Guidance Note
UNDP Social and Environmental Standards (SES)

Stakeholder Engagement

UNDP Guidance Notes on the Social and Environmental Standards (SES)

This Guidance Note is part of a set of operational guidance materials related to the UNDP Social and Environmental Standards (SES). UNDP's SES seek to (i) strengthen quality of programming by ensuring a principled approach; (ii) maximize social and environmental opportunities and benefits; (iii) avoid adverse impacts to people and the environment; (iv) minimize, mitigate, and manage adverse impacts where avoidance is not possible; (v) strengthen UNDP partner capacities for managing social and environmental risks; and (vi) ensure full and effective stakeholder engagement, including through mechanisms to respond to complaints from project-affected people.

The SES guidance notes follow a similar structure to assist users in finding specific information or guidance (however the SESP Guidance Note focuses on the steps of the screening process). The set of guidance notes will develop over time to include specific guidance on each of the SES Programming Principles, Project-level Standards, and elements of the Social and Environmental Management System (see Key Elements of the SES). The SES Toolkit is an on-line resource for the guidance notes and supporting materials.

How to Use This Guidance Note

The target users for the SES guidance notes are staff, consultants, stakeholders and partners who are involved in developing, assessing and implementing projects that invoke UNDP's SES. To facilitate use of the overall package of SES guidance, users should understand that the guidance notes:

Key Elements of the SES

PART A: Programming Principles
- ❖ Leave No One Behind
- ❖ Human Rights
- ❖ Gender Equality and Women's Empowerment
- ❖ Sustainability and Resilience
- ❖ Accountability

PART B: Project-level Standards

Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management

Standard 2: Climate Change and Disaster Risks

Standard 3: Community Health, Safety and Security

Standard 4: Cultural Heritage

Standard 5: Displacement and Resettlement

Standard 6: Indigenous Peoples

Standard 7: Labour and Working Conditions

Standard 8: Pollution Prevention and Resource Efficiency

PART C: Social and Environmental Management System
- ✓ Quality Assurance and Risk Management
- ✓ Screening and Categorization
- ✓ Assessment and Management
- ✓ Stakeholder Engagement and Response Mechanism
- ✓ Access to Information
- ✓ Monitoring, Reporting and Compliance

- Are structured around the process of **screening, social and environmental assessment, and management** (including monitoring).

- Assist in determining the applicability of relevant SES requirements in the screening process for all projects.

- Provide additional guidance for projects that require assessment and development of management measures (i.e. projects with Moderate, Substantial or High Risks related to a certain Principle or Standard).

- Provide a practical resource for implementing SES requirements to address potential social and environmental impacts within the context of the project cycle. Users do not necessarily need to read them in full but rather may select information that is specific to their needs.

- Complement and elaborate on the SES, which must be read in conjunction with the guidance notes (SES language is generally not repeated in the notes).

- Will continue to be developed as lessons are derived from implementation. Feedback is always welcome and can be sent to info.ses@undp.org
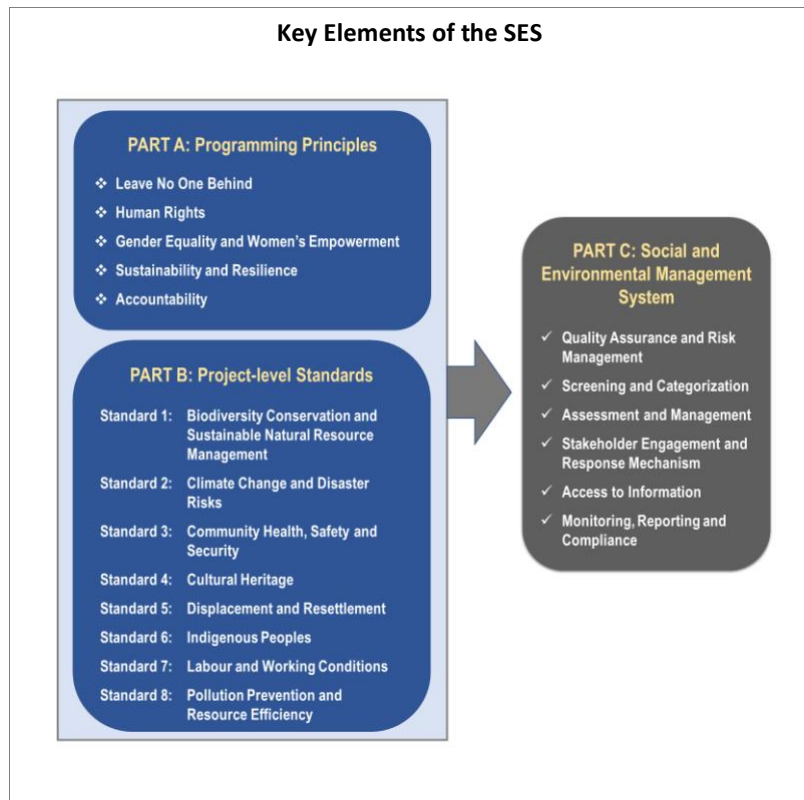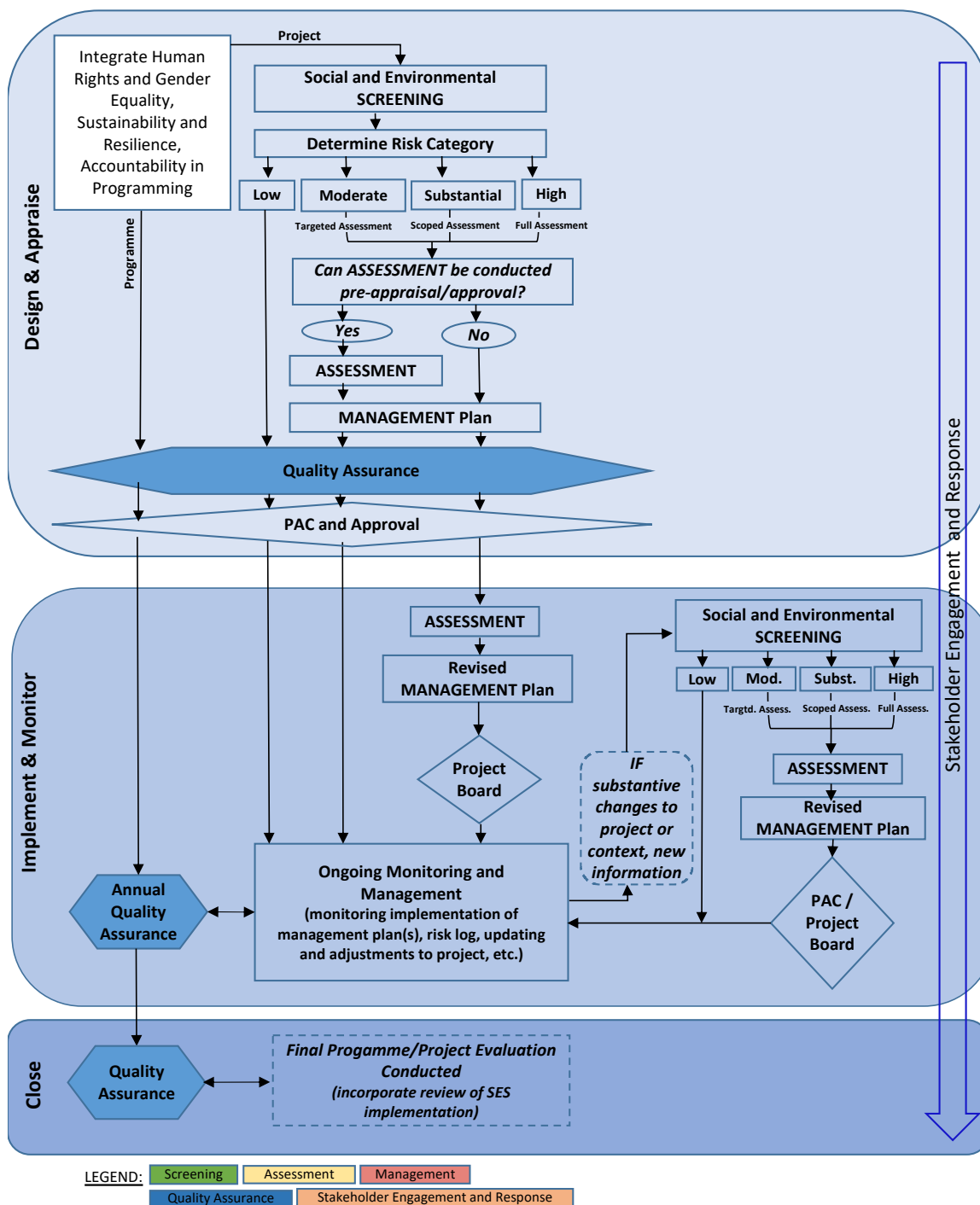
Figure 1. SES Implementation – Screening, Assessment and Management in the Programming Cycle

Design & Appraise

Integrate Human Rights and Gender Equality, Sustainability and Resilience, Accountability in Programming

Project

Social and Environmental SCREENING

Determine Risk Category

Low | Moderate | Substantial | High

Targeted Assessment | Scoped Assessment | Full Assessment

Can ASSESSMENT be conducted pre-appraisal/approval?

Yes / *No*

ASSESSMENT

MANAGEMENT Plan

Quality Assurance

Programme

PAC and Approval

Implement & Monitor

ASSESSMENT

Revised MANAGEMENT Plan

Project Board

IF substantive changes to project or context, new information

Social and Environmental SCREENING

Low | Mod. | Subst. | High

Targtd. Assess. | Scoped Assess. | Full Assess.

ASSESSMENT

Revised MANAGEMENT Plan

PAC / Project Board

Annual Quality Assurance

Ongoing Monitoring and Management
(monitoring implementation of management plan(s), risk log, updating and adjustments to project, etc.)

Close

Quality Assurance

Final Progamme/Project Evaluation Conducted
(incorporate review of SES implementation)

Stakeholder Engagement and Response

LEGEND: Screening | Assessment | Management | Quality Assurance | Stakeholder Engagement and Response

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What's New?

This update (November 2020) to the UNDP SES Guidance Note on Stakeholder Engagement includes the following top-line revisions:

- ✓ Strengthened focus on accessibility preferences and need for differentiated measures to allow effective participation of disadvantaged or vulnerable groups, including persons with disabilities (Section 3.3)

- ✓ Incorporated material regarding Stakeholder Engagement Plans from Annex 2 into body of Guidance Note (Section 3.4)

- ✓ Added focus regarding stakeholder engagement in challenging environments, including areas experiencing infectious disease outbreaks (Section 3.5)

- ✓ Clarified guidance regarding need to establish project-level grievance mechanisms for complex Moderate Risk, and all Substantial Risk and High Risk projects (Section 3.6)

- ✓ New section added on addressing risks of reprisals and retaliation against project stakeholders (Section 3.7)

- ✓ Additional points added regarding use of frameworks (e.g. ESMFs) and Stakeholder Engagement Plans (Section 4.2 and Annex 2)

- ✓ Strengthened section on access to information, incorporating some material from Annex 3 and includes focus on accessibility of information and need to disclose a public record of stakeholder consultations throughout the project cycle (Section 4. 3)

- ✓ Updated Annex 1 on Stakeholder Analysis, including revised templates and examples

- ✓ Annex 2 on Stakeholder Engagement Plans updated to reflect use of frameworks, differentiated measures for effective participation of marginalized and disadvantaged groups, including persons with disabilities, and addressing risks of reprisals and retaliation

- ✓ Annex 3 updated to include Substantial Risk projects in disclosure guidance regarding assessments and management plans

1   Introduction

This Guidance Note describes how the SES requirements regarding Stakeholder Engagement are to be operationalized during the development and implementation of UNDP projects.[1]

- **Section 2** summarizes the policy basis and key objectives and concepts relevant to addressing the SES stakeholder engagement requirements.

- **Section 3** discusses the need for stakeholder analysis and the development of Stakeholder Engagement Plans. Initial engagement and involving stakeholders early in project planning are also addressed.

- **Section 4** addresses stakeholder engagement in screening the project for potential social and environmental risks and impacts, assessing a project's potential social and environmental impacts, and in the development of management plans and in monitoring project implementation.

- **Annex 1** outlines key steps for conducting stakeholder analysis.

- **Annex 2** contains further guidance and generic outlines for developing Stakeholder Engagement Plans.

- **Annex 3** provides guidance on the disclosure of project screenings, assessments and management plans.

Figure 1 provides a general overview of SES implementation in UNDP's project cycle, noting that stakeholder engagement occurs throughout all stages.

2   Understanding the Basics

2.1   Policy Basis

UNDP is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all UNDP projects.[2] Effective stakeholder engagement is a cornerstone to achieving sustainable development. Government agencies (national and local), civil society actors and organizations, indigenous peoples, local communities, the private sector and other key stakeholders are crucial partners for advancing human rights-based development.

Effective stakeholder engagement is fundamental to attaining the Sustainable Development Goals (SDGs), and applying the principle of 'leave no one behind' in combatting inequality and ensuring equity and non-discrimination across all programming areas. For example, SDG Goal 16 – promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels – includes critical targets for achieving progress, including among others 16.7 (ensure responsive, inclusive, participatory and representative decision-making at all levels) and 16.10 (ensure public access to information and protect fundamental freedoms, in accordance with national

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[1] SES requirements for stakeholder engagement apply to both UNDP Programmes as well as Projects (similar to the SES Overarching Principles). This guidance note addresses stakeholder engagement in projects.

[2] As noted in ft. nt. 1, while stakeholder engagement requirements also apply to UNDP programmes, this guidance note addresses stakeholder engagement in projects.

legislation and international agreements).[3] Stakeholder engagement is critical to secure multi-stakeholder partnerships to advance the SDGs (see SDG 17).

UNDP's commitment to stakeholder engagement arises from internal policies, procedures and strategy documents as well as key international human rights instruments, principles and numerous decisions of international bodies, particularly as they relate to the protection of citizens' rights related to freedom of expression and participation. See, for example: Article 19 of the Universal Declaration on Human Rights (guaranteeing freedom of expression and the right to seek, receive and impart information and ideas)[4]; Article 25 of the International Convention on Civil and Political Rights (guaranteeing the right of all citizens to participate in the conduct of public affairs); Article 5(c) of the International Convention on the Elimination of All Forms of Racism (guaranteeing all the right to participate in public life without discrimination)[5]; Articles 3 and 29 of the Convention on the Rights of Persons with Disabilities (affirming rights of persons with disabilities to full and effective participation in the conduct of public affairs).[6]

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) further affirms the right of indigenous peoples to participate in decision-making in matters which would affect their rights, as well as to be consulted and to give their free, prior and informed consent to a variety of matters.[7]

UNDP also follows the UN Statement of Common Understanding on Human Rights-Based Approaches to Development Cooperation which provides for:

> "*Participation and Inclusion: Every person and all peoples are entitled to active, free and meaningful participation in, contribution to, and enjoyment of civil, economic, social, cultural and political development in which human rights and fundamental freedoms can be realized*."[8]

2.2   Objectives and Requirements

Stakeholder engagement supports the development of strong, constructive, and responsive relationships that are critical for sound project design and implementation. Effective stakeholder engagement enhances project acceptance and ownership and strengthens the social and environmental sustainability and benefits of supported interventions. It is both a goal in itself – upholding the rights of citizens and others to participate in decisions that may affect them – as well as an effective means for achieving project outcomes, including those related to democratic governance, protecting the environment, promoting respect for human rights, and preventing and resolving conflict.

Full and effective stakeholder engagement is one of the six overarching SES policy objectives (SES, para. 3) and seeks to:

- provide meaningful access to dialogue and decision-making in development processes
- strengthen development results through effective partnerships

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[3] See the Sustainable Development Goals, targets and indicators at https://sustainabledevelopment.un.org/sdgs.

[4] UN Universal Declaration of Human Rights, http://www.un.org/en/universal-declaration-human-rights/.

[5] International Convention on the Elimination of All forms of Racial Discrimination, at http://www.ohchr.org/EN/ProfessionalInterest/Pages/CERD.aspx.

[6] UN Convention on the Rights of Persons with Disabilities, at https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html.

[7] See UNDRIP Articles 10, 11(2), 18, 19, 28(1), 29(2), 30(1), 32(2)). Further, Article 42 specifically mandates the organs and specialized agencies of the United Nations system to promote respect for and full application of the rights affirmed in UNDRIP.

[8] Available at http://hrbaportal.org/the-human-rights-based-approach-to-development-cooperation-towards-a-common-understanding-among-un-agencies.

- identify stakeholder priorities to better tailor project activities, opportunities and benefits
- seek to ensure no one is left behind and disadvantaged and vulnerable project stakeholders have a voice in project development and implementation
- identify potential constraints and conflicts that could affect project effectiveness
- ensuring transparency, accountability and integrity
- learn from and incorporate local knowledge to improve project design and avoid and mitigate project-related risks and impacts
- provide a feedback and monitoring mechanism to ensure the project is achieving its intended results, and identifies potential unintended consequences, and

Box 1 summarizes the SES requirements regarding stakeholder engagement that support these key objectives.

Box 1. Key SES stakeholder engagement requirements (refer to full text in SES, Part C. Social and Environmental Management System, paras. 18-28)

- *Ensure meaningful, effective, informed participation of stakeholders in the formulation and implementation of UNDP programmes and projects, providing stakeholders opportunities to express their views at all points in the project decision-making process on matters that affect them (SES, Part C, paras. 18, 20)*

- *Conduct stakeholder analysis and engagement in a gender-responsive, culturally sensitive, non-discriminatory and inclusive manner, identifying potentially affected vulnerable and marginalized groups and providing them opportunities to participate (SES, Part C, para. 18)*

- *Develop appropriately-scaled Stakeholder Engagement Plans, with level and frequency of engagement reflecting the nature of the activity, magnitude of potential risks and adverse impacts, and concerns raised by affected communities (SES, Part C, para. 21).*

- *Meaningful, effective and informed consultation processes need to be free of charge and meet specified criteria, including free of intimidation and external manipulation; initiated early and iterative; inclusive; gender and age responsive; culturally appropriate and tailored to language preferences; and based on timely disclosure of relevant, accessible information regarding the project and its social and environmental risks and impacts (SES, Part C, para. 20)*

- *Include differentiated measures to allow effective participation of disadvantaged or vulnerable groups, including persons with disabilities (SES, Part C, para. 20)*

- *Undertake measures to ensure effective stakeholder engagement occurs where conditions for inclusive participation are unfavourable (SES, Part C, para. 18)*

- *Document consultations and report them in accessible form to participants and the public (SES, Part C, paras. 20, 28)*

- *Ensure early and iterative meaningful stakeholder engagement throughout the assessment and management of potential social and environmental risks and impacts (SES, Part C, para. 16)*

- *Ensure that stakeholders who may be adversely affected by the project can communicate concerns and grievances through various entry points, including when necessary an effective project-level grievance mechanism, and also UNDP's Stakeholder Response Mechanism and Social and Environmental Compliance Unit (SES, Part C, paras. 23-26, 37)*

- *For projects that affect rights, lands, territories, resources, and traditional livelihoods of indigenous peoples, ensure meaningful consultations and free, prior informed consent (FPIC) (SES, Part C, para. 22; SES, Standard 6, para. 10)*

- *For projects that may involve physical or economic displacement, ensure activities are planned and implemented collaboratively with meaningful and informed participation of those affected (SES, Standard 5)*

- *Provide ongoing reporting to affected communities and individuals for projects with significant adverse social and environmental impacts (SES, Part C, para. 34)*

- *Seek to identify, reduce and address the risk of retaliation and reprisals against people who may seek information on and participation in project activities, express concerns and/or access project-level grievance redress processes/mechanisms or UNDP's Stakeholder Response Mechanism or Social and Environmental Compliance Unit (SES, Part C, para. 27)*

Note: various SES Project-level Standards include other specific stakeholder engagement requirements. See relevant Standards and Guidance Notes.

2.3   Key Concepts of Stakeholder Engagement

A number of key concepts and terms need to be understood regarding the SES stakeholder engagement requirements. These are noted below.

Stakeholders: Stakeholders are persons, groups, or institutions with an *interest* in the project or the ability to *influence* the project outcomes, either positively or negatively. Stakeholders may be directly or indirectly

affected by the project. The range of potential stakeholders is diverse and may include target beneficiary groups, locally affected communities or individuals, national and local government authorities, civil society actors, including non-governmental organizations (NGOs) (both domestic and at times international), indigenous peoples, politicians, religious leaders, the academic community, private sector entities, workers organizations, UN agencies and donors, and other special interest groups. Importantly, stakeholders may include groups opposed to proposed interventions. The "stake" that each of these different groups has in the project will vary.

Stakeholder analysis: Stakeholder analysis is the process of identifying a project's key stakeholders and assessing their interests in the project and the ways in which these stakeholders may influence the project's outcomes. An understanding of power relations and potential alliances and conflicts among stakeholders is necessary. Stakeholder analysis provides the foundation for planning stakeholder engagement throughout the project cycle. Section 3 and Annex 1 provide further information on undertaking a stakeholder analysis.

Stakeholder engagement: Stakeholder engagement is an overarching term that encompasses a range of activities and interactions with stakeholders throughout the project cycle. The SES defines stakeholder engagement as an ongoing process that may involve, to varying degrees, the following elements:[9]

- stakeholder analysis and planning
- disclosure and dissemination of information
- consultation and meaningful participation
- dispute resolution and grievance redress
- stakeholder involvement in monitoring and evaluation
- ongoing reporting to affected communities and other stakeholders.

The intensity and scale of stakeholder engagement will vary with the type of project, its complexity, and its potential risks and impacts. It starts early in project planning and spans the entire life of the project. Stakeholder engagement involves more than just occasional consultations; it seeks to involve beneficiaries and interested parties in decision-making processes.

Information Disclosure: Information disclosure here refers to the provision of timely, accessible information regarding the project and its potential social and environmental impacts to stakeholders in order to facilitate their meaningful, effective and informed participation in project design and implementation. The SES contain requirements for the disclosure of records of consultations, Stakeholder Engagement Plans, screening reports; draft and final social and environmental assessments and management plans; and any required social and environmental monitoring reports (Part C, para. 28). See the Supplemental Guidance on Disclosure of Project-related Social and Environmental Screenings, Assessments, and Management Plans (at Annex 3 and in the SES Toolkit) for further guidance.

Meaningful consultations with indigenous peoples and free, prior and informed consent (FPIC): At the earliest stage of project conceptualization and design, and iteratively throughout implementation and closure, mechanisms need to be identified and implemented to guarantee the meaningful, effective and informed participation of indigenous peoples[10] on all matters that may affect them. Culturally appropriate consultation will be carried out with the objective of achieving agreement, and FPIC will be ensured on any matters that may affect the indigenous peoples' rights and interests, lands, territories, resources,
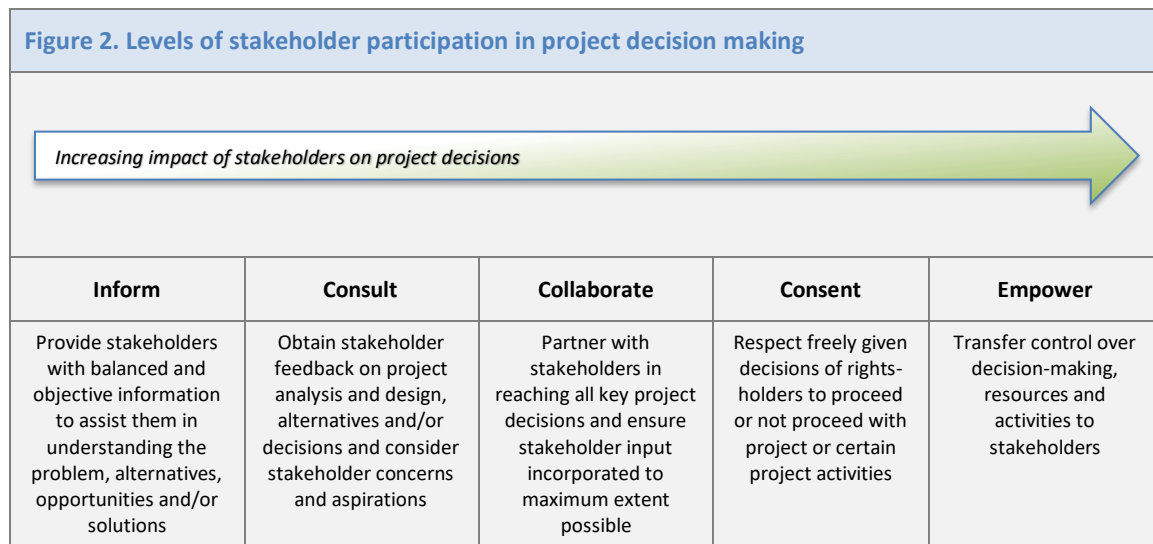
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[9] UNDP, Social and Environmental Standards (SES), Part C, para. 18.

[10] The term "indigenous peoples" is used in a broad sense. There is no universally accepted definition of indigenous peoples. SES 6 Indigenous Peoples establishes criteria for the identification of indigenous peoples, no matter the terms that may be applied in a certain country, such as national or ethnic minorities, or Native Americans, or Scheduled Classes, or Forest Peoples, aborigines, tribal, hill people, pastoralists, etc.

livelihoods and cultural heritage. For issues regarding indigenous peoples and FPIC, please consult the SES Standard 6 on Indigenous Peoples and its companion Guidance Note in the SES Toolkit.

Types and levels of stakeholder participation: The nature, scope and frequency of stakeholder engagement needs to be proportionate to the nature and scale of the project, its potential risks and impacts, and the level of stakeholder concern. The extent to which the project may impact various stakeholder rights and interests and the power and influence of certain stakeholders will affect needed engagement strategies and approaches. Stakeholder analysis (see Section 3 and Annex 1), together with project screening and assessment of social and environmental risks, assists in developing appropriate engagement strategies for different stakeholder groups, which will then be articulated in the project's Stakeholder Engagement Plan. **Figure 2** provides a simplified overview of degrees of stakeholder participation in project decision making.

Figure 2. Levels of stakeholder participation in project decision making				
Increasing impact of stakeholders on project decisions				
Inform	**Consult**	**Collaborate**	**Consent**	**Empower**
Provide stakeholders with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	Obtain stakeholder feedback on project analysis and design, alternatives and/or decisions and consider stakeholder concerns and aspirations	Partner with stakeholders in reaching all key project decisions and ensure stakeholder input incorporated to maximum extent possible	Respect freely given decisions of rights-holders to proceed or not proceed with project or certain project activities	Transfer control over decision-making, resources and activities to stakeholders

Source: International Association for Public Participation, Public Participation Spectrum; UN-REDD Guidelines on Free, Prior and Informed Consent, Types of Participation (Annex II)

3 Stakeholder Analysis and Engagement Plans

3.1 The Earlier the Better

UNDP is committed to ensuring meaningful, effective and informed participation of stakeholders throughout the programming cycle. Crucially, this begins early in planning, including identification of priority issues and design.

Stakeholder involvement in planning builds local ownership, strengthens project integrity and design, and helps to create foundational relationships that may contribute to constructive problem solving if difficulties or challenging issues arise. Early and iterative stakeholder engagement helps to create good faith and mutual trust and contribute to sustainable development outcomes that extend beyond the project.

> **Box 2. Inclusive Planning**
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> "There is a tendency for core planning teams not to involve certain stakeholders in planning. This typically occurs with complex programmes and projects and work that involves developing policy. Marginalized groups, poor rural community members, minorities and others are often left out because planners assume that these groups are not well informed or educated enough to contribute to the planning process. This assumption often turns out to be very costly. A good planner should always ask: "Whose voice is normally not heard on this issue?" Planners are often pleasantly surprised at the insights that previously unheard stakeholders have to offer." UNDP Handbook on Planning, Monitoring and Evaluation (2009), p. 25.

Effective project planning is done with the participation of key stakeholders.[11] Early and iterative stakeholder engagement can help identify:

- key issues and problem areas that need to be addressed
- risks and constraints that may affect proposed activities
- the degree of local support, concern, and/or opposition to potential interventions
- opportunities for relationship-building and partnerships
- discriminated and marginalized groups that may normally be left out of planning processes (see Box 2).

3.2 Stakeholder Analysis and Initial Engagement

Meaningful, effective and informed participation builds on a strong stakeholder analysis and engagement plan.

An **initial stakeholder analysis** needs to be undertaken in order to identify key stakeholder groups and individuals to be involved in the project planning process (see Annex 1 for additional guidance and tools for stakeholder analysis). The initial stakeholder analysis and engagement processes are key elements of quality programming and should inform project design.

In early planning stages, the full scope of potential project activities and locations may not yet be known, and, consequently, the full range of potential stakeholders may not be apparent. This will also be the case for projects with sub-components that will only be fully defined during implementation. Initial analysis would thus focus on identifying and consulting with representatives of likely stakeholder groups, such as regional or national associations, unions, indigenous peoples networks, local and national NGOs, etc.

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[11] Additional resources on stakeholder engagement include Kvam, Reidar, Meaningful Stakeholder Engagement: A joint publication of the Multilateral Financial Institutions Group on Environmental and Social Standards (2019); and IFC, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007).

A key objective at this stage is to begin to identify stakeholders who may have a strong interest in or ability to influence what is being planned, including potential groups who may benefit from the project, those who may also be adversely impacted, and groups potentially opposed to the planned interventions.

Initial engagement would focus on sharing the early project concept, potential options for achieving objectives, receiving feedback, and identifying other stakeholders that should be included going forward.

Early stakeholder involvement may build on previous stakeholder engagement processes (e.g. similar projects, country programme development, etc.). However, each project is likely to generate its own specific configuration of stakeholders. Generally, the analysis will need to identify core decision makers, target groups and beneficiaries, other project-affected groups, and those who may have an interest in the project or who may influence it (see Annex 1 for a general list of stakeholder categories and more detail on undertaking stakeholder analysis).

It is important to be transparent about uncertainties and knowledge gaps during early project stakeholder engagement. Working with a broad range of stakeholders will likely help to define project parameters and fill key knowledge gaps, and, if necessary, generate alternative ideas regarding project design and potential risks and mitigation measures, monitoring, and grievance mechanisms.[12]

Identification of stakeholders and early consultations during planning can lay the groundwork for partnerships with key stakeholder groups as well as help identify potential stakeholder representatives for the Local Project Appraisal Committee, Project Board and/or steering committees.

An **updated stakeholder analysis** will be needed as the project is further defined and additional interested and potentially affected stakeholder groups are identifiable. The stakeholder analysis should be a transparent, participatory process which provides the basis for the Stakeholder Engagement Plan.

3.3   Meaningful, Effective and Informed Consultation

As a starting point for any Stakeholder Engagement Plan, it is important to consider the key factors in ensuring meaningful, effective and informed consultation processes, as articulated in the SES. These criteria and considerations for Stakeholder Engagement Plans are elaborated in Table 1 and should be carefully reviewed.

Table 1. Meaningful, effective and informed consultation processes (SES, Part C, para. 20)	
Characteristic	*Considerations for Stakeholder Engagement Plan*
Free of external manipulation, interference, coercion, and intimidation	✓ No acts of intimidation or violence or provision of bribes, gifts, and unregulated and questionable patronage ✓ Timelines for stakeholder engagement need to be realistic and respectful of stakeholder decision-making processes and preferences (e.g. respecting seasonality (not during harvest periods), festivals, etc.) ✓ Carefully consider security arrangements to ensure safety but also to avoid perceptions of intimidation. Where possible, security arrangements should be discussed with all parties
Gender and age-inclusive and responsive	✓ Ensure stakeholder analysis accounts for differentiated roles and interests of men and women, and that women stakeholders are appropriately identified

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[12] IFC, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, (2007), pp. 5-7.

	✓ Include culturally appropriate mechanisms/processes to facilitate the increased participation of women, youth and the elderly (see Table 2), and ensure feedback is reflected in project design
Culturally appropriate and tailored to the language preferences and decision-making processes of each identified stakeholder group, including disadvantaged or marginalized groups	✓ Cultural understanding and awareness is central to meaningful stakeholder engagement. Design consultations/workshops to specificities of each stakeholder group, including respect for local decision-making processes and preferences (including appropriate time frames) ✓ Ensure materials and outreach methods are understandable and accessible to the range of stakeholders involved, including in local languages where necessary. Tailor materials for different stakeholders to ensure equity in information access ✓ Ensure consultations are conducted free-of-charge ✓ Apply principles of accessibility and make reasonable accommodation for persons with disabilities ✓ Consider diverse forms of communication: fact sheets, flyers, community postings, press releases, newsletters, hotlines, graphics, oral representation, posters, community bulletin board postings, local press announcements, public hearings, community meetings, informal meetings, videos, electronic media (websites, SMS messages), community radio, local plays and dramas, use of liaisons (community elders, religious leaders, NGO supporters)
Based on prior and timely disclosure of accessible, understandable, relevant and adequate information, including draft documents and plans	✓ Ensure information on project's purpose, nature, scale, duration, and potential risks and impacts is available in timely, accessible manner ✓ Ensure that draft social and environmental assessments and management plans are disclosed and stakeholder feedback is considered ✓ Disclose final social and environmental assessments, management plans, and screening reports (appended to Project Document or disclosed during implementation) ✓ Provide summaries of technical information in accessible and understandable manner
Initiated early in the project design process, continued iteratively throughout the project life cycle, and adjusted as risks and impacts arise	✓ Engage stakeholders early in project planning process ✓ Identify in Stakeholder Engagement Plan key junctures where stakeholder engagement is required before further project activities can advance ✓ Update stakeholders about upcoming activities and issues that may require their input ✓ Provide adequate lead time to accommodate stakeholder decision-making processes
Addresses social and environmental risks and adverse impacts, and the proposed measures and actions to address these	✓ Involve stakeholders in screening of project for social and environmental risks/impacts (SESP) ✓ Consult with stakeholders on assessment of social and environmental risks and development of mitigation and management measures. Ensure those who may experience potential adverse impacts are fully consulted ✓ Consider participatory assessment techniques

Seeks to empower stakeholders, particularly marginalized groups, and enable the incorporation of all relevant views of affected people and other stakeholders into decision-making processes, such as project goals and design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues	✓ Provide iterative opportunities to stakeholders to express concerns, ideas and knowledge and reflect stakeholder input in project goals, objectives and design ✓ Seek to transfer as much decision-making as possible to stakeholder groups ✓ Provide for stakeholder representation at different levels (national, regional, local) on project boards, monitoring committees and other key project structures ✓ Allocate budget for capacity building where needed (and available), as well as payment for accessibility and reasonable accommodation, and expenses incurred by stakeholders, especially rights holders, to secure technical advisors and/or legal counsel to accompany them to consultations and if applicable, negotiations
Documented and reported in accessible form to participants, in particular the measures taken to avoid or minimize risks to and adverse impacts on the project stakeholders	✓ Summarize each consultation with project stakeholders, circulate to participants for feedback, and publicly disclose (withholding identifying information where confidentiality is necessary) ✓ Ensure that stakeholders are regularly informed of relevant information and new developments, including setbacks and delays, throughout the life of the project. ✓ Include reporting intervals in stakeholder engagement/communications plan ✓ Include feedback mechanism for stakeholder input on project progress, and how feedback is addressed ✓ Disclose monitoring reports in a culturally appropriate format
Consistent with the States' duties and obligations under international law	✓ Ensure Stakeholder Engagement Plan consistent with domestic laws and regulations regarding public engagement (e.g. public hearings and access to environmental and social assessments and comment periods) ✓ Support international obligations of governments to ensure public participation and, where relevant, consent processes, transparency, redress for grievances, and accountability

UNDP's SES are aligned with the UN Human Rights-Based Approach to development programming and the commitment to uphold principles of equality and non-discrimination, noting that prohibited grounds of discrimination include race, ethnicity, sex, age, language, disability, sexual orientation, gender identity, religion, political or other opinion, national or social or geographical origin, property, birth or other status including as an indigenous person or as a member of a minority.[13] Stakeholder engagement processes need to respect these commitments and ensure that engagement processes are gender responsive (see **Table 2** and **Annex 1**).

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[13] See UNDP SES, para. 14.

Table 2. Tips for Conducting Gender Responsive Stakeholder Consultations[14]	
✓ Project team members should be aware that relations between men and women will influence all stages of a project. Male and female stakeholders may have **different interests** in and abilities to influence the outcome of a project. The project team should be aware of the cultural context and the different barriers (geographical, physical, attitudinal, informational and communicational) that may undermine equal gender participation. For instance, women who have low literacy levels may lack access to information. To address this issue, project information could be disseminated through various media, including notices, leaflets, announcements in community forums, market days and picture-based texts (to serve those who cannot read)	**Gender and age inclusive consultation methods** • Women/elderly/youth-only interviews • Gender or age specific focus groups and group consultations • Separate meetings with women's cooperatives or youth associations • Reserved seating in steering committees, decision-making & monitoring bodies for females, youth & elderly • Choosing consultation times & places that will increase gender and age inclusiveness • Providing child care during consultations • Tailored capacity building sessions
✓ **Good facilitation** is required so that everyone has adequate explanation and information needed to make informed decisions. Framing questions, and listening to the responses in a gender-responsive way will reveal points where there are significant differences between men and women in terms of existing economic and social conditions, opportunities, priorities for action, planning approaches, implementation abilities, training needs and ideal outcomes.	
✓ To facilitate women's participation, planned activities need to be mindful of women's **daily routines** and where their activities take place. A critical issue is the lack of child care, either so that women can attend the meetings and their children are cared for or child care facilities should be available at the meetings. The project should budget for childcare for all meetings and involvement of women in project activities. In many countries of the world, meetings should not be planned for evenings, as women can feel insecure in the dark. Timing should be adapted to working schedules of men and women.	
✓ Some **meeting locations** may undermine women's participation because they may not be culturally appropriate. Women may not be allowed to stay in public places or they may feel embarrassed or even threatened in some unfamiliar environments. Gender training or consultations should take place within the community to avoid men feeling threatened and to reduce the risk of male violence against women. It is ideal to identify leaders in the community and to raise their awareness of gender and how including it can benefit the whole community so that they can act as local ambassadors	

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[14] Section from Guide to Gender Mainstreaming in UNDP Supported GEF Financed Projects, v.1, 30 September 2016, pp. 8-9.

> **Box 3. Accommodations for marginalized and vulnerable groups and persons with disabilities**
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> ✓ Provide information in accessible formats
>
> ✓ Choose convenient locations for consultations
>
> ✓ Ensure venues are accessible
>
> ✓ Provide support for meals, transportation, accommodations. In some circumstances, stipends for loss earnings may be necessary (e.g. due to long travel times, meetings)
>
> ✓ Change time of meetings to accommodate needs to stakeholders
>
> ✓ Provide facilitation and explain complex issues and terminology
>
> ✓ Provide support workers for assisting participants with disabilities
>
> ✓ Provide simultaneous interpretation (language, signing)
>
> ✓ Protect stakeholders from adverse consequences of participating (including private meetings if necessary)

It may be necessary at times to undertake **differentiated approaches** to engaging with certain groups and communities to ensure inclusion of marginalized and disadvantaged groups as well as to protect their safety and security if they are subject to forms of discrimination and harassment in the project areas (e.g. lesbian, gay, bisexual, transgender, queer and intersex, or LGBTQI, groups and individuals). For example, private meetings that ensure a degree of anonymity may be needed.

In addition, the SES require special measures to ensure appropriate accommodation and facilitation for effective participation of project-affected persons with disabilities (see **Box 3**).[15]

Groups and individuals subject to potential exclusion due to health status (e.g. people living with HIV) should be identified among potential stakeholder groups.

If the project may involve indigenous peoples stakeholders, additional measures will be required to ensure their full and effective participation. As noted above (Section 2.3), if the project may affect indigenous peoples rights and interests, lands, resources, and territories, FPIC processes will need to be initiated early and respected throughout the project. SES Guidance Note 6 on Indigenous Peoples provides important background on consultations and FPIC processes with indigenous peoples (see SES Toolkit).

3.4 Stakeholder Engagement Plans

The SES stipulate that "stakeholder engagement plans will be developed for all programmes and projects, scaled to reflect the nature of the activity and its potential impacts (e.g. from relatively simple measures for programmes/projects with few if any social and environmental risks to comprehensive plans for High Risk activities with potentially significant adverse risks and impacts" (SES, Part C, para. 21).

UNDP's Project Document Template requires every project to identify key stakeholders and an engagement strategy (Section III, Results and Partnerships, see **Box 4**). This section of the ProDoc should summarize and link to the project's Stakeholder Engagement Plan (which would include more detail).

The **Stakeholder Engagement Plan** informs the Project Document and provides a roadmap for stakeholders and project implementers as to when, how and with whom consultations and exchanges should be undertaken throughout the life of the project (see **Table 3**).

Development of the Stakeholder Engagement Plan is based on the project's stakeholder analysis (see Section 3.2 and **Annex 1**). As noted in Section 3.2, all potential project stakeholders may not be identifiable early in project development. For many UNDP projects, specific components and locations will only be fully defined during project implementation and the specific configuration of project-affected stakeholders will

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[15] Article 2 of the Convention on the Rights of Persons with Disabilities calls for reasonable accommodations that are defined as "[n]ecessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms."

not be known before project appraisal. In such cases an **initial Stakeholder Engagement Plan/framework** (see Annex 2) will be needed. As noted in Section 3.2, the initial stakeholder analysis and engagement planning would first focus on identifying and consulting with representatives of likely stakeholder groups, such as regional or national associations, unions, indigenous peoples networks, local and national NGOs, etc.

As the project is further defined, an **updated Stakeholder Engagement Plan** would be needed that provides greater specificity regarding stakeholder groups and the methods and timing of engagement processes (again, see **Table 3**).

Appropriately-scaled plans. No one type or format of a Stakeholder Engagement Plan will accommodate all projects. Its content will depend on various factors, including the nature, scale, location, and duration of project; the diverse interests of stakeholders; the scale of the project's potential positive and adverse impacts on people and the environment; and the likelihood of grievances.

For a relatively small project with few if any potential adverse social and environmental impacts or initial stakeholder concerns (e.g. a Low Risk project, or a straightforward Moderate Risk project), a **"simplified"** Stakeholder Engagement Plan may be utilized, focusing primarily on initial consultations, information disclosure and periodic reporting.

A project with greater complexity and potentially significant adverse social and environmental impacts (e.g. complex Moderate Risk projects, Substantial/High Risk projects) will require a more strategic plan (simplified plans would not be appropriate for Substantial and High Risk projects).

> **Box 4. Stakeholder Engagement in ProDoc**
>
> UNDP's Project Document template includes a mandatory section on stakeholder engagement (Sec. III):
>
> *Stakeholder Engagement*
>
> Identify key stakeholders and outline a strategy to ensure stakeholders are engaged throughout, including:
>
> - *Target Groups: Identify the targeted groups that are the intended beneficiaries of the project. What strategy will the project take to identify and engage targeted groups?*
> - *Other Potentially Affected Groups: Identify potentially affected people and a strategy for engagement and ensuring they have access to and are aware of mechanisms to submit concerns about the social and environmental impacts of a project (e.g. UNDP's Social and Environmental Compliance Review and Stakeholder Response Mechanism).*

A **"comprehensive"** plan would outline mechanisms that buttress not just disclosure and good communications, but iterative consultations and possibly consent processes over the course of the social and environmental assessment process, development of mitigation and management plans, monitoring project implementation, and evaluation.

Annex 2 provides additional guidance on how to develop a Stakeholder Engagement Plan (both simplified and comprehensive and includes information on what should be addressed in an initial stakeholder engagement framework).

Table 3. Key questions for developing a Stakeholder Engagement Plan[16]	
Who	✓ Which stakeholder groups and individuals are to be engaged based on the stakeholder analysis? ✓ Have potentially marginalized groups and individuals been identified among stakeholders?
Why	✓ Why is each stakeholder group participating (e.g. key stakeholder objectives and interests)?
What	✓ What is the breadth and depth of stakeholder engagement at each stage of the project cycle?

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[16] As modified, see Asian Development Bank (ADB), Strengthening Participation, p. 43.

	✓ What decisions need to be made through stakeholder engagement?
How	✓ How will stakeholders be engaged (strategy and methods, including communications)? ✓ Are special measures required to ensure inclusive participation of marginalized or disadvantaged groups?
When	✓ What is the timeline for engagement activities, and how will they be sequenced, including information disclosure?
Respon-sibilities	✓ How have roles and responsibilities for conducting stakeholder engagement been distributed among project partners (e.g. resident mission, executing agency, consultants, NGOs)? ✓ What role will stakeholder representatives play? ✓ Are stakeholder engagement facilitators required?
Resources	✓ What will the Stakeholder Engagement Plan cost and under what budget?

Prior to project appraisal, a **validation workshop** should be held with stakeholders that in addition to confirming the project's planned activities also includes review and agreement on the Stakeholder Engagement Plan. With the start of project implementation, an **inception workshop** should be held to assist project partners to understand the approved project design, understand their role and responsibilities in the project including stakeholder engagement during project implementation and monitoring, including communications, reporting, and conflict resolution and grievance redress.

Note on budget: Stakeholder Engagement Plans need to include adequate financial resources to undertake stakeholder engagement in throughout the different phases of the project cycle. This is often overlooked, and for large-scale projects with significant risks and impacts (e.g. Substantial and High Risk projects), the costs may be substantial. Realistic planning regarding capacity needs and costs is required.

3.5 Stakeholder Engagement in Challenging Environments

UNDP projects may at times be undertaken in especially challenging environments, such as areas experiencing armed conflict or where human rights violations are rampant. Government stakeholders may object to engaging with certain other stakeholder groups, or civil society stakeholders may be fearful of expressing opposing or critical perspectives. Natural hazards may impede access to project areas. Or, infectious disease outbreaks could pose health risks to project stakeholders.

The project team needs to ask whether planned meetings and consultations could put stakeholders at risk, and if so, undertake measures to avoid and minimize them.

Stakeholder engagement specialists with up-to-date familiarity of local contexts will most likely be required to devise and help manage engagement processes in such contexts. Decentralized, targeted meetings with specific stakeholder groups may be necessary. Where direct consultation with certain stakeholder groups is politically impossible, other avenues need to be explored, such as utilizing third-parties as go-betweens. Third-party monitors will likely be required to closely monitor risks to project stakeholders.

Projects planned for areas experiencing infectious disease outbreaks (e.g. the COVID-19 pandemic) need to be carefully reviewed to identify and avoid/minimize risks:

- Would planned meetings and consultations risk spread of the disease?
- Do local/national restrictions on group meetings limit or rule out certain programming activities?
- Do government regulations ensure that a "do no harm" approach is respected?
- Would limits on stakeholder engagement exacerbate exclusion of marginalized and disadvantaged groups and individuals?

- Do disease-related restrictions limit ability to share information with stakeholders?
- Is there a risk of disinformation that programming activities may lead to spread of the disease?

The context of each project is unique and potential health risks related to stakeholder engagement need to be carefully reviewed. **Table 4** presents some general considerations to help avoid and minimize risk exposure.

Table 4. Stakeholder engagement in areas experiencing infectious disease outbreaks	
Risk analysis: • Review spread of disease in programming areas, capacity of duty bearers, and awareness of stakeholders • Review national and local government regulations currently in force (to be monitored regularly for updates) and ensure a do no harm" approach is respected • Assess level of proposed direct in-person engagement with stakeholders and level of disease transmission risk • Identify programming components for which direct in-person engagement is critical • Assess level of stakeholder access to information and communications technology that could be utilized • Ensure any alternative stakeholder engagement approaches are in accordance with local applicable laws and policies	*Potential adjustments and risk mitigation:* • Consider postponement of relevant programming components or activities • Avoid public or group gatherings • Utilize social media and on-line channels where available for two-way communication (on-line platforms for virtual workshops, chatgroups, online meetings, SMS, WhatsApp, Facebook, Twitter groups, email) • Structure on-line consultations with prior electronic sharing of documents, guiding questions and facilitators • Establish or identify community groups that can organize local consultations and refer back to the activity manager (by phone, other communications), supporting the capacity of those groups/organizers as needed • Diversify means of informing stakeholders (TV, newspaper, radio, dedicated phone-lines, mail, public postings, message boards) • Where marginalized and disadvantaged groups do not have ready access to forms of communication and media, develop tailored approaches with specialists to minimize exclusion risks • Ensure all team members understand good hygiene and precautionary social behavior and articulate this in all interactions with stakeholders

3.6 Ensuring Stakeholders Have Access to a Grievance Mechanism

UNDP's SES recognize that even with strong planning and stakeholder engagement, unanticipated issues can still arise and project stakeholders need to be able to communicate any concerns or complaints to both project implementers and UNDP.

The SES require that appropriately-scaled entry points for receiving and addressing stakeholder complaints be available. For projects that present few if any adverse social and environmental risks and impacts (e.g. categorized as Low Risk by UNDP's Social and Environmental Screening Procedure), stakeholder concerns, for example, could be effectively addressed through relatively simple procedures established by the project implementer (e.g. handled directly by a communications officer or community liaison). Information on how to contact such officers would need to be shared through the stakeholder engagement process.

As described in the SESP Guidance Note and the Guidance Note on Social and Environmental Assessment and Management, there are two general types of Moderate Risk projects: (a) those with relatively straightforward, readily identifiable potential social and environmental risks and impacts (no stand-alone assessment); and (b) more complex projects where the full extent of potential risks and impacts requires additional targeted assessments. Project-level GRMs are necessary for the latter type of Moderate Risk projects.

Where there is potential for adverse social and environmental impacts – that is, complex Moderate Risk projects and those categorized as Substantial or High Risk – UNDP will require and support the use and/or establishment of a more formalized project-level grievance redress mechanism (GRM) as part of the project's social and environmental risk management measures. While UNDP's Accountability Mechanism (see below) remains available to stakeholders in every UNDP-supported project, project-level GRMs can be better suited to respond to project-related grievances because they are tailored to the project context, staffed by individuals with good understanding of risks and issues related to the project, and able to engage more directly and rapidly to address concerns raised by project stakeholders.

For the projects required to have a GRM (or those choosing to have one), the decision on whether to create a new project-level GRM will depend on a number of factors, including what mechanisms the implementing partner has in place to address potential project-related grievances, the potential to use existing national grievance mechanisms (e.g. a national human rights ombudsman) for project-specific concerns, and the quality and effectiveness of those existing mechanisms.

UNDP's Supplemental Guidance on Grievance Redress Mechanisms includes more information on the core functions and design principles of a GRM and how to assess the quality and capacity of an existing GRM. Once UNDP (ideally jointly with the implementing partner) has screened and identified the need for a project-level GRM and has assessed the capacity and suitability of existing GRMs, UNDP will make one of the following determinations:

- If it is found that an implementing partner has **sufficient capacity** and means of addressing potential project-related grievances (whether directly or through national mechanisms), the project documentation (such as the Stakeholder Engagement Plan) should further elaborate how the existing GRM(s) will be accessed and utilized during project implementation.

- If it is found that an implementing partner **requires additional capacity** to address potential project-related grievances, the project could include activities and budget to strengthen existing GRM capacity while also identifying an interim or alternative means of addressing project-related grievances while those activities are occurring (e.g. a project-GRM based within the project steering committee or project board).

- If it is found that the implementing partner has **no capacity or interest** in hosting the entry point for receiving and responding to project-related grievances, the project could designate the project governing body (e.g. project steering committee or project board) as the project-GRM. The project's SEP? could include a Terms of Reference outlining the roles, responsibilities and functions of this project-GRM (see example ToR in the Supplemental Guidance on Grievance Redress Mechanisms).

Accessibility is a key principle for any grievance mechanism. Accessibility starts with awareness raising. Therefore, every project needs to ensure that project-affected people and communities are informed of project-level grievance entry points. In all interactions with stakeholders (e.g. consultations, meetings, project websites), information about how to access complaints processes should be made available.

In addition to any project-level mechanism, all UNDP projects fall under corporate grievance mechanisms. As noted, the SES are underpinned by the UNDP Accountability Mechanism that includes two key components:

1. A Social and Environmental Compliance Review Unit (SECU)[17] to respond to claims that UNDP is not in compliance with applicable environmental and social policies; and

2. A Stakeholder Response Mechanism (SRM)[18] that ensures individuals, peoples, and communities affected by projects have access to appropriate grievance resolution procedures for hearing and addressing project-related complaints and disputes.

UNDP's Accountability Mechanism is available to all of UNDP's project stakeholders. Information on how to access UNDP's Accountability Mechanism needs to be shared during the stakeholder engagement process. However, access to UNDP's Accountability Mechanism does not replace a project-level GRM where the latter is required.

In addition, stakeholders should be informed that UNDP has other mechanisms to receive allegations of wrongdoing, such as the Office of Audit and Investigation's (OAI) for issues regarding fraud, abuse, and misconduct.[19]

3.7 Avoid and Minimize Risks of Retaliation and Reprisals

Project-affected stakeholders will often actively seek information on or participation in project activities. This is to be anticipated and addressed by the project's Stakeholder Engagement Plan. Concerns and complaints from stakeholders regarding a project's

> **Box 5. Retaliation and reprisals against project stakeholders**
>
> Retaliation and reprisals against project stakeholders who express concerns and complaints may take many forms. Some general examples that should be considered when assessing such risks include the following:
>
> - Intimidation, including by indirect and direct threats and verbal harassment against requesters, complainants or others associated with them
> - Smear campaigns, including by State-owned media and social media
> - Revoking professional permits for individuals (lawyers, trade unions, etc.) and CSOs that support or facilitate the complainants
> - Dismissal from employment, or discrimination, disadvantage or other adverse treatment in relation to employment
> - Judicial harassment, including retaliatory lawsuits intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition (commonly referred to as strategic lawsuits against public participation, SLAPPs) and arbitrary detention
> - Physical assault against persons or their property, including their offices and vehicles
> - Surveillance by State and non-State actors, including through digital interference.
>
> *See IDB MICI, Guide for Independent Accountability Mechanisms on Measures to Address the Risk of Reprisals in Complaint Management: A Practical Toolkit (2019)*

social and environmental performance are also to be expected and can be addressed in a straightforward, collaborative process with concerned parties, as outlined in part above in Section 3.6.

In some circumstances, however, requests for information, participation, and/or complaints by project-affected stakeholders can elicit harsh reactions from powerful actors with vested interests in certain projects. Retaliation and reprisals can include intimidation, threats, and violence (see **Box 5**).

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[17] The Social and Environmental Compliance Unit (SECU) investigates concerns about non-compliance with UNDP's Social and Environmental Standards and Screening Procedure raised by project-affected stakeholders, and recommends measures to address findings of non-compliance.

[18] The Stakeholder Response Mechanism helps project-affected stakeholders, UNDP's partners (governments, NGOs, businesses) and others jointly address grievances or disputes related to the social and/or environmental impacts of UNDP-supported projects.

[19] See UNDP Office of Audit and Investigation at
https://www.undp.org/content/undp/en/home/accountability/audit/office-of-audit-and-investigation.html.

It should be noted that the Office of the High Commissioner for Human Rights has identified a significant increase in cases of retaliation and reprisals against persons who cooperate with the UN on human rights, including through submitting complaints and sharing information.[20]

There has also been an increase in cases of severe retaliation against local communities and activists who oppose certain projects and interventions. In 2019, for example, 212 environmental and land defenders, including indigenous activists, were killed in connection with their opposition to damaging exploitation of natural resources or the environment. [21]

It is in this context that **the SES require that project developers/implementers seek to identify, reduce and address the risk of retaliation and reprisals** against people who may seek information on and participation in project activities, express concerns and/or access project-level grievance redress processes/mechanisms or UNDP's SRM or SECU (see SES, Part C, para. 27).

The SESP specifically asks project developers to **screen for potential risks of retaliation or reprisals** (Question P.15). Where the likelihood of such risks exists, the social and environmental assessment process should analyze them and include measures that seek to avoid and minimize them. **Table 5** below provides general guidance on how to approach the issue.

Table 5. General guidance on identifying/addressing risks of retaliation and reprisals
Note: Addressing risks of retaliation and reprisals against project-affected stakeholders requires context specific analysis and response actions. The following are general points for consideration.

✓ **Communicate to project partners that retaliation against project-stakeholders will not be tolerated**
    o Establish a clear set of expectations that all project-affected stakeholders have the right to seek information on and participate in project design and implementation, including expressing concerns and submitting complaints to project grievance redress mechanisms
    o Notify project team members and contractors that any acts of retaliation against project stakeholders are unacceptable and will lead to serious consequences

✓ **Assess risks of retaliation**
    o Seek to identify whether project-affected persons may be at risk of retaliation for seeking information on, participation in, or raising concerns or complaints regarding the project. A key starting point would of course be any personal safety concerns expressed during meetings and consultations with project-affected stakeholders
    o Review media reports, and consult UNDP Country Office staff and local CSOs on potential risks of retaliation
    o Examine country/region-specific reporting from human rights bodies/groups on the state of civil society, the situation of human rights/environmental defenders, previous reprisals and authorities' responses to them

✓ **Adopt preventative measures and include in the Stakeholder Engagement Plan**   o Where the risk assessment indicates that there is a likelihood of retaliation against stakeholders, identify possible preventative measures specific to the circumstances together with relevant stakeholders. Measures may include suggestions for means and timing of communication, location and timing of meetings, means of transportation, use of trusted intermediaries, use and selection of

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[20] UN OHCHR, Intimidation and reprisal for cooperating with the United Nations in the field of human rights. A Special Rapporteur on the situation of human rights defenders has been established. See also OHCHR, Human Rights Defenders: Protecting the Right to Defend Human Rights, Fact Sheet No. 29.

[21] Global Witness, Defending Tomorrow: The climate crisis and threats against land and environmental defenders (July 2020). Global Witness has published annual reports on violence against environmental and land defenders since 2012.

interpreters, facilitators and other consultants, and use of specialized intermediaries for people with special needs. Such measures will be sensitive to gender, race, ethnicity, age, disability, sexual orientation or gender identity, or other status

- o Respect confidentiality of project stakeholders (e.g. identity, information received), disclosing such information only with informed consent of potentially at-risk stakeholders.
- o Utilize secure forms of communication
- o Monitor potential retaliation by following up with those who have raised concerns or complaints
- o Engage relevant groups in monitoring the situation and/or refer specific at-risk individuals to support organizations

✓ **Respond to acts of retaliation and reprisals**

- o Give immediate priority to reported cases of retaliation and sensitively seek to corroborate and assess credibility and severity of retaliatory threats and actions
- o Notify appropriate UNDP representatives of reported cases of retaliation (where UNDP staff or contractors are involved in allegations of retaliation, UNDP's Office of Audit and Investigation is to be informed)
- o Prioritize the safety and well-being of persons subject to retaliation and seek their views on appropriate courses of action. Actions must be context specific and may include the following:
  - ▪ intervene directly with source of threat
  - ▪ engage influential persons (political, civil, religious) to intervene with source of threat
  - ▪ publicize and condemn actions
  - ▪ request project partners to engage national authorities
  - ▪ seek support from international mechanisms (e.g. UN human rights bodies, diplomatic missions, intl NGOs)
  - ▪ support protection strategies (e.g. temporary relocation)

4 Stakeholder Engagement in Screening, Assessment, Management and Monitoring

Stakeholder engagement is a core principle of sustainable development and is one of the six overarching SES policy objectives. It is required of all projects no matter the potential level of associated social and environmental risks and impacts. While stakeholder engagement processes will be increasingly more intensive for Moderate, Substantial and High Risk projects, it is also required for Low Risk projects.

This section addresses the application of the SES stakeholder engagement requirements during the "screening – assessment – management" process whereby projects are *screened* for potential adverse social and environmental risks and impacts, the identified risks and impacts are *assessed*, and the potential risks and impacts that could not be avoided are *managed* through the application of appropriate mitigation and management measures and plans. Specific SES requirements need to be addressed at each stage. **Table 6** provides an overview of key actions regarding stakeholder engagement in this process.

Table 6. Overview of stakeholder engagement in screening, assessment and management

Screening	Assessment	Management
• Undertake initial stakeholder analysis and engage stakeholders in pre-screening with SESP to identify potential social and environmental risks/impacts • Develop initial Stakeholder Engagement Plan with stakeholders, appropriately scaled to nature of project and potential risks and impacts • Validate SESP results and engagement plan with stakeholders	For Moderate/Substantial/High Risk projects: • Revise/update Stakeholder Engagement Plan • Ensure stakeholder engagement in design and conduct of assessments (targeted assessments for Moderate Risk, appropriately-scoped ESIAs/SESAs for Substantial Risk and comprehensive ESIAs/SESAs for High Risk) • For Substantial/High Risk projects, hold stakeholder consultation on draft terms of reference for social and environmental assessments • Ensure stakeholders consulted on draft assessment report • Ensure level of engagement scaled to potential risks/impacts • Update Stakeholder Engagement Plan with new information from assessment or changes in context • Disclose summary reports of consultations	For Moderate/Substantial/High Risk projects: • Develop mitigation measures and management plans with participation of affected stakeholders • Ensure stakeholders consulted on draft management measures/plan • Ensure stakeholders involved in monitoring of management measures/plan • Enhance awareness of UNDP's Accountability Mechanism and, where needed, a project-level grievance mechanism • Update stakeholders on changes to project and involve them in any new screening, assessment, and management of additional potential social and environmental risks and impacts

4.1   Screening

UNDP's Social and Environmental Screening Procedure (SESP) is designed to help integrate the SES Programming Principles (i.e. human rights, gender equality and women's empowerment, sustainability and resilience, accountability) into project design and to identify potential social and environmental risks and impacts, leading to an overall risk categorization that helps to determine the appropriate level of needed social and environmental assessment and management/mitigation measures. Screening naturally affects key stakeholder interests; consequently, stakeholders should be involved in the screening process.

Pre-screening for potential adverse social and environmental risks and impacts can lead to necessary changes to the project strategy and design in order to avoid identified potential impacts. A range of key stakeholders – not just project promoters, but importantly stakeholders who may be adversely affected – should participate in and review the pre-screening. A workshop with stakeholders (as noted in Section 3.2, involving representatives of likely stakeholder groups where specific activities and/or locations have not yet been fully defined) and relevant experts may be organized in order to discuss the pre-screening, gather additional stakeholder input, and identify measures to prepare the project for full appraisal.

Final screening of the Project Document must be completed prior to appraisal of the project by the LPAC/PAC. As this comes at the end of the design process, the final screening considers additional design elements since pre-screening and confirms that the project has incorporated relevant SES requirements, including any needed social and environmental assessment and management measures (for Moderate, Substantial and High Risk projects).

A stakeholder consultation should be organized prior to full appraisal in order to validate the screening results and to incorporate any further stakeholder comments and concerns into the project's design. In addition, the project Stakeholder Engagement Plan should be reviewed and validated.

To participate effectively in the screening process, stakeholders need to be provided all relevant information about the project, including any social and environmental assessment and management plans that may have been developed to date. Where there are uncertainties and unknowns, these should be transparently discussed with the stakeholders.

To foster trust and relationship-building, efforts should be made to avoid having the screening results, including the overall social and environmental risk categorization, be a surprise to stakeholders upon project approval.

4.2   Assessments and Management Planning

A key objective of the social and environmental assessment process is to promote public participation in crucial decisions regarding projects that may present adverse social and environmental impacts. The assessment process must provide opportunities for stakeholders to express their views on matters that affect them and for these views to be considered and responded to by the project team. Project-affected stakeholders should be involved in identifying means to avoid or mitigate potential impacts.

The timing of assessments may vary.[22] Social and environmental assessment is most effective when initiated early during project preparation as it allows for the timely identification of potential risks and impacts and incorporation of impact avoidance and mitigation measures into the project design process – that is, at a time when they can be more easily accommodated and budgeted.

However, many UNDP projects may not have full information regarding specific project components and locations at the time of project appraisal and thus utilize a framework approach (e.g. ESMF) that includes

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[22] See SES Guidance Note on Social and Environmental Assessment and Management, Section 4.1.

preliminary social and environmental analysis and establishes procedures for undertaking assessments and developing appropriate management measures/plans during project implementation. See the UNDP SES Guidance Note on Social and Environmental Assessment and Management in the SES Toolkit for more on the use of ESMFs. The ESMF would need to indicate how the project's Stakeholder Engagement Plan would be updated in relation to the required assessments and management plans.

During project implementation, certain circumstances may require the revision of the completed SESP and additional assessments and management planning, such as where new information becomes available, where there are substantive changes to the project (e.g. changes in design, additional components), or where changes in the project context might alter the project's risk profile (e.g. conflict, mass migration, natural disaster, or discovery of previously unrecognized or undocumented cultural or natural heritage in the project-affected area).

In all cases, UNDP requires that social and environmental assessments and adoption of appropriate mitigation plans/measures must be completed, disclosed, and discussed with stakeholders prior to initiation of any project activities that may cause adverse social and environmental impacts.

The project team should inform stakeholders of the assessment process and ask them how they would like to be consulted, including types of information and formats, frequencies, and appropriate locations and venues. The applicable regulatory requirements (e.g. national environmental impact regulations, public notice and hearing requirements) as well as UNDP's stakeholder engagement requirements should be clearly explained.

The project's Stakeholder Engagement Plan should identify key entry points to involve stakeholders in the in the assessment and management process. **Table 7** outlines general opportunities and milestones for projects that require formal assessment studies and management plans – that is, all Substantial and High Risk projects and some Moderate Risk projects with potentially significant adverse impacts.[23]

For relatively straightforward Moderate Risk projects that do not require additional studies and assessment, stakeholders should be provided the draft Project Document and clear, culturally appropriate, summaries on the project and its potential risks and impacts prior to the LPAC/PAC and asked to comment on the proposed social and environmental and management measures outlined in the documentation. The management measures should be revised accordingly, as should the Stakeholder Engagement Plan.

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[23] The SES require targeted forms of social and environmental assessment for Moderate Risk projects, appropriately-scoped ESIAs/SESAs for Substantial Risk projects and comprehensive ESIAs/SESAs for High Risk projects.

Table 7. Key entry points for stakeholder consultations in the SES assessment and management process	
Scoping	An initial "scoping" exercise is undertaken in order to identify and focus the social and environmental assessment on key issues and to establish a logical roadmap for the assessment process. Scoping involves gathering primary information with an emphasis on listening to issues of greatest interest and concern to stakeholders. Consultations should be held with project stakeholders (on a selective basis, with a focus on potentially affected persons/groups). Input from stakeholder consultations would supplement research and review of secondary sources.
Draft terms of reference for assessment studies	The scoping exercise typically informs the drafting of a terms of reference for the assessment (e.g. Environmental and Social Impact Assessment, Strategic Social and Environmental Assessment). Project stakeholders, with a focus on project-affected communities, should be consulted when the draft terms of reference for the assessment is developed in order to help identify any additional issues or concerns that may require further attention in the conduct of the assessment.
Undertaking assessment studies and development of management plan	Components of the assessment studies may require targeted consultations with project-affected stakeholders. Stakeholder input may assist in "designing out" activities that may give rise to adverse impacts. Also, participatory assessment techniques may be employed (see below). A key output of the assessment process is a management plan to mitigate and manage residual adverse impacts (typically an Environmental and Social Management Plan, or ESMP). The management plan needs to be developed in close consultation with project stakeholders. Consultations should aim to enhance mitigation and agree on project benefits.
Draft assessment findings and management plans *(see Section 4.3)*	Once the draft assessment and management plan are developed, organized consultations with project-affected stakeholders should be undertaken in order to ensure that they adequately respond to potential issues and concerns. The draft assessment and management plan are to be disclosed (see Annex 3). At a minimum a summary of the draft assessment and management plan should be translated into local languages and made accessible with appropriate lead-time before consultation meetings. A summary of the consultation should be produced and disclosed and the draft assessment and management plan should be revised as appropriate per input from project-affected stakeholders. The management plan should include an updated Stakeholder Engagement Plan to promote meaningful, effective consultations during project implementation and should include identification of milestones for consultations, information disclosure, and periodic reporting on project implementation and issues of concern to project stakeholders. The plan should also include a description of effective processes for receiving and addressing stakeholder concerns and grievances regarding the project's social and environmental performance. Also, the assessment and management plan must address the requirements of applicable SES Project-level Standards, which may include further and more extensive stakeholder engagement (e.g. FPIC requirements per Standard 6 Indigenous Peoples, stakeholder participation in development of Resettlement/Livelihood Action Plans per Standard 5 Displacement and Resettlement)
Final assessment and management plans (see Section 4.3)	Stakeholders should be properly notified on the availability of the final assessment and management documents, and access facilitated.

Throughout the assessment process it may be necessary to undertake targeted consultations to ensure that marginalized or disadvantaged groups and individuals affected by the project also have the opportunity to participate. Gender-inclusive methods should be employed (see Section 3).

Careful documentation of stakeholder consultations can demonstrate to stakeholders that their input has been considered and incorporated into the project. Summary reports of each consultation need to be produced per the SES, circulated to participants, and publicly disclosed. Any commitments made to stakeholders should be carefully recorded. Where confidentiality is necessary to protect stakeholders from harm (see Section 3. 7), statistical information can be recorded and reported.

In addition, stakeholders should be provided regular updates as the social and environmental assessment studies progress and project design is modified.

Project implementers should log and track meetings, communications, exchanges, responses, disclosures, responses to grievances, summary reports, etc. This is particularly important if/when disputes arise regarding the extent to which stakeholders were engaged in project development and implementation.

Participatory assessments. Participatory assessment methods and approaches have been developed to better understand the social and cultural context of development and to design interventions for local conditions. The approach enables stakeholders to examine their own concerns and problems. The technique uses local knowledge, strengthens stakeholders' influence on decision making, and encourages ownership by people whose lives the project will affect. Participatory assessment includes a spectrum of approaches that vary in their level and extent of participation. Core principles of participatory assessment include the following (i) involve stakeholders as active participants – not just passive sources of information; (ii) promote learning between project developers and stakeholders; (iii) strengthen local people's capacities to analyze, reflect, and act; and (iv) catalyze commitment into actions.[24] (See also Section 4.4 regarding participatory monitoring)

The assessment process leads to the development of appropriate management plans and measures to address any remaining potential adverse social and environmental impacts that could not be avoided through changes in project design. Stakeholders, especially project-affected groups and individuals, need to be closely involved in the development of management plans and measures. In addition, it is equally important for stakeholders to be involved in monitoring any anticipated potential impacts throughout project implementation.

4.3   Access to Information on Social and Environmental Risks and Impacts

UNDP is committed to ensuring that information about UNDP projects is disclosed in a timely manner, in an appropriate place, and in a form and language understandable to affected persons and other stakeholders so they can understand potential project-related opportunities and risks and to provide meaningful input into project design and implementation.[25]

As part of the stakeholder engagement process, UNDP's SES require that project stakeholders have access to relevant information. Specifically, the SES (SES, Part C, para. 28) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

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[24] Asian Development Bank, "Participatory Assessment" in Strengthening Participation for Development Results: An Asian Development Bank Guide to Participation (2012), pp. 37-40. See SES Toolkit for further references on participatory assessment.

[25] Disclosure of information is to be consistent with the UNDP Information Disclosure Policy. Para. 12(g) notes that SESPs as well as draft and final assessments and management plans are to be disclosed.

- Information on a project's purpose, nature and scale, duration, and potential risks and impacts
- Stakeholder engagement plans and summary reports of stakeholder consultations
- Social and environmental screening reports with project documentation
- Draft social and environmental assessments, including any draft management plans
- Final social and environmental assessments and associated management plans
- Any required social and environmental monitoring reports.

The SES require that draft and final assessments and management plans be shared with project-affected stakeholders in a timely manner. National regulations regarding public consultation and disclosure of assessments vary significantly from country to country, and therefore additional consultation and disclosure measures may be required to meet the SES requirements.

Table 8 briefly summarizes key SES disclosure milestones, timelines and modalities. **Box 6** provides general guidance on disclosing draft assessments and management plans. Further guidance is provided in **Annex 3**.

Assessments and management plans often contain technical information that may need to be summarized in accessible and understandable formats to be shared with stakeholders. As noted in Section 3.3, project information sharing strategies may need to be further augmented to accommodate stakeholders with special needs, such as due to disability, literacy, gender, mobility, language, and accessibility. This may include development of additional summaries presented in accessible formats and further meetings to explain findings orally (with appropriate interpretation).

The SES require that a public record of stakeholder engagement throughout the project cycle be maintained and disclosed. In cases where it may be necessary to safeguard the identities of stakeholders due to potential harm, statistical information should be recorded and disclosed (SES, Part C, para. 28).

Table 8. Disclosure of Screenings, Assessments and Management Plans

What to disclose	When to disclose	How to disclose
SESPs		
• draft	• Design stage consultations	• Append to project concept note or draft ProDoc
• final and revised	• Post-PAC • During project implementation when SESP revised due to substantive changes to project or context	• Annex to ProDoc, uploaded into Corporate Planning System (CPS) • If revised during implementation, share with Project Board/PAC and upload to CPS
Assessments and Management Plans/Frameworks		
• draft *Note: must include summary report for Substantial/High Risk projects*	• Part of consultations • At least 30 days for Moderate Risk Projects and 120 days for Substantial/High Risk projects (a) prior to PAC (when assessment pre-appraisal) or (b) prior to implementation of activities that may cause adverse impacts (when assessment post-appraisal)	• At minimum ensure a summary is translated in local language and distributed locally • Annex to and disclose draft ProDoc • Posted on UNDP unit (e.g. CO) website
• final	• Upon receipt	

For Moderate Risk projects: Drafts of any prepared assessments and related management plans need to be disclosed and consulted on at least 30 days prior to project approval or initiation of relevant activities (see Box 4). When no separate assessment/management plan is needed, a summary of the analysis contained in the SESP together with the proposed management measures needs to be similarly shared with project-affected stakeholders. In addition, final assessments and management plans must also be disclosed.

For Substantial/High Risk Projects: Draft assessments and reports, including any draft management plans, need to be disclosed 120 days prior to project approval or initiation of relevant activities (see Box 6). In addition, for ESIAs and SESAs a summary report of the draft must be prepared in order to provide an

adequate, accurate and impartial evaluation and presentation of the issues and conclusions of the technical assessment. This summary report must be presented in an understandable format and in an appropriate language(s), including a non-technical summation that can be understood by many stakeholders in order to facilitate and encourage comments. Short summaries and graphic presentations will often be required to facilitate reading and understanding.

Box 6. Disclosing draft assessments and management plans

The SES requires disclosure of draft assessments and management plans in order to provide stakeholders' the opportunity to fully understand potential risks and to meaningfully comment on the plans before they are finalized. This requirement applies to projects with Moderate, Substantial and High Risks. Various ways exist to address this requirement:

- Ensure that national "notice and comment" periods are observed (most national environmental regulations include public comment requirements)
- Conduct stakeholder consultations to inform the initial scoping process and also to get inputs on the findings of the draft assessment and management plan(s)
- Ensure that a summary report of the draft assessment and management plan is translated into local languages and made available in an accessible location together with the draft assessment and management plan
- Circulate a translated summary report and information on availability of draft assessment and management plans to participants of prior consultations and identified stakeholder groups
- Ensure draft and final assessments are posted on project websites (specific project site, UNDP Country Office website)

Stakeholder feedback/input on the draft project documentation should be carefully recorded with a mechanism for showing how the input has been considered. A comment/response matrix may be an effective tool in this regard. Stakeholders may have additional means/preferences for being informed on how their feedback was taken into consideration.

Address Stakeholder Engagement Requirements in Management Measures/Plans. Mitigation and management measures need to be developed for each identified potential adverse risk and impact. The SESP and scoping phase of the assessment determine and confirm which Project-level Standards are applicable to the project. Tailored management plans – typically integrated into the project's overall Environmental and Social Management Plan, or ESMP – may be required. For example, projects with significant adverse impacts (e.g. High/Substantial Risk projects, some complex Moderate Risk projects) may require a Biodiversity Action Plan (Standard 1), a Cultural Heritage Management Plan (Standard 4), a Resettlement or Livelihood Action Plan (Standard 5), an Indigenous Peoples' Plan (Standard 6), or plans related to wastes or hazardous materials (Standard 8).

Stakeholder input is required in the elaboration of such management plans. Consultations with stakeholders should be utilized to broaden and discuss the range of options available to eliminate and reduce potential adverse social and environmental impacts. The local knowledge of directly affected stakeholders and the wider experiences of many non-governmental organizations and the scientific community may help identify innovative approaches and make mitigation measures more effective. Consultation is also an essential tool for coming to agreement with project-affected stakeholders on the key measures to be adopted as well as on the design of benefits programs that are targeted and culturally appropriate.

The project's Stakeholder Engagement Plan should be updated and modified to reflect the key actions, decisions, and timelines developed as part of the management plan. The plan should define when, how, and about what matters stakeholders shall be consulted, and how information relevant to the management

plans should be shared with stakeholders (see Annex 2). Stakeholders should also be made aware of those project activities that must not be undertaken until appropriate management measures are in place.

Stakeholder consultations should be utilized to verify whether the draft management plan appropriately reflects concerns of project-affected groups and individuals.

4.4 Stakeholder Engagement in Implementation and Monitoring

It is critical to involve affected stakeholders in monitoring the project's anticipated impacts and management measures throughout implementation. With the launch of project activities (potentially including construction), coupled with an urgency to complete work on schedule, there are risks that impact mitigation measures or employment and other intended benefits may not be as effective as anticipated.

Engagement during project implementation is essentially about involving stakeholders in assessing whether previously agreed measures are being implemented and working as intended, being responsive to grievances, and identifying alternatives where there are failings.

UNDP's Monitoring Policy requires the active participation of stakeholders in monitoring activities (see **Box 7**).[26]

The SES also calls for direct participation of affected stakeholders in project monitoring, particularly for projects with potentially significant adverse risks and impacts (SES, Part C, Monitoring, Reporting and Compliance, paras. 32, 35).

> **Box 7. UNDP Monitoring Policy requires stakeholder involvement**
>
> UNDP's Monitoring Policy for projects and programmes requires stakeholder involvement in monitoring activities (para. 10):
>
> *"Monitoring activities must be carried out with the active participation of relevant stakeholders including national and international government agencies, NGOs and CSOs, the private sector, and representatives of local communities including representatives of indigenous peoples, where relevant. The use of real-time monitoring and collection of beneficiary feedback should be deployed when justified and feasible to track effects (good or bad), perceptions, unintended consequences, specific bottlenecks to results for disadvantaged communities, and to engage citizens in monitoring."*

The project's Stakeholder Engagement Plan should include mechanisms for inclusion of key stakeholders in monitoring project implementation. Various mechanisms can be considered. Stakeholder representatives, including for project-affected groups, may be included as members of monitoring committees and bodies. This is particularly important for projects with potentially significant adverse social and environmental risks and impacts. Mechanisms should be in place for stakeholders to verify monitoring results.

Participatory monitoring techniques may be employed. Participatory monitoring means more than mere stakeholder access to monitoring data. Typically it involves stakeholders themselves defining meaningful monitoring indicators and processes and participating actively in field visits and elaboration of monitoring reports and recommendations. Participatory approaches focus on building stakeholder capacity, ownership and commitment to implement any corrective actions. A range of methods may be utilized, for example community-based monitoring, citizen report cards, social audits, and target group narratives.[27]

Complex projects and those with potentially significant adverse impacts may require engaging independent third-party monitors. If it is determined that an independent advisory panel is needed for the project, it

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[26] See UNDP POPP, B.3 Monitor, para. 10(a).

[27] See the SES Toolkit for references to participatory monitoring techniques.

may be composed of stakeholder representatives as well as internationally recognized independent experts.[28]

Ongoing reporting to affected communities and individuals. For projects with significant social and environmental risks and/or impacts (i.e. Substantial/High Risk projects, some complex Moderate Risk projects), the SES require that affected communities be provided periodic progress reports on implementation of project management plans and mitigation measures and on issues of concern to stakeholders.

Any material changes, incident, accident, corrective actions or additions to the mitigation measures or action plans also need to be communicated through the periodic reports, the frequency of which should be proportionate to the level of stakeholder concerns, but not less than annually.[29]

The SES require that stakeholder complaints and grievances be tracked and monitored. Project implementers should include information as to how it has been responding to grievances that may have been received.

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[28] The SES requires the use of independent advisory panels during preparation and implementation of projects that are highly risky or contentious. SES, Part C, Assessment and Management, para. 16.

[29] SES, Part C, Monitoring, Reporting and Compliance, para. 34.

Annex 1. Stakeholder Analysis

Stakeholder analysis (also referred to as stakeholder mapping) is the process of identifying a project's key stakeholders and assessing their interests in the project. Stakeholder analysis provides the foundation for development of the project's Stakeholder Engagement Plan and facilitates prioritization of engagement activities with particular stakeholder groups and individuals.

Stakeholder analysis seeks answers to the following fundamental questions:
- Who are the key stakeholders of the proposed project?
- What are the interests of these stakeholders related to the project?
- How will stakeholders' interests be affected (positively/negatively) by the project?
- Which stakeholders are the most vulnerable and subject to potential adverse impacts?
- Which stakeholders wield the most influence to affect project outcomes?
- Whose capacity needs to be supported to enable them to participate?

A systematic approach is needed to ensure that all potential stakeholders are identified and their interests well understood so that they will be appropriately engaged throughout the project. Various methodologies exist for undertaking stakeholder analysis. [30] This annex outlines common key steps for undertaking stakeholder analysis in development projects.[31]

While the stakeholder analysis can initially draw on secondary data (e.g. desk study, review of past consultations), direct collaboration with key stakeholder groups is required in order to accurately identify stakeholders, their interests, and to plan for their participation. Workshops, public meetings, focus group discussions, in-depth interviews, surveys and other methods can be used to gather primary data on stakeholders. In many countries, experienced national institutes, research centers, government officials, social scientists, academics, or NGOs can be recruited to assist in carrying out stakeholder analysis.[32]

Stakeholder analysis typically involves three main steps: identifying stakeholders; specifying stakeholder interests and mapping power relations and influence; and prioritizing engagement across different stakeholder groups. These steps are outlined below and in the following tables. Of course, the ultimate goal of stakeholder analysis is to identify those entities, groups and persons that may be most impacted by the project or who may influence its success so that their engagement in the project can be sought, prioritized, and tailored to ensure maximum benefits, minimal harms, and project success. The Stakeholder Engagement Plan is critical to this success, outlining the specific engagement activities to be carried out over the course of the project. The Stakeholder Engagement Plan is addressed in **Annex 2**.

Step 1 – Stakeholder identification

The first step of stakeholder analysis is to identify relevant stakeholder groups. Key questions to ask are:

- Who are the project's targeted beneficiaries?

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[30] For example, the World Bank has outlined several models to better understand potential stakeholder dynamics in complex policy reforms. See
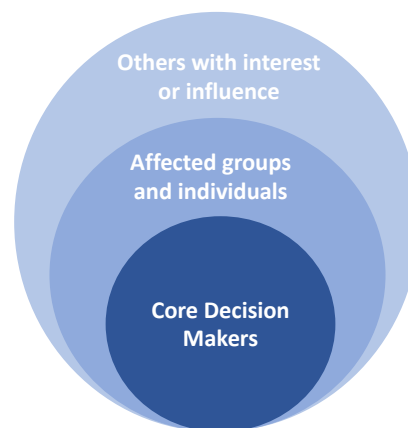http://www1.worldbank.org/publicsector/anticorrupt/PoliticalEconomy/stakeholderanalysis.htm.

[31] This Annex utilizes information outlined in UNDP, Handbook on Planning, Monitoring and Evaluating for Development Results (2009); Kvam, Reidar, Meaningful Stakeholder Engagement: A joint publication of the Multilateral Financial Institutions Group on Environmental and Social Standards (2019); IFC, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in emerging Markets (2007); World Bank, Participation and Social Assessment: Tools and Techniques (1998); African Development Bank, Handbook on Stakeholder Consultations and Participation in [AfDB] Operations (2001); Asian Development Bank, Strengthening Participation for Development Results: An ADB Guide to Participation (2012).

[32] African Development Bank, Handbook on Stakeholder Consultations, p. 25.

- Who might be adversely impacted (directly or indirectly)?
- Will the project impact (positively or negatively) any marginalized groups?
- How will the project affect women and men stakeholders?
- Who are the projects main supporters and opponents?
- Who is responsible for carrying out planned activities?

Projects will typically involve a broad range of stakeholders. While stakeholder groupings will vary across projects, three broad categories are typical of groups who either need to agree with or support the project, or whose views should be considered (see **Figure A1.1** and **Table A1.1**).[33]

Figure A1.1. Broad stakeholder categories

Others with interest or influence

Affected groups and individuals

Core Decision Makers

Table A1.1. Groups within broad stakeholder categories		
Note: there may of course be overlap across categories		
A **core category** of stakeholders who are directly responsible for aspects of project decision-making: • Government agencies and local authorities directly responsible for approval processes • Implementing agency staff and their consultants, both at the technical and management levels • Contractors and sub-contractors • Other financial institutions providing funding and support to the project • Other members of Project Board as constituted	Groups **directly affected** positively or negatively by a project: • Intended beneficiaries • Adversely affected persons and groups • Project workers and their representatives	A broader category of stakeholders who may have an **interest in the project or who may influence it**. This category may include: • Other agencies or institutions contributing to the project (e.g. extension services, sub-national and local authorities) • Community and traditional leaders • Civil society groups (community-based organizations, local and international NGOs, religious groups, women's organizations, media, etc.) • Academia and research organizations • Organized interest groups (business associations, trade unions, others) • Consumers of goods or services produced by the project • Relevant private sector companies operating in the project area or expected to play a role in project

The stakeholder analysis needs to be initiated early in order to identify key stakeholder groups and individuals to be involved in the project planning process. Since the full scope of project activities and

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[33] Adapted from Kvam, Reidar, Meaningful Stakeholder Engagement, p. 19.

potential stakeholders are not yet defined at this stage, an initial list of stakeholders – encompassing government, civil society, and, where relevant, the private sector – should be generated, relying on a desk review and expert input from the country focal points as well as governmental and civil society groups. Special care must be taken at this stage to ensure that the stakeholder identification exercise is an expansive one so that relevant groups are not inadvertently excluded.

Stakeholder identification should be as specific as possible. Use of overly general categories – such as "local communities," "CSOs," "indigenous peoples groups" – should be avoided, as they tend to communicate a lack of outreach and engagement.

The initial list of identified stakeholders should be verified, modified, and enhanced through interviews with key informants (e.g. government officials, donor representatives, issue/sectoral experts, NGO staff, community leaders), consultations/workshops with already identified stakeholders, and site visits. The list should be disseminated with an explanation on how other groups may be suggested or put themselves forward. It is important to not just rely on known entities, and to reach out to groups who typically may be excluded from decision-making processes, in particular women and marginalized groups that may be affected by the project.

> **Box A1.1. A gender responsive stakeholder analysis should respond to the following questions**
>
> - Who are the different stakeholders?
> - Are men and women represented?
> - What are their interests?
> - What are the project priorities for men and women?
> - How will men and women be affected differently by the proposed project?
> - What is the capacity for men and women to participate in the project, particularly at the decision-making level?
> - What are the key constraints to women's participation?
> - Who does what work? How does the work differ for men and women?
> - Who has access to and who has control over environmental resources?
>
> *From Guide to Gender Mainstreaming in UNDP Supported GEF Financed Projects, p. 8.*

Gender responsive analysis. Gender is often a key factor in determining access to project benefits and vulnerability to potential adverse impacts. It is vital that the stakeholder identification and analysis process be gender responsive in order to determine how and when women and men stakeholders should be involved and to address potential existing gender gaps in participation and decision-making. Stakeholder identification should be informed by the project's gender analysis which should provide insights regarding (a) the distribution of tasks, activities, and roles associated with the division of labour among women and men, and (b) the relative position of women and men in terms of representation, influence and decision-making. The gender analysis should provide key information on the number of men and women potentially affected by the project, literacy levels and access to and control over resources. Cultural norms may exist that make gender differences more pronounced, or difficult to interpret, and identifying these allows for a more successful implementation of an inclusive Stakeholder Engagement Plan. **Box A1.1** outlines some key gender-related questions that should be addressed in the stakeholder analysis. To strengthen identification and participation of women stakeholders, it may be necessary to consult with civil society organizations focused on women's rights and areas of work related to the project, local committees, and relevant coalitions of women's organizations as well as ministries of women's affairs or equivalent institutions, and gender focal points in other ministries who may have a role in the project.

It is important for the stakeholder identification process to also encompass groups and individuals with other sexual and gender identities (e.g. lesbian, gay, bisexual, transgender) where relevant in the project context. Persons with certain sexual and gender identities may be subject to discrimination and exclusion. Targeted outreach may be necessary to ensure that these groups and individuals are engaged where relevant.

In addition, groups and individuals that may face exclusion due to disabilities or health status (e.g. people living with HIV) should be appropriately identified among stakeholder groups.

Indigenous Peoples. Further due diligence may be required in identifying potential indigenous peoples stakeholders. Although indigenous groups may be clearly recognized by national governments, this is not always the case. There is no universally accepted definition of indigenous peoples. SES Standard 6 Indigenous Peoples sets out criteria for identifying distinct collectives as "indigenous peoples" even in the absence of State recognition or the use of other terms to refer to such groups. See the SES Guidance Note 6 for more information on identification of indigenous peoples.

Box A1.2. Who represents stakeholders?

The stakeholder analysis should seek to understand how stakeholder groups are represented, from their decision-making structures, specific constituencies, and accountability. This is especially important for civil society organizations.

Generally self-selection should be supported. The rights of key stakeholders, such as indigenous peoples, to organize themselves and be represented by the institutions and individuals of their choosing needs to be respected. Attention must also be given to who represents the respective stakeholders at the national level versus the local level (not necessarily the same). Support may need to be provided to ensure that representatives of certain stakeholder groups can meaningfully participate.

The representativeness of stakeholder participants should be verified. One way to do this is by talking directly to a sample of project-affected people. 'Ground-truthing' is not about "exposing" or undermining a stakeholder's position. It is about understanding how information is being relayed and processed, and assessing the extent to which the project can rely on the inputs received. Where gaps are identified, the project team should determine if greater capacity, resources, information, or expertise could fill the void. Verification measures should not overstep cultural boundaries (e.g. seeking access to groups that should not be spoken to in private or undermine the decision making structure put in place by the stakeholders themselves).

The identification process must then be updated and refined as the design of the project takes shape and the full scope of the project's activities – and range of potential stakeholders – is better understood. This should occur during the social and environmental assessment process (for Moderate, Substantial and High Risk projects) whereby the project's full social and geographical scope (e.g. "area of influence") will be identified and provide a more comprehensive view of who may be affected – either directly by project components or indirectly by associated activities or potential cumulative impacts. [34] At times this may involve groups far beyond planned project areas.

Where stakeholder groups may be represented by a leader or spokesperson, their representativeness needs to be understood in order to design effective engagement approaches. Verifying that certain representatives actually speak for a given stakeholder group can be a tricky process (see **Box A1.2**).

For projects that may involve a large number of stakeholder groups or require the development of highly tailored engagement approaches, a stakeholder log or database may need to be developed in order to collect and organize useful information.[35]

Step 2 – Identify stakeholder interests in the project

Once relevant stakeholder groups have been identified, the next step is to discern their interests in the project and how their interests may be affected. Identification of stakeholder interests can help illuminate

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[34] A Project's area of influence encompasses the primary Project site(s), associated facilities, areas and communities potentially affected by cumulative impacts, and areas and communities potentially affected by project-induced impacts. See SES, ft. nt. 147. For projects with a physical footprint, mapping the project's key components, identifying broad "impact zones," and overlaying the stakeholder groups may be helpful. See IFC, Stakeholder Engagement, p. 15.

[35] For example, see IFC, Stakeholder Engagement, Appendix 4.

the motivations of different actors and how they may influence the project, including potential project opponents.

Key questions to be answered include, at a minimum:

- How does each group of stakeholders perceive the problem at hand and proposed solutions?
- What are stakeholders' expectations of the project?
- What does each group of stakeholders stand to gain/lose as a result of the project?
- Would the rights of some stakeholders be adversely affected?
- Do some stakeholders face greater risks than others?
- What stakeholder interests conflict with project goals?
- What resources might the stakeholder be able and willing to mobilize?

Some stakeholder interests are less obvious than others and may be difficult to define, especially if they are "hidden," multiple, or in contradiction with the stated aims or objectives of their own stakeholder group, organization or representative. Interests may be quite diverse and extend far beyond potential material project benefits, such as maintenance of cultural practices and livelihoods. Stakeholder groups and individuals may not fall into discreet categories; the same group could be both positively and negatively affected by various project activities.

The above questions can guide the inquiry into the interests of each key stakeholder or group. It is critical to understand potential perceptual differences among women and men regarding the project and its potential benefits and impacts.

To increase consensus and ownership, these questions are best answered by stakeholders themselves, typically in the context of a stakeholder workshop (and/or through focus groups and interviews). The following template can be utilized in such settings.

Sample Stakeholder Analysis Template

The following template can be utilized to identify stakeholder groups and interests. The template may be organized in multiple ways, such as by (a) core decision makers, directly affected groups, project beneficiaries, others; or (b) government, civil society, private sector).

Stakeholder Group	Stakeholder Interest	Perception of Problem	Resources/influence

Example: The following example demonstrates utilization of the above stakeholder analysis template based on an example of a project that seeks to improve urban air quality and reduction in GHG emissions by the replacement of highly polluting 2-stroke engine taxis with more efficient vehicles.[36]

Stakeholder Group	Stakeholder Interest	Perception of Problem	Resources/influence
Government			
Ministry of Finance	Recipient of project funding	Expensive dependency on imported liquid fuel; poor air quality due to 2-stroke engines affecting health	Ministry budget, allocates project financing
Ministry of Energy and Mineral Resources	Owns and supervises national oil company	Expensive dependency on imported liquid fuel; domestic natural gas needs promoting	Energy Ministry budget and staff
Ministry of Communication	Responsible for transport in city	2-stroke engines in "taxis" are contributing to poor air quality but are a cheap, convenient form of transport	Ministry budget and staff
Gas Company	Executing agency, recipient of project financing	Infrastructure for domestic gas is underdeveloped including use of 4-stroke engines	Company budget and staff
Civil Society			
Taxi Driver Association	Project plans to ban taxis with 2-stroke engines	Ban on 2-stroke engines will destroy taxi drivers' livelihoods; if it goes ahead drivers need support to convert vehicles to 4-stroke	Membership fees, drivers
Taxi Users	Project plans to ban vital transport service	Ban on 2-stroke engines will disrupt transport service in the city	Public pressure
Greenpeace International (nongovernment organization [NGO])	Share project goal to reduce pollution and improve environment	2-stroke engines highly damaging to the environment and should be banned	Finance from donations/grants; public pressure, political influence
Community life National (NG0)	Share project goal to reduce pollution; avoid other negative impacts on quality of life	2-stroke engines highly polluting and causing health problems for city residents, but cheap and convenient	Finance from donations/grants; staff, volunteers
Doctors' Union	Share project goal to improve health; ensure people know benefits of 4-stroke engine	2-stroke engines in taxis causing increased breathing disorders in city	Membership fees, professional status/influence
Private Sector			
"Taxi" Manufacturers	Project ban on 2-stroke taxis will damage business	Ban on 2-stroke engines unnecessary; taxis are popular	Business profits, staff
Filling Station owners	Project ban on 2-stroke taxis will damage business	Ban on 2-stroke engines unnecessary; taxis are popular	Business profits, staff
International Donors			
World Bank	Project supports goals of their own work	Ban on 2-stroke engines will help their work on environmental health	Member government contributions

Step 3 - Stakeholder Prioritization

The group of potential stakeholders and their interests will naturally be quite diverse. It may be neither practical nor warranted that the same level of engagement be sustained for each stakeholder group

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[36] Based on example from ADB, Strengthening Participation, p. 32.

throughout the project. Prioritization between stakeholders, especially in complex projects with multiple phases and impacts, will likely be necessary. ***To be clear, prioritization is not tantamount to exclusion or discrimination but is objectively based on the identified rights, interests, and influence of each stakeholder.*** Prioritization facilitates identifying appropriate forms of engagement for different stakeholder groups.

Key questions to address include:

- What is the degree influence of each stakeholder group to affect project outcomes?
- What is the importance of each stakeholder group to the success of the project?
- What are the relationships between different stakeholders/groups of stakeholders?
- What type of stakeholder engagement is mandated by national law, international obligations or other requirements?
- Who are the project's targeted primary beneficiaries?
- Who may be adversely impacted by the project?
- Who is it critical to engage with first, and why?   (e.g. enhance project design, assist in early project scoping, avoid adverse impacts)
- Are special measures needed to protect the interests of marginalized stakeholder groups?
- Does opposition from any of the stakeholders or stakeholder groups put the project at risk? If so, are there ways to engage with them to ensure that their concerns are being addressed?

One approach to assist in prioritization is creation of a simple matrix that organizes stakeholders according to "impact" and "influence." **Impact** in this respect relates to who the project is most likely to affect (adversely or positively), which may be different from the level of **influence** they may have to affect project outcomes (see Table A1.2 below).[37] The above stakeholder analysis and prioritization exercise facilitates the development of tailored engagement approaches for specified stakeholder groups. This would then be outlined in the project's Stakeholder Engagement Plan, which is discussed in Annex 2.

Table A1.2: Stakeholder impact and influence matrix		
Impact low---------->high	**Group 1:** High Impact/ Low Influence	**Group 2:** High Impact/ High Influence
	Group 3: Low Impact/ Low Influence	**Group 4:** Low Impact/ High Influence
	Influence low--------------------->high	

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[37] The 'impact-influence matrix' is one tool to help prioritize stakeholder engagement, and has been recommended in other UNDP guidance. See UNDP's Handbook on Planning, Monitoring and Evaluation (2009) for an example of applying this approach to an election strengthening project.

Annex 2. Stakeholder Engagement Plans

Appropriately-scaled plans. No one type or format of a Stakeholder Engagement Plan will accommodate all projects. Its content will depend on various factors, including the nature, scale, location, and duration of project; the diverse interests of stakeholders; the scale of the project's potential positive and adverse impacts on people and the environment; and the likelihood of grievances.

For a relatively small project with few if any potential adverse social and environmental impacts or initial stakeholder concerns (e.g. Low Risk project, straightforward Moderate Risk project), it is likely that only a **"simplified"** Stakeholder Engagement Plan would be needed, focusing primarily on initial consultations, information disclosure and periodic reporting (see **Box A2.1**). In such cases, the "plan" would be relatively simple and easily described in the body of the Project Document (that is, no separate plan would be needed).

A project with greater complexity and potentially significant adverse social and environmental impacts (complex Moderate Risk project or Substantial and High Risk projects) should elaborate a more strategic plan. A **"comprehensive"** plan would outline mechanisms that buttress not just disclosure and good communications, but iterative consultations and possibly consent processes over the course of the social and environmental assessment

> **Box A2.1. Triggering the appropriate scale of Stakeholder Engagement Plans**
>
> - *Simplified Stakeholder Engagement Plan*: Project funding aimed at providing technical support (training in survey equipment) and materials (office space, computers, GPS equipment) to a national land and survey commission will likely have minimal impact on stakeholders other than the government. Utilized for Low Risk and straightforward Moderate Risk projects.
>
> - *Comprehensive Stakeholder Engagement Plan*: Project funding to the same land and survey commission to actually conduct land titling in indigenous and forest-dependent communities across the nation, however, would require a comprehensive plan. Utilized for complex Moderate Risk and Substantial/High Risk projects.

process, development of mitigation and management plans, monitoring project implementation, and evaluation. A separate, detailed Stakeholder Engagement Plan should be appended to the Project Document (see outline below).

All Stakeholder Engagement Plans – whether simplified or comprehensive – should address basic minimum criteria. The following checklist (**Table A2.1**) will help ensure that the plan addresses key issues and components. The plan should specify

Table A2.1. Key questions for developing a Stakeholder Engagement Plan[38]	
Who	✓ Which stakeholder groups and individuals are to be engaged based on the stakeholder analysis? ✓ Which stakeholders will be involved in particular project outputs/activities? ✓ Have potentially marginalized groups and individuals been identified among stakeholders?
Why	✓ Why is each stakeholder group participating (e.g. key stakeholder objectives and interests)?
What	✓ What is the breadth and depth of stakeholder engagement at each stage of the project cycle? ✓ What decisions need to be made through stakeholder engagement?

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[38] As modified, see Asian Development Bank (ADB), Strengthening Participation for Development Results: An ADB Guide to Participation (2012), p. 43.

	✓ What roles will stakeholders undertake in various project outputs/activities (e.g. lead, support, beneficiary)
How	✓ How will stakeholders be engaged (strategy and methods, including communications)? ✓ Are special measures required to ensure inclusive participation of marginalized or disadvantaged groups?
When	✓ What is the timeline for engagement activities, and how will they be sequenced, including information disclosure?
Responsibilities	✓ How have roles and responsibilities for conducting stakeholder engagement been distributed among project partners (e.g. resident mission, executing agency, consultants, NGOs)? ✓ What role will stakeholder representatives play? ✓ Are stakeholder engagement facilitators required?
Resources	✓ What will the Stakeholder Engagement Plan cost and under what budget?

Building mutual trust and ensuring meaningful and effective engagement is facilitated by stakeholder ownership of the relevant processes. All efforts should be made to work with the relevant stakeholders to design by mutual agreement the engagement and consultation processes, including mechanisms for inclusiveness, respecting cultural sensitivities, and any required consent processes. Cultural understanding and awareness is central to meaningful stakeholder engagement.

Moreover, a general solicitation of feedback or input cannot be relied upon nor accepted as the sole method of consultation. Information-laden questions presenting various options, the reasons for those options, and their consequences may be a better method in that it presents information in a relationship-building manner, does not assume full stakeholder knowledge of the project plans, and solicits input on specific project instances instead of placing the impetus on the stakeholder to make seemingly high-level suggestions.

Recall that stakeholder engagement may be minimal at certain times and intense at others, depending on the issues and particular project phase. Also, targeted input from select stakeholder groups may be needed at key points in project development and implementation.

As project information changes – perhaps from subsequent risk assessments, the addition of project activities, stakeholder concerns – the Stakeholder Engagement Plan should be reviewed and modified accordingly to ensure its effectiveness in securing meaningful and effect stakeholder participation.

The Stakeholder Engagement Plan should also anticipate if/when professional, neutral **facilitators** might be needed to lead key engagement activities. For projects where the stakeholder engagement process is likely to be complex or sensitive, social advisors or other expert staff should help design and facilitate the process and assist with participatory methodologies and other specialized techniques. [39]

Grievance redress processes for the project need to be described in the Stakeholder Engagement Plan. Section 3.6 of the SES Guidance Note on Stakeholder Engagement elaborates on relevant SES requirements regarding grievance mechanisms.

The plan should also outline a reasonable **budget** for stakeholder engagement activities, including potential support for groups to facilitate their participation where necessary (noting that meeting locations should be as convenient as possible and stakeholder acceptance of such support should not be interpreted as endorsement of the project).

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[39] IFC, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in emerging Markets (2007), p. 101.

Note regarding use of frameworks. Many UNDP projects may not have full information regarding specific project components and locations at the time of project appraisal and will thus utilize a framework approach (e.g. ESMF) that includes preliminary social and environmental analysis and establishes procedures for undertaking assessments and developing appropriate management measures/plans during project implementation.

When details of the project location or specific activities will be decided at a future date, the Stakeholder Engagement Plan and the ESMF (or other Framework) should present the approach envisaged for further development of the Stakeholder Engagement Plan once further details of the project are specified. It is important to note the following points:

- Stakeholder identification may expand to a wider area once locations are specified.
- Provide information on the process that will be followed in developing more specific stakeholder engagement approaches once further stakeholder groups are identified.
- Specify how stakeholders will be informed when more information regarding the project is known.
- When locations and dates of meetings are not known, provide a general range of the number of meetings planned and the approach to consultations.
- Contact information needs to be clearly provided for people who have more questions.
- The grievance redress process/mechanism needs to be provided in the framework as stakeholders may have concerns during the planning process.

Simplified Stakeholder Engagement Plan

The template below provides a rough outline for a simplified Stakeholder Engagement Plan. Many approaches exist, and this is one example of outlining key elements. It is important to not only to list stakeholders and say they will be consulted, but also to identify **why** they are being engaged, **how** engagement will proceed, **who** will do it, **when**, and **how** it will be financed/supported.

Template of simplified Stakeholder Engagement Plan					
Stakeholder Group	**Why included (interests)**	**Participation methods**		**Timeline**	**Cost est.**
		Method	**Responsibility**		

Comprehensive Stakeholder Engagement Plan

Below is an example of elements that should be addressed in a comprehensive Stakeholder Engagement Plan. The scope and level of detail of the plan should be scaled to fit the needs of the project.

Outline of a Comprehensive Stakeholder Engagement Plan[40]

1. Introduction

- Briefly describe the project including design elements and potential social and environmental issues. Where relevant, include maps of the project site and surrounding area.

2. Regulations and Requirements

- Summarize any legal, regulatory, donor/lender requirements pertaining to stakeholder engagement applicable to the project. This may involve public consultation and disclosure requirements related to the social and environmental assessment process as well as relevant international obligations.

3. Summary of any previous stakeholder engagement activities

- If any stakeholder engagement activities had been undertaken to date, including information disclosure and/or consultation, provide the following details:
  - o Type of information disclosed, in what forms and languages (e.g., oral, brochure, reports, posters, radio, etc.), and how it was disseminated
  - o Locations and dates of any meetings undertaken to date
  - o Individuals, groups, and/or organizations that have been consulted
  - o Key issues discussed and key concerns raised
  - o Responses to issues raised, including any commitments or follow-up actions
  - o Process undertaken for documenting these activities and reporting back to stakeholders

4. Project Stakeholders

- List the key stakeholder groups who will be informed about and engaged in the project (based on stakeholder analysis). These should include persons or groups who:
  - o Are directly and/or indirectly affected by the project
  - o Have "interests" in the project that determine them as stakeholders
  - o Have the potential to influence project outcomes or operations
  - o [Examples of potential stakeholders are beneficiaries and project-affected communities, local organizations, NGOs, and government authorities, indigenous peoples; stakeholders can also include politicians, private sector companies, labor unions, academics, religious groups, national environmental and social public sector agencies, and the media. See Annex 1]
  - o Consider capacities of various stakeholder groups to effectively participate in the stakeholder engagement activities, and include measures to support them where capacity is limited
  - o Identify project-affected marginalized and disadvantaged stakeholders, including persons with disabilities and:
    - o Identify limitations for understanding project information and participating in consultation process (e.g. language differences, lack of transportation, accessibility of venues, disability)
    - o Develop measures to support and accommodate engagement (e.g. provide information in accessible formats, choose convenient locations for consultations, ensure venues are accessible, provide transportation to meetings, change time of meetings to accommodate needs, provide facilitation and explain complex issues and terminology, provide support workers for assisting participants with disabilities, provide simultaneous interpretation (language, signing)

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[40] Outline relies in part on content provided in IFC, Guidance Note 1: Assessment and Management of Environmental and Social Risks and Impacts (2012), Annex B.

5. Stakeholder Engagement Program

- Summarize the purpose and goals of the stakeholder engagement program
- Briefly describe what information will be disclosed, in what formats and languages, and the types of methods that will be used to communicate this information to each of the stakeholder groups identified in section 4 above. Methods used may vary according to target audience, for example:
    - Newspapers, posters, radio, television
    - Information centers and exhibitions or other visual displays
    - Brochures, leaflets, posters, non-technical summary documents and reports
- Briefly describe the methods that will be used to engage and/or consult with each of the stakeholder groups identified in section 4. Methods used may vary according to target audience, for example:
    - Interviews with stakeholder representatives and key informants
    - Surveys, polls, and questionnaires
    - Public meetings, workshops, and/or focus groups with specific groups
    - Participatory methods
    - Other traditional mechanisms for consultation and decision-making
- Describe how the views of women and other relevant groups (e.g. minorities, elderly, youth, other marginalized groups) will be taken into account and their participation facilitated
- Where relevant, define activities that require prior consultation and FPIC from indigenous peoples (and refer to Indigenous Peoples Plan and FPIC protocols)
- Outline methods to receive feedback and to ensure ongoing communications with stakeholders (outside of a formal consultation meeting)
- Describe any other engagement activities that will be undertaken, including participatory processes, joint decision-making, and/or partnerships undertaken with local communities, NGOs, or other project stakeholders. Examples include benefit-sharing programs, stakeholder-led initiatives, and training and capacity building/support programs.
- Where the risk assessment indicates that there is a likelihood of reprisals and retaliation against stakeholders, clarify to all relevant parties there will be zero tolerance for such actions and develop possible preventative and response measures specific to the circumstances together with relevant stakeholders. Measures may include respect for confidentiality; adjustments to means and timing of communications, meetings, transportation; use of trusted intermediaries, interpreters, facilitators and other consultants; clear response protocols for notification, reporting, and support for protection strategies.

6. Timetable

- Provide a schedule outlining dates/periodicity and locations where various stakeholder engagement activities, including consultation, disclosure, and partnerships will take place and the date by which such activities will be undertaken

7. Resources and Responsibilities

- Indicate who will be responsible for carrying out the specified stakeholder engagement activities
- Specify the budget and other resources allocated toward these activities
- For projects with significant potential impacts and multiple stakeholder groups, it is advisable to hire a qualified stakeholder engagement facilitator to undertake all or portions of the stakeholder engagement activities. This may include, where necessary, community facilitators/assistants who are able to work in local languages (where relevant, ideally from the same ethnic group/culture). A gender expert may also need to be engaged to assist with gender-responsive planning aspects

8. Grievance Mechanism

- Describe the process by which people concerned with or potentially affected by the project can express their grievances for consideration and redress. Who will receive grievances, how and by whom will they be resolved, and how will the response be communicated back to the complainant? (see Supplemental Guidance on Grievance Redress Mechanisms)
- Ensure reference is made to and stakeholders are informed of the availability of UNDP's Accountability Mechanism (Stakeholder Response Mechanism, SRM, and Social and Environmental Compliance Unit, SECU) as additional avenues of grievance redress.

9. Monitoring and Reporting

- Describe any plans to involve project stakeholders (including target beneficiaries and project-affected groups) or third-party monitors in the monitoring of project implementation, potential impacts and management/mitigation measures
- Describe how and when the results of stakeholder engagement activities will be reported back to project-affected and broader stakeholder groups. Examples include newsletters/bulletins, social and environmental assessment reports; monitoring reports

Annex 3. Supplemental Guidance: Disclosure of Project-related Social and Environmental Screenings, Assessments, and Management Plans

1. Introduction

Transparency is essential to building and maintaining public dialogue, increasing public awareness, enhancing good governance, accountability, and ensuring programmatic effectiveness. UNDP is committed to ensuring that relevant information about UNDP programmes and projects will be disclosed to help affected communities and other stakeholders to understand the opportunities and risks of proposed activities and to facilitate meaningful, effective and informed participation of stakeholders in project formulation and implementation.

UNDP's Information Disclosure Policy establishes a presumption in favor of disclosure whereby information concerning UNDP programmes and operations is made available to the public unless there is a compelling reason for confidentiality.[41] The Policy stipulates that general project information and project documents are to be disclosed through the UNDP Transparency Portal.

The Information Disclosure Policy specifically requires disclosure of Project Documents and "the completed Social and Environmental Screening Procedure and any related draft and final social and environmental assessments and management plans. Screenings and assessments conducted prior to project approval will be annexed to the Project Document. Subsequent reports and drafts will be disclosed through the UNDP Transparency Portal (para. 12.g). The Policy also notes that country specific documentation is available also from the appropriate Regional and Central Bureaux, Country Office websites.

UNDP's Social and Environmental Standards (SES) reinforce the Information Disclosure Policy and stipulate further requirements regarding disclosure of project-related information concerning stakeholder engagement, social and environmental screening, assessments, management plans, and monitoring reports. This note provides guidance on addressing these SES requirements.

2. Timely, accessible, and appropriate disclosure

UNDP is committed to ensuring meaningful, effective participation of stakeholders in its projects. Stakeholders require access to relevant project information in order to understand potential project-related opportunities and risks and to engage in project design and implementation.

For projects with potential adverse social and environmental impacts, stakeholders need access to screening reports, draft and final assessments and management plans. This information is to be disclosed in a timely manner, in an accessible place, and in a form and language understandable to affected persons and other stakeholders. These elements of effective disclosure are briefly elaborated below:

- *Timely disclosure:* information on potential project-related social and environmental impacts and mitigation/management measures should be provided in advance of decision-making. Draft screenings, assessments and management plans should be provided in advance as part of the stakeholder consultation process. In all cases, draft and final screenings, assessments and management plans must be disclosed and consulted on prior to implementation of activities that may give rise to potential adverse social and environmental impacts.

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[41] The Information Disclosure Policy defines a range of exceptions to disclosure in Part IV.

- *Accessible information:* Stakeholders need to be able to readily access information regarding assessments and management plans. While local regulatory requirements might mandate availability of environmental assessments in government offices, this may not be sufficient to ensure that local stakeholders can access the information. Other means of dissemination may need to be considered, such as posting on websites, public meetings, local councils or organizations, newsprint, television and radio reporting, flyers, local displays, direct mail.

- *Appropriate form and language:* Information needs to be in a form and language that is readily understandable and tailored to the target stakeholder group. Summary information from assessments and management plans may need to be translated and presented by various means (e.g. written, verbal). Level of technical detail, local languages and dialects, levels of literacy, persons with disabilities, roles of women and men, and local methods of disseminating information are important considerations in devising appropriate forms of disclosure. A general solicitation of feedback on project documents may not be an appropriate form of information sharing and solicitation of input. Rather, the material may need to be presented in a contextual manner, such as the presentation of options with key information and questions designed to solicit feedback. Appropriate forms of proactive disclosure should be utilized beyond web posting of information. These may include radio broadcasts, brochures, community postings, SMS, oral presentations, etc. Also, it is vital to ensure that appropriate communication methods are devised to reach potentially marginalized and disadvantaged groups.

- Stakeholders should be asked for input on the types of information they want and need (in addition to the required disclosures covered here) and the most appropriate formats and languages and mechanisms for dissemination.

3. SES disclosure requirements

As part of the stakeholder engagement process, UNDP's SES require that project stakeholders have access to relevant information. Specifically, the SES (SES, Policy Delivery Process, para. 21) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

- Information on a project's purpose, nature and scale, duration, and potential risks and impacts
- Stakeholder engagement plans and summary reports of stakeholder consultations
- Social and environmental screening reports with project documentation
- Draft social and environmental assessments, including any draft management plans
- Final social and environmental assessments and associated management plans
- Any required social and environmental monitoring reports.

As outlined in the SES and UNDP's Social and Environmental Screening Procedure (SESP), the type and timing of assessments and management plans vary depending of the level of the social and environmental risks and impacts associated with a project as well as timing of the social and environmental assessment. Table **A3.1** below outlines various scenarios for disclosing both draft and final screenings, assessments and management plans.

TABLE A3.1. SES/SESP DISCLOSURE GUIDANCE

WHAT to Disclose		WHEN to Disclose	HOW to Disclose
Draft Social and Environmental Screening Procedure (SESP)		• During project design stage stakeholder consultations, gathering input to SESP • If assessment takes place during project design, then the SESP can also be shared and consulted as part of scoping process for assessment	• Appended to Project Concept Note and/or draft Project Document and distributed to project stakeholders
Final (and **Revised**) Social and Environmental Screening Procedure (SESP)		• Post PAC, when Project Document disclosed (SESP included as an Annex) • During project implementation when SESP revised due to substantive changes to project or context	• As an Annex to the Project Document, the SESP will be disclosed on open.undp.org once it is uploaded in the Corporate Planning System. • If revised during implementation, share with Project Board/PAC and upload to CPS
Draft social and environmental assessment reports, including any draft management plans/frameworks			
• Moderate Risk Project with <u>no</u> stand-alone assessment	When no separate assessment is needed,[42] a summary of the analysis contained in the SESP and ProDoc, together with the documents and proposed management measures, should be shared with project-affected stakeholders	• At least 30 days prior to PAC • Part of stakeholder consultations	• Summary should be translated in local language and distributed locally • Disclose draft ProDoc • Posted on UNDP unit (e.g. CO) website[43]

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[42] "In cases where potential adverse impacts are limited in number, well understood, clearly circumscribed, and can be easily avoided or mitigated, the analysis of social and environmental risks and impacts and recommended management actions contained in the SESP may be sufficient (with the risks/impacts and proposed management measures/plans incorporated into the project budget, risk log, and monitoring framework)." UNDP SES Guidance Note on Social and Environmental Assessment, sec. 4.5.

[43] This is now standard practice for UNDP projects that seek support from the Global Environment Facility (GCF). To address the GCF requirements, UNDP discloses the ESMP for Moderate Risk projects at least 30 days before GCF Board consideration on the relevant UNDP country website in both English and the local language(s). UNDP completes the GCF "Environmental and Social report(s) disclosure" template with the relevant weblinks to the posted documents and submits the template together with the GCF proposal.

• Moderate Risk Project with stand-alone assessment and management plan	Drafts of any stand-alone targeted assessments and management plans	• At least 30 days prior to PAC if assessment conducted as part of project preparation • If undertaken as part of project implementation, must be disclosed and consulted on at least 30 days prior to implementation of any activities that may cause adverse social and environmental impacts	• At a minimum, ensure that a summary report of the draft assessment and management plan is translated into local languages and made available in an accessible location together with the draft assessment and management plan • Disclose draft ProDoc • Posted on UNDP unit (e.g. CO) website
• Substantial Risk and High Risk Project	Disclose draft ESMFs, ESIAs or SESAs including any draft management plans. ESIAs and SESAs also require that a summary report be prepared in order to provide an adequate, accurate and impartial evaluation and presentation of the issues and conclusions of the technical assessment. This report must be presented in an understandable format and in an appropriate language(s), including a non-technical summation that can be understood by many stakeholders in order to facilitate and encourage comments. A summary report of the ESMF should also be so developed and shared.	• At least 120 days prior to PAC if assessment conducted as part of project preparation • If undertaken as part of project, must be disclosed and consulted on at least 120 days prior to implementation of any activities that may cause adverse social and environmental impacts	• At a minimum, ensure that a summary report of the draft assessment and management plan is translated into local languages and made available in an accessible location together with the draft assessment and management plan • Disclose draft ProDoc • Posted on UNDP unit (e.g. CO) website
Final social and environmental assessments and associated management plans	Stand-alone targeted assessments for Moderate Risk projects and ESIAs/SESAs for High Risk Projects and any management plans	• Upon receipt. Needs to be prior to the PAC if assessment conducted as part of project preparation, or if undertaken as part of project, before implementation of any activities that may cause adverse social and environmental impacts	• At a minimum, ensure that a summary report of the final assessment and management plan is translated into local languages and made available in an accessible location together with the final assessment and management plan • Posted on UNDP unit (e.g. CO) website