

**KINGDOM OF CAMBODIA**  
**Nation Religion King**



**National Committee for Sub-National Democratic Development**  
**Secretariat (NCDDS)**

**Integration of Social Accountability into National and Sub-National Systems**  
**Project ID: P178921**

**STAKEHOLDER ENGAGEMENT PLAN (SEP) EMBEDDED IN**  
**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**  
**(ESCP)**

**16 August 2022**

## National Committee for Sub- National Democratic Development Secretariat (NCDDS)

### STAKEHOLDER ENGAGEMENT PLAN (SEP) PART OF ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. NCDDS will continue to implement the Integration of Social Accountability into National and Sub-National Systems Project until 2025, with the involvement of the following Ministries/agencies/units such as Ministry of Interior (MOI), Ministry of Education, Youth and Sport (MOEYS), Ministry of Health (MOH), Ministry of Industry, Science, Technology and Innovation (MISTI), Sub-National Administrations (SNAs) and civil society organizations. The International Bank for Reconstruction and Development/International Development Association (hereinafter the Bank) has agreed to provide new financing for the Project, primarily through its Australia World Bank Partnership for Promoting Inclusion, Sustainability and Equality in Cambodia Trust Fund (PROMISE).
2. NCDDS will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. NCDDs will also comply with the provisions of any other E&S documents required under the ESF referred to in this ESCP and the timelines specified in those E&S documents.
4. NCDDS is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by NCDDS as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and NCDDS, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project, changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, NCDDS will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the NCDDS. NCDDS will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the NCDDS shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>NCDDS will prepare and submit regular environmental and social monitoring reports as a section of the semi-annual project reports regarding compliance in accordance with the requirements of ESCP.</p>	Six monthly reports	<i>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</i>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>NCDDS will promptly notify the Bank of any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the communities and workers. The following will be given ultimate priority:</p> <ul style="list-style-type: none"> <li>✓ A list of emergency phone numbers at national level and at site specific locations will be shared to relevant workers, and communities in order to access primary support when there has been an incident or accident.</li> <li>✓ NCDDS will notify the Bank within 24 hours of any incident or accident related to the project or that has an impact on its implementation, and that has or could have a significant impact on affected communities, workers including, for example, health accidents that could result in death or serious injury, cases of gender based violence or violence against minors, vehicle accidents and electrocution.</li> <li>✓ NCDDS will provide sufficient details regarding the incident or accident, and indicate immediate measures taken to address it following NCDDS' HR policy.</li> </ul>	<p>Promptly after taking notice of the incident or accident.</p> <p>Such a mechanism has already been developed by NCDDS and will be updated as required. Ref.: OPP Manual, 2019.</p>	<i>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</i>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>NCDDS will ensure staff with appropriate skills are in place to support project E&amp;S risk management, monitoring and reporting of incidents, including:</p> <ul style="list-style-type: none"> <li>✓ National level team support will be coordinated by M&amp;E and Environmental and Social Safeguard Officers, monitoring accidents, incidents, and environmental and social standard compliance (in line with ESF) with assistance from consultants who support the project and facilitate with line ministries, Sub-National Authorities, and Civil Society;</li> <li>✓ At the sub-national level, the project focal person in each SNAs (Municipal/Provinces, Khan /districts, and commune/sangkat) will work closely with relevant stakeholders and NCDDS;</li> <li>✓ At the community level, the project will provide needed ESF support to community facilitators including volunteers and interns that will regularly monitor environmental and social risks (including Occupational, Health and Safety/EHS of workers) and report on the project.</li> </ul>	<p>Team will be in place right after the project becomes effective and will be kept in place to follow up on results during project implementation.</p>	<i>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</i>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Labor and working condition provisions as per Standard Operating Procedures (SOP) of the NCDDS OPP manual will be implemented for all direct workers. These provisions include the following:</p> <ul style="list-style-type: none"> <li>✓ Labor management procedure under Labor law of Ministry of Labor and Vocational Training of Cambodia, and NCDDS policy on Environmental and Social Safeguards for Sub-national Democratic Development;</li> <li>✓ Management and responsibility for labor and working conditions between the employer and employee such as informed worker’s rights, ensuring safety and welfare, non-discrimination, equality, and equity, not constraining the rights and freedom, grievance mechanism, and preventing the exploitation of children and forced labor based on labor law and child protection.</li> </ul> <p>The OPP/SOP will be reviewed to identify gaps to be met for meeting Bank requirements in particular for suppliers, consultants, interns and community facilitators and provisions will be added if any gaps are identified.</p> <p>The SOP and any additional provisions will be implemented for this project.</p>	<p>The OPP/SOP Manual has been developed and implemented under NCDD/RGC agenda. This OPP/SOP will be reviewed prior to hiring any new workers (direct, contracted, intern, community workers) for this project.</p> <ul style="list-style-type: none"> <li>• Labor Law of 1997</li> <li>• RGC ratified ILO C. 138, Minimum Age and ILO C. 182, Worst Forms of Child Labor, and MOSAVY Prakas (proclamation) No. 106 on the Prohibition of Children Working in Hazardous Places (28 April 2004).</li> </ul>	<p>M&amp;E and Environmental and Social Safeguard officer, NCDDS</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>The grievance mechanism for workers for the project shall be implemented as follows:</p> <ul style="list-style-type: none"> <li>✓ Independent suppliers/consultant/internship/community facilitator have the right to submit complaints to NCDDS at the National level and Sub-national level;</li> <li>✓ Project workers using the grievance mechanism will follow the NCDDS OPP manual;</li> <li>✓ NCDDS will conduct orientation on its existing policies including worker grievance procedures, gender policy, as well as environmental and social requirements with all project staff, consultants, interns and volunteers to ensure that they aware of their rights and benefits before they sign their contracts.</li> </ul>	<p>The NCDDS OPP Manual is in place which may be required to update before hiring staff.</p> <p>NCDDS policies and procedures will be used for suppliers, consultant, interns and volunteers to ensure they are fully aware of, and understand their rights before they start working on the project.</p>	<p>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>NCDDS will review existing occupational, health and safety (OHS) procedures and amend them to meet the required standards of the Bank, especially travel safety for workers.</p> <p>Measures will be implemented, in accordance with Cambodian labor law (Kram March 13, 1997 Labor Code), NCDDS policy on environmental and social safeguards and Bank requirements and will address:</p> <ul style="list-style-type: none"> <li>✓ Analyze and avoid any effects on health and safety of independent contractor/consultant Direct workers/internship/community facilitator during or after the project implementation;</li> <li>✓ Training of project workers and maintenance of training records;</li> <li>✓ Documentation and reporting of occupational accidents, diseases and incidents;</li> <li>✓ Training workers on road safety and monitoring the application knowledge;</li> <li>✓ Prepare for emergencies during the project implementation in case of any problems or accidents;</li> <li>✓ Safety and health considerations of workers and code of conduct.</li> </ul>	<p>The review and amendment of existing procedures will be undertaken for all categories of workers to ensure that they well understand and are aware of them before they start work on this project.</p> <p>Once procedures are revised, they will be implemented throughout the duration of the project.</p>	<p>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</p>
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES ENGAGEMENT</b></p> <p>Indigenous peoples because of their specific needs, require specific measures to ensure they can benefit from the project implementation and in line with their lives, traditions and customs. The following practices must be performed. A protocol for engaging with Indigenous Peoples will be developed to cover:</p> <ul style="list-style-type: none"> <li>✓ Invitations to indigenous peoples including their representatives or village chiefs, with sufficient advance notice, when conducting any training, workshops or consultations;</li> <li>✓ Ensure understanding and participation of Indigenous Peoples in project implementation;</li> <li>✓ The preparation of training at least has a community facilitator and an interpreter for Indigenous Peoples; participation of Indigenous Peoples will be encouraged for each Indigenous Peoples group.</li> </ul>	<p>The protocol will be developed and in place prior to commencement of any engagement activities in communities where Indigenous Peoples are present</p>	<p>M&amp;E and Environmental and Social Safeguard Officer, NCDDS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT AND DISCLOSURE</b></p> <p>The nature of the project is to ensure meaningful engagement of all groups, in particular participation from Indigenous Peoples, marginalised and vulnerable groups.</p>	Continue to implement the annual cycle of public information, citizen engagement, civil society, and action plan development and implementation with citizens.	M&E and Environmental and Social Safeguard Officer, NCDDS
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>The project grievance mechanism as per the NCDDS policy on environmental and social safeguards includes the following:</p> <ul style="list-style-type: none"> <li>✓ Civil society engagement where stakeholders can submit complaints through verbal comments to Community Accountability Facilitators (CAFs), NCDDS, or any public forum where there is participation from citizen, civil society and stakeholders;</li> <li>✓ Civil society engagement where stakeholders have the right to submit a complaint to ombudsman officer at sub-national level (i.e. province or district);</li> <li>✓ Civil society engagement where stakeholders have the rights to submit a complaint to the project technical team at sub-national level. Project team will record and review all complaints received at project quarterly meetings;</li> <li>✓ Civil society engagement where stakeholders have the right to submit a complaint directly to the Partnership Steering Committee (PSC).</li> </ul>	Complain logbook will be used follow the complaint procedure indicated in OPERATIONS POLICIES AND PROCEDURES MANUAL (OPP) 31 July 2019, and Environmental and Social Safeguards for Sub-National Democratic Development (ESS) 31 May 2019 which are The Grievance mechanism as per the NCDDS policy on environmental and social safeguards. This will be implemented throughout the life of the project and reporting.	M&E and Environmental and Social Safeguard Officer, NCDDS

CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training will be provided to all NCDDS staff, consultants and volunteers and the curriculum will be reviewed to ensure all relevant policies are covered and adequate.</p> <p>All relevant stakeholders (staff, contractors, volunteers and interns will receive training at the beginning of the project or on signing their contract. Refresher training will be conducted regularly, at least once a year or as required by safeguard officers.</p> <p>This training will include the following aspects:</p> <ul style="list-style-type: none"> <li>• NCDDS E&amp;S Policy</li> <li>• Training on project grievance mechanism for workers</li> <li>• Training on road safety and application knowledge</li> <li>• Training on stakeholder engagement including indigenous people and most vulnerable groups</li> <li>• Training on stakeholder engagement and disclosure</li> <li>• Policy on Incident Reporting</li> <li>• Occupational Health and Safety/OHS</li> </ul>	<p>Training to subnational authorities on E&amp;S policy and specific topics, continuously throughout the project timeline</p>	<p>M&amp;E and Environmental and Social Safeguard officer, NCDDS</p>