### 5.2 Management Functions and Responsibilities

The CMU at the PCM will need to hire a social safeguards specialist who will follow up and monitor the successful implementation of this SEP including the review of all comments and in coordination with the focal points at the respective organizations. The stakeholder engagement activities are the responsibility of the MoSA in coordination with the CMU, the social safeguards specialist and the communications firm. All need to have a minimum of 7 years’ experience and the relevant qualifications in their respective fields. The CMU in coordination with the social safeguards specialist will ensure that the stakeholder engagement activities as outlined in this SEP are adhered to and will report accordingly the outcomes of these consultations in their progress reports.

### 6-Grievance Mechanism

The GOL discussed the importance of developing a solid GRM both at the central and local levels with the World Bank, and will seek to expand the scope of the GRM system and address weaknesses in the current informal complaint resolution mechanism at MoSA.

The proposed new GRM structure for the ESSN Project entails the establishment of a GRM at the national and local levels that can be used by project beneficiaries, PAPs, and the broader public. Workers will use a separate GRM system.

While the overall monitoring of the GRM would remain under the responsibility of the CMU that sits at the PCM, the CMU will outsource a third-party GRM firm that will set up the GRM at the national level. The CMU will also appoint a GRM officer who will serve as a central focal point and handle the liaison of all parties involved in the GRM including third parties, and who will provide regular feedback on the effectiveness of the GRM to the Inter-ministerial Committee (IMC). As part of the communication and outreach activities, the CMU will also be responsible of ensuring that the public is aware of the existence of the GRM and other relevant details (such as the uptake locations). At the Ministries’ level, MEHE and the NPTP unit at MoSA will each assign GRM focal points who will be



in charge of overlooking the GRMs at the local levels (at SDCs or in schools) and coordinating with both the third-party firm and the CMU. At the local level, social workers (at SDCs), principals and teachers (in schools) will play an essential role in receiving complaints and feedback from beneficiaries, and will ensure reporting cases through the MIS system within 24 hours of the submission of a grievance form (filled by the complainant or the worker).

The public and the beneficiaries will be notified about the existence of the GRM at different stages, and as of the Project's earliest stages, through different means of communication including TV, radio, leaflets, flyers, websites, word of mouth, brochures, posters, and through communication and outreach activities and consultation processes.

The uptake channels that will be available for beneficiaries and the public include a dedicated email address, a toll-free number (1747), the third-party GRM firm's website (info@impact.gov.lb), the MoSA's website (<http://www.socialaffairs.gov.lb>), feedback boxes located at SDCs and at schools, a designated mailbox, and physical centers (schools/SDCs) which will ensure flexibility in the channels available and provide the public with enough means to file their complaints or provide their feedback.

In order to keep track of grievances, the contracted firm will develop and operate a "complaint management system" that will be accessed by all parties involved in the GM to ensure harmonization of the format of GM forms submitted across all uptake channels. The firm will also be in charge of sorting/categorizing the complaints which are later referred by the GM manager to a GM coordinator at the CMU, who will determine the investigation process, timeframe (that does not exceed 7 days), and appropriate course of action.

Where feasible, complainants will be notified through logged communication about the process before any action is taken by the entity receiving the complaint and handling the investigation. This entity will carry out verification tasks including site visits, verification of documents, and meetings with complainants. No investigations will be conducted for cases of GBV-related complaints. As required by the World Bank guidelines, such cases should be referred to an NGO procured under the project (component 3) to manage GBV cases for referral to the appropriate service providers.

Finally, complainants will be notified about the results of the investigation and the proposed action through the same channel their complaint was received within a specified timeframe and will be informed of the appeal process in the event they are not satisfied with the response.

The CMU will supervise the GM regularly and ensure its efficiency, while the GM focal point will work with an M&E specialist to provide quarterly reporting of GM results. All quarterly and annual reports that will be submitted to the World Bank will include a GM section that includes various information and indicators about the GM. The CMU will also ensure that an independent review/audit of the GM is conducted prior to the project mid-term review to assess the effectiveness of the GRM system.

The detailed description of the GM system is provided in [Appendix 1](#).



## 7.1 Involvement of Stakeholders in Monitoring Activities

The CMU will publish reports about activities associated with the Emergency SSN project in general on the existing PCM and NPTP websites ([www.pcm.gov.lb](http://www.pcm.gov.lb); and [www.nptp.pcm.gov.lb](http://www.nptp.pcm.gov.lb)) and will include in its reporting any additional coverage needed by the scale-up Project. In addition, weekly / monthly reports are produced by the Central Inspection and published on their website (<https://impact.cib.gov.lb>)

## 7.2 Reporting Back to Stakeholder Groups

As suggested in this document, periodical reporting will be published by the CMU and the Project's management in a technically and socially appropriate manner during the course of the project. Results of all stakeholder engagement activities will be disclosed by the PMU to both affected stakeholders and broader stakeholder groups through the channels identified in this document. In addition, stakeholders will always be reminded of the availability of a grievance mechanism through which they could address any complaints or concerns.



## References

- World Bank, March 2020 poverty update
- World Bank, Implementation Support Missions, Aide-Mémoire, May-August 2019
- World Bank, technical note on public consultations throughout pandemic outbreak
- DAEM Database (2022)
- World Bank, ESS10 Guidance Note
- World Bank, Project Preparation Documents (components 1, 2, 3, 4; distribution of responsibilities and tasks; institutional arrangement chart)
- World Bank, NPTP Reforms and Expansion, August 2019
- MoSA, NPTP Communication Strategy, March 2020

### Consultations and meetings (all virtual):

- Dr. Bashir Osmat, March 19<sup>th</sup>, 2020
- Ms. Marie Ghiya and Ms. Abou Jaoudeh, March 20<sup>th</sup>
- Dr. Bashir Osmat, March 21<sup>st</sup>, 2020
- Mr. Ramzi Fanous and Ms. Abou Jaoudeh, PCM, March 23<sup>rd</sup>, 2020
- Mr. Ramzi Fanous and Ms. Marielouise Aboujaoudeh, PCM, April 6<sup>th</sup>, 2020



## Appendix 1

### **Outline of the proposed GM for ECRSSN**

**Scope:** A Grievance Mechanism (GM) is a system whereby stakeholders can submit their complaints, queries, suggestions, and feedback, about the project. Effective project GMs are intended to address issues and complaints in an efficient and timely manner. They should be widely accessible to the full range of project stakeholders, including project-affected parties, community members, vulnerable groups, civil society, media, and other interested parties, through multiple uptake channels. The mechanism focuses not only on receiving and registering complaints and feedback from beneficiaries, but also on how complaints are resolved. GMs are usually supported by an information campaign and training.

No Social Safety Net project is successful without a robust GM that ensures social accountability and builds trust with communities. Accordingly, the success of the Emergency Crisis Social Safety Net Project would rely heavily on the existence of a strong and functional GM.

**Who Can Use this GM?** Project beneficiaries (Households/individuals receiving assistance), project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader public who can use the GM for the purposes of making complaints and providing feedback. Workers will use a separate GM.

**The types of grievances that can be submitted through the GM would include the following:**

- Fraud and corruption
- Eligibility
- GBV/SEA complaints
- Lost cards/payment issues/withdrawal/etc.
- Misconduct of staff
- Misuse of funds

**The Public Awareness and Communication:**

The public and beneficiaries will be notified about the existence of the GM and the way to access it at the earliest stages of the project through communication and outreach activities and the consultation process.

The communication campaign shall include information on the scope of the GM, the procedure to submit grievances (where, when and how), the investigation process, the timeframe for responding to the complainant, principle of confidentiality and right to make anonymous complaints. Multiple means of communication will be used including TV, radio, leaflets, flyers, website, and word of mouth. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in Municipalities, Public Schools and Social Development Centers.

Information on complaints received and resolved will be also reported as part of the project's routine quarterly reporting. Also, a summary of implementation of the GM will be provided to the public on an annual basis.

**Organizational structure:**



Component 4 of the project will support the establishment of a GM at the national and local levels in Lebanon.

The overall monitoring of the GM would be the responsibility of the Central Management Unit (CMU) sitting at the Presidency of Council of Ministers (PCM). The CMU will outsource a firm which will be in charge of setting up the GM at the national level. The Ministry of Social Affairs and Ministry of Education and Higher Education will play a role each in their own capacity in operating the GM at the local levels. A separate mechanism will be used for workers' grievances. The PCM CMU will appoint a GM officer who will serve as a central focal point by providing regular feedback on the effectiveness of the GM to the Inter-ministerial Committee (IMC). The responsibilities of the GRM officer will consist of liaising with all parties involved in the GRM including third parties, UN agencies and service providers, and monitoring the efficiency and functionality of the GM. As part of the communication and outreach activities, the CMU would also ensure that the public is aware of the existence of the GM, and particularly of the uptake locations to request information or complain.

Development and management of Central GM will be outsourced to a firm.

The responsibilities of the firm would include:

- Assigning a GM manager which will be in charge of ensuring complaints are logged and sorted.
- Assigning a GM coordinator which would determine which complaint should be investigated and escalated to the CMU.
- Developing a protocol and MIS program to manage and record all complaints and responses/feedback.
- Setting up a GM Operational Manual which would include standardized processes, timelines and procedures at each level. The OM needs to be formulated and disseminated among all staff as well as teams in direct contact with beneficiaries or non-beneficiaries.
- Establishing an automated tracking system, FAQs, call centers with a Toll free hotline available to the public, email address and website that communities can access to submit complaints and receive information about the GM
- The firm will report to the GM officer at the CMU.

The uptake locations would be established at the central level through a call center, website and email. At the local levels, the uptake locations will be distributed throughout the regions in the SDCs, and public schools.

At the Ministries' level, MOSA NPTP Unit and MEHE will each assign GM focal points who will be in charge of overlooking the GMs at the local levels, ensuring they're operational and following the established standards. They will also be responsible for liaising and coordinating with the firm and CMU.

The social workers will play an essential role in receiving face to face complaints and feedback from beneficiaries. It is also expected that school principals and teachers would gather information and feedback from beneficiaries at the school level.

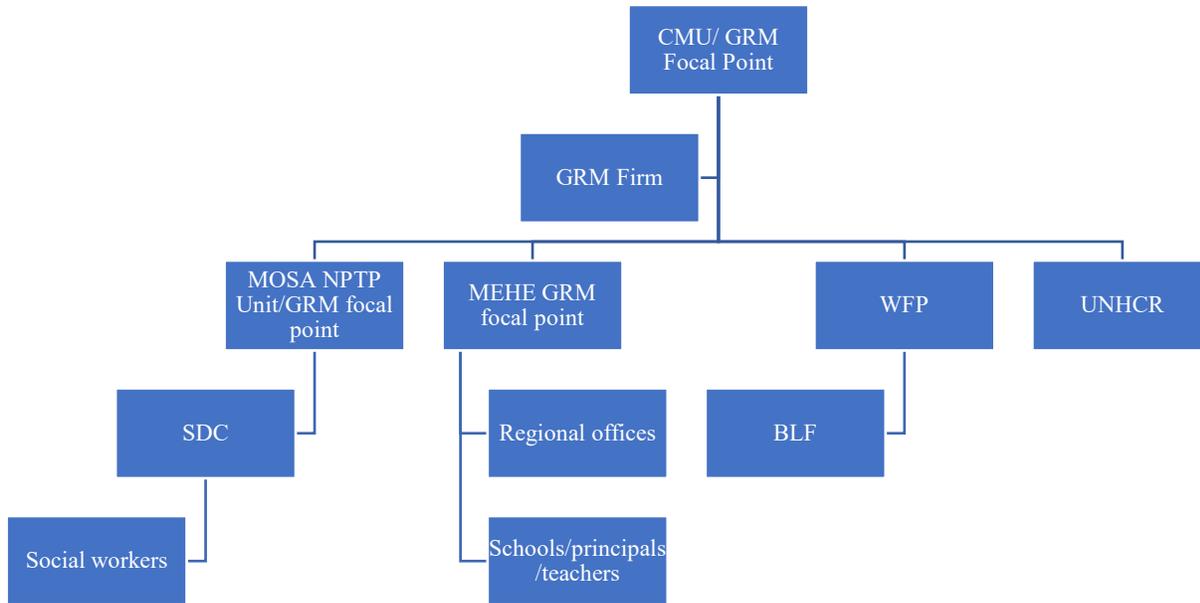


Figure 1- Proposed GRM organizational structure

It is important to note that the GM would need to be tailored to address any potential GBV/SEA grievances. Accordingly, staff managing the GM would need to receive appropriate training to ensure protocols are established including confidentiality and referral to service providers.

**GM Process:**

The overall process for the GM will be comprised of six steps, as shown and described below.

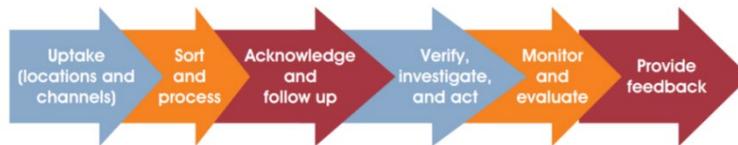


Figure 2- GRM Value Chain

**Uptake channels: It is suggested that the project will establish the following channels through which citizens/beneficiaries can make complaints or provide feedback.**

- a. A dedicated email address TOLL FREE NUMBER
- b. On the GM website
- c. On the NPTP website
- d. Feedback boxes located at SDCs and Public Schools



- e. Letters sent to a defined Mailbox
- f. Verbal or written complaints to social workers (directly or through walk ins to SDCs). (If project stakeholders provide verbal feedback/complaint, social workers will lodge the complaint on their behalf, and it will be processed through the same channels.
- g. Project meetings/consultations set up throughout project implementation.

The project shall ensure flexibility in the channels available, making sure that different contact points are available for a person to make a verbal complaint, and that complaints addressed to the wrong person or entity are redirected to the central GM. It is also important to ensure that uptake channels are culturally sensitive and accessible to vulnerable groups, particularly in remote areas.

**Confidentiality:** Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known, and when GBV related grievances are submitted.

**Collection and Registration of complaints:** The firm would be in charge of developing a “complaint management system” which can be accessed by all parties involved in the GM. The management system will have different registration databases at each level. Complaints can be received at the local levels through the Social Development Centers and Public Schools, or through the central GM.

Assigned staff from the central GM/ MOSA/MEHE should be using the system to register complaints and feedback received by the community. The system would be managed and maintained by the firm which will ensure harmonization of the format of the GM submission forms across the different uptake channels.

The person receiving the complaint whether at the SDC level, the school, the call center, etc. will need to complete a grievance form, or make the form available to the complainant to fill out directly and submit it through the MIS system without delay (within 24 hours). The complaints for the project will be collected and compiled by the firm on a regular basis.

**Sorting/categorization**

Once received and filed in the system, the firm will be in charge of sorting the complaints/feedback into the following categories:

<b>Category No.</b>	<b>Classification</b>
Category 1	Grievances regarding eligibility of the beneficiaries, scoring, PMT formula
Category 2	Grievances regarding the ecard, loss of cards, inability to retrieve cash, or other technical issues linked to the Bank ATM/POS
Category 3	Grievances regarding violations of policies, guidelines and procedures
Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 5	Grievances regarding abuse of power/intervention by project or government officials



Category 6	Grievances regarding staff performance
Category 7	GBV grievances
Category 8	Suggestions
Category 9	Appreciation

**Follow-up and Acknowledgment:**

The GM firm would develop in coordination with the CMU/MOSA and MEHE, an automated tracking system, FAQs, processes and service standards including timeline for resolution, to ensure follow up to all complaints across agencies and at different levels.

Accordingly, once the complaints have been categorized, the GM Manager logs the details regarding the complaint into the tracking system as part of the MIS system.

Once a complaint has been logged and sorted, the GM Manager refers the case to a GM Coordinator at the CMU. The latter will be responsible of the following:

- The person responsible to investigate the complaint.
- The timeframe within which the complaint should be resolved.
- The agreed course of action (e.g. investigation, reply not requiring investigation, escalating to CMU, liaising with MOSA, MEHE, WFP, etc.).

The investigation process is determined based on the nature and gravity of the complaint, however regardless of type/category complaints all complainants should be assured of receiving feedback within a timeframe communicated in advance. The timeframe should not exceed 7 days.

- For local level complaints, the investigation will be conducted by the social workers at the SDC level.
- For complex complaints, the investigation will be conducted by an assigned investigation officer as described in the GM Operational Manual

When determining who will be the investigating officer, the CMU will ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GM records (GM manager) and enters this data into the system.

The number and type of suggestions and questions should also be recorded and reported to the CMU on a regular basis, so that they can be analyzed to improve project communications.

**Notification to the complainant**

If the complainant is known, the entity receiving the complaint will be responsible for communicating the timeframe and course of action to her/him by phone, email or mail, within a specified deadline of receipt of the grievance.



Where feasible, the communication should be provided in writing with a tracking number and the deadlines by which they will hear back from the Project GM.

### **Investigation**

The person responsible for investigating the complaint will be in charge of gathering facts in order to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who could resolve the issue. It is important to note that with the COVID19 situation, measures of social distancing should be respected when determining the means of verification.

More importantly, no investigation will be conducted for cases of GBV related complaints. As required by the World Bank guidelines, such cases should be referred to an NGO procured under the project (component 3) to manage GBV cases for referral to the appropriate service providers. The results of the verification and the proposed response to the complainant will be logged in the system and communicated to the GM coordinator at the firm who will in turn communicate it to the GM focal point at the CMU, if need be.

Once the decision has been made on the course of action and on the response to provide to the complainant, the actions to be, along with the details of the investigation and the findings, are also entered it into the MIS system.

### **Response to complainant**

If the complainant is known, the GM communicates the proposed action to her/him via letter, email, verbally, as received within a specified timeframe. The complainants will also be informed of the appeal process. Feedback from the complainants should be collected as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken.

### **Appeal process:**

In the event the complainant is not satisfied with the response, he/she should be able to appeal. The project will ensure an appeal process is established and communicated to the complainants.

Complainants are not precluded from appealing outside the project GM or from using the judiciary system if they are not satisfied with the proposed response.

### **Regular internal monitoring and reporting**

The CMU will assess the functioning of the GM and supervise it regularly. The GM focal point will work with the M&E Specialist at the CMU and with the GM firm to:

- Ensure accurate entry of GM data into the management information system or other system. Produce compiled reports to the CMU coordinator and IMC.
- Provide a quarterly report of GM results including any suggestions and questions, to the CMU.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.



On a periodical basis, the CMU and GM focal points in each ministry shall discuss and review the effectiveness and use of the GM and gather suggestions on how to improve it.

### **Reporting in quarterly and annual progress reports submitted to the Bank**

Quarterly and annual progress reports shall include a GM section which include information and indicators on the following:

- Status of establishment of the GM (procedures, staffing, training, awareness building, budgeting etc).
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved
- Quantitative data on the number of complainants, and number of female complainants
- Qualitative data on the type of complaints and answers provided, issues that are unresolved
- Time taken to resolve complaints
- Number of grievances resolved at the local level, escalated to the central levels.
- Satisfaction with the action taken
- Any other issues faced with the procedures/staffing or use
- Problems that may be affecting or delaying the use of the GM/beneficiary feedback system

### **GM audit:**

The CMU will ensure that an independent review/audit of the GM is conducted prior to the project mid-term review to assess the effectiveness and use of the GM and recommend introduce improvements as necessary.

### **Capacity building:**

Finally, all teams should receive a GM training once the tasks and responsibilities of each entity are clarified. Dedicated trainings should be provided as part of component 4 activities, to staff directly engaging with beneficiaries, those handling the system, and those involved in the management and oversight of the system. The training shall include all aspects of the GM and its management.

Training and awareness building dedicated to handling GBV related grievances would be conducted separately and would target all staff particularly the social workers.

A key focus at the outset will be shifting from informal complaint resolution as is the case currently in MOSA, to the logging of all complaints/feedback into the developed GM system