

Independent Project Accountability Mechanism

Outreach Strategy 2025-2029

FOR CONSULTATION

June 2025

The Independent Project Accountability Mechanism (IPAM) is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determines whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project. For information about IPAM, please contact us at <u>ipam@ebrd.com</u> or visit <u>the IPAM webpage</u>.

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|--|--|
| Telephone: +44 (0)20 7338 6000 Email: <u>ipam@ebrd.com</u> | <u>https://www.ebrd.com/project-finance/ipam.html</u> |

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List of Abbreviations

| Abbreviation | Long Form |
|-------------------|--|
| ADB | Asian Development Bank |
| ADR Centre Global | Accord Dangereuses par Route |
| AMPEM | Annual Meeting, Protocol and Event Management |
| CAO | Chief Accountability Officer |
| CIArb | Chartered Institute of Arbitrators |
| CSEU | Civil Society Engagement Unit |
| CSO | Civil Society Organization |
| EBRD | European Bank for Reconstruction and Development |
| EIB | European Investment Bank |
| ESD | Environment and Sustainability Department |
| FOP Committee | Financial and Operations Policies Committee |
| GCF | Green Climate Fund |
| HQ | Head Quarters |
| IAD | Internal Audit Department |
| IAM | Independent Accountability Mechanism |
| IAMNet | Independent Accountability Mechanisms Network |
| IAIA | International Association for Impact Assessment |
| IFI | International Financial Institution |
| TMEA | Turkey, Middle East and Africa |
| IPAM | EBRD's Independent Project Accountability Mechanism |
| ІТ | Information Technology |
| JAMS | Judicial Arbitration and Mediation Services, Inc. |
| MDB | Multilateral Development Bank |
| 0000 | Office of the Chief Compliance Officer |
| OECD | Organisation for Economic Co-operation and Development |
| PAP | Project Accountability Policy |
| PPAD | Procurement Policy and Advisory Department |
| RO | EBRD's Resident Office |
| RSFIA | Regional Sustainable Finance and Impact Assessment |
| SSA | sub-Saharan African |
| UN | United Nations |
| UNGP | United Nations Guiding Principles |
| UNHCHR | United Nations High Commission on Human Rights |

I. Background

The Project Accountability Policy (PAP) approved by the EBRD Board of Directors in 2019, provided for the establishment of the Independent Project Accountability Mechanism (IPAM). In July 2020, the PAP came into effect with the appointment of the first Chief Accountability Officer (CAO - IPAM Head).

IPAM's purpose, as per the PAP, is to facilitate the resolution of social, environmental, and public disclosure issues among project stakeholders; to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and where applicable, to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

IPAM has also a mandate to conduct outreach among internal and external stakeholders, in order to promote greater knowledge and understanding of the PAP and the purpose of the mechanism, its functions and activities.

As a foundational obligation of IPAM, the Policy required it to develop an outreach programme to fulfil the mandate above. Therefore, after a consultative process, IPAM issued its first Outreach Strategy in April 2021, to serve as guidance to the IPAM team for the design and implementation of the annual outreach plan. The strategy covered the period 2021-2024 and served to structure the foundation of our outreach activity as a recently established mechanism.

After four years of operation, IPAM has undertaken the task of revising its strategy based on the experience obtained in implementation and the feedback provided during our engagement with all stakeholder groups. The document here presented has been drafted with the objective of increasing our effectiveness in outreach through more targeted actions that address the gaps of information and understanding that each of our stakeholder groups have manifested while recognising the increased complexity of the landscape in which the Bank operates.

The review has been undertaken within the boundaries of the normative and operational framework provided by the **2019 Project Accountability Policy** that establishes the mandate of IPAM as well as the scope and purpose of its outreach function and considering the **United Nations Guiding Principles on Business and Human Rights** (UNGP) that serve as guidance on the effectiveness of IPAM, a non-judicial grievance mechanism, in ensuring accessibility and transparency.

II. The implementation of the 2020-2024 outreach strategy

Between July 2020 and December 2024, IPAM established the core lines of action to be followed in internal and external outreach: awareness raising activities (workshops, meetings, participation in conferences), production of outreach materials (guidance materials, videos, presentations), development of content for intranet and website (including the design of the virtual case registry), mapping of civil society organisations (both in EBRD countries of operation and international) and stakeholder engagement.

During the reference period IPAM held 49 external and 68 internal outreach events to promote access and raise awareness. This could be virtual (considering the Covid-era restrictions), inperson and/or hybrid. In addition, IPAM co-organised sessions with the Independent Accountability Mechanisms' Network (IAMNet) members and other partners participated. The table below provides a summary while Annex 1 includes a full list of external and internal outreach activities.

Some of these sessions were organised by IPAM, specifically aimed at engaging with civil society organisations (CSOs) and affected communities. Others were jointly coordinated with members of the IAMNet.

Internal information sessions were organised in partnership with EBRD units and resident offices (ROs). IPAM also participated in all four EBRD Annual Meetings held, facilitating sessions to showcase its work and the outcomes of cases managed within the Civil Society Programme offered in each. Beyond the meetings initiated or co-hosted by IPAM, the team also actively participated in a wide range of external engagements, including industry conferences, forums, and stakeholder discussions.

| Years | External Outreach | Internal Outreach |
|-------|---|---------------------------------------|
| 2020 | Development of a revised IPAM website | 20 internal meetings |
| | Annual Report 2020 | |
| 2021 | 7 Meetings (virtual) | 15 internal meetings |
| | Annual Meeting session - virtual | Production of onboarding video |
| | First outreach strategy | Intranet update |
| | New case registry | |
| | Production of outreach materials* | |
| | Annual Report 2021 | |
| 2022 | 13 Meetings | 14 internal meetings |
| | Morocco Annual Meeting – hybrid session | Internal training video on IPAM- |
| | Annual Report 2022 | collaboration with Central Asia units |
| 2023 | 11 meetings | 11 meetings |
| | Samarkand Annual Meeting – hybrid session | Collaboration with ESD on draft |
| | New IPAM web section | protocol of engagement |
| | Videos on Problem Solving outcomes | One video |
| | Annual Report 2023 | |
| 2024 | 17 meetings | 28 internal meetings |
| | Yerevan Annual Meeting – hybrid session | Engagement on ESP and AIP reviews |
| | Annual Report 2024 | Intranet collaborations and update |

Table 1. Summary of outreach outputs 2020 - 2024

III. Project Accountability Policy Provisions

The 2019 Project Accountability Policy includes provisions specific to IPAM's mandate as regards outreach and its goals in different sections of the Policy.

a. Definitions

Independent Project Accountability Mechanism is the independent project accountability mechanism established under the 2019 Project Accountability Policy.

IPAM Head - the Chief Accountability Officer responsible for the running of IPAM, the implementation of the Policy and for making decisions that are the responsibility of IPAM under this Policy.

b. Scope – Functions and Governance

IPAM has two complementary, non-judicial and non-adversarial functions for handling Requests: Problem Solving and Compliance. IPAM also has a mandate to:

- identify institutional learnings that distinguish shared challenges, provide constructive recommendations, and promote a culture of continuous learning at EBRD,
- conduct outreach among internal and external stakeholders, to ensure that IPAM's purpose, functions and activities are known and understood.

c. Outreach and Training

IPAM's mandate for outreach is further clarified in section 3.2 of the PAP, with a number of provisions (see below) related to who IPAM stakeholders are, promoting access and focusing on the effectiveness of actions:

IPAM's ability to fulfil this mandate is dependent on its capacity to effectively engage with its stakeholders.

Further, it establishes that IPAM is to conduct outreach among both internal and external stakeholders, in order to promote greater knowledge and understanding of the Policy and IPAM's purpose, functions and activities.

In addition, it establishes the obligation to develop an outreach programme to that effect; and to include cooperation with other institutions' accountability mechanisms, as appropriate.

In relation to **reducing barriers to access**, the PAP signals for IPAM to be responsive to **constraints impeding stakeholders' access** to IPAM, engagement in **Cases**, or participation in **outreach** initiatives. IPAM is to **engage with Vulnerable People or groups in the EBRD territories or countries of operation** and to advance stakeholder access **efficiently and cost-effectively**. Accessibility: working to be known to individuals and groups that could use IPAM; ease barriers to access; operate in a culturally appropriate and gender responsive manner; and promote safe access to IPAM through confidential Case handling, Retaliation risk assessment and risk mitigation measures. PAP Guiding Principles

As shown in the box above, the PAP establishes **Accessibility** as one of its guiding principles and provides language on how to operationalise the principle. Further to this, the PAP includes provisions on how to make the Mechanism more accessible:

Accessibility through Engagement Materials: IPAM will develop, publish, and distribute a range of engagement materials to enhance internal and external stakeholders' understanding of IPAM's mandate, policies, functions, and activities. If feasible, IPAM will consult externally on the development of such materials to promote their accessibility to project-affected people.

IPAM will also maintain an interactive website through which it will disseminate information and materials related to its work.

Accessibility through language: IPAM aims for effective communication and disclosure of its reports and activities among internal and external stakeholders. Although English is the working language of the Mechanism, IPAM is to seek to make reports and communication materials available in relevant local languages as needed to create and maintain access to IPAM. As a start, the Policy is to be available in English, Russian, and Arabic and translated into other official languages of EBRD countries of operation or territories on a progressive basis.

Requests may be submitted in any official language of an EBRD country of operation or territory, or in any of the official languages of EBRD (i.e. English, Russian, French, or German); and IPAM communications will be both in the language of the Request and in English.

For outreach activities, if English is not spoken, IPAM is to offer communications in the relevant local language, through translation and interpretation services.

Safe access: IPAM is not to tolerate retaliation against Requesters, or any other individuals involved in the IPAM process or outreach activity and rejects any form of threat, intimidation, harassment, violence, or discrimination based on the fact that they have exercised their right to raise concerns. To this end, **confidentiality is to be granted and IPAM commits to taking steps to assess the risk and implement mitigation measures in consultation with the Requesters**.

Training: IPAM shall provide **training and familiarisation services to Bank staff** and **external stakeholders** about the implementation of this Policy.

In its access promotion, the PAP envisions the **support of Bank staff in HQ and Resident Offices**, who are to be encouraged to **integrate IPAM information into other Bank activities and publications**. As well, as support IPAM's efforts to publicise its mandate and functions.

d. Reporting

Finally, the Policy establishes IPAM's reporting obligations. IPAM is required to maintain **a public Case Registry on its website, which will provide internal and external stakeholders with up-to-date information on the nature and status of each registered request**. All reports produced as part of a case under this Policy will be published on the case registry. If some of the findings include confidential information, the reasons for non-disclosure will be included in the relevant reports.

The IPAM Head is to make **quarterly presentations to the Audit and Risk Committee** (EBRD Board) and provide briefings to the Board upon request or as needed.

IPAM will prepare an **Annual Report** that shall describe registered Requests, Case outcomes, completed outreach initiatives and institutional learnings from the preceding fiscal year. Annual Reports will be submitted to the Board and the President for information and disseminated to the public as soon as possible thereafter through the IPAM website.

The relevant guiding principles for outreach, training, and reporting in addition to accessibility include predictability and equitability.

Predictability: offering clear, consistent processes and procedures **Equitability**: working to ensure that all Parties have reasonable access to the information necessary to engage in IPAM processes on fair and informed terms, while respecting appropriate confidentiality requirements.

IV. Guiding Principles and Effectiveness Indicators

The PAP establishes the following guiding principles for IPAM operation:

Box 1. IPAM Guiding Principles

| Independence | Impartiality |
|----------------|---------------|
| Transparency | Equitability |
| Predictability | Accessibility |
| | |

Source: Project Accountability Policy

IPAM's effectiveness in fulfilling its mandate is determined by how its actions and outcomes can respond to the guiding principles set in its Policy. In this sense, any measure of success, i.e. of an effective mechanism, should consider the fulfilment of these guiding principles.

In order to ensure that IPAM achieves the objectives set in relation to Outreach and Training, it needs to identify a set of indicators and establish measurable targets for each one. The UN Guiding Principles for Business and Human Rights (See Box 2) have established seven effectiveness criteria, which combined with the PAP guiding principles, provide IPAM with a solid basis to measure progress and as such, the objectives and goals in this Outreach Strategy have been defined in line with them (See Evaluation section for further details).

Box 2. UN Guiding Principles Effectiveness Criteria for Non-Judicial Grievance Mechanisms

The UN Guiding Principles on Business and Human Rights rest on three pillars:

- Protect
- Respect and
- Remedy

Independent Accountability Mechanisms are one of the non-judicial grievance mechanisms avenues considered by the third pillar of the UNGP to provide access to remedy for victims of business and related abuses. The UNGP's establish a set of effectiveness criteria for non-judicial grievance mechanisms.

Legitimate: enabling trust from the stakeholder groups for whose use they are intended and being accountable for the fair conduct of grievance processes.

Accessible: being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face particular barriers to access.

Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.

Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair, informed and respectful terms.

Transparent: keeping parties to a grievance informed about its progress and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake.

Rights-compatible: ensuring that outcomes and remedies accord with internationally recognised human rights.

A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.

V. Scope of Strategy

The Outreach Strategy 2025-2029 builds on the implementation of the last four years and expands in scope to address the insights provided by stakeholder groups and the changes in the EBRD's operational landscape.

Its purpose remains as established in the 2019 Project Accountability Policy, whereby the focus is on how IPAM proposes to engage with its key stakeholder groups in order to promote awareness of IPAM, its mandate, processes and value it adds to the Bank; how to access the mechanism safely; clarify the roles and expectations and become a source of relevant information for strengthening of Bank operations.

Three main elements were considered when drafting the 2025-2029 outreach strategy.

- 1. **IPAM's operational experience:** The foundational stage of IPAM has ended so communication needs to evolve. In practice this allows IPAM to present the mechanism through cases and outcomes. The core of the messaging is not anymore, the establishment of IPAM but what it does through examples. Additionally, through doing, IPAM has identified areas of the operation that would benefit from support through better outreach materials or increased engagement. One of the ways to increase engagement is using social media. In the first 4-year period, IPAM lacked the human resources to launch its social media platforms successfully. However, as IPAM has increased its capacity, it can now proceed to implementation.
- 2. Insights from the implementation of the 2021-2024 outreach strategy: Formal and informal feedback from civil society, clients, Bank staff and others on the implementation of the outreach mandate identifies how to improve or finetune our outreach work to generate greater impact.
- 3. Changes in the operational landscape of EBRD: The context in which IPAM started operations will change in the next few years and our outreach strategy needs to address this. On one hand, this change in landscape will require greater investments in outreach (new countries, new languages, cultural diversity). On the other, in some of the existing countries of operation, the shrinking civic space requires considering alternative ways to contact affected communities to ensure safe access to our service.

The addition of a management grievance response function to the accountability architecture of the Bank requires clear communication of access and requirements. Internally, the growth in staff and the periodic turnover of senior management signals a need to continue educating new staff with relevant information on IPAM. Finally, the scheduled review of the Project Accountability Policy, will require raising awareness about the changes in processing and revision of content as relevant amongst all communicational platforms and stakeholders.

The table below provides the key elements that have informed the revised strategy divided in these three main drivers:

| IPAM's Operational Experience | Insights from the implementation of the 2021- 2024 outreach strategy | Changes in the operational landscape of EBRD |
|---|--|---|
| A dynamic portfolio of cases provides the opportunity to move from talking about the Policy to discussing cases. | IPAM's role and processes need higher visibility and clearer communication. | Growing number of shareholders. |
| Initial insights on which sectors, countries and issues generate complaints can be deemed as valuable for decision making. | Identify new channels of engagement with potentially affected communities in collaboration with other accountability mechanisms. | Expansion to sub-Saharan Africa and Iraq. |
| No size fits all outreach (activities and materials) is possible considering the different regions, countries, and contextual realities. | IPAM is still relatively unknown, or its mandate misunderstood by all stakeholders to date. | Generational change in senior management and new staff. |
| Collaboration with other IAMs has been the norm in many of the cases. | Informational materials to the Board need to be tailored to their needs and clarify their role in case processing. | Recently approved Environmental and Social Policy includes provisions to establish a Management Grievance Response process. |
| Covid and hybrid operations meant reduced interactions with Board members. | Collaboration with relevant departments is required to increase awareness of IPAM in HQ and ROs. | Increased reliance on lending partners. |
| Audit & Risk Committee members rotate every year requiring IPAM to ensure materials and reports can support transitions. | Focus has been in HQ, with engagement with ROs limited to those countries where IPAM has had cases. | Shrinking civic space in many of the countries of operation. |
| Clients are not aware of IPAM and require clarification on their role in a case and how to interact with the mechanism. | Website and Intranet content needs to be revised and provide easy navigation. | Project Accountability Policy review to take place in 2025- 2026. |
| | | |

VI. External Outreach

External outreach is defined by IPAM as all actions and behaviours of IPAM staff in its daily operation with the objective of promoting awareness about the Mechanism and increasing accessibility to it within the scope provided by the PAP. Thus defined, outreach goes beyond producing dissemination materials and organising awareness-raising activities. Also relevant is ensuring that our message is clear and that our processes are understood.

As the Bank expands into sub-Saharan African (SSA) countries, there is a need for IPAM to identify new partners in these countries and inform them of the mandate of IPAM and its processes so that they can support IPAM in its local awareness-raising of the mechanism.

The external outreach strategy for this period seeks to provide more focused information to Clients from the earliest stages of a case so they understand the mandate of IPAM, its procedures and their expected behaviours in support of the process.

Through external outreach, IPAM also needs to reinforce the transparency and engagement with both Requesters and Clients to afford greater predictability in case processing.

a. External outreach objectives 2025-2029

For the period 2025 to 2029, IPAM will continue implementing those activity streams that have proven to work effectively. In addition to that, it will expand its scope as follows:

- To identify and engage new target audiences in selected countries of operation to promote safe access to the mechanism, with a particular emphasis on sub-Saharan Africa and Iraq.
- To support the Project Accountability Policy review process to ensure inclusiveness and responsiveness. Also, once the revised Policy is approved, undertake enhance dissemination of new procedures to ensure predictability, access, and transparency.
- To enhance quality of informational content in all current outlets and introduce new tools that provide potential requesters, clients and other external stakeholders with clearer understanding of IPAM and its process.

b. Target Audiences

IPAM's ability to fulfil its mandate is dependent on its ability to effectively engage with a range of stakeholders.

For purpose of this Strategy, IPAM has identified six different external audiences we will continuously keep in mind when planning our outreach and stakeholder engagement activities. The table below shows each one of the groups and what we aim to do.

| Target Audience | What we aim to do | |
|---|---|--|
| Individuals and communities looking for redress | Ensuring that the cost to communities of seeking access to the mechanism is significantly reduced and they can take a fully informed decision. | |
| | Strengthen the quality and availability of information on the Bank and how to access the mechanism. | |
| Individuals and communities that have had engagement with IPAM | Enable the "passing the voice" phenomenon by disseminating their first-hand experience with IPAM. | |
| Local and international civil society organisations working in areas of common interest | For the 2025-2029 strategy, IPAM has to increase the depth and breadth of its stakeholder engagement so that there is greater understanding of the accountability architecture of the Bank and IPAM in specific. We will do so by: growing the network of civil society organisations at the local level in countries of operation where EBRD has traditionally operated, introduce the mechanism to civil society organisations in our newest countries of operation, Identify proxy-contacts for those countries where shrinking civic space have limited their operation (for example: professional association of environmental and human rights lawyers). | |
| Technical experts in human rights, environmental and social issues | Promote in-the-ground groups that can inform communities of the existence of IPAM and its mandate. | |
| Academia | Seek to have "third trusted parties" talking about the mechanism and its work. | |
| Bank Clients | Ensure that they can easily access information on the mechanism, its process and what to expect. | |

c. Our partners in outreach

To generate greater impact and considering our limited resources, IPAM will leverage its impact through collaboration. There are four key partner groups:

| Core group civil society organisations in our network |
|---|
| IAMNet Secretariat |
| Sister IAMs with same geographical focus as EBRD |
| Bank Units: Civil Society (CSEU), Environmental and Sustainability Dept (ESD), Banking and Communications |

In addition to our close partnerships with civil society and other IAMs, this strategy incorporates a number of Bank units as key partners. This is because the context in which the outreach function will be implemented in the next five years, requires a stronger collaboration with Bank units than in the past. The reasons for this are:

- The introduction of a new grievance system within Management requires external communication to be harmonised between the different Bank units and IPAM.
- Introducing the accountability architecture of the Bank and the right of affected communities and civil society organisations to raise concerns to new countries of operation will need the support from CSEU, Banking and Communications departments.

• The external consultation activities to be undertaken for the Project Accountability Policy review will require the support of CSEU who not only long-standing experience have but also a wide network of contacts to make the process more robust and inclusive.

d. Outreach tools

IPAM implements its External Outreach function through a combination of activities and outlets. The function is subsidiary to case processing which it supports to promote accessibility, predictability, and transparency. The annual programme will incorporate actions through many of the following tools:

On development and dissemination of outreach content

• Website

IPAM's dedicated website (part of EBRD.com) remains IPAM's leading outreach tool and the team continues to ensure that it provides clear, up-to-date, and useful information to potential and existing requesters as well as to other stakeholders. IPAM ensures the website is user friendly and the information it presents to be accessible in all ways. As promised, the IPAM website has become a one-stop shop for the provision of information about IPAM, how to submit a complaint and clarification on its services and their scope and potential outcomes.

However, the current IPAM section has shown important technological and hosting limitations imposed by the existing EBRD.com infrastructure. In 2024, EBRD embarked on a redesign of its web platform which will now allow IPAM to provide friendlier navigation and host diverse outreach materials in the different languages of operation.

It is expected that the new functionality, IPAM will have greater freedom to update content and introduce new sections to disseminate statistical data, institutional learning pieces and more engaging dissemination formats. Particularly, the aim is to enrich the content of the IPAM section, introduce downloadable materials in all relevant languages and improvements in the information provided by the case registry.

The expansion to sub-Saharan Africa and Iraq will require the additional translation to French which is currently not available.

Website Key Actions per Objective

| External Outreach Objectives | Key actions relevant to the website |
|---|---|
| To identify and engage new target audiences in selected countries of operation to promote safe access to the mechanism, with a particular emphasis on sub-Saharan Africa and Iraq. | Ensure the electronic complaint form and current guidance materials are available in relevant languages for new countries of operation. |
| To support the Project Accountability Policy review process to ensure inclusiveness and responsiveness. | Disclose transitory provisions (procedural transition from 2019 Policy to 2026 Policy). |
| Also, once the revised Policy is approved, undertake enhance dissemination of new procedures to ensure predictability, access, and transparency. | Add new section on revised policy procedures and produce guidance materials. |
| | Incorporate information on accountability architecture, mutual reliance initiatives, and IAMNet system. |
| To enhance quality of informational content in all | Disclose guidance on case processing in all relevant |
| current outlets and introduce new tools that provide | languages. |
| potential requesters, clients and other external stakeholders with clearer understanding of IPAM and its process. | Generate culturally appropriate materials that provide guidance on the IPAM process. |

o Outreach materials

Outreach materials, both printed and virtual, play a crucial role in IPAM's communication with its target audiences. These materials not only promote access to the Mechanism but also clarify its aim, scope, procedures, and potential outcomes at each stage of case processing. Covering the four functions of IPAM, these outreach materials are available in various languages to meet the needs of requesters. If a language doesn't exist, they will be provided in the languages requested by the affected communities, ensuring inclusivity and effective communication.

The current Project Accountability Policy and its Guidance are available in 30 languages. The same treatment will be given to the new Policy and any other relevant materials. Accessibility to those materials will be enhanced on the new website.

As a new tactic to address the barriers to access posed by language, IPAM will work with Bank Communications and external vendors to address this through the production and use of short video clips that can visually communicate our purpose and process.

Key actions relevant to outreach materials

Once the new Policy is approved (in all languages):

- Produce Policy guidance materials (written and video formats) by processing stage for potential requesters.
- Accountability architecture web-sections and guidance materials produced in collaboration with ESD.
- IPAM guide for Clients.
- Creation of case studies to exemplify the IPAM process.

• New tools: social media

Through social media, promoting access to IPAM and reaching more affected communities in the countries of operation, particularly in sub-Saharan Africa, becomes significantly easier. Preliminary studies indicate that information shared via social media is trusted and disseminated by local communities in sub-Saharan Africa.

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In line with this, IPAM will leverage social media to present critical content such as case updates, case studies, and outreach materials. These resources are extremely useful for audiences engaging with IPAM at different stages and for various motivations. By promoting access to the mechanism through social media, IPAM aims to enhance transparency, foster community engagement, and ensure that affected individuals are informed about their rights and the support available to them. Additionally, social media will support the visibility of IPAM among other accountability mechanisms, highlighting its role and effectiveness in promoting accountability and addressing grievances.

This approach will help IPAM reach a broader audience, facilitate the spread of vital information, and ultimately contribute to more effective accountability and project outcomes.

o Annual Report

As part of its reporting obligations, IPAM produces its Annual Report that describes registered requests, case outcomes, completed outreach initiatives and institutional learnings from the preceding fiscal year. This product is also an excellent outreach material for showcasing the work of IPAM and providing guidance on how to access the mechanism.

• Dissemination of Institutional Learning Products

As IPAM matures and its caseload grows, a body of evidence will be used to produce institutional learnings. The annual outreach programme will include dissemination activities of the knowledge products generated by other areas of IPAM and will make use of their content to enrich the outreach materials.

• On workshops, conferences, and events

• Periodic sessions with Civil Society Organisations

Quarterly meetings with core CSO stakeholders are to be organised to ensure that the Mechanism is effectively implementing these guiding principles, but also to learn about the challenges of communities in accessing IPAM and understanding the process. Accessibility, transparency, and predictability are at the core of every IPAM action.

• IPAM Presence in the EBRD Annual Meeting and Showcase of Outcomes

In coordination with the Civil Society Engagement Unit of the EBRD, IPAM will participate in relevant activities within the agenda of the EBRD Annual Meeting.

| Year | Host | Subject |
|------|------------------------|------------------------------|
| 2025 | London, UK (15-18 May) | Policy review |
| 2026 | Latvia (June) | New policy and case outcomes |
| 2027 | Egypt | Access promotion |

• Regional/Country Specific Workshops to Promote Access

Annually, IPAM will undertake at least two regional/country specific workshops to promote access. The workshops will preferably be organised in collaboration with other sister IAMs and will seek to identify a local CSO partner to lead in the coordination and identification of relevant participants. The countries will be identified based on EBRD country portfolio and past events.

When operation in SSA countries begins, IPAM will propose to partner with grassroots organisations to host virtual (or in-person) workshops tailored to local cultural and linguistic contexts. Conducting pre-engagement sessions to familiarise local CSOs and community leaders with IPAM processes.

• IAMNetwork Outreach Activities

IPAM participates in the Outreach IAMNet committee that identifies joint outreach initiatives and will include those that are relevant to its mandate and objectives in its annual programme. This is not limited to events, and include other showcasing alternatives such as joint publications, production of outreach materials, development of good practice notes, participation in relevant fora and engaging with relevant institutions to promote accountability. In the new period, IPAM will particularly focus on participating events in sub-Saharan Africa in partnership with the network.

• Participation in relevant fora

IPAM routinely participates in relevant fora as guest speaker establishing the leadership of EBRD in accountability as well as enlarging its network of relevant contacts. A non-exhaustive list of this is provided below.

| Key events and conferences to consider | |
|---|--|
| Impact Assessment International Association Annual Conference | |
| OECD Global Forum on Environment | |
| UN Business and Human Rights Forum | |
| Other IFI's Annual meetings | |

VII. Internal Outreach and Training

Internal outreach is defined by IPAM as all actions and behaviours of IPAM staff regarding its engagement with Bank staff in headquarters and Resident Offices aimed at raising awareness of the PAP and promoting predictability and efficiency. For these purposes, the PAP establishes that IPAM shall provide training and familiarisation services to Bank staff and external stakeholders on its implementation. This engagement not only serves the above but also allows for Bank staff in HQ and Resident Offices to support IPAM in promoting access to the mechanism as required by the PAP. Furthermore, the PAP requires IPAM and Management to jointly identify where and how to **integrate IPAM information into other Bank activities, documents, and publications**.

The last four years have shown that there is still limited awareness of IPAM amongst Bank staff. Making sure that every member of staff knows at a minimum what IPAM is and its role within the Bank's sustainability commitments, remains a key goal for IPAM considering the expansion ambitions of the Bank, the growth/rotation in staff.

In addition, as the recently approved 2024 Environmental and Social Policy includes the establishment of a management grievance response, a joint communication strategy must be pursued with the Environmental and Social Department (ESD) to clarify the accountability architecture of the Bank and the responsibilities of staff in relation to project grievances to avoid escalation and ensure they are properly addressed within that architecture.

Through internal outreach, IPAM also seeks to disseminate its knowledge products to promote a culture of accountability and continuous learning to prevent unintended harm.

Within the internal outreach and training strategy, the Board is one of the key stakeholders. IPAM needs to reinforce its engagement with Board members, identify better tools to sustain continuous communication. The flow of information must go beyond individual cases to providing operational risk insights that can assist in decision making.

a. Internal Outreach and Training Objectives

- To ensure that all relevant Bank staff knows what IPAM is, its place within the accountability architecture of the Bank and how to act in regard to environmental, social and disclosure complaints.
- To support a culture of accountability and learning through the dissemination of focused case products and outcomes to strengthen projects' environmental and social outcomes and promote a culture of accountability.
- To provide the Board, Senior Management and heads of relevant units with insights to better assess operational risk and facilitate prevention.

b. Target Audiences

IPAM's target audiences for internal outreach focus primarily on Board directors to ensure that they have useful and timely information for decision making; those bodies and units that assess, address and decide on operational risk, and those directly involved in the management of grievances.

In addition to those, all Bank staff are considered to promote a culture of accountability and prevention bank wide.

| Target Audiences | What we aim to do |
|--|--|
| Board members, emphasis on Audit and Risk Committee and constituencies relevant to IPAM cases | Provide timely and robust insights derived from Institutional learning pieces to assist decision making and frequent engagement on specific cases through one-on-one updates. |
| Senior Management with particular emphasis on VP Risk, ESD and Banking | One-on-one engagement Periodic briefings on case portfolio Dissemination of institutional learning pieces |
| Bank teams responsible for transactions in HQ and Resident Office, with specific sectorial focus | Foster a more collaborative and relationship during case processing increasing predictability and understanding of roles. |
| | To engage periodically to present case studies and identify jointly areas of strengthening. |
| Bank staff in general | To develop a basic understanding of the accountability framework of the Bank and IPAM. |

c. Internal Outreach tools

In line with IPAM's mandate, annual outreach programs will include a mix of continuous, recurrent, and one-off initiatives to ensure Bank staff are well-informed about IPAM's processes, policy, and role within the Bank's accountability framework. To strengthen engagement, IPAM will integrate institutional learnings, case studies, multimedia tools, and interactive training materials into its internal outreach strategy.

o Intranet

The Bank's intranet platform, currently been revamped, will be used more actively and it will become a key tool for internal communication. New content will be developed, and all institutional learning products will be made available there, as well as guidance materials by processing stage.

On the Bank's Intranet platform, IPAM will disseminate institutional learning briefs summarising insights from past cases, trends in grievances, and recommendations for improving project outcomes.

Multimedia Tools: Bringing Accountability to Life

To make complex processes more understandable and accessible, IPAM will develop the following multimedia products which is subject to budget availability.

- Short explainer videos and clips on key accountability topics such as:
 - How does IPAM work?
 - What happens after a complaint is submitted?
 - How does IPAM engage with different stakeholders?
 - Lessons learned from past cases.
- Testimonial videos (where possible) featuring past stakeholders discussing their engagement with IPAM.

• Internal screens and other digital platforms placed at Bank's different locations and departments will be leveraged for awareness campaigns on accountability, grievance mechanisms, and stakeholder engagement. This will require coordination with the Communications department and their support.

• Collaborative initiatives

IPAM will seek to work with others to promote greater understanding of accountability, governance and sustainability within EBRD. The following are the key initiatives that will be pursued by IPAM:

Key initiatives

Collaboration with ESD: A series of awareness-raising activities will be proposed to the Environmental and Social Department to clarify the accountability architecture of the Bank and promote prevention.

Governance collaboration with Independent Evaluation, Internal Audit and Office of the Chief Compliance Officer Departments to promote understanding of EBRD's governance and the role of each.

New joiners: Collaboration with Human Resources Department to ensure that new joiners know about the Accountability architecture of the Bank, IPAM will engage with different departments to propose the joint creation of mandatory modules on the different grievance options within the Bank and their purpose.

Case studies short video clip series in collaboration with Communications department

• Case Studies & Best Practices sessions

A dedicated knowledge-sharing series will be launched to support learning and promote accountability, including Q&A sessions and scenario-based discussions. IPAM will annually implement a set of training sessions on case insights targeted to relevant Bank units and ROs.

• Country-specific sessions for ROs

Information sessions for ROs are particularly important when the caseload is high in a country. These information sessions are designed to help ROs understand why IPAM exists and how accountability mechanisms contribute to the sustainability of projects funded by the EBRD. They will provide insights into IPAM's processes, the importance of accountability, and the benefits of transparent and responsible project management.

When visiting countries of operation for casework, IPAM will propose Q&A sessions and case workshops to ROs. These interactive sessions will allow ROs to ask questions, discuss specific cases, and gain a deeper understanding of the issues at hand. This engagement will empower ROs to implement better practices and support the overall goals of IPAM and the EBRD.

• Engagement with Senior Management

Engagement with senior management is crucial for IPAM, despite its independence from Bank management. This interaction ensures alignment with the Bank's strategic goals, secures necessary support, and resources, and keeps decision-makers informed about the accountability landscape. To do so, the IPAM Head will periodically engage with Senior Management, participate in Executive Committee meetings to make presentations when relevant and engage with Risk Committee.

• Engagement with Board

IPAM's engagement with the Board is crucial because it ensures that the Mechanism remains independent and accountable. Direct reporting to the Board allows IPAM to operate without undue influence from the Bank, maintaining its objectivity and credibility. This engagement is essential for keeping the Board well-informed about the issues and trends identified through IPAM's work, enabling them to provide valuable input and support.

In this second phase of IPAM, there will be an intentional increase in engagement with Board members through bilateral interactions and regular updates on the case portfolio, issues raised, and insights derived from them. This engagement will ensure that Board members are well-informed and can provide valuable input.

In support of the policy review process, IPAM will produce briefing notes on how other mechanisms operate, case experiences, and data evidence to support proposed changes. These efforts will be complemented by ongoing information sessions and bilateral engagements to ensure comprehensive communication and collaboration.

VIII. Resources

a. Human Resources

As per the current approved organisational structure, the implementation, oversight and evaluation of the Outreach Strategy is undertaken by the following roles within IPAM:

The Chief Accountability Officer and Managing Director IPAM - responsible for approval and oversight of the implementation of the outreach strategy. As such, the CAO will ensure that the annual work programme includes a dedicated section on outreach activities to be undertaken during the year and that annual objectives as set in this strategy are achieved.

The Director IPAM - responsible for proposing the annual outreach work programme (external and internal), its implementation in line with the objectives set in the strategy, managing the outreach team and optimising the financial resources to generate the greatest impact.

The Outreach, Communications and Stakeholder Engagement Analyst - responsible for the implementation of the External Outreach annual programme, creating content as needed and engaging with others in the team to identify and growing our civil society engagement network.

The **Assistant Analyst**, responsible for implementing the Internal Outreach annual programme and supporting the events component of the External Outreach annual programme.

All members of the IPAM team are responsible for ensuring accessibility to the Mechanism according to their roles and responsibilities. In addition, they are to propose initiatives, provide inputs for the production of content, assist in the mapping of relevant stakeholders and peer review materials to ensure they are fit for purpose.

b. Financial Resources

Annually, the IPAM Head will submit to the Board a budget proposal that will include allocations for outreach as relevant. The scope intensity of the annual outreach programme will be dependent on the approved allocation.

The programme will include a combination of high-low investment activities and identify costsharing initiatives so that the annual targets established can be achieved in a cost-effective fashion and considering limited resources.

Subject to budget availability, country focused outreach activities can be organised especially for priority regions, including new countries of operation.

IX. Monitoring and Evaluation

The success of the outreach strategy cannot be measured only by the number of activities undertaken or materials produced each year. In addition to the quantitative indicators, assessment of the strategy must include qualitative indicators to evaluate whether it has allowed for a more accessible, predictable process, i.e. measuring the adequacy of the content and its delivery.

The achievement of the objectives is considered within the IPAM outreach strategy as building from one year to the next, measuring progress through the setting of intermediate targets that feed into the overall 2025-2029 strategic goals.

Therefore, annually IPAM will establish plans for outreach and training activities, the implementation of which will be reported in a quarterly fashion to the Board and globally in the Annual Report.

The UNGP Principles on accessibility, predictability inform the key questions to guide the evaluation are:

- Are the tools used to communicate culturally appropriate?
- Is the information presented conveying the intended messages?
- How effective are the messages in promoting access to the Mechanism?
- Do stakeholders perceive the Mechanism as accessible, transparent, and predictable?
- Is the information being used by stakeholders and understood?

Additionally, actions will be individually evaluated for their effectiveness. For that purpose, the following evaluation tools will be used:

| Outreach Actions | Evaluation tool | Requirements |
|---|--------------------------------------|---|
| On external/internal outreach events, workshops, sessions | Before and after surveys | Standardise sets of questions and analysis of collected data |
| Materials | Focus groups. Surveys | Identifying a relevant group of individuals and organisations to review materials and provide feedback. Survey design |
| IPAM Website | # of hits per page # of downloads | Communication monitoring reports |
| Social Media (Facebook, LinkedIn, etc.) | # of new followers/likes | Analysis of collected data Communications monitoring reports |
| Intranet | Experience Survey | Standardise sets of questions and analysis of collected data |

Globally, measuring the impact of the Strategy requires evaluation as well. For the establishment of a baseline, we will identify a relevant volume of stakeholders (one focus group for external outreach and one for internal outreach) in the next few months and circulate a questionnaire. Annually, we will strive to circulate the same questionnaire to the same group so that we can effectively capture progress, or lack of it.

X. Annexes

| Years | External Outreach | Internal Outreach | |
|----------|--|--|--|
| 2020 | Tools & Products | | |
| | IPAM website: Development of a revised IPAM website to reflect policy changes | Board engagement: Introductory bilateral meetings with Directors, Board refresher IPAM presentation. | |
| | Annual Report 2020 | | |
| | Meetings | President's Office: First meeting with EBRD President Odile Renaud-Basso to present IPAM | |
| | Regional consultation on remedy in development finance | Management engagement: 15-plus meetings with the President, Senior Management team, Regional Directors, Office of the Secretary General, | |
| | Annual Independent Accountability Mechanisms Meeting | Communications, Civil Society Engagement Unit, Evaluation Department, Office of the Chief Compliance Officer, Legal, Human Resources, | |
| | Bilateral meetings with CSOs: Bankwatch, AWC, Accountability Counsel, ReCourse, Accountability Project | Finance and Environment and Sustainability Department (ESD); general introductory session with the ESD team and IPAM presentation to the Western | |
| | IAM-CSO Roundtable on Eligibility and Access to Remedy: IPAM chaired "Third parties - Financial Intermediaries and Supply Chain" | Balkans senior team 20 Internal meetings | |
| | IAMNet: Revision of good practice note, feedback to Inspection Panel and IFC Compliance Advisor Ombudsman reviews | | |
| | Business and Human Rights Forum: IPAM Managing Director invited as speaker to the Accounting and Remedy Project (ARP) III session on preventing retaliation | | |
| | Knowledge sharing among sister IAMs: IPAM Associate Director invited as resource person to the Green Climate Fund's Independent Redress Mechanism's capacity-building workshops for grievance redress mechanisms of the GCF's direct access entities in Africa, Asia and Latin America | | |
| | 7 External meetings | | |
| 2021 | Tools & Products | | |
| | 2021-2024 First Outreach Strategy was prepared | Interactive sessions with the Environment and Sustainability Department, the Office of the General Counsel, and teams in Resident Offices | |
| | A new online complaint form became available in three languages | One video production for the New Joiners | |
| Producti | Production of Outreach Materials | Programme | |
| | Annual Report 2021 | Updating IPAM Intranet section | |
| | Meetings | Engaging with Board Directors, including quarterly | |
| | EBRD Annual Meeting and Business Forum | reports to the Audit Committee and two briefing sessions | |
| | Uzbekistan Webinar in collaboration with IAMNet | 15 internal meetings | |

Annex 1 – List of external and internal outreach activities 2020-2024

| Years | External Outreach | Internal Outreach |
|-------|---|---|
| | 2 External meetings | |
| | Pathways to Sustainability in Mineral Supply Chains Promoting Access – Grievance Redress Mechanism | |
| | Türkiye Webinar in collaboration with IAMNet | |
| | Engaging in Collaborative Dialogue in Europe and Beyond Global Webinar Series: Confronting Chaos, Embracing Conflict (organised by ADR Centre Global, JAMS and the Centre for Effective Dispute Resolution) | |
| | Access to Remedy and Shrinking Civic Space – 2nd Forum on Business and Human Rights in Eastern Europe and Central Asia, organised by the United Nations Development Programme, Business and Human Rights Asia initiative and United Nations Human Rights Special Procedures | |
| | Participation in a debate lunch on Corporations and Human Rights – House of Lords | |
| | 8 External meetings | |
| 2022 | Tools & Products | |
| | Annual Report 2022 | |
| | Meetings | |
| | Civil Society Rendezvous with EBRD's Chief Accountability Officer in collaboration with Argüden Governance Academy in Türkiye | Fourteen awareness sessions for the Bank's headquarters and resident offices, either in person or virtually |
| | Access Promotion Workshop in collaboration with Bankwatch and the A11 Initiative in Serbia | One video production for staff to raise awareness |
| | "Role of Civil Society in EBRD Policies and Projects in Türkiye," organised in collaboration with the CSEU and the Istanbul Citizens Assembly in Türkiye | about accountability and improve collaboration with the mechanism |
| | Technical sessions on resettlement and cultural heritage, International Association for Impact Assessment in Canada | Intranet articles to share success stories, celebrate anniversaries and introduce new team members 14 internal meetings |
| | "Human Rights, Remedy and Accessibility," IPAM Session, EBRD Annual Meeting in Morocco | |
| | Access Promotion Workshop with Moroccan CSOs, in collaboration with Arab Watch Coalition in Morocco | |
| | Workshop on Accountability of International Financial Institutions in Bosnia and Herzegovina, Croatia, Serbia, and Montenegro, in collaboration with IAMnet in Bosnia Herzegovina | |

| Years | External Outreach | Internal Outreach |
|-------|---|--|
| | Webinar Series "Commercial stability in a world of conflict: Effective dispute management in uncertain times", organised by JAMS and CIArb in global (virtual) | |
| | Access Promotion Workshop with Mongolian CSOs, in collaboration with OT Watch in Mongolia | |
| | CSO day organised within the scope of the IAMnet Annual Meeting, hosted by UNDP in USA | |
| | Civil Society Delegation visit to EBRD HQ in London | |
| | Attendance to IAMNet Annual Meeting in New York | |
| | 13 External meetings | |
| 2023 | Tools & Products | |
| | New webpage for IPAM | One co-produced video with Central Asia Banking |
| | Annual Report 2023 | team |
| | Meetings | Eight IPAM Introduction sessions were held with Independent Evaluation, Internal Audit, CSEU, |
| | EBRD's Annual Meeting in Uzbekistan and a panel on the Belgrade Solid Waste case with CSOs | Infrastructure TMEA, Agribusiness, AMPEM, Infra Europe and Albania Resident Office and a joint panel presentation on the EBRD's independent functions: |
| | Participation in the CSEU-CSOs steering committee in London | Contributing to a stronger and more effective EBRD for the Bank staff was organised |
| | CSOs delegation in London | |
| | Access Promotion Workshop with Albanian CSO in Albania meeting | A policy review presentation and a breakfast with the EBRD President |
| | IAMnet outreach session at the IAIA Annual Meeting in Malaysia | 11 meetings |
| | Session on "Remedy and sustainability through conflict resolution" as part of the Civil Society Programme at the EBRD Annual Meeting in Uzbekistan | |
| | Access Promotion Workshop attended by 40 CSOs from Central Asia in Uzbekistan | |
| | Policy Review Proposed Action Plan – IPAM initial consultation with CSOs in global (virtual) | |
| | Presentation on Development Finance Institutions and Remedy at the European Business and Human Rights Working Group Meeting in Europe | |
| | Session with CSOs organised within the scope of the IAMnet Annual Meeting hosted by the EBRD in London | |

| Years | External Outreach | Internal Outreach |
|-------|---|---|
| | Participation in the UN Business and Human Rights Forum in Switzerland | |
| | One-to-one interviews as part of the IPAM Policy Review Forum in global (virtual) | |
| | 11 external meetings | |
| 2024 | Tools & Products | |
| | CSO Database development | Intranet articles to share success stories, celebrate |
| | Update of outreach materials | anniversaries and introduce new team members |
| | Annual Report 2024 | Updating Intranet |
| | Meetings | Sessions for Board, Steering Committee, President's Office, Donor Partnerships, PPAD, Secretary General, |
| | EBRD's Annual Meeting in Armenia and a consultation session with CSOs | Risk Management and Chief Finance Officer, Risk Committee, Finance, OCCO, FOP Committee, CSEU, |
| | Meeting with Business and Human Rights Development and Social and Economic Issues Branch – Office of the UNHCHR in London | Corporate Strategy, General Counsel, IAD, Risk Management, IT, Albania, Bosnia and Herzegovina, and Montenegro Resident Offices |
| | International Conference on Participatory Approaches to World Heritage in South Korea | 28 internal meetings |
| | IAMNet Outreach session – IAIA Annual Conference in Dublin | |
| | Meeting with UNHCHR in London | |
| | Meeting with EIB delegation in London | |
| | A member of IPAM took part in a Bank's initiative to explore and get to know one of the Resident Offices in Romania | |
| | IAMnet Annual Meeting hosted by the ADB and GCF in Manila | |
| | Participation in RSFIA Symposium in Dubrovnik | |
| | Meeting with Bankwatch delegation in London | |
| | Conflict Resolution Day in Washington DC | |
| | Devex Conference in Washington DC | |
| | IAMNet meeting on Mutual Reliance in Washington DC | |
| | World Bank Annual Meeting in Washington DC | |
| | Meeting with Civil Society Organisations on Policy Review in Washington DC | |
| | 17 meetings | |
| Total | 56 external meetings and several other activities | 88 internal meetings and several other activities |