



The World Bank

Emergency Broad Coverage Cash Transfer, Stakeholder Engagement Plan Draft

Government of Lebanon
The World Bank

Emergency Broad Coverage Cash
Transfer Project (EBCCT) (P177920)

PRELIMINARY STAKEHOLDER
ENGAGEMENT PLAN (SEP)

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ABBREVIATIONS AND ACRONYMS

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
FX	Foreign Exchange
GOL	Government of Lebanon
GM	Grievance Mechanism
HBS	Household Budget Survey
IGO	International Organization
IMC	Inter-Ministerial Committee
IPF	Investment Project Financing
IRP	Intake Registration Platform
MoSA	Ministry of Social Affairs
MoPH	Ministry of Public Health
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
SSN	Social Safety Net
SPIS	Social Protection Information System



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1 -Introduction/Project Description

Lebanon is currently in a high-risk situation as it faces a combination of a balance of payments crisis, coupled with an economic and banking sector crisis, a 10-year humanitarian situation caused by an unprecedented influx of refugees, and most recently having to deal with the impact of the COVID19 pandemic. The situation in the country is further compounded by the outbreak of the COVID-19 pandemic and subsequent lockdown measures.

Poverty and vulnerability have increased significantly, with severe implications on Lebanon’s human capital. Poverty was already increasing before the crisis, from 25.6 percent in 2012 to 37 in 2019.

The crises increased unemployment further worsening household welfare. One in five workers lost their jobs since October 2019 while 61 percent of firms surveyed decreased the number of permanent workers by 43 percent on average. (World Bank Enterprise surveys)

In response to the multiple crises, the GOL is launching the Emergency Broad Coverage Cash Transfer (EBCCT), a \$270 million program aimed at: (i) mitigating the adverse effects of the foreign exchange (FX) subsidy removal on the population, (ii) further developing a social registry and payment mechanism for all social safety net programs with strong monitoring measures in place, and (iii) building a resilient society for future shocks and crises. The EBCCT will build upon the successes of the National Poverty Targeting Project or NPTP and the Lebanon Emergency Crisis and COVID19 Response Social Safety Net Project or ESSN and learn from challenges of the past 10 years, particularly in further developing the DAEM¹ Intake and Registration Platform (IRP) into a fully functional and robust Social Protection Information System (SPIS), automating and digitizing the end to end delivery process for the national social safety nets.

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 World Bank’s Environmental and Social Framework (ESF) requirements <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>. 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 has developed and will implement a SEP proportionate to the nature and scale of the project and its potential risks and impacts. If significant changes are made to the SEP during implementation, the Borrower will disclose the updated SEP.” Therefore, the SEP shall remain a living document.

The objective of the SEP is to raise awareness and engage with the identified stakeholders throughout the project lifecycle and seek feedback from them and define how stakeholders can lodge their grievances in relation to the proposed Emergency Broad Coverage Cash Transfer program, hereinafter the “Program” or the “Project”. The SEP will ensure that the stakeholders are provided with sufficient opportunity to voice their opinions and concerns which are addressed in a timely manner.

The objectives of the SEP are outlined as follows:

¹ DAEM -IRP is the Intake and Registration platform for the ESSN and the EBCCT.



- Plan and define stakeholder engagement requirements for the Project after identifying key stakeholders that are directly 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.
- Define Grievance Mechanisms (GMs).

1.2 -Project Overview and Description

Lebanon is faced with an unprecedented economic crisis that has been further escalating since the recent COVID-19 pandemic outbreak. The shortage of dollars and the sharply accelerated average inflation since the beginning of 2020 have already led to de facto depreciation of the Lebanese pound and uncontrolled rises in prices, and are also likely going to exacerbate the economic situation by putting massive pressure on consumer prices, particularly given the country's heavy reliance on imports. As a consequence, unemployment and poverty are rising fast, inflicting unbearable pain on the Lebanese population. In addition, a sharp decline in remittances and disruptions in global supply chains resulting from the pandemic are expected to exacerbate Lebanon's food security vulnerabilities and place additional pressure on the economy.

Already prior to the current crisis, poverty was on the rise with overall poverty increasing from 25.6 percent in 2012 to 37 percent in 2019, and extreme poverty increasing from 10 percent in 2012 to 16.2 percent in 2019, according to the World Bank. The Syrian crisis alone has increased overall poverty 7 percentage points between 2012 and 2017 through direct and indirect impacts that the mass refugee influx has put on public infrastructure and public finance. 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 average annual inflation ballooned to 85 percent in 2020 while average food inflation alone grew by a record 250 percent over 2019. Between September and August 2021, the average year-on-year inflation rate reached 133 percent with a corresponding food inflation rate of 341 percent. In response to the worsening living conditions for a large number of Lebanese citizens, a popular uprising erupted in October 2019 where large demonstrations demanded better standards of living and equal opportunities. More than 220,000 jobs had been temporarily or permanently lost between October 2019 and February 2020/21² even before the lockdown measures that the government had imposed and which are expected to further compound the economic situation. World Bank staff calculations estimate that a contraction of the Lebanese GDP per capita by 8.3 percent in real terms in 2020-21¹ could result in more than a doubling of extreme (food) poverty to 22 percent, and an increase in overall poverty to 45 percent in 2020. This translates into approximately 1.7 million people (350,000 households) falling under the poverty line, of which 841,000 people (156,000 households) fall under the food poverty line.

The Government of Lebanon (GoL) recognizes the urgent need to backstop the country's current economic crisis which, if unmitigated, can lead to even higher levels of poverty and inequality, and can reverse hard won gains in human capital investments in the country. The government hopes to create favorable conditions for a rebound by restoring social trust among citizens. As such, through much-needed structural reforms and extensive social safety nets, the GoL aims to protect the poorest segments of the population

² <http://www.businessnews.com.lb/cms/Story/StoryDetails/7423/220,000-jobs-lost-estimated-by-InfoPro>



and reduce inequalities.

In preparation for the Foreign Exchange (FX) subsidy removal, the GoL in mid-2020 started designing a broad coverage cash transfer (BCCT) program to support households during the transition. The program is a cash transfer compensation scheme providing temporary support to Lebanese Households as subsidies are lifted. The Program was designed by 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 program. Implementation and governance arrangements for the program were set and announced in an inter-ministerial decree dated September 30, 2021. The BCCT will be implemented alongside the World Bank supported Lebanon Emergency Crisis and Covid-19 response social safety Net Project (ESSN).

The ESSN (US\$ 246 Million) provides cash transfer and access to social services to 147,000 extreme poor and vulnerable Lebanese households affected by the economic and COVID-19 crises.

The ESSN scales up and enhances the GOL's National Poverty Targeting Program (NPTP) Lebanon's first poverty- targeting social assistance program launched in 2011 with financial and technical assistance from the World Bank. The NPTP ESSN and BCCT cash transfer programs combined are expected to expand SSN coverage approximately 57 % of the Lebanese population. The NPTP ESSN are programs that target households under extreme poverty, while the BCCT aims to reach the new poor/middle income levels.

The BCCT project consists of 2 components:

Component 1: provision of cash transfers to Households affected by price increase (US\$ 262 million)

This component will finance cash transfer to approximately 257,000 households deemed eligible to receive benefits under the EBCCT. These represent the bottom 75% of the population. Beneficiaries for the EBCCT are selected among the households registered at the DAEM-IRP after applying an affluence test and other filters to exclude for instance the well-off segments of the population. Specifically, per the inter-ministerial decree (September 30, 2021 ration card) there are six affluence criteria³.

Households are ranked as affluent or non- affluent, with the former notified of non-eligibility to receive social assistance. In addition, households benefiting from the NPTP or the ESSN are ineligible for the EBCCT. Lastly public servants (civil, military, and security) are excluded given that they will benefit from the "social assistance" program under the ministry of finance introduced in 2022 budget law.

As mentioned above, the newly- established DAEM-IRP which serves both the ESSN and the EBCCT programs includes a fully automated application process. Any resident Lebanese citizen has the right to apply for the social assistance on the DAEM IRP. The application form is made only by registering with a valid identification national ID or Passport for each household member. Information entered includes

³ Project Appraisal Document (PAD) : All Household members currently residing outside Lebanon from June 1, 2020 to July 2021 except members below 23 years of age or those undergoing medical treatment, (b) Households whose total annual income is more than \$10,000 (fresh or its equivalent in Local USD at Sayrafa platform rate, (c) Households whose total Bank deposits (in Lebanon or abroad) on June 30, 2021 on the banks is above \$ 10,000 fresh or its equivalent in Local USD at sayrafa platform rate, (d) Households whose annual rent is \$3,500 or above in fresh or its equivalent in Local USD at Sayrafa platform rate, (e) Households who own 3 or more cars registered after 2018 and whose make year is 2017 or after, (f) Households who employ one or more foreign domestic worker, one foreign domestic worker is allowed in case there is a need for Households who have elderly or disabled members, (g) Households who benefits from NPTP program "Hayat".



information on household demographics, contact information, income, employment, assets, ownership etc.

The benefit level for the EBCCT beneficiaries is designed based on the household size and number of elderly members as per the ration card law 230. For each household member the benefit is a flat rate of US\$25 with a top-up of US\$ 15 for each member above 65 years of age. The total benefit is capped at US\$ 126 per household. The program is designed for a 12-month period as per the ration card law.

Component 2: building payment and monitoring system (US\$ 5 Million):

The objective of the component 2 is to support the development of a government-to-person (G2P) payment system for the EBCCT as well as the monitoring and management systems required for a transparent and effective safety net system. Specifically, the component will finance: (a) G2P payment system and further development of the SPIS, (b) Third party monitoring (TPM) and evaluation external audits, (c) project management and implementation support.

2 -Brief Summary of Previous Stakeholder Engagement Activities

In accordance with WB’s ESF framework, stakeholder consultations were conducted by the PCM CMU during the preparation phase of the project. These consultations aim to ensure inclusive engagement of all relevant stakeholders, mitigate potential risks and impacts, and lead to long term sustainability.

In line with the national restrictions and the available resources for carrying out stakeholder engagement in the context of COVID-19 and the WB’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020), the project will avoid public gatherings and minimize physical interaction between people. (Refer to [Annex 1](#)).

Separate virtual meetings were held on March 16, 2022, with local NGOs first followed by CSOs and Experts (Refer to [Annex 2](#)). The PCM CMU presented the importance of implementing the E-BCCT project given the current situation of the country. They were provided with a brief summary of the project components and objectives focusing on the necessity of adopting a robust GM. The ESF was introduced and the ESSs which apply which give a broad and systematic assessment of all environmental and social risks associated with the project to better manage the project and improve development outcomes.

The list of all consulted stakeholders (2 females and 2 males) and results of the consultations is referred in [Annex 2](#).

Overall, the stakeholders expressed a very clear understanding of the planned project components and confirmed the Project to have the potential to achieve the planned impact in its current form.

The GoL will update the SEP after the project effectiveness following additional inclusive stakeholder consultations with all stakeholders identified in this SEP, including project affected parties, other interested parties and disadvantaged / vulnerable groups or NGOs representing such vulnerable groups to take into consideration their feedback and for successful project implementation. These consultations will take place in line with the provisions of the Environmental and Social Commitment Plan (ESCP). The SEP, which is a living document, will be updated as needed throughout the project implementation.



The presentation was shared with all present and absent stakeholders.

3 -Stakeholder Identification and Analysis

This section of the SEP identifies the Project Affected Parties, the Other Interested Parties, and other disadvantaged or vulnerable group.

The project-affected parties include those likely to be benefiting and those 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 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' support through cash transfers:

Beneficiaries for the EBCCT are selected among the Households registered at DAEM IRP platform after applying the affluent test and other filters to exclude the ineligible.

Cash transfers will support the Lebanese household's ability to increase access to basic goods and services and meet basic needs in a period of high market volatility and instability. Smoothing household's consumption patterns will reduce their economic vulnerability in the short to medium term. Meeting basic needs will consequently free up households' own resources to make room for other important purchases and investments in human capital such as health care and education and cushion them from slipping into poverty in the longer term.

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 3: Other interested parties

Category	Institution	Interest
Government agencies	CMU at the Presidency of the Council of Ministers	The CMU will be responsible for the following functions: direct instructions for payment on a monthly basis, managing the fiduciary operations, managing M&E, and the ESF
	Ministry of Social Affairs (MoSA)	Will ensure the efficient and effective implementation of the central Grievance Mechanism
	Central inspection Office (CIO)	Responsible of supervision and oversight of the DAEM IRP on the Impact platform as per the data protection rules and regulations set by the IMC. CIO will also be responsible for the implementation of data protection measures on any system related operations
	Ministry of Interiors and Municipalities (MoIM)	Municipalities under the MoIM will be involved in the areas with vulnerable Households.
International organizations, donors, investors	European Union	EU through Madad ⁴ fund
	Germany	Through Madad fund
	NGOs Oxfam-GB, Mercy corps international(MCI), Hope worldwide, ,Save the Children etc	Provide humanitarian assistance to vulnerable people affected by the crises, and contribute also with local partners to the protection and empowerment of Women, men and child welfare OXFAM , charity, fighting global poverty MCI: disaster, poverty Save the children : health, education, opportunities, and protection from harm Hope international: poverty, family, elderly

⁴ The **EU Regional Trust Fund** in Response to the Syrian crisis - or the Madad Fund - was established in 2014 to support children from both Syria and local communities get better access basic services, such as education, healthcare, water and sanitation, and protection.
https://ec.europa.eu/trustfund-syria-region/index_en



<p>NGO Partners</p>	<p>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</p>	<p>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</p>
	<p>Other potential NGOs involved in social support services namely Abaad, Kafa, Amel association, Tadamon, Ajjalouna Lebanese Physically Handicapped Union (LPHU), LebRelief, Al Majmoua, Lebanon Support</p>	<p>Interaction with the public through NGOs to support on communicating the project information and application procedures and eligibility. Such NGOs which will be consulted throughout the project and implementation of this SEP include:</p> <p>ABAAD: gender equality, women’s rights, GBV</p> <p>KAFA: gender-based violence and exploitation</p> <p>Amel Association: health education empowerment psycho-social support protection</p> <p>Tadamon: development and poverty reduction, elderly, youth women, children</p> <p>Ajjalouna: women-led NGO supporting underprivileged youth, women, and elderly</p> <p>LPHU: advocacy, civil rights, disabilities, human rights</p> <p>LebRelief: responds to the most urgent needs of refugees and host communities</p> <p>Al Majmoua: provides affordable financial services to build sustainable businesses for low-income individuals (specifically women) residing in Lebanon</p> <p>Lebanon Support: aims to foster social change through innovative uses of social science, digital technologies, and publication and exchange of knowledge</p>



Press and Media Academia	All communication channels identified in section 4 of this SEP including TVs, radios, newspapers,	Present to the public the project information and announcements during the application process and the project GM
Academia and think-tanks	American University of Beirut (AUB) , Issam Fares Institute, Saint Joseph University of Beirut (USJ), Lebanese Center for Policy studies (LCPS), Kulluna Irada, Beit el Baraka, Carnegie	<p>Kulluna Irada: good governance and political reform,</p> <p>AUB-Issam Fares Institute: public policy and international Affairs, bridging gap between the academia and policy making by conducting high quality research and creating intellectual space for an interdisciplinary exchange of ideas among researchers, civil society actors, media and policy makers.</p> <p>LCPS: Enhance governance and improve regional relations, promote inclusive and effective social policies and inform the development of policies for a sustainable environment</p> <p>Beit el Baraka: health education social protection, elderly, family, food security</p> <p>Carnegie: provide in depth analysis of political, socio economic, and security.</p>
Contracted workers	Grievance Mechanism service providers, workers of Financial Service Providers (FSPs) or Money Transfer Operators (MTOs), Communications Outreach Firm, External financial Auditor and the Third-Party Monitoring Agency (TPMA)	Contracted workers will be involved in providing relevant services such as GM, financial services, third-party monitoring, communication and outreach and will need to have a clear understanding of the environmental and social impacts associated with the project and as such will be included in the stakeholder consultations as per this SEP

3.3 -Disadvantaged/Vulnerable Groups

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



- Small-sized families composed of one or 2 members, sometimes elderly persons.
- Extremely poor Lebanese households³ who may not be able to manage some necessary paperwork required for the application;
- Extreme poor Lebanese households who come from certain regions in which contrasting patterns of poverty exist, leading to the lack of appropriate communication.
- Persons who do not know how to read or write
- Female headed households, women groups
- 300,000 displaced people from the Port of Beirut explosion
- Persons with disabilities
- Persons who do not have access to the internet

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

3.4 -Summary of Project Stakeholder Needs

Table 4 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 4: Summary of Project Stakeholder Needs

Stakeholder group	Key characteristics	Preferred notification means	Language needs and literacy need	Specific needs (accessibility, large print, daytime meetings)
Affected Parties				
<u>Beneficiaries of basic income support through cash transfers</u>	Poor and recently affected by the foreign exchange (FX) subsidy removal	<p>Normal notification channels include: mass and social media, call centers, website, emails (generated by communication firm), news and press, schools, and mail address also provided by the firm.</p> <p>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 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.</p>	Official language (Arabic)	<p>As needed per household.</p> <p>Some individuals from this group:</p> <ul style="list-style-type: none"> - 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>Outreach through relevant municipalities in community discussions and focus group discussions</p>



Other Interested Parties				
<u>Government stakeholders</u>	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 inline with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Official language (Arabic)	N/A
<u>INGOs, donors, and investors</u>	EU; WFP; Germany; UNICEF, NGOs Stakeholders engage in technical and non-technical (operational management) assistance.	Written information, emails, telephone, fax. Amidst the COVID-19 coronavirus outbreak, stakeholders meet virtually inline with WHO requirements to reduce risks of transmission by limiting social interactions and large gatherings.	Language alternative (English)	N/A
<u>Partnering organizations, CBOs, CSOs, NGOs</u>	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
<u>Press and media academia</u>	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



Disadvantaged/Vulnerable Groups				
<p>Disadvantaged and vulnerable groups</p>	<p>Poor and extreme poor Lebanese households who might be eligible beneficiaries but are currently excluded from the Program, such as the elderly, persons with disabilities small-sized families, extreme poor Lebanese households from certain regions; and Female-headed households just above the extreme poverty line. They may have disadvantages in accessing information based on their geographic location, age if elderly, disability, gender, no access to internet.</p>	<p>All channels identified in the communication strategy targeting extreme poor households and the program’s beneficiaries.</p>	<p>Official language (Arabic) and infographics for those who do not know how to read or write</p>	<p>As needed per households: Some individuals from this group:</p> <ul style="list-style-type: none"> • 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>Proactive communication outreach campaigns with the support of local and relevant NGOs/CSOs to facilitate discussions, present the project description and application procedures, the GM and responsible persons</p>



Disadvantaged/Vulnerable Groups				
Vulnerable women and groups advocating for women, children, and adolescent girls	Female headed households and women groups who are potential beneficiaries of the EBCCT but who may be excluded or who may not have access to the internet or live in remote geographical areas of the country	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 such as through women rights groups and NGOs in focus group discussions in at suitable times for female headed households and provide daycare for children during the consultation sessions as needed again through the support of the NGOs



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 bestway 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 highlydepend on decisions that are in discussion as of this writing, in addition to Lebanon’s status in fighting theCOVID19 outbreak, that information will be incorporated in future versions of this document.



Table 5: Purpose and Timing of Stakeholder Engagement Program

Project Stage	Target Stakeholders	Topic(s) of engagement	Method(s) used	Frequency	Responsibilities
Launch of component 1: Provision of cash transfer	257,000 beneficiary households	Announcing the launch 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	CMU, Communication and outreach firm, MoSA, , CIO
Implementation of component 1 	257,000 beneficiary households	Provision of cash transfer	Through direct engagement	Continuous engagement	PCM, MoSA,
	257,000 beneficiary households	Communication and outreach	Communication channels such as mass media, social media, TV, radio, websites, brochures, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement (frequency of each communication activity can vary)	PCM CMU, Communication and outreach firm, MoSA,, CIO
	257,000 beneficiary households	GM and SEA/SH	Communication channels TV, radio, leaflets, flyers, websites, virtual and in-person consultations depending on COVID19 public health guidelines	Periodic engagement	PCM CMU, GM Firm, MoSA
	Vulnerable Groups including women and groups advocating for women,	GM and SEA/H and application eligibility criteria	Communication channels, mass media, social media, websites, SMS, virtual and in-person consultations depending on COVID19 public health guidelines, focus group discussions through relevant	Periodic engagement: monthly or quarterly engagement and/or as needed	PCM CMU, MoSA, GM Firm,



Project Stage	Target Stakeholders	Topic(s) of engagement	Method(s) used	Frequency	Responsibilities
	children, and adolescent girls		NGOs to arrange for meetings with identified vulnerable groups		



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;
- Application timeline;
- Information on the post-application process;
- Information on meetings and consultation sessions;
- Information on GM including SEA/SH referral pathways;
- 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 safeguards 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);
- This SEP document, 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)
- PCM website (www.pcm.gov.lb)
- DAEM website (daem.impact.gov.lb)
- Emails, fax, and telephone
- Short Message Service (SMS) in Official Language (Arabic)
- Social media platforms: WhatsApp, Facebook, Instagram, Twitter
- Traditional/Mass media platforms: TV, radio, newspapers and magazines
- Online blogs
- Print media: brochures, posters, and leaflets
- Outreach through third-party stakeholders

Other documentation will be provided to the appropriate stakeholders upon availability and as needed and all relevant documents will be translated to Arabic. 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.



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.

See Table 6 which provides a detailed outline of the proposed strategy for information disclosure.



Table 6: Proposed Strategy for Information Disclosure

Project Stage	List of information to be disclosed	Timetable location/dates	Target stakeholders	Responsibilities	Methods proposed
During preparation phase - Pre-application outreach	<p>General information about the Project,</p> <p>the application and the eligibility criteria;</p> <p>overview of the services and benefits;</p> <p>application timeline; information on meetings and consultation sessions;</p> <p>relevant environmental and social systems assessment reports;</p> <p>distribution of Project responsibilities;</p> <p>the Project’s timelines and key dates;</p> <p>M&E information; environmental and social systems assessment report,</p> <p>GM procedures.</p>	<p>March 2022</p> <p>Documents to be disclosed</p>	<p>Potential and existing beneficiaries;</p> <p>Government stakeholders;</p> <p>INGOs, donors, and investors.</p> <p>NGOs and academia</p> <p>Vulnerable Groups</p>	PCM CMU	<p>Posting of documents on the websites of PCM, MoSA; NPTP website; DAEM website; emails, fax, telephone, SMS, social media, traditional media, online blogs, print media.</p>



Project Stage	List of information to be disclosed	Timetable location/dates	Target stakeholders	Responsibilities	Methods proposed
	<p>All documents to be disclosed with executive summary in Arabic</p> <p>Where the information can be found should be clearly communicated (refer to methods proposed)</p>				
<p>Prior to implementation Eligibility Criteria, GM and E&S instruments</p>	<p>Provide information associated with the eligibility criteria, the GM, the project related documents and E&S instruments which will be disclosed such as the SIA and SEP, ESCP and LMP and SEA/SH Prevention and Response Plan, application timeline; information on meetings and consultation sessions; responsible personnel/staff; timelines to respond to comments on the instruments</p> <p>All documents to be disclosed with executive summary in Arabic</p>	<p>April 2022</p> <p>Documents to be disclosed</p>	<p>Potential and existing beneficiaries;</p> <p>Government stakeholders;</p> <p>INGOs, donors, and investors.</p> <p>NGOs and academia</p> <p>Vulnerable Groups</p>	<p>PCM CMU</p>	<p>Posting of documents on the websites of PCM, MoSA; NPTP website; DAEM website; emails, fax, telephone, SMS, social media, traditional media, online blogs, print media.</p>



Project Stage	List of information to be disclosed	Timetable location/dates	Target stakeholders	Responsibilities	Methods proposed
<p>Prior to implementation Eligibility Criteria, GM and E&S instruments</p>	<p>Provide information associated with the eligibility criteria, the GM, the project related documents and E&S instruments which will be disclosed such as the SIA and SEP, ESCP and LMP and SEA/SH Prevention and Response Plan, application timeline; information on meetings and consultation sessions; responsible personnel/staff; timelines to respond to comments on the instruments</p> <p>Present the project activities and SEP and identify those NGOs with the necessary resources to support its implementation.</p>	<p>April 2022</p> <p>Documents to be disclosed</p>	<p>Engage with identified local NGOs to support the PCM CMU in the engagement activities.</p>	<p>PCM CMU</p>	<p>Focus groups meetings / consultation workshop with NGOs</p>



Project Stage	List of information to be disclosed	Timetable location/dates	Target stakeholders	Responsibilities	Methods proposed
Prior to Implementation Eligibility Criteria and GM with referral pathways	Program’s eligibility criteria and the project Grievance Mechanism and referral pathways	April/May 2022	Women groups and organizations and other relevant interested parties in focus groups discussions	PCM CMU	Posting of documents on the websites of PCM MoSA website; NPTP website; PCM website, MEHE website; and NGOs websites; emails, fax, telephone, SMS, 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 locations and application points, GM, responsible persons to address complaints and concerns, timelines to respond to complaints, E&S instruments which will be disclosed such as SIA, LMP and SEA/SH Prevention and Response Plan	April/May 2022 Documents to be disclosed	Potential and existing beneficiaries. Vulnerable groups Other interested parties	PCM CMU	Posting of documents on the websites of PCM MoSA website; NPTP website; PCM website, MEHE website; and NGOs websites; emails, fax, telephone, SMS, social media, traditional media, online blogs, print media.



Project Stage	List of information to be disclosed	Timetable location/dates	Target stakeholders	Responsibilities	Methods proposed
<p>Implementation Phase</p> <p>During the applications of beneficiaries</p>	<p>Disclose information on the project’s environmental and social performance and the mitigation measures being implemented and major GM concerns reported and how they are being handled and the SEP implementation progress</p>	<p>Every 3 months</p> <p>Progress Reports to be disclosed</p>	<p>Existing beneficiaries.</p> <p>Vulnerable groups</p> <p>Other interested parties such as NGOs, INGOs, academia</p>	<p>PCM CMU</p>	<p>Environmental and Social Performance Report available in both English and Arabic.</p> <p>Posting of documents on the websites of PCM MoSA website; NPTP website; PCM website, MEHE website; and NGOs websites; emails, fax, telephone, SMS, social media, traditional media, online blogs, print media.</p> <p>Focus group discussions with identified vulnerable groups following COVID19 safety measures and through identified and relevant NGOs as needed to facilitate the discussions</p>



4.3 -Proposed Strategy for Consultation

Methods used for consultation and disclosure are provided in Table 6 and includes a variety of methods:

- Online methods
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topic
- Use of newspapers and mass media
- Notifications at municipalities

It is highly recommended to engage with NGOs to support the PCM CMU in the engagement activities.

A consultation workshop with NGOs is proposed to be conducted in April 2022 to present the project activities and SEP and identify those NGOs with the necessary resources to support its implementation. As COVID19 pandemic is still ongoing in Lebanon, the PCM CMU will ensure that COVID19 preventive and safe measures are implemented during the stakeholder consultations as per the national and most recent WHO guidelines and following the guidance of the World Bank Technical Note on Conducting Consultations during times of Constraint like COVID19, (Refer to [Annex1](#))

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) and through identified NGOs who can support in the engagement with the vulnerable groups as 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 GM system put in place.

4.5 -Timelines

Timelines are defined in Table 6.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project including any feedback received from them that support successful project implementation. The methods of engagement will also be revised and improved periodically and as needed to maintain their effectiveness and relevance to the project's evolving environment. The SEP will also be updated as per the Timelines stipulated in the ESCP.

Information on timelines for project phases and key decisions will be disclosed to the appropriate stakeholders as soon as possible and once available.



4.6 -Review of Comments

The CMU, in coordination with MoSA, and the CIO will identify staff within each organization to help develop a team who will be responsible for addressing any comments on any of the documents and information disclosed. Communication and feedback from stakeholders will be taken into consideration at each stage of this project and as outlined in Table 6. The stakeholders will be kept informed as the project develops, including reporting on project social risk management and implementation of the stakeholder engagement plan and grievance mechanism. This will be done through the publication of post-disclosure documents but also via direct meetings with vulnerable groups including those who do not know how to read or write with the support of NGOs.

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, in coordination with MoSA, and the CIO, 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

The CMU at the PCM will hire a social 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 CMU in coordination with the MOSA, the social specialist hired by the CMU for both the ESSN and the BCCT and the communications firm. The CMU in coordination with the social specialist who will be on board by mid-March 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.

The budget for the SEP is included in Subcomponent 2.3: Program Management and Implementation Support of the Project. An estimated budget to implement the SEP is listed below:

- Graphic design for dissemination and information materials: USD 5000
- Printing of dissemination and information materials: USD 5000
- Transportation, venues and F&B expenses: USD 5000

6 -Grievance Mechanism

The GOL discussed the importance of developing a solid GM. While the overall monitoring of the GM would remain under the responsibility of the CMU that sits at the PCM, the MOSA will be charge of implementing the central Grievance Mechanism with close follow up and monitoring by the PCM CMU social safeguards specialist.

The proposed new GM structure for the Emergency Broad Coverage Cash Transfer Project (EBCCT) entails the establishment of a GM at the MoSA that can be used by project beneficiaries, PAPs, and the broader public and all stakeholders as identified in this SEP.

As part of the communication and outreach activities, the CMU will also be responsible for ensuring that



the public is aware of the existence of the GM and other relevant details (such as the uptake locations) .

The public and the beneficiaries will be notified about the existence of the GM at different stages, and as of the Project’s earliest stages, through different means of communication including TV, radio, leaflets, flyers, websites, brochures, posters, and through communication and outreach activities and consultation processes. (See [table 5](#))

The uptake channels that will be available for beneficiaries and the public include a dedicated email address, a toll-free number, the third-party GM firm’s website, the NPTP’s website, the DAEM and ESSN websites, 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 GM firm which will be housed at the MoSA 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. The grievance mechanism will also have the option to accept anonymous grievances as requested.

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 as needed. 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 identified NGOs such as ABAAD and KAFA to manage GBV cases for referral to the appropriate service providers. The social specialist assigned to the EBCCT and ESSN project will ensure regular coordination with the identified NGOs through this SEP such as ABAAD and KAFA.

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 not exceeding 7 days and will be informed of the appeal process in the event they are not satisfied with the response.

In addition, the GM will also have an escalation mechanism in the event of complainants who are unsatisfied with the resolution of their complaints. In such a case, the complaint will be escalated to the PCM project coordinator supervised by the inter-ministry committee.

The CMU will supervise the GM regularly and ensure its efficiency, while the MoSA team will work with the social specialist and 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 GM system.

Once the uptake channels are developed for the project, this SEP will be revised to incorporate those updates which will be clearly communicated to all identified stakeholders and as per the proposed program in Table 5 of this SEP. Once the updated SEP is bank cleared it will be disclosed on the PCM’s website.



The detailed description of the GM system is provided in Appendix 1

7 -Monitoring and Reporting

7.1 -Involvement of Stakeholders in Monitoring Activities

It is recommended that NGOs are involved in the stakeholder monitoring activities (refer to Table 6). This can be discussed in the NGO's consultation session and a relevant NGO with required competency and resources can be selected for further discussions. Community members such as school head, mayors, consulted during this due diligence, could also be included in monitoring activities.

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 allstakeholder 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.



Annex1

Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings

March 20, 2020

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

This Note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly and careful regard needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

Investment projects under implementation. All projects under implementation are likely to have public consultation and stakeholder engagement activities planned and committed as part of project design. These activities may be described in different project documents, and will involve a variety of stakeholders. Commonly planned avenues of such engagement are public hearings, community meetings, focus group discussions, field surveys and individual interviews. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for task teams' consideration while advising their clients:

Task teams will need to review their project, jointly with the PMUs, and should:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.



- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.
- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines. For example, selection of resettlement options by affected people during project implementation. Reflecting the specific activity, consider viable means of achieving the necessary input from stakeholders (see further below).
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, task teams should discuss and agree with PMUs the specific channels of communication that should be used while conducting stakeholder consultation and engagement activities. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators



- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

Investment projects under preparation. Where projects are under preparation and stakeholders' engagement is about to commence or is ongoing, such as in the project E&S planning process, 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. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the PMU should:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and Skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders



- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. WebEx, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - Virtual registration of participants: Participants can register online through a dedicated platform.
 - Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.
 - Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - Discussion, feedback collection and sharing:
 - ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
 - ✓ Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
 - Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project weblinks/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.
- Engagement with direct stakeholders for household surveys: There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and Social Development or to the ESSA for the respective region, in case they need additional support to develop such tailored approaches.



- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.



Annex2

List of all stakeholders present in the previous stakeholder engagement activities

Table1: Stakeholders Consulted

Name or organization	Stakeholder category	Details of organization and website
Al Majmoua	Other interested parties	Al Majmoua provides affordable financial services to build sustainable businesses for low income individuals (particularly women) residing in Lebanon. LHDF ⁵ primary contact https://www.almajmoua.org/
LebRelief	Other interested parties representing vulnerable groups	LebRelief responds to the most urgent needs of refugees host communities LHDF ⁶ member https://leb-relief.org/
ABAAD	Other interested parties representing vulnerable groups	ABAAD aims to achieve gender-equality as an essential condition to sustainable social and economic development in the MENA region LHDF ⁷ member https://www.abaadmena.org/
Lebanon Support	Other interested parties	Lebanon support aims to foster social change through innovative uses of social science, digital technologies, and publication and exchange of knowledge LHDF ⁸ member https://socialsciences-centre.org/

The 'Lebanese Physically Handicapped Union' and 'Himaya' tried to join but unsuccessfully due to internet connection. The PCM CMU will make additional efforts to reach out to these organizations to hear their views in the next consultation session as outlined in this SEP.

Stakeholders were invited to share their thoughts, questions and concerns regarding the Project setup. The main comments provided are summarized as follows:

Al Majmoua:

Comments:

- Al Majmoua is aware that the presentation is about the E-BCCT program. However, regarding the ESSN program (since all safety net programs are associated), many citizens who applied did not

⁵ Lebanon Humanitarian and Development Forum, a well-organized network of local entities with nationwide coverage across sectors. The selected agencies all work with Lebanese communities.

⁶ Idem

⁷ Idem

⁸ Idem



get evaluated for eligibility. They did not understand what was required from them.

- In addition in the ESSN program, many citizens do not have an identity card because the process is very lengthy and complicated giving the current situation in Lebanon. They are constantly postponed and can't seem to apply properly.
- The E-BCCT project only chose 257,000 households out of the 583,000 households which applied. How do you explain this selection to the citizens?

Answers:

- Most probably their applications were not complete, they should fill in the whole application in order to get evaluated and accepted if eligible. The benefit level for the E-BCCT beneficiaries is designated on the household size and the number of elderly members as per the Ration Card Law 230. Many applications miss filling in the number of family members in the household or of elderly person for instance. We need all this specific information to accurately evaluate the respective cases.
- We are planning on helping all eligible cases to the program in issuing their identity card. We will facilitate the process by specific pathways that will be indicated to the concerned citizens.
- The selection of the 257,000 households is based on affluence testing which determines the required criteria to be eligible and benefit from the E-BCCT. For instance, if the household already benefits from another social safety net program (NPTP-ESSN) they will be rejected. If the total income of the household exceeds 10,000\$ (fresh or its equivalent at Sayrafa platform rate) they will also be declined. It is important however for us that all citizens be aware of the decisions that we are making that is why a GM is being established for them to contact us and find answers to their multiple questions.

ABAAD:

Comments:

- The project imposes the primary cash transfer recipients an adult female member of the household. Abaad thinks giving our experience on the ground that this rule might cause a lot of social tensions. In fact, men are more likely to place a greater emphasis on their role as financial providers. They need to provide for their family to perceive themselves as a good husband or partner. Men are expected to be breadwinners and make a greater contribution financially towards the family than women in a traditional role. So if the project is giving the female member of the household the cash transfer men will be destabilized, feel vulnerable and it will create social tension in the family. Therefore why impose the female member as the primary cash transfer recipient?
- Will gender equality be respected for all labors of the project? Will you differentiate between men and women like you did by designating women as first beneficiary of the E-BCCT.

Answers:

- Each beneficiary household will be asked to designate up to two members of the household as cash transfer recipients. This will include a primary recipient as well as an alternate recipient, where applicable. In households that include an adult female member the primary designated recipient must be female. We prioritize this choice because global evidence shows that assigning women as primary recipients has multiple positive externalities both for households and women. This is linked to boosting the bargaining power of women when transfers are directed to them which is



associated with better educational and health outcomes among children. Designating women as primary cash transfer recipients can also improve women's financial inclusion and economic empowerment. Studies have shown that changes in the control of income among individual household members are associated with changes in expenditure patterns. In addition, in depth and focused discussions as outlined in the SEP and within specified timelines, we will make sure that our choice is explained very clearly to the beneficiaries to minimize risks of social tensions.

- Assigning the female member as primary cash transfer recipient has nothing to do with gender equality that will be definitely applied to laborers. Lebanese Laws are adopted. Discrimination between “working men and women” with respect to type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel is prohibited. In addition, the laborers will be able to use a GM to raise complaints and concerns.
- More in-depth consultations with relevant organizations like ABAAD and KAFA will take place to discuss the above mentioned issues.

Lebanon Support

Comments:

- How will you conduct the consultations, which organizations will be included and how frequently will it happen?
- Why are you creating various programs NPTP, ESSN, E-BCCT and not a single program that helps all Lebanese citizens in those difficult times? Moreover, in those targeted programs such as ESSN or E-BCCT where the project chooses a category of people, social tensions will occur. Why not create a universal program that will help all Lebanese cope with the difficult situation of their country? Those selective programs inadvertently channel aid in ways that deepens social exclusion thereby contribute to social risks and conflicts.
- The E-BCCT is a temporarily program. How long will it last, and why not create a sustainable solution to the Lebanese crisis? The instability of the country needs permanent solutions that will reassure the citizens and create a peaceful environment.
- The majority of Lebanese citizens do not trust the government. How will you reassure the Lebanese people of the legitimacy of the E-BCCT? Are the program and the coming elections linked in any way?
- How much will the E-BCCT cost? Wouldn't implementing a universal social protection program be more efficient and sustainable? Why not carry out a nationally defined system of policies and programs that provide equitable access to all people and protect them throughout their lives against poverty and privation.

Answers

- As per the SEP which will be disclosed, during each phase of the project stakeholders will be invited to consultations to share their questions and feedbacks. These consultations will include all key sector stakeholders:
 - Direct beneficiaries from the program
 - Other parties interested in the Project which 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 to consider and address (NGOs, CSOs, Academics...)



- Disadvantages and vulnerable groups (elderly, disabled...)

Those consultations will seek stakeholder views on the project implementation as well as any suggestions. The feedback loop will be closed by reflecting their opinion in project implementation where possible. This outreach effort will take into account the perspectives of respective citizen groups involved. We are aware that it is very important to have meaningful consultations to study various aspect of the project and minimize risks and impacts.

- All the social safety net programs created will have the same database but will help each a certain category of citizens. Lebanon lacked a shock-responsive integrated social protection information system (SPIS). A fully functional social protection delivery system is our aim to be able to significantly expand social safety net coverage. The GOL already took the 1st steps (supported by the ESSNP in mid-2021) in the development of a SPIS by launching a web-based intake and registration platform on IMPACT under DAEM. It is a significant step in the direction of creating synergies across all those social safety net programs, leading to standardization in the implementation process, increasing program performance and decreasing the cost of service delivery. The NPTP, ESSN, PSCS and BCCT combined are expected to expand social safety net coverage to approximately 57 percent of Lebanese households.
- When it comes to creating a universal program, selective benefits and services are needed due to the Lebanese crisis to reserve help for people most in need. This affirmative approach will help promote the rights of disadvantaged groups, and focus more on micro-level community development. For your concerns regarding social tensions created by the exclusion of certain categories of people, first the GM will help us communicate better with all citizens. Second, the Social Impact Assessment (SIA) will help us anticipate potential risks and find mitigation measures. Both combined we will be able to promote social protection and release tensions among citizens.
- Lebanon urgently needs to adopt and implement a credible, comprehensive and equitable reform plan if it is to avoid a complete destruction of its social and economic networks and stop the irreversible loss of human capital. The E-BCCT is a temporary cash transfer program to support households cope with rising prices as subsidies are lifted. It is not the solution to the Lebanese crisis but it is necessary to support Lebanese households to face and adapt to the FX subsidy removal. However, E-BCCT contributes to strengthening social protection systems in Lebanon which builds institutional sustainability in the long term. A strong and adaptive social protection system can create efficiencies across existing and future programs, reduce cost, and enable the government to better respond to crises.
- There is no association between the E-BCCT and elections.



References

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