Timor Leste Water Supply and Sanitation Project
(P167901)

Stakeholder Engagement Plan (SEP)

November 2019

Disclaimer
This SEP is a draft document, which is subject to further consultation with relevant
Government counterparts. It will be completed and approved after consultation with
stakeholders during Project Preparation.
Stakeholder Engagement Plan

1. INTRODUCTION
The Timor Leste Water Supply and Sanitation Project is being prepared as an investment project with a proposed outlay of US$ 25 million of IDA Credit resources. As a first engagement of the World Bank in the water and sanitation sector in the country, the proposed Project provides an entry point for further work in Timor-Leste. The Project aims at addressing water supply and sanitation related infrastructure gaps in Baucau-the second largest city and supporting the Government to improve water and sanitation service delivery and sustainability of the investments across the country, including in Baucau, through the development and implementation of its sector institutional reform. In addition, the proposed Project will address the climate-related risks of extreme heat, drought and floods.

The proposed Project is also part of a coordinated World Bank effort to support the Human Capital development agenda in Timor-Leste. Along with the Public Expenditure Review (PER) covering Health, Education and Stunting (FY19), the Basic Education Quality Improvement Project (FY19), the Human Capital Development Strategy (FY20), the Nutrition and Stunting Project (FY21) and the Sustainable Agriculture Productivity Improvement AF (FY23), the Project is part of a well-aligned World Bank support to Government of Timor-Leste efforts to improve access to basic services and nutrition.

2. PROJECT DESCRIPTION
The Project Development Objective is to improve water and sanitation services in the project area. The proposed Project activities are based on the Water and Sanitation Master Plan prepared in 2016. The World Bank has reviewed the Master Plan and considers it acceptable for the preparation of the Project. The estimated cost for the construction of the water supply infrastructure is US$22 million including 20 percent contingency, US$0.5 million for simplified wastewater collecting network and decentralized wastewater treatment systems (DEWATS), US$0.5 million for the construction of the fecal sludge treatment plant, and US$1.5 million for the supervision contract. Master Plan technical design and estimated construction costs will be reviewed during the preparation of the detailed engineering designs (DEDs) studies. Infrastructure will be designed and specified considering the impacts of climate change on water supply and demand, aiming to be climate-proof and with durability of materials as a high priority. Preparation of DED is being contracted and financed by the Government of Timor-Leste and the DED is expected to be available in June 2020.

Implementation of this project will involve the following three components: Component 1: Water Supply and Sanitation infrastructure Development; Component 2: Infrastructure Sustainability Support; and Component 3: Institutional strengthening and Project Management.
Component 1: Water Supply and Sanitation Infrastructure Development

This component will finance the construction and supervision of (i) a water supply system, (ii) a fecal sludge treatment plant and (iii) simplified wastewater collecting network and decentralized wastewater treatment systems (DEWATS) thereby making the residents of Baucau more resilient to heatwaves, droughts, and floods. The design of the infrastructures will be made on the projected population of municipal capital of Bacau, i.e. 32,000 by 2030\(^1\).

Component 2: Infrastructure Sustainability Support

This component is designed to ensure the sustainability of water and sanitation-related investments funded under Component 1. All related infrastructure sustainability support activities will be included in the construction contract and will be implemented in synchrony during the construction phase and continued over the 2 first years of systems operation. This subcomponent will finance technical assistance and goods to: (i) support the water and sanitation service provider in the municipality of Baucau (currently SMASA, but may be the National Water Utility in the future) to develop its capacity, systems and procedures to manage, operate and maintain the new water supply system and the sludge treatment plant according to international quality standards, (ii) support the municipal authorities to promote and regulate desludging, including the transport and safe disposal of fecal sludge from household, institutional and commercial septic tank sludge, thereby increasing access to safely managed sanitation and (iii) secure community participation in and support project sustainability.

Component 3: Institutional strengthening and Project Management

This component aims to support MPW-led sector stakeholder’s collaborative platform to develop and implement the sector institutional reforms to improve sustainable service delivery and sustainability. The component will also finance technical assistance, equipment, and operational costs associated with the implementation of the project. This component is split into two subcomponents, as detailed below. Leadership and coordination of the sector reform will be ensured by Ministry of Public Works (MPW) and financing of sector reform related activities will be provided by the World Bank, ADB, JICA, DFAT, UNICEF and MCC and the GoTL. The World Bank will finance inter alia training, knowledge exchange, and technical and operational support, including the diagnostic of the urban

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\(^1\) Population figures based on the national census of 2014 and projected to 2030 based on 5% population increase, as indicated in the census.
water service and the preparation of a priority service improvements plan, as part of *Utility of the Future* World Bank initiative.

3. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Project formulation and implementation requires substantial engagement with the beneficiary communities and other stakeholders. As part of the Master Plan preparation exercise for Baucau, extensive social research was undertaken during the assessment Stage, including household surveys, focus group discussions (FGDs) and in-depth stakeholder interviews. The details from the household surveys etc. were analyzed and documented in the Assessment Report and the results used to inform various aspects of the master plan. This work was also used to develop an action plan for community consultations and traditional ceremonies as well as a stakeholder communications strategy.

For consultations with community, the result of an earlier survey (for master plan development) indicated that the most preferred method in Baucau is public meeting; the second option is meetings organized by NGOs. Tetum has been and would continue to be used as consultation language and interpreters would be mobilized to translate into other local languages as appropriate. Among others, the modalities of using water source need to be carefully discussed and agreed with the surrounding communities, avoiding social conflicts (as they are using the same source for other purposes, irrigation for example) and maximizing the project benefits. During the preparation of the master plan (an ADB funded TA – Second District Capitals Water Supply Project), consultation with municipality and communities was organized in Baucau from March 24-25, 2015. These consultation meetings were conducted to present the broad outline of the proposed project, solicit issues and concerns from the people regarding the project and their existing water supply and the anticipated environmental impact of the proposed project, and to gather people’s opinion on how to improve their water supply system. During the consultation meetings, mechanisms were proposed to resolve unforeseen concerns, issues and problems that might arise during project implementation. Informed by the results of the previous consultations, this project Stakeholder Engagement Plan and a Grievance Redress Mechanism has been developed and is being disclosed prior to appraisal. The plan is tailored to ensure meaningful consultation with traditional communities experiencing adverse project-related impacts on land, resources and cultural heritage.

4. STAKEHOLDER IDENTIFICATION

In order to define a communication process with the stakeholders, several groups that may be interested and/or affected by the Project implementation have been identified. There are several groups of people and social groups who are interested in the Project at different levels and can

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2 Utility of the Future is an initiative by the World Bank aimed at knowledge exchange to support new utilities in implementing new innovative approaches for improvement of utilities performance and service provision.
be classified as (i) project affected parties (ii) other interested parties (iii) vulnerable groups. For this Project, these may be identified as following:

(i) **Project affected parties:** Community members benefitting from the water supply and sanitation services, community members affected either temporarily or permanently by project construction activities either due to temporary or permanent land taking, water supply agents or sanitation service providing agents who are negatively impacted by the introduction of the water supply and sanitation project intervention, service provider agencies directly involved with the water supply and sanitation service provision are examples of project affected parties who need to be actively consulted with, informed about overall project approach and design and whose buy in needs to be sought as part of the stakeholder engagement process. Financial and other implications in terms of improvement in the water supply and sanitation service delivery, the impact in terms of O&M responsibilities for the individual and family, need to participate in decision making etc. are facts that need to be clearly communicated to all of the participating stakeholders. Meaningful consultations to ensure that all of these aspects are clearly communicated and confirming full understanding of all affected stakeholders is a primary requirement that the project proponent will aim to fulfill using this stakeholder engagement plan.

(ii) **Other interested parties:** The category of “Other Interested Parties” includes agencies who may have a possibility to be involved in the decision-making related to the project on implementation of the Project and/or may have an interest in the Project. This group mainly includes governmental entities such as the Directorate General of Water Supply and Sanitation (DGAS), Ministry of Public Works that is primarily responsible for project conceptualization, design and implementation and consists of the Directorate for Water Resources (DNGRH), the Directorate for Water Supply (DNSA) and the Directorate of Sanitation (DNSB). Ministry of Health, Ministry of Education, Ministry of Justice, National Directorate of Lands, Properties and Cadastral Services, National Council for Food Security, Sovereignty and Nutrition in Timor Leste (KONSSANTIL) are some of the other key Government level stakeholders. A Project Steering Committee to be chaired by the Ministry of Public Works (MPW) and including Ministry of State Administration, Ministry of Finance, Ministry of Health and Ministry of Education representatives would provide overall policy and implementation guidance to the project. A Project Management Unit (PMU) to be established at DGAS would be primarily responsible for project implementation. The Municipality of Baucau would be primarily responsible for coordination of the development and regulation of safely managed sanitation service and social activities, including community engagement, conflict resolution, social supervision and other community related issues. Amongst international organizations, ADB, UNICEF, Wateraid etc. work on water supply and sanitation issues in and around Baucau and provide support for related project level and capacity building investments. The local stakeholders include the project beneficiaries living in Baucau and need to be fully
involved in understanding their roles and responsibilities vis a vis managing the water supply and sanitation system sustainably.

In addition, there are civil society organizations providing support to community-based resource management efforts, special social groups such as Youth and women groups, private sector, academia, and the public.

(iii) **Vulnerable & Disadvantaged stakeholders:** While the vast majority of the Baucau city population is indigenous and vulnerable on that count, even amongst this population there are the relatively more vulnerable and disadvantaged whose active participation needs to be solicited. The stakeholder engagement plan and strategy places particular emphasis on community organization and socialization efforts to reach out to these communities understand their specific needs and concerns and ensure that project design takes them adequately into account.

The main groups of stakeholders identified so far are listed in the table below. The list will be updated and modified in the ESCP by February 15, 2020 as part the course of the preparation for Project implementation and as a result of cooperation of the parties.

<table>
<thead>
<tr>
<th>Level of Stakeholder interest in/involvement with the Project</th>
<th>Stakeholders who may directly or indirectly be involved with the Project</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beneficiary Communities directly benefitting from the improved water supply and sanitation services</td>
<td>Active participants in project design and formulation and decisions on community involvement in project implementation and operations and maintenance.</td>
<td></td>
</tr>
<tr>
<td>Local community members either temporarily or permanently adversely affected by project construction activities, land taking etc.</td>
<td>Actively involved in the process of discussing project design, construction implications and manner in which they would be compensated for temporary or permanent effect to their assets and livelihoods.</td>
<td></td>
</tr>
<tr>
<td>Vulnerable, disadvantaged and relatively voiceless sections of the community including marginalized ethnic groups, women, landless, ageing population etc. that need to be reached out to address their concerns.</td>
<td>To be reached out to, made fully aware or project design and operating considerations, construction related impacts and their concerns and opinions</td>
<td></td>
</tr>
</tbody>
</table>
proactively sought and incorporated as part of project design.

<table>
<thead>
<tr>
<th>Ethnic groups and communities with strong traditional beliefs and ceremonies associated with community resource ownership amongst other traditions.</th>
<th>Special attention would be paid to consultations with ethnic groups and IP communities with intangible cultural heritage embodied in traditional beliefs and ceremonies associated with community resource ownership. For instance with many ethnic groups and other stakeholders including government officials, the local tradition holds that the amount and abundance of spring water is influenced by spirits associated with the spring.</th>
</tr>
</thead>
</table>
| Ministry of Public Works (MPW), Directorate General for Water and Sanitation (DGAS) National Directorate for Water Supply (DNSA), National Directorate of Basic Sanitation (DNSB) National Directorate of Water Resources Management (DNGRH). | Ministry of Public Works (MPW) is the Executing Agency (EA) and will be responsible for the design, execution, coordination & evaluation of policies in the areas of public works, urban planning, housing, water supply, distribution and management, sanitation and electricity. MPW responsibilities for the distribution of public water supply & sanitation, drainage and management of water resource are delivered through the DGAS which will be the Implementing Agency along with its 3 national-level directorates. DGAS will be responsible for planning, contract administration, financial management, supervision of environmental and social safeguards and monitoring with
- DNSA--responsible for establishing national policy priorities & financing capital investments of public water supply systems.
- DNSB-- that has the mandate to construct, operate, and maintain wastewater treatment facilities & |
drainage systems & construct public toilets in urban areas.

- DNGRH—that is responsible for monitoring & research on the quality and volume of water resources to support current water supply needs & future development of the water resources

| **Project Steering Committee (PSC)** to be chaired by the Ministry of Public Works (MPW) and to include Ministry of State Administration, Ministry of Finance, Ministry of Health, and Ministry of Education representatives. | To provide overall policy guidance during Project preparation and implementation. It will coordinate interventions from various ministries and agencies in charge of water supply and sanitation development.

| **A Project Management Unit (PMU)** to be established under the DGAS | The PMU

- will play a key role in managing, implementing and monitoring the project.
- Undertake project administration including the project design, ensuring fiduciary and environment and social management including finalizing ESF documentation such as Stakeholder Engagement Plan (SEP), Environment and Social Commitment Plan (ESCP), Labor Management Procedure (LMP) etc.
- Prepare a Project Operations Manual
- Carry out the Project activities according to the operations manuals.
- Field supervision.
- Monitor progress of the project management and provide progress and annual project implementation reports to the Project Steering Committee.

| **The Municipality of Baucau** | To coordinate the development and regulation of safely managed sanitation service and social activities, including community engagement, conflict |
The Municipal Water, Sanitation and Environmental Service. (SMASA)  
| Provision of water supply and sanitation services at the municipal level. SMASA also provides support to community water management groups (Grupu Maneja Fasilidade, GMF) for the delivery of service in rural communities.

| Ministry of Health (MoH)  
| Ensuring health, sanitation and related concerns are well addressed.

| Ministry of Justice- (MoJ)  
| Ensuring timely delivery of justice.

| National Directorate of Lands, Properties and Cadastral Services—(NDLPCS)  
| Ensuring Land required for the project is made available following due procedure.

| National Council for Food Security, Sovereignty and Nutrition in Timor Leste (KONSSANTIL)  
| Ensuring food security through coordinated efforts of participating Ministries.

| International Organizations like ADB, UNICEF, Wateraid etc..  
| Water and Sanitation related investments and capacity building support.

| The Project Management Unit (PMU)  
| Ministry of Health through the National Directorate for Public Health (DNSP)  
| Responsible for Water, Sanitation and Hygiene (WASH), Health and Nutrition behavior change communication programs.

| Municipal Water, Sanitation and Environmental Service (SMASA)-part of municipal government.  
| Provision of municipal level, water supply and sanitation services.

| Community Water Management Groups (Grupu Maneja Fasilidade-GMF)  
| Delivery of service in rural communities.

5. INSTITUTIONAL ARRANGEMENTS

The institutional arrangement for the SEP will follow the project’s overall implementation arrangements to ensure that stakeholder engagement is fully mainstreamed into the project implementation. The DGAS PMU will act as the Executing Agency (EA) for this project, with day-to-day project management and project coordination under the oversight of the DG-DGAS. As the EA, PMU will be responsible to coordinate the results achieved by each of the contracted agencies in accordance with the contracts and with due accountability towards the Baucau Municipality and other relevant Baucau district level stakeholders who are well versed with district level water supply and sanitation realities. The PMU would be responsible for measuring progress towards the project’s objectives. The Head of the PMU will be responsible for the overall implementation of the Stakeholder
Engagement Plan (SEP). The PMU will also facilitate regular coordination meetings with the Baucau Municipality and all relevant Baucau district/municipality stakeholders; implement Environmental and Social Standards (ESSs) in accordance with the ESF; manage and report on the Results Framework; and develop, utilize, and update the Project Operations Manual (POM) with all relevant stakeholders. It will be led by a dedicated Project Coordinator, who will be responsible for managing the project’s technical, fiduciary, safeguards, and monitoring and evaluation (M&E) activities.

6. STAKEHOLDER COMMUNICATION

The purpose of using different methods of communication are (1) to promote easy, transparent, direct, open and interactive communication with all stakeholders and (2) to elicit feedback in the project preparation and implementation phase.

The methods vary according to the target group as follows.

- Regular meetings with government – central, and district/municipal.
- Community facilitation;
- Public information dissemination and disclosure (i.e. through local media, information boards, village representatives and/or leaders);
- Interview with representatives of local communities and organizations;
- Public meetings (in provinces, regency/city, village), and workshops.

Public information materials to enable wider access to project information as well as progress will be developed during project implementation. This includes the types and forms of information dissemination, as well as timing which will be determined during project implementation based on assessments of communities’ access to such information and barriers. Stakeholders’ communication and consultation preferences, particularly those of target communities will also be carefully assessed to promote greater participation and social inclusion.

The principles of communication and stakeholder engagement include as follows.

1. Participation: It is necessary to ensure broad and inclusive participation of beneficiary communities who will receive the water supply and sanitation service. Such participation will be conducted through a culturally sensitive approach and is based on meaningful engagement. Inputs would be sought from beneficiaries, affected people and other interested parties on issues related to site specific planning and implementation of the project. Communities will be provided with options to enable them to participate and a targeted outreach will be made available to ensure that vulnerable groups have access to overall project implementation.

2. Access to information and disclosure: Relevant information will be disclosed in Tetum and other local languages and forms accessible to target communities and the wider public. Communities will retain the rights to ask information about the status of the project, their entitlements, eligibility criteria as well as responsibilities and GRM channels will be made accessible.

3. Social inclusion: Community engagement should take into considerations various factors which may inhibit and/or prevent participation such as gender inequality, illiteracy, disability, ethnicity, and other exclusion factors amongst vulnerable groups. Hence, consultations and facilitation will be targeted to ensure tailored engagement approach. Risk mitigation measures shall be prepared in consultations with vulnerable groups.
4. **Transparency:** Environmental and social risks and benefits generated and/or associated with project activities shall be communicated through open and constructive dialogue. Agreement on mitigation measures, including alternative designs shall be documented and made available to the public. A regular monitoring and tracking of FGRM will be made publicly available, including status of resolution.

5. **Informed consultation without coercion:** Prior engagement and information dissemination should precede consultations to allow such consultations to be meaningful. Project stakeholders will be provided with options on a range of consultation modalities and/or approaches and retain the rights to refuse participation despite such options.

The public consultation plan related to environmental and social management will be developed once the target locations have become clear by around March 15, 2020.

**FINANCING PLAN:**
Initially, the Project Management Unit (PMU) will be formed by appointing a Project Coordinator under the responsibility of PMU. This unit aims to engage and work with stakeholders to build and maintain constructive coordination/relationships. All PMU members are representatives of the PMU staff.

The implementation of SEP will be funded by the PMU under the control and responsibility of the Project Coordinator through **Component 3** on Institutional strengthening and project management. The main task of the PMU is to be responsible for the overall project operation, solve project problems, and coordinate with the Steering Committee.

The PMU will work and communicate with the District/Municipal authorities and other stakeholders and will use it to:
- Deliver the latest information and keep stakeholders/community informed of the progress;
- Deliver the information to stakeholders about the complaints mechanisms and procedures described in this SEP;
- Consult with the interest groups and ensure that consultation is inclusive and can be accessed both in format and location according to the group characteristics.

A preliminary assessment of the financing needs is currently being undertaken and will be included in the revised SEP prepared by February 15, 2020 (as per ESCP), with the main components as follows:

**Table 2: Financing Needs**

<table>
<thead>
<tr>
<th>Expenditure Items</th>
<th>Est. Amount</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recruitment of environmental and social specialists, including community engagement specialist.</td>
<td>TBD</td>
<td>Comp. 3 on Institutional strengthening and project management</td>
</tr>
<tr>
<td>Public consultations at the national level</td>
<td>TBD</td>
<td>Comp. 3 on Institutional strengthening and project management</td>
</tr>
</tbody>
</table>
10 | P a g e

| Public consultations at the Baucau district level | TBD | Comp. 3 on Institutional strengthening and project management. |
| Community facilitators | TBD | Comp. 3 on Institutional strengthening and project management. |
| Capacity building on community engagement for facilitators Baucau district/municipality authority. | TBD | Comp. 3 on Institutional strengthening and project management. |
| Stakeholder engagement and community awareness materials and campaign | TBD | Comp. 2 (PMU) and Comp. 3 (PMU) on project implementation support |
| GRM operationalization | TBD | Comp. 3 on Institutional strengthening and project management. |

7. PUBLICATION (INFORMATION DISCLOSURE)

Documentation and information about the update of project activities and the results of consultation with stakeholders will be published by PMU in two places as follows.

Directorate General for Water and Sanitation (DGAS) office
Ministry of Public Works, Dili, Timor Leste

Ministry of Finance website: https://www.mof.gov.tl/?lang=en

8. GRIEVANCE REDRESS MECHANISM (GRM)

The project will use the Grievance Redress Mechanism (GRM) to identify and solve the problems related to the project. It facilitates the process of receiving, evaluating, and handling complaints from citizens, affected persons, or beneficiaries related to the project. The aims of GRM are to: (i) strengthen accountability to the beneficiaries; and (ii) provide a means for project stakeholders to provide feedback and/or express complaints related to project activities.

By increasing transparency and accountability, GRM is expected to reduce the risk when the project inadvertently affects citizens/beneficiaries and serves as important feedback and learning mechanisms that can help increase the project's impact. This mechanism will not only receive and record complaints but also seek to resolve them. Although feedback must be handled at the level that
is closest to the complainant, all complaints must be recorded and follow the basic procedures as required in the SEP.

The Grievance Redress Mechanism (GRM) will be developed based on the existing complaints handling system at DGAS-MPW. The GRM design is detailed below.

**Definition of GRM:** Regarding Operational Guidelines, the Grievance Handling Mechanism is a process for receiving, evaluating, and handling complaints from communities, beneficiaries, other stakeholders and casualties.

**Scope and user of GRM:**
**Scope:** Complaints Handling Mechanisms will be provided for stakeholders and other interested parties to raise questions, comments, suggestions and/or complaints, or provide any feedback from all activities funded by the project.

**GRM users include** (1) project beneficiaries, people who affected by the project (i.e. people who will and/or directly or indirectly affected by the project), (2) project workers, including construction workers and (3) other citizens who can use GRM for the purposes aforementioned (see Scope).

**Management of GRM:** GRM will be managed by PMU, under the direct responsibility of the Project Coordinator.

**Submission of complaints:** Complaints can be submitted at any time during the implementation of the Project.

**Procedure**

**How to file a complaint**
The PMU will provide the channels where residents/beneficiaries/affected residents can make a complaint by:

a. **Social media:** Twitter, Facebook (will be established before starting the project)
b. **Email:** Project email address: (will be established before starting the project)
c. **Letter:** Sent to the Project Office, PMU.
d. **Hotline number** will be made before starting a project that can also be accessed via text – WhatsApp or SMS

The project must ensure the availability of all channels and accessibility to the complainant contact.

**Confidentiality and conflict of interest:** Complaints can be made anonymously. Confidentiality is a fundamental aspect of the GRM system of the project. It is a legal obligation to guarantee all cases, even when the complainant is identified. To ensure this and to avoid conflicts of interest, many channels were made to file complaints.

**Receiving and recording:** a person who receives complaints will fill out the complaint form (see Appendix 1), record them in the Complaints List, and ensure that these are saved by the person in charge of GRM. Next, complaints must be immediately submitted to the tracking system. In the tracking system, complaints are sorted and transferred to the division that is responsible for investigating and handling complaints, or to staff if the complaint is related to a particular project
activity. The Project Coordinator is responsible to choose a person who will direct the complaint, whether or not the complaint needs an investigation and the time period to respond.

To appoint an investigating officer, the Project Coordinator must ensure that there is no conflict of interest. All people involved in the investigation process must not have material, personal, or professional interests to the investigation and there is no personal or professional relationship with the complainant or witness.

After the investigation process is completed in an organized manner, the person in charge will organize the GRM records and enter these data into the Complaints List.

The number and type of suggestions and questions must also be recorded and reported so that they can be analyzed to improve project communications.

**Review complaints or/and questions**
Complaints must be checked within 10 (ten) working days. The person who takes charge of investigating complaints will gather the facts to get a clear situation. Investigation/follow-up can include site visits, document review, and meetings with parties who can solve the problem.

The results of the investigation and response will be submitted for consideration to the Project Coordinator, who will decide what action to take. After a decision is made and the complainant receives the information, the investigation specialist will explain the action to be taken in the complaint form (see Appendix 1), as well as details of the investigation and findings, and submit a response to the Project Coordinator for signature.

**Response to complaints**
The complainant will receive response on the complaint by mail or e-mail. Responses are made in answer to a question based on the materials of the investigation and, if appropriate, must refer to national law.

The deadline of investigating complaints can be extended to 10-30 business days based on Project Coordinator approval, and the complainant must be informed whether:

a) additional consultation is needed to respond to a complaint;

b) complaints need to be answered by complex information and need to learn additional materials to respond.

**Awareness raising**: Information is provided in an accessible format. Information about the Grievance Handling Mechanism will be available on the website of Directorate General for Water and Sanitation (DGAS) office Ministry of Public Works, Dili, Timor Leste and the Ministry of Finance website: [https://www.mof.gov.tl/?lang=en](https://www.mof.gov.tl/?lang=en) and will be included in communication with stakeholders.

**Staff placement and capacity building**: The Project Coordinator will assign roles and responsibilities to PMU staff. This will be documented in the Project Operation Manual and will be updated regularly.

- Management of the entire GRM system
- Develop and maintain the improvement of awareness
- Collecting the complaints
- Recording the complaints
- Notification to complainants about receipts and deadlines for reviewing complaints
• Sorting / categorizing complaints
• Observing the entire problems, including the causal relationship between project activities and suspected damage/danger/disturbance
• Decision making based on the observation
• Processing appeals or ongoing communication to complainants with the aim of resolving the issue peacefully
• Publishing the responses to a complaint (need to be confirmed by the complainant)
• Organizing and applying information delivery and awareness raising campaigns
• Reporting and handling GRM results.

Transparency, monitoring, and reporting

Transparency
Regular policies, procedures, and updates on the GRM system, complaints made and resolved, will be available on the website of Directorate General for Water and Sanitation (DGAS) office Ministry of Public Works, Dili, Timor Leste and the Ministry of Finance website: https://www.mof.gov.tl/?lang=en
This complaint database will be updated every 3 months.

Routine internal monitoring and reporting
The PMU will assess the GRM function on a quarterly basis to:
- Make summaries of GRM results on a monthly & quarterly basis, including suggestions and questions, to the project team and management.
- Review the status of complaints that have not been resolved and suggest corrective actions as needed.

During the quarterly meetings, there will be a discussion and review of the effectiveness and use of GRM and suggestions collected on how to improve it.

Submitting the midterm and annual progress report to the World Bank
In the midterm (semester) and annual implementation reports that are submitted to the Bank, the DGAS, Ministry of Public Works will include GRM results, which provide the latest information as follows:
• Status of GRM information (procedures, staffing, awareness raising, etc.);
• Quantitative data about the number of complaints received, the relevant number, and the amount completed;
• Qualitative data about the types of complaints and answers given, unresolved problems;
• The time needed to resolve complaints;
• Number of complaints resolved at the lowest level, rising to a higher level;
• Any special problems solved by procedures/staffing;
• Factors that can influence the use of the GRM / beneficiary feedback system;
• All corrective actions used.

9. MONITORING AND REPORTING
Mid-year and annual progress reports on project activities will be available at the Project office and published on the Ministry of Public Works and Housing Website (https://PMU.go.id). The special webpage will be established at the beginning of the project. The Grievance Redress Mechanism (GRM) would be finalized and the final version included as part of the Stakeholder Engagement Plan to be finalized by February 15, 2020.
APPENDIX 1 - COMPLAINTS / QUESTIONS RECORD FORM

<table>
<thead>
<tr>
<th>COMPLAINTS / QUESTIONS RECORD FORM (Form A)</th>
</tr>
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<tbody>
<tr>
<td>Instructions: This form must be completed by staff who receive questions or complaints and are stored in the project file. Please attach relevant supporting documentation/letters.</td>
</tr>
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<table>
<thead>
<tr>
<th>Date of Complaint:</th>
<th>Name of Staff:</th>
</tr>
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<tbody>
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<table>
<thead>
<tr>
<th>Complaints Received by (please tick (√) the appropriate box):</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ National □ City □ Municipality □ Village</td>
</tr>
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<table>
<thead>
<tr>
<th>Complaint made via (please tick (√) the appropriate box):</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ In person □ Phone □ E-mail □ SMS □ Website</td>
</tr>
<tr>
<td>□ Complaint Box / Other advice □ Community Meeting □ General Consultation</td>
</tr>
<tr>
<td>□ Others______________</td>
</tr>
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<table>
<thead>
<tr>
<th>Name of Complainant: (information is optional and confidential)</th>
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<tbody>
<tr>
<td>Male □ Female □</td>
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<table>
<thead>
<tr>
<th>Address or contact information of complainant: (information is optional and confidential)</th>
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<tr>
<th>Location of complaints/problems occurred [please write]</th>
</tr>
</thead>
<tbody>
<tr>
<td>National: □ City: □ District: □ Village:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A Brief Explanation of Complaints or Questions: (please write as much detail as possible)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Category</td>
</tr>
<tr>
<td>------------</td>
</tr>
<tr>
<td>Category 1</td>
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<tr>
<td>Category 2</td>
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<td>Category 3</td>
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<td>Category 8</td>
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<tr>
<td>Category 9</td>
</tr>
<tr>
<td>Category 10</td>
</tr>
</tbody>
</table>

Handle and follow up required by:

Progress in resolving complaints (e.g. answered, resolved):