



**KOSOVO**  
**MINISTRY OF FINANCE, LABOR AND TRANSFERS**

**KOSOVO SOCIAL ASSISTANCE REFORM PROJECT**  
**STAKEHOLDER ENGAGEMENT PLAN**

**JULY 16, 2021**

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## **Acronyms and Abbreviations**

ALMP	Active Labor Market Programs
CPF	Country Partnership Framework
CSW	Centers for Social Work
DSPF	Department for Social Policy and Families
EARK	Employment Agency of the Republic of Kosovo
ESF	Environment and Social Framework
ESS	Environmental and Social Standards
ESCP	Environmental Social Commitment Plan
GM	Grievance Mechanism
IT	Information Technology
MFLT	Ministry of Finance, Labor and Transfers
MT	Means Test
NGO	Non-governmental organization
OIPs	Other interested parties
PAPs	Project-affected parties
PDO	Project Development Objectives
PCU	Project Coordination Unit
PMT	Proxy Means Test
RAE	Roma, Ashkali and Egyptian
SAS	Social Assistance Scheme
SEP	Stakeholder Engagement Plan
SHI	Social Health Insurance
MIS	Management Information System
SRMS	Social Registry Management System
SWIS	Social Welfare Information System

## I. INTRODUCTION

### 1.1 Project Description

The World Bank aims to support the Government of Kosovo to strengthen its social protection system through the Kosovo Social Assistance Reform (KSAR) Project. The Project seeks to improve the performance of the Government's Social Assistance Scheme (SAS) as the first step in a broader reform of the Government's social protection spending and enhance social protection delivery systems, which will also lay the building blocks for the broader reform of Kosovo's social protection system and a more effective response to future crises. The project will also support the Government's reform of the SAS through the adoption and rollout of a new Law on the SAS.

To achieve these objectives, the Project has been structured in three components: a) strengthen social protection delivery systems; b) improve the performance of the SAS and enhance the management capacities, stakeholder engagement and communication strategy.

The Social Assistance Reform Project aims to improve the performance of the Government's Social Assistance Scheme (SAS) as the first step in a broader reform of social protection spending. To this end, the project will support the Government to make much needed investments in the delivery systems of the SAS, which will also lay the building blocks for the broader reform of Kosovo's social protection system and a more effective response to future crises.

The **Project Development Objective** is to improve the effectiveness and equity of Kosovo's social safety net.

The Project is planned to be implemented through three components organized in sub-components which are interlinked and contribute towards the achievement of the PDO.

#### **Component 1. Strengthening social protection delivery systems**

This component will include (i) a set of investments in core delivery systems, which will improve the performance of the SAS and the social protection system more broadly; and (ii) resources to support the Government's aim of promoting the activation of SAS beneficiaries into the active labor market. Each of these are described below.

Sub-component 1.1: Social protection delivery systems provides investment financing for:

**The development of the Social Registry Management System (SRMS)**, which is a core part of the reform of the SAS and foundational to any reform of the broader social protection system. The SRMS will be a database containing information about the socioeconomic status of individuals, families and/or households to be used by the SAS and other social assistance and pension programs, such as Social Health Insurance (SHI) Scheme and energy subsidies. The SRMS will also contain tools designed to allow for assessment of socioeconomic status (the means test (MT) and the new Proxy Means Test (PMT) that together comprise the new poverty test), and information from ministries about the social programs from which households are benefitting. In this way, the SRMS will allow the Government to see which households are receiving which social benefits, creating transparency in the sector as well as the evidence base for further reforms of social assistance and pensions. The development of the SRMS will build on experience gained through the existing SAS information system, the information system built for Measure

15, and the ongoing Social Health Insurance Scheme pilot, and will include building the database, drafting necessary regulations, operational procedures and capacity building for Centers for Social Work (CSW) in terms of training and equipment to ensure that they use the system as intended.

These investments in the SRMS will be complemented by transforming SAS Management Information System (MIS) into integrated Social Welfare Information System (SWIS). The SWIS will be a system that will provide harmonized tools for the administration of fully integrated social protection delivery chain (outreach-asses-enroll-provide-oversee) for all non-contributory cash benefits. The system will support business processes in the social protection delivery chain for existing cash benefits and be easily configurable to support any future benefits. The SWIS will be built through the upgrade and generalization of the SAS MIS and will be able to support any non-contributory cash benefit schemes. The administration of the following programs will be initially transferred to SWIS: SAS, SHI exemptions, Child Benefits and Disabilities.

This will be supported by improving the capacity of the Ministry and CSWs to utilize the SRMS and SWIS. The implementation of the SRMS and SWIS will require change of legal environment, changes in institutional responsibilities, capacity building and stronger IT infrastructure and IT governance model. The Project will support: (i) Development of legal foundations for introduction of the SRMS and SWIS; (ii) Development of procedures and guidelines/rulebooks for reformed cash benefits administration; (iii) Reorganization of Centers for Social Work to introduce function of social agent responsible for MT and PMT; (iv) Increase capacity of social workers (job description, skills) to enable use of SRMS, SWIS and case management with a focus on the client; (v) Improve technical infrastructure (computing and communications) of CSWs to be able to use SWIS and SRMS; (vi) Increase capacity of the Ministry of Finance, Labor and Transfers (MFLT) to manage SRMS, SWIS and data analytics and standardization (reformed IT function, job descriptions, service standards, procedures, operations manuals, skills development, technical infrastructure); and (vii) Introduce performance evaluation oriented more to outcome and impact evaluation.

**Modernizing the SAS delivery systems**, with a proposed focus specifically on the introduction of digital payments systems for the SAS and social benefits in general. Digital payments have been shown to increase financial inclusion among beneficiaries, promote savings, and reduce the scope for error, fraud, and corruption. The Central Bank is committed to promoting financial inclusion in Kosovo and, to this end, this activity will contribute towards its objective. In close coordination with the Central Bank, and building on analysis carried out by the World Bank's Finance, Competitiveness and Innovation Global Practice, this component will (i) assess options for digital payments that are suitable for the target population of the SAS, including a review of access points; (ii) support the review of SAS regulation, and other regulations, as needed; (iii) finance the implementation of strategy to adopt the use of the selected technological solution; and (iv) the preparation or adaptation of materials to promote financial literacy, with particular attention to Roma, Ashkali and Egyptian (RAE), given reports of a lack of identification documents as well as high rates of illiteracy, that may create barriers for this population in accessing the financial system.

**Improving outreach, communication and profiling.** This component will also support the modernization of communication, outreach and enrollment processes to, for example, allow online applications to the SAS. It will also support a communication strategy and citizen engagement activities to help ensure that poor families, and especially RAE population, have full knowledge of the SAS reform, are aware of their rights and obligations, and are able to provide feedback on the reform. This will include disseminating widely information about the new rules and procedures for application for entry in the proposed social

registry before and during the nationwide implementation of the SAS reform. This sub-component will also provide support to further refining and strengthening the support provided through CSWs to beneficiaries applying to and enrolling in the SAS by, for example, improving the profiling of beneficiary needs and vulnerabilities, and linkages with the Employment Offices (see sub-component below).

#### **Sub-component 1.2: Supporting the activation of SAS beneficiaries**

This component will seek to strengthen the coordination within the CSWs and between the CSWs and the Employment Offices of the Employment Agency of the Republic of Kosovo (EARK) to support the activation of SAS beneficiaries into appropriate training and other active labor market programs (ALMPs), thereby supporting their graduation out of the SAS. Given the Government's ambitious agenda in terms of promoting employment and activation, it is proposed that detailed objectives of and activities under this sub-component will be designed following approval of the Project.

#### **Component 2: Improving the performance of the SAS**

This component will (i) retroactively financing an increase in SAS benefits in response to the COVID-19 pandemic, thereby improving the responsiveness of the SAS to shocks; (ii) support the Government to introduce the eligibility criteria for the SAS that will select beneficiaries on the basis of their poverty only (that is, eliminating the categorical criteria); and (iii) finance the delivery of cash transfers to beneficiaries selected and paid according to the new SAS Law, once approved by Parliament.

#### **Sub-component 2.1: Responding to COVID-19 through SAS**

This sub-component will provide retroactive financing to be provided to reimburse the Government for the cost of providing additional support to SAS beneficiaries in 2021 to help them weather the ongoing negative economic effects of the COVID-19 pandemic. This retroactive financing will reimburse the Government for the cost of payments that were made following the established procedures for the SAS, which have been assessed by the World Bank as being adequate.

#### **Sub-component 2.2: Supporting the roll-out of the new eligibility criteria for the SAS.**

This sub-component will provide investment financing to support the Government to rollout a new method of poverty targeting based on a revised means test and a new PMT. While this new poverty test will be first introduced for use by the SAS and the Social Health Insurance Scheme, it is anticipated that, over time, it will be extended to other programs, thereby becoming a key component within Kosovo's social protection system. Following the submission of the new SAS Law, which is the basis for the reform of the Scheme, this sub-component will support the implementation of the new poverty test by financing the cash transfers for a temporary expansion of the SAS to allow the Government to rollout the new poverty-targeting procedures. Such a temporary expansion is required because, with the adoption of the new poverty-targeting procedures and without an increase in the budget, it is expected that a significant proportion of existing beneficiaries will lose their eligibility for the SAS whereas others will gain access. In order to smooth this reform, it is important to establish a transition period in which households who would lose SAS eligibility under the new targeting instrument remain in the program for a period of at least six months before exiting. For this reason, the coverage of the SAS will temporarily expand while current beneficiaries continue to receive support and new beneficiaries are targeted and enrolled. Establishing this transition period will also allow the Government to carefully review and learn from the introduction of the new poverty test.

### **Sub-component 2.3: Implementation of the new SAS Law**

This sub-component will support the Government to adopt the new SAS Law and to deliver on the objectives, as will be set out in this Law. The approval of a new SAS Law will, at a minimum, (i) set out the eligibility criteria for the SAS, which will be based on the poverty status of a household only, removing the categorical criteria, and any associated exit criteria; (ii) the new benefit formula; and (iii) the basis for allowing the program to expand in response to shocks. This sub-component will allocate financing to the Government to deliver cash transfers to beneficiary households who are selected, enrolled and paid according to the new rules that will be set out in the SAS Law, once approved by Parliament.

### **Component 3. Project management and capacity building, stakeholder engagement and communication strategy**

This component aims to strengthen the capacity of the MFLT to manage the SAS and meet World Bank financial management, procurement, and environmental and social framework (ESF) requirements. To this end, the component will finance a Project Coordination Unit, which will include Project Coordinator, an information technology (IT) expert to oversee the Social Registry Management Information System (SRMIS) and, as required, other IT investments, financial management expert, procurement expert, social expert, as well as other short-term consultants, and operating costs for the MFLT which exclusively relate to the implementation of the Project. Through involvement in the project coordination and implementation, the project shall strengthen the MFLT's capacity in planning, monitoring and evaluation, including financing a proposed set of process reviews and beneficiary surveys. It is anticipated that this component will also include regular training of social workers in the CSWs and assist the CSWs by purchasing of equipment, such as office equipment (including computers) and vehicles as deemed necessary to ensure the reform sustainability.

Direct beneficiary of the KSAR Project is the Ministry of Finance, Labor and Transfers (MFLT) as Implementing Agency. Centers for Social Work (CSW) and Employment Agency with municipal employment offices as end beneficiaries are key stakeholders for Project implementation, including municipal entities and local communities. Key vulnerable groups include SAS Beneficiaries; persons living below the poverty line; economically marginalized and disadvantaged groups; unemployed and long-term unemployed; elderly, people with disabilities and chronic diseases; single-parent headed households; women; people with low literacy; RAE communities and other ethnic minorities living in Kosovo.

Due to its nature, this Project will require strong community and stakeholder engagement for the proposed activities to insure its success and sustainability. The Project foresees citizen and stakeholder engagement which has been considered for the planning stage and throughout implementation to provide inputs on SAS reform needs. The Project will enable participation and promote inclusiveness, especially for vulnerable groups, and will ensure that gender considerations are met.

## **1.2 Purpose of the SEP**

This SEP aims to identify stakeholder groups of the proposed Word Bank-financed project and provide a program framework for stakeholder engagement in line with the laws of Republic of Kosovo, as well as the requirements of World Bank. Previous engagement activities carried out by MFLT in the context of the proposed reform of the SAS and the roles and responsibilities of MFLT in engaging with its stakeholders for the implementation of the Project activities will be summarized in this Plan.

Additionally, this plan will identify effective ways of communication with stakeholders who may be affected by or will be interested in the Project throughout its whole life cycle, as such communication is critical to make sure that all potential beneficiaries become aware of the Project. Hence, the plan of how MFLT (including the Department for Social Policy and Families (DSPF) and the proposed Project Coordination Unit (PCU) that will support Project implementation) will communicate with the Project stakeholders will be presented in this SEP document.

Finally, this plan will describes a grievance mechanism, outlining the process that stakeholders may use to raise any concerns about the Project providing their opinions that may influence the Project implementation and its results.

Overall, the main objectives of SEP aim to: (a) identify and analyze stakeholders including importantly the potential beneficiaries of the Project who may be excluded from or find problems accessing Project benefits; (b) lay out a framework for engagement modalities for consultations and disclosure; (c) enable platforms for influencing decisions; (d) define role and responsibilities of different actors in implementing the SEP; and (g) help implement and manage the Grievance Mechanism (GM).

### **1.3 Scope and Structure of the SEP**

The scope of the SEP follows the World Bank's ESS10 (described below in the section 1.5 of this document). The engagement will be planned as an integral part of the Project design and implementation.

The SEP consists of the following Chapters:

1. Introduction
2. Administrative, Policy And Regulatory Framework
3. Summary of Previous Stakeholder Engagement Activities
4. Stakeholder Identification and Analysis
5. Stakeholder Engagement Program
6. Resources and Responsibilities for implementing the Stakeholder Engagement Plan
7. Grievance Mechanism
8. Monitoring and Reporting

### **1.4 Administrative, Policy and Regulatory Framework**

The national legislative framework regulating policy and implementation of processes for SAS and Social Protection includes the following:

**The Constitution of the Republic of Kosovo (2008, 2016):** provides for the rule of law and social justice, principles of civil democracy and human and minority rights and freedoms. The Article 51 proclaims the right to health and social protection and grants the right to basic social insurance related to unemployment, disease, disability and old age.

**The Law on Social Assistance Scheme (No.2003/15, No. 04/L-096):** regulates the assistance for families living in poverty. It provides the network of social security and bases towards reducing poverty through

social assistance to needy individuals and poor families. The MFLT intends to replace this law, as described under the Project Components above.

**The Law on Social and Family Services (No. 02/L-17):** regulates the provision of social and family services for persons and families in need in Kosovo. Social and family services, according to this law, include the provision of direct social care, counseling and, in special cases, and material support for persons in social need.

**The Family Law of Kosovo (No. 2004/32, No. 06-L-077):** provides the basic principles of comprehensive protection for families and their members. This Law, among others, regulates engagement, marriage, relationships between parents and children, adoption, guardianship, protection of children without parental care, family, property relations and special court proceedings in disputes arising from family relationships.

**The Law on Material Support for Families of Children with Permanent Disabilities (No. 03/L-22):** establishes support for families caring for children with physical and mental disabilities under the age of 18.

**Law on Child Protection (No. 06/L-084):** establishes the legal basis for guaranteeing and protecting children from all forms of physical and mental violence, abuse, exploitation, neglect or other form that endangers their life, safety, health, education, and development.

**The Law on Labor (No. 03/L-212):** regulates labor standards and principles and provides benefits for workers in line with human rights values.

**Law on the Status and rights of martyrs, invalids, veterans, members of the Kosovo Liberation Army, civilian victims of war and their families (No. 04 /L-054):** provides individual financial aid for those who participated in the war and became disabled and for civilians who have become disabled due to the consequences of war.

## **1.5 World Bank Environmental and Social Standard on Stakeholder Engagement**

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation.

According to the World Bank's ESF (June 2018), the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in the ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- Borrowers will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

## **II. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

Two stakeholder engagement and consultation processes, carried out by the Kosovo Government and with the support of World Bank, have provided input and have informed the concept stage and development of this Project. These are described in the sections below. Following these consultations, the Project preparation phase will also include stakeholders' engagement and consultations. The stakeholder engagement and consultation activities that have taken place to date, include:

### **2.1 Consultation on Social Assistance Scheme**

As mandated under the Constitution of Kosovo, as part of the process of drafting new laws, the Ministry sponsoring a new law must consult as specified times with the public. Based on this, the first consultation process that engaged stakeholders and provided information on SAS implementation and reform needs, aimed at reforming the Social Assistance Scheme in order to improve the impact of the scheme on reduction of poverty and expansion of the coverage of poor families in the scheme. The consultation process was led by the Ministry of Labor and Social Welfare (currently functioning under the MFLT) during 2019. This process involved consultations with a large number of institutions at central and local level responsible for the implementation of the Social Assistance Scheme or who provide or are mandated to provide other services or benefits to the beneficiaries. Members from the sector of local non-governmental organizations and international organizations (including donors) who operate in the area of assistance, services, protection and / or social inclusion through their programs have also been involved in this consultation process. Additionally, several meetings were held with local non-governmental organizations (NGOs) and international organizations, including OSCE, UNDP and UNICEF, to discuss reform options.

The main issues identified and recommendations made during this consultation process include:

- Activating SAS beneficiaries through active labor market measures and other employment services.
- Coverage of participants' (SAS beneficiaries) costs for transportation and food while attending vocational training should be considered.
- Only half (50%) of retirement income for persons with disabilities of 80% or more need to be counted on the poverty test.
- Ownership and utilization of arable land and agricultural assets as well as livestock ownership should be included in the Appropriate Assets Test, as it can generate significant revenue for potential SNS applicants / beneficiaries.
- Questions about whether the household has members living abroad, as well as if any household member has bank deposits should be considered in the household assessment.
- Indicator 'Household owns color TV' to be replaced with 'Household owns LCD TV' because the latter coincides more with reality on the ground.
- Verification of data for the Financial Assets Test should include data sharing with municipalities as well, since the latter also provide agricultural grants as well as agricultural working tools.
- Higher secondary education certificates should not be exclusionary criteria at the stage of applying for a Social Assistance Scheme, as they result in poor families not qualifying for the scheme.
- Include eventual changes to the Poverty Test with the reforms envisaged in the data collection by the Kosovo Agency of Statistics, namely, the transition from the collection of household consumption data; / SAS beneficiaries who are offered employment opportunities but refuse and forward this data to the CSWs.

The table below presents the summary of communication and consultation activities that have been carried out on the proposed reform of the SAS:

**Table 1. Stakeholder Engagement Activities on SAS Reform**

The main purpose	Target group	Activity	Communication/ notice	Dates/time periods	The person in charge
Open meeting for all stakeholders	All stakeholders	Public meeting	Press conference, Minister of MLSW	30.08.2019	Ylfete Ramosaj – Abazi, Ismail Gashi
Targeted consultations	<ul style="list-style-type: none"> <li>• Municipalities, CSWs</li> <li>• Line Ministries (MoH, MoF, MEST, Health Insurance Fund, energy regulator, Water Services Regulatory Authority)</li> <li>• NGOs in the field of social protection and social services</li> <li>• 4. Donors (UNICEF, World Bank, UNDP)</li> </ul>	Consultation	Meeting	26.03.2019	Ylfete Ramosaj – Abazi,
Targeted consultations	<ul style="list-style-type: none"> <li>• Municipalities (CSWs)</li> <li>• Line Ministries</li> <li>• Donors</li> </ul>	Consultation	Meeting	10.05.2019	Ylfete Ramosaj – Abazi
Targeted consultations	<ul style="list-style-type: none"> <li>• Municipalities (CSWs)</li> <li>• Line Ministries</li> <li>• Donors</li> </ul>	Consultation	In writing - the draft of the CD has been distributed to the Working Group for comments	13.06.2019	Ylfete Ramosaj – Abazi
Targeted consultations	<ul style="list-style-type: none"> <li>• Municipalities (CSWs)</li> <li>• Line Ministries</li> <li>• Donors</li> </ul>	Consultation	In writing - the draft of the CD has been distributed to the Working Group for comments	26.07.2019	Ylfete Ramosaj – Abazi
Targeted consultations	<ul style="list-style-type: none"> <li>• Municipalities (CSWs)</li> <li>• Line Ministries</li> </ul>	Consultation	Workshop - Finalization of the draft CD was	26-28.07.2019	Ylfete Ramosaj – Abazi

	• Donors		discussed with the members of the working group in a 3-day workshop in Tirana		
Public consultation in writing	All stakeholders	Publication of the consultation on the portal for	In writing	30.08.2019 - 20.09.2019	Ylfete Ramosaj – Abazi, Ismail Gashi
Targeted consultations	Meeting with Directors and Leaders in CSW	CSW SNS	Workshop	Invitation, e-mail, phone	29.11.2019 Ylfete Ramosaj-Abazi

## 2.2 Survey on Implementation of SAS and Measure 15

The data gathering process, through the interviews with 11 CSW implemented by the World Bank team and carried out during 2020, provided information on the implementation of SAS, focusing on best practices and challenges. This survey data served as a valuable input to inform the concept design and preparation of the Project. The main issues identified during this consultation process include:

### CSW capacities

- CSWs work with limited capacity compared to the workload they have. The limited capacity in some CSWs is also a result of not timely replacement for the staff that have been retired.
- CSWs often lack basic resources such as printers, letter for printing, toner for printing and other needed office materials. The computers used are old and not with good performance so this slows the work and makes it more time consuming.
- Some CSWs do not have a vehicle to be able to conduct field visits. The data base used for SAS is considered not user friendly and time consuming for CSW staff.

### SAS Application Criteria

- The SAS legislation is considered not inclusive and very limiting. Category I and II criteria are considered to exclude many poor families that would benefit from the assistance. The disability pensions, the regular pensions and age 5 category are especially considered as discriminating criteria that exclude many poor families who use these program assistance for specific needs such as medication or health/other care.
- In addition exclusion because of short term employment or income is considered to harm the motivation for job seeking.

### **Roma, Ashkali and Egyptian (RAE) Communities in SAS**

- There is a good understanding among RAE community of the SAS program and requirements for application. They are organized, have developed a routine and are very persistent in getting the information they need. They seemed to be disciplined as well, in following the requests and fulfilling the paperwork.
- Most of the RAE families in Municipalities are beneficiaries of SAS. Some RAE communities have community volunteers or organizations that facilitate the information sharing on SAS program, procedures and deadlines. Some also support preparation of paper work for application. RAE families have also been prepared to submit the complaint in case of being rejected or when not in agreement with the decision.
- However, in some Municipalities, RAE as the poorest and less literate community, still experience various challenges and mostly approach CSW for support or advice. The main challenges experienced are mainly with lacking paper work for children who have been not registered at birth.
- There is also a group of individuals that do not possess the Kosovo ID, as they have returned from abroad and have not still got a Kosovo ID.
- Divorces and marriages are not documented and often siblings do not have the same surname and all this makes cases difficult for categorizing under limited categories and absence of the father.
- SAS is often the only source of income for RAE families. Thus, another challenge for RAE is the limitation of the category 2 and children below age 5 criteria. The need to be under this assistance program often pushes families to give birth to more children to be able to continue and be eligible for the assistance.

The table below presents the summary of communication and consultation activities that have been carried out on Measure 15 implementation and SAS:

**Table 2. Stakeholder Engagement Activities on Measure 15 and SAS**

The main purpose	Target group	Activity	Communication/ notice	Dates/time periods	The person in charge
Targeted consultations	CSW in Lipjan	Consultation	Phone Interview	07.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Fushe Kosove Roma Representativ	Consultation	Phone Interview	08.07.2020 15.07.2020	Sarah Coll-Black; Edita Alo,

	e at CSW in Fushe Kosove				
Targeted consultations	CSW in Gracanica	Consultation	Phone Interview	09.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Rahovec	Consultation	Phone Interview	10.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Vushtrri	Consultation	Phone Interview	10.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Prizren	Consultation	Phone Interview	09.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Ferizaj	Consultation	Phone Interview	14.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Drenas	Consultation	Phone Interview	13.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in North Mitrovica	Consultation	Phone Interview	13.07.2020	Sarah Coll-Black; Edita Alo,
Targeted consultations	CSW in Istog	Consultation	Phone Interview	16.07.2020	Sarah Coll-Black; Edita Alo,

### 2.3 Consultations during the Project Preparation

Project preparation process included virtual meetings and consultations with stakeholders and potential stakeholders with the aim to obtain positive and negative feedback on the Project, learning about unanticipated potential challenges in the field and agree on the scope of the proposed Project, its development objective, components, amount, as well as the preparation timeline.

The key issues discussed and agreed upon during this consultation process and meetings organized included:

- The MFLT and the Government are committed to reform social protection spending.

- The reform of the Social Assistance Scheme (SAS) as well as investments in social protection systems will lay the foundation for the broader reform.
- The scope of the proposed Project was agreed to consist of the following components: a) Component 1: Strengthening social protection delivery systems; b) Component 2: Improving the performance of the SAS; c) Component 3: Project management and capacity building, stakeholder engagement and communication strategy.
- The number of the World Bank's Environmental and Social standards will apply to the proposed Project. As a result, the MFLT will prepare a Stakeholder Engagement Plan (SEP), disclose and consult up it prior to Appraisal, which is scheduled for August 20, 2021.
- Prior to negotiations, the MFLT will need to prepare and agree with the World Bank the Project Procurement Strategy for Development, including the initial procurement plan for the first 18 months of the Project.
- A follow-up preparation mission will be organized in end of July, 2021 to rapidly advance the preparation of the Project, with a view to completing Appraisal in a timely manner.

The meetings were organized with following stakeholders and institutions:

The main purpose	Target group	Activity	Communication/notice	Dates/time periods	The person in charge
System building activities to agree on objective, components and detailed activities to move towards costings	MFLT including DSPF representatives	Consultation	Virtual Meeting	07.06.2021	Sarah Coll-Black, Stefanie Brodman
Discuss poverty test for SAS reform	DSPF and CSWS representative	Consultation	Virtual Meeting	08.06.2021	Natalia Millan
Discuss overall objective of the Payment System and identify resources within the Project to support	MFLT including DSPF representatives	Consultation	Virtual Meeting	09.06.2021	Sarah Coll-Black
To confirm policy objectives of Government with regards to Social Registry and MIS	MFLT including DSPF representatives	Consultation	Virtual Meeting	09.06.2021	Zlatan Sabic

Outreach and Profiling of beneficiaries	DSPF and CSW	Consultation	Virtual Meeting	10.06.2021	Sarah Coll-Black
MIS and Social Registry feedback on the proposal presented in meeting 1	MFLT and DSPF	Consultation	Virtual Meeting	14.06.2020	Zlatan Sabic
Support to CSW	DSPF and CSW	Consultation	Virtual Meeting	14.06.2020	Sarah Coll-Black
Agree on a capacity needed to support MFLT to implement the Project	MFLT including DSPF	Consultation	Virtual Meeting	16.06.2020	Sarah Coll-Black

### III. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The WB ESS 10 recognizes three broad categories of stakeholders:

**Project Affected Parties (PAPs)** refers to individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the Project, positively or negatively. They are individuals or households most likely to observe/feel changes from the impacts of the Project.

**Other Interested Parties (OIPs)** includes individuals, groups, or organizations that may not be directly affected by the Project but have an interest in the Project due to its characteristics, its impacts, or matters related to public interest e.g. relevant institutions, government officials, private sector, universities, NGOs, INGOs, women's organizations, cultural groups and others who may be positively or negatively affected by the scope of the Project.

**Disadvantaged or vulnerable individuals or groups** refer to ones that often do not have a voice to express their concerns or may not understand the Project and how it affects them. This includes women, elderly, marginalized groups, long-term unemployed, victims of violence, refugees and asylum seekers, minorities and others that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Project.

#### 3.1 Stakeholder Mapping

Mapping and engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the Project and will enable the Project to draw on existing expertise and networks. It will also facilitate both the community's and institutional endorsement of the Project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

### **3.1.1 Project Affected Parties**

The Project Affected Parties for the Kosovo Social Assistance Reform Project include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the direct stakeholders to be affected by the Project are:

- Currently recipients of the Social Assistance Scheme (SAS).
- Persons and families who do not currently qualify for SAS owing to the program's very restricted eligibility criteria, which may include
  - Families with child (ren) who drop out from schools or with girls marrying at a minor age.
  - Persons and families without formal income.
  - Persons and families who are losing income and are falling in poverty due to COVID-19 pandemic.
  - Persons and families who benefited from Government Measure 15 implementation.
- Poor families that do not qualify for other social support programs in country.
- Asylum seekers and refugees.
- Staff of the CSW, including those:
  - who are directly involved in tracking eligibility, and servicing current SAS beneficiaries.
  - who will be identifying new beneficiaries of cash benefits without being required to perform home visits.
  - Staff of the CSWs working in the back offices, administrators of benefit databases, and staff involved in the provision of social care services.
  - CSWs whose benefit implementation capacity will be enhanced with, *inter alia*, methodology for more precise beneficiary identification.
- Staff of the Employment Agency of the Republic of Kosovo (EARK).
- The staff of the Municipal Employment Offices supervised by EARK.
- Decision makers and designers of social assistance programs at the MFLT.
- Officials in the MFLT who administer the SAS and new benefit scheme(s), and the related systems - management information systems, grievance and redress, payment systems, etc.
- Officials at the Municipal Directorate for Health and Social Welfare who supervise the CSWs and support the work of the CSWs.
- Officials at the Municipal Directorate for Education who cooperate with CSWs in addressing specific cases and facilitate relevant processes.

### **3.1.2 Other Interested Parties**

Other Interested Parties for the Kosovo Social Assistance Scheme Reform Project are as follows:

- Extended families of benefit recipients, including Stay-home mothers and caregivers for family members with special needs in the family.
- Officials at the Office of Medical Committee within the Office of the Permanent Secretary at MFLT.
- Post offices and bank branches, which currently make the SAS payments to beneficiaries
- Officials at the Ministry of Education who design and develop policies affecting children of poor families.
- Officials at the Ministry of Internal Affairs, including Officials working at:
  - The Center on Vehicle Registration.

- The Department of Citizenship, Asylum and Migration.
  - Civil Registration Agency.
- Officials at the Ministry of Justice working at:
  - Office of State Advocacy.
  - Kosovo Correction Center.
  - Government Shelters.
- Officials at the Ministry of Agriculture Forestry and Rural Development.
- Officials at Municipalities responsible for providing required documentation for SAS application, approving policies and implementing agreements.
- The Ombudsperson.
- Workers at the Free Legal Aid Agency.
- The Staff at the Faculty for Social Work.
- General Auditor.
- Officials at the Inspectorate for Labor.
- National and local media, also social media.
- NGOs, religious institutions, charities, community activists and volunteers who could be involved in dissemination of information about the mitigation measures and in identification of potential beneficiaries.

### **3.1.3 Disadvantaged or Vulnerable Individuals or Groups**

Successfully enabling individuals or groups who may not have a voice to express their concerns or lack understanding of the ways how they may be impacted by the Project, requires a good understanding of the skills that this Group of people may have and their capacity to engage in opportunities. Additionally, a good understanding of individuals' or groups' particular sensitivities, concerns, cultural sensitivities and barriers to Project information are crucial to help the vulnerable or disadvantaged groups' full understanding of Project activities and benefits.

In the Project context, the key vulnerable groups identified include:

- The poor at large.
- Elderly.
- People with various disabilities.
- Orphans and young people with no support or employment.
- Long-term unemployed.
- Women who are facing increased household level responsibilities, especially in female-headed households.
- Daily wage earners.
- Those living below poverty line.
- Representatives of Roma, Ashkali and Egyptian ethnic groups (RAE).
- RAE neighborhoods and settlements.
- Other ethnic minorities and marginalized groups in Kosovo.
- Other vulnerable groups such as returnees and refugees or asylum seekers.
- Victims of human trafficking, violence and abuse in the family.
- Families living in remote rural areas far from health and education facilities.
- Illiterate.
- Married Minors.

#### **IV. STAKEHOLDER ENGAGEMENT PROGRAM**

The purpose of the stakeholder engagement program is to ensure meaningful, effective and informed participation of stakeholders and partners from the early planning phase through Project implementation. Effective stakeholder engagement and participation will enable better understanding of the Project, development of ownership and will ensure its sustainability. These will lead to full participation and achieving the Project's outcomes and outputs with support of all stakeholders and reduce challenges and obstacles during the Project implementation at the same time.

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. The approach to stakeholder engagement and consultation will be sensitive and adaptable to the different target groups or local communities who involve in the Project, to ensure inclusion and their active participations and consultations. Different Project components and implementation activities, potential risks and monitoring issues will be discussed transparently and involve the participation of relevant stakeholder groups. Targeted messaging will help vulnerable groups raise awareness of the Project activities and encourage their participation by providing a better understanding of the Project benefits designed to respond to their needs.

The table below presents the stakeholder engagement activities envisaged under the project

**Table 3. Planned Stakeholder Engagement Activities**

Subgroup	With whom	Channels of Engagement	Venue	Frequency	Engagement methods	Purpose
World Bank	MFLT, Department for Social Policies and Family (DSPF), PCU	E-mails, implementation support and supervision missions, prior review of bids, mid-term and final review	Virtual, site visits to the target municipalities, MFLT Offices	Quarterly Reports, biannual missions, regular monitoring visits	Aide Memories, monitoring reports	To keep informed about the Project implementation progress, challenges faced and seek for approvals for the Project transactions and procurements
The Ministry of Finance, Labor and Transfers	Other stakeholders, beneficiaries, WB, CSWs, Employment Agency of the Republic of Kosovo (EARK), PCU	Official internal and external communications, written requests via official letters and emails	MFLT, CSWs, DSPF, the Division of the Social Assistance Scheme ,visits, official meetings and other relevant venues depending on event	Regular and as needed	Press conferences, progress reports, official requests and letters, monitoring, face to-face meetings, virtual and offline, mass media/ social media	Share information, reviews, clearance and seek support, financial oversight of the Project and management of disbursement process disbursement, to ensure inclusion of poor and vulnerable
Project Coordination Unit (PCU) at MFLT	Stakeholders and direct Project Beneficiaries, MFLT leadership and relevant departments including DSPF and	Stakeholder awareness and consultations campaigns, information sharing meetings and communication, Official emails and phone calls workshops and working groups, participatory	Internal or external event venues, virtual, site visits, training venues	Regular, quarterly and annual reports, biannual missions, regular monitoring	Face-to-face meetings with all Project stakeholders, virtual meetings, surveys and communication materials, focus groups, working groups,	Share information, to help stakeholders understand the Project, inform about the Project achievements, track Project progress and address challenges and bottle necks in implementation

	SAS Division, CSWs, World Bank	needs assessment and citizen engagement			progress reports and monitoring	
Centers for Social Work	DSPF, Municipality Officials, Directorate for Health and Social Welfare, Directorate for Education, Project Beneficiaries, other stakeholders, Municipal Employment Offices	Operational meetings, site visits, beneficiary consultations and outreach campaigns GM, information desk, support for surveys and citizen engagement	CSW offices, MFLT Meeting place, Beneficiary placements, PCU Office	Regularly, Semi- annual beneficiary visits	Progress and monitoring reports, face-to-face meetings and reporting, trainings and workshops, daily support to SAS beneficiaries' application process, the website, telephone, email, online letter, social media, leaflets, ads, posters, brochures, hand-outs, public consultations	To implement the Project Components, to ensure beneficiaries are informed about the application criteria and Project level GM, to collect feedback on the implementation, to identify challenges and seek solutions, to ensure inclusion of poor and vulnerable
Employment Agency of the Republic of Kosovo	DSPF, SAS Division, CSWs, Municipal Employment Offices, the unemployed, SAS beneficiaries	Operational meetings, beneficiary consultations and outreach campaigns GM	MFLT and EARK Offices, Municipal Employment Offices, training venues	Regular, quarterly	Progress and monitoring reports, face-to-face meetings, trainings, emails telephone, official webpage, social media, leaflets, posters, brochures	To complement the information provided by CSW to ensure it has wider reach

Project Final Beneficiaries	CSW, Employment Offices, SAS Division, PCU	Consultations, surveys and feedback	Community premises	As needed	Public/community meetings, participatory beneficiary assessment surveys	To increase awareness, provide consultations and collect feedbacks, to ensure beneficiaries are informed about the Project interventions and expected outcomes, as well as the Project specific GM
Partners (Civil Registry Agency, MEDs, Municipal Health and Social Welfare Directorate, NGOs etc.) in the field in the scope of the Project	CSWs, other stakeholders	Coordination Meetings, interinstitutional meetings	Official meeting spaces	As needed	Phone, email and face to face meetings, face-to-face meetings, information desks, working groups	To share information, coordinate, follow up on cases and provide support in case management, to develop understanding of the new platform and coordinate work

## **V. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT**

### **5.1 Implementation Arrangements**

The Project will be implemented by the MFLT through the Department for Social Policies and Family (DSPF) and the Division of the Social Assistance Scheme in coordination with the General Secretary Office of MFLT. A PCU will be established, which in coordination with the DSPF and the General Secretary Office of MFLT, will be responsible for relevant outreach, disclosure and consultation activities. The PCU, will be responsible to ensure the Project is following and implementing the Stakeholder Engagement Plan and the process is transparent and inclusive.

Once the Project is effective, a Social Expert will be recruited to ensure the regular monitoring of the Project result framework and there is adherence with social and environmental requirements, and management of the SEP. At the CSWs level, a focal person responsible for SEP will be identified by each CSW. Beside the role the CSWs have in accepting applications to the SAS and perform data entry, the CSWs will also carry out communication and will support the outreach activities. Additionally, they will continue to be the first instance body for complaints and grievances and, as required, will elevate complaints to the SAS Division.

DSPF and Division of the Social Assistance Scheme will mobilize human and material resources to implement the SEP and the GM, both of which will be supported by the PCU. Outreach activities will be led mostly by DSPF and carried out by the PCU and relevant identified stakeholders. Some of the engagement activities may be outsourced to private organizations and/or NGOs, as necessary, contracted by MFLT through the PCU.

Finally, to insure the successful implementation of Project activities, more specifically activities under component 1, a strong inter-ministerial and inter department coordination will be required and involvement of all relevant stakeholders will be crucial. This coordination, ensuring that all involved understand and endorse the new MIS Platform, will be led by the PCU through consultancy end expertise involvement.

The material resources that MFLT, with the PCU support, will mobilize are: a) a Project specific section on the MFLT website; b) an electronic grievance registry; c) a stakeholder engagement register; d) printed documents (manuals, brochures, posters, etc.) that will be used, based on the requirements of the SEP.

### **5.2 Roles and Responsibilities**

The PCU in close coordination with the DSPF and the General Secretary Office of MFLT will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the PCU will need to closely coordinate with other key stakeholders including national and local government departments/agencies and institutions. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

**Table 6. Responsibilities of Key Actors/Stakeholders in SEP Implementation**

Actor	Stakeholder Responsibilities
Implementing Agency (MFLT, DSPF, SAS Division)	Develop and implement the SEP Monitor stakeholder engagement activities Supervise the contractors on SEP activities Manage and process of the Grievance at Project Level Manage and process the SAS second level of grievances Report to the World Bank
PCU	Develop and coordinate stakeholder engagement activities Coordinate the contractors on SEP activities Monitor SEP activities at the municipal level Report to MFLT (General Secretary level) Report to the World Bank
CSWs	Participate in the implementation of relevant SEP activities Inform DSPF and the PCU of any challenges or issues related to their engagement with stakeholders Make available the disclosed SEP documents and GM procedures Manage the first level of GM for SAS Beneficiaries Provide report on all complaints to the DSPF and PCU GM Focal Point Provide required information to support Project's citizen engagement activities Participate in professional development activities that enhance implementation of SEP activities
EARK	Complement the information provided by CSW and ensure it has wider reach Provide required information to support Project's citizen engagement activities Participate in professional development activities that enhance implementation of SEP activities
Project-affected parties	Engage, ask questions and provide feedback about the Project at Project Meetings and through discussions with relevant Project actors where it is of interest or of relevance to them Participate in relevant Project surveys and Citizen engagement activities Lodge grievances using the Grievance Mechanism defined in the SEP
Other Project stakeholders	Engage with MFLT through the PCU regarding Project design and implementation Get involved in coordinated activities by PCU and provide required input on specific Project deliverables Participate in relevant working groups and focus group discussion as needed Raise concerns to help the Project be inclusive

## **5.3 Stakeholder Engagement Methods**

### **Public/community consultation meetings**

Prior to other activities, at the time of disclosure of this SEP, MFLT will organize Project launch meeting on a national level. Engagement of the stakeholders will follow through consultation meetings to be organized including related ministries, institutions, CSWs municipal relevant directorates or other line ministries and other relevant stakeholders. Additionally, separate meetings will be held for targeted beneficiaries or stakeholders based on the need or for specific activities. Beside face-to-face meetings, working groups, trainings or focus groups will be conducted to support the Project implementation and achievement of its objectives.

### ***Communication materials***

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. MFLT will also update its website regularly (at least on a quarterly basis) with key Project updates and reports on the Project's performance both in local languages and English. The website will also provide information about the grievance mechanism for the Project.

### ***MFLT Website***

The PCU will develop the Project sub-page on the MFLT Official Website to enable continuous opportunities for structured information and engagement with social assistance beneficiaries. This space shall also be used for the Citizen Engagement tools as well as information, consultation, surveys and the GM.

### ***Mass/social media communication***

PCU will be responsible to ensure continuous communication with stakeholders during the Project implementation in order to maintain a close and transparent communication process with all Project stakeholders. MFLT will be responsible to make sure relevant information are posted timely on the dedicated space for the Project on MFLT website and social media channels throughout the Project's lifecycle.

### ***Citizen survey***

A survey examining citizen's experience and feedback about the Project or specific components will be carried out during the Project's lifecycle. DSPF in cooperation with CSWs will put efforts to develop a two-way dialogue enabling citizens to see the difference their feedback has made to on-going decisions and the strategies for reaching vulnerable groups.

### ***Training, workshops***

Training, workshops or working groups on a variety of social issues will be provided to MFLT, CSWs, EARK, PCU and relevant government service providers. Issues covered or discussed will be relevant to the new SAS Law and reform, new MIS Platform and other issues that will support implementation or utilization of Project deliverables.

## **5.4 Proposed Strategy to Incorporate the View of Vulnerable Groups**

The Project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. DSPF, through the CSWs and other Project resources, will help ensure proactive outreach to all population groups. Focus groups dedicated specifically to vulnerable groups may also be envisaged as appropriate.

## **5.5 Information Disclosure**

The current MFLT website will be used to disclose Project documents in local languages and English. The Ministry will create a section on the Project on its existing website. This SEP will be disclosed in the Project section of this official website for public consultation among stakeholders along with other safeguards documents prior to Project Appraisal. This will enable gathering input and feedback on the SEP and on the proposals for additional stakeholders if applicable and future engagement. Additionally, special effort will be put in making sure that the vulnerable groups will have the chance to participate and benefit from Project activities. This may include among others, household-outreach through SMS, telephone calls, social networks and CSW networks etc. in local languages.

## **VI. GRIEVANCE MECHANISM**

Effective grievance handling, transparency, fairness and the avoidance of adverse project impacts is an essential part of a successful and effective project. Achieving these requires all actors to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures and the rights involved.

This Project will have the Grievance Mechanism part of its public awareness campaign and communication strategy. This mechanism will be available at the dedicated social network accounts for the Project and the information about the GM shall be locally advertised i.e. at CSWs and local governments. Project Beneficiaries and stakeholders will be informed on the process of Grievance and their rights as well as the required steps they would need to take if interested to raise a complaint.

Any comments/concerns/grievance can be submitted to the MFLT verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery or e-mail) to the Project contact person, email or telephone at the MFLT. Individuals who submit comments or grievances have the right to request that their name be kept confidential. Grievances may be submitted anonymously, although in such cases, the person will not receive any response though the case will be reviewed. All comments and grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.

Grievances whether by Project beneficiaries and interested parties, consultants or other stakeholders will be addressed through the following steps:

- 1. Complaint:** A Grievance complaint can be submitted in writing or anonymously through the Project communication channel (email, phone number or in person). The contact numbers and project email will be set within 30 days of the PCU establishment. The Project Coordinator and

the Social Expert will collect the complaints and document them in the Project Grievance Register to be developed for the purposes of this Project.

2. **Investigation:** If needed, a full investigation will be carried out by the Project relevant team members and DSPF responsible officials and all needed evidence will be gathered. The findings will be sent to the aggrieved party in advance of the meeting by the Project Coordinator. In cases of anonymity, since grievances would be made public, findings and solutions will be made available online and or communicated at stakeholder consultations.
3. **Timeframe:** The grievance matter will be addressed within thirty (30) days from the day the complaint was received.
4. **Decision:** The aggrieved party will be informed in writing of the decision reached.
5. **Referral:** Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then s/he would be advised of their right to legal recourse.
6. **Appeal:** The aggrieved party will be notified of their right to appeal against the outcome of the grievance procedure. If either party is not satisfied with the outcome they may seek redress in the courts of the Country.
7. **Documentation:** Documents and records will be kept on all grievance matters including the outcomes and at every stage of the grievance process.
8. **Monitoring:** The person responsible for the monitoring of the GM, and reporting will be the Social Expert of the Project. Contact information will become available, once he/she is hired and, likely once the Project is effective.
9. **Reporting:** Quarterly reports in the form of a summary of grievances, types, actions taken, and progress made in terms of resolving of pending issues will be submitted for the review, by the PCU to all focal points at the implantation structures in the MFLT.

## 6.1 SAS Grievance Mechanism

For SAS there will be a separate channel for the Grievance. The SAS Grievance Mechanism is regulated by the Law on SAS, No.04/L-096 and the Law on General Administrative Procedures No. 05/L-031.

The complainant can contact the local CSW or Division for Social Assistance Services (SAS) at the Central level via phone and present their complaint to the officer. The first level complaints will be addressed at the CSW as the main channels for grievance communication on SAS. The second level of complaint is addressed at the central level by the Committee for Complaints established at the DSPF. The Committee for Complaints can be reached out through the following contact information:

Email: ilir.mazreku@rks-gov.net

Tel: 038/212-311 and 038/20026159

Address: Str. UÇK nn, Qafa 1,10000 Prishtina

If either party is not satisfied with the ruling by the institution they may seek redress in the courts of the Country.

## **6.2 WB's Grievance Redress Service**

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported Project may submit complaints to the WB's Grievance Redress Service (GRS) [grievances@worldbank.org](mailto:grievances@worldbank.org). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

Information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), is available at <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>, and information on how to submit complaints to the World Bank Inspection Panel is available at [www.inspectionpanel.org](http://www.inspectionpanel.org).