

# Stakeholder engagement (PR10)

## EBRD briefing note

Covid-19

15 April 2020

**Advice to clients during the Covid-19 crisis: The Covid-19 pandemic has created significant environmental, health and safety and social impacts, risks and challenges for workforces across the economies where the EBRD invests, affecting businesses and their staff, contractors and suppliers. The EBRD has prepared briefing notes to highlight some critical areas of concern that clients may want to consider in their Covid-19 response planning, together with references to additional resources with further details on how risks can be mitigated or minimised.**

*This briefing note is not a compliance document and should be taken only as a source of information and analysis. It does not constitute medical or legal advice and is not a substitute for professional advice from international public health organisations such as the World Health Organization (WHO), national public health authorities and national governments, which should be consulted for qualified and more detailed information. We strongly encourage our clients to seek daily updates from these sources as the coronavirus pandemic evolves. No representation, warranty or undertaking, expressed or implied, is made in respect of any information contained herein or the completeness of the content of this briefing note, or any conclusion or judgements described herein. Certain parts of the briefing note link to external internet sites. No responsibility is accepted for the content of any external references.*

### Information disclosure, stakeholder engagement and Covid-19

Information disclosure and stakeholder engagement are the cornerstones of managing the social impacts of projects and fundamental principles of the EBRD's Environmental and Social Policy (ESP) and Access to Information Policy (AIP). Mandatory restrictions and social distancing measures associated with Covid-19 in the economies where the EBRD invests, however, rule out some traditional consultation approaches in the short term. Projects at a stage of active engagement with stakeholders therefore need to develop alternate plans, taking account of mandatory, national Covid-19 restrictions and social distancing.

This note presents considerations for continuing effective information disclosure and stakeholder engagement during the Covid-19 pandemic and will be updated on an as-needed basis as the crisis and responses in our regions evolve. As each project context is unique, we recommend working with the EBRD's Environment and Sustainability Department (ESD) to develop a tailored plan for your project.

### Consultation approaches

Possible approaches for disclosing information and engaging with stakeholders are presented below, along with examples that could be considered.

**Table 1. Alternate information disclosure and stakeholder engagement measures in light of Covid-19 restrictions**

| Type                   | Method                          | Examples   | Engagement content  |
|------------------------|---------------------------------|--|---|
| Information disclosure | Project leaflets                | <ul style="list-style-type: none"> <li>▶ Information postcards</li> <li>▶ Project impact and mitigation summaries</li> </ul>                 | <ul style="list-style-type: none"> <li>▶ Links to project documents and further information</li> <li>▶ Overview of project, impacts and mitigation</li> <li>▶ Frequently asked questions (FAQs)</li> <li>▶ Project updates</li> <li>▶ Direction to feedback and grievance mechanisms</li> </ul> |
|                        | Email campaigns                 | <ul style="list-style-type: none"> <li>▶ Constant Contact</li> <li>▶ Mailchimp</li> <li>▶ Sendinblue</li> </ul>                              |   |
|                        | Text-based messaging            | <ul style="list-style-type: none"> <li>▶ WhatsApp</li> </ul>   |   |
|                        | Traditional media               | <ul style="list-style-type: none"> <li>▶ Newspaper</li> <li>▶ Radio</li> <li>▶ Television</li> <li>▶ Public address systems</li> </ul>       |   |
|                        | Engagement through local actors | <ul style="list-style-type: none"> <li>▶ Local authorities</li> <li>▶ Civil society organisations</li> <li>▶ Worker organisations</li> </ul> |   |

| Type                   | Method   | Examples   | Engagement content  |
|------------------------|--|--|---|
|                        | Signage  | <ul style="list-style-type: none"> <li>▶ Community notice boards</li> <li>▶ Information panels in community and at project site</li> </ul> |   |
| Stakeholder engagement | Surveys and questionnaires (telephone, online) | <ul style="list-style-type: none"> <li>▶ SurveyMonkey</li> <li>▶ SurveyPlanet</li> <li>▶ Typeform</li> </ul>                               | <ul style="list-style-type: none"> <li>▶ Socioeconomic baseline surveys</li> <li>▶ Feedback mechanism on project, impacts and mitigation</li> </ul> |
|                        | Online engagement                              | <ul style="list-style-type: none"> <li>▶ EngagementHQ</li> <li>▶ Social Pinpoint</li> </ul>  |   |
|                        | Social media                                   | <ul style="list-style-type: none"> <li>▶ Facebook</li> <li>▶ Instagram</li> </ul>  |   |
|                        | Radio call-in shows                            | ▶ Dependent on local context   |   |
|                        | Telephone engagement                           |  |   |

### Processes, systems and tools

Information disclosure and stakeholder engagement require effective processes, systems and tools. These become even more important in ensuring effective engagement during the Covid-19 pandemic. Some considerations include:

- ▶ **Stakeholder database:** reviewing **existing stakeholder lists** to ensure that key stakeholders and their contact information are included. This is critical for continuing engagement with stakeholders who are significantly impacted by a project, such as vulnerable people or those subject to economic and physical displacement. Local authorities, emergency services and medical providers and civil society groups can be of assistance in developing stakeholder lists. Consider if there are any new Covid-19 related stakeholders who need to be added to your list. However, any effort to develop a stakeholder database must respect people's privacy and be consistent with regulations such as the General Data Protection Regulation.<sup>1</sup>
- ▶ **Messaging:** when using a number of engagement platforms, it is crucial to ensure that information provided is **clear, concise and consistent and is provided in relevant local languages**.
- ▶ **Documentation:** keeping track of interactions requires **effective documentation** of engagement activities, commitments and complaints.
- ▶ **Resources:** ensure **appropriate resources are in place to track and respond** to queries, concerns and disputes or grievances that may be raised. With restrictions on movement, it is important that, where possible, staff managing stakeholder engagement and grievances can access systems and work remotely to enable processes to work effectively.

### Developing an appropriate tailored engagement approach

Each EBRD project and every economy where the Bank invests is unique, requiring a tailored approach to information disclosure and stakeholder engagement during the Covid-19 pandemic. Factors to consider in developing an engagement plan include:

- ▶ **Connectivity:** limited mobile phone usage and internet connectivity can make electronic communication more challenging in some contexts.
- ▶ **Literacy:** variable levels of literacy among project stakeholders may reinforce the need for more oral and visual rather than written engagement channels.
- ▶ **Cultural considerations:** direct methods of engagement, such as telephone surveys, may not be appropriate in some cultural contexts.
- ▶ **Language:** online engagement tools may be lacking local language versions.
- ▶ **Vulnerable people:** vulnerable project stakeholders may be harder to reach using non-traditional engagement methods. Attention should be paid to ensuring that an engagement strategy deploys approaches that specifically target these groups.
- ▶ **Anonymity and risks of reprisal:** the transparency of online engagement platforms can increase the risk of reprisals. It is therefore important to ensure that channels continue to be available for stakeholders to raise concerns, questions or complaints and have these addressed securely and/or anonymously.
- ▶ **Government restrictions on social distancing and gatherings:** Covid-19-related restrictions on public assembly differ throughout the economies where the EBRD invests. Engagement approaches therefore need to be tailored to comply with local restrictions and flexible as those restrictions are modified.

### Preparing a revised short-term engagement plan

The EBRD's Environment and Sustainability Department is here to advise you on how to tailor a Covid-19 engagement approach that is right for your project. For projects with significant planned stakeholder engagement and information disclosure in the coming months, we recommend preparing a short-term engagement plan considering alternate methods, including those outlined in this document.

<sup>1</sup> The General Data Protection Regulation (EU) 2016/679 (GDPR) is a [regulation](#) in EU law on [data protection](#) and privacy in the [European Union](#) (EU) and the [European Economic Area](#) (EEA). It also addresses the transfer of [personal data](#) outside the EU and EEA areas.

We recognise that while some consultation activities can be modified in the short term, others cannot and will need to be deferred until Covid-19 restrictions are lifted and social distancing eases. A short-term engagement plan can serve as a basis for discussion with the EBRD in order to implement a strategy that balances short-term engagement needs with

long-term project planning. This is especially important for higher-risk and Category A projects. For these projects, the EBRD will work closely with its clients to develop a strategy for information disclosure and stakeholder engagement.

A simple template for this plan is proposed in Appendix A below for clients with existing operations..

## Appendix A. Engagement plan templates

Two possible engagement plan templates are provided below. The first concerns stakeholder engagement regarding the Covid-19 pandemic and the client's response it:

**Table 2. Short-term engagement planning template: Covid-19-related engagement with example content**

| Stakeholder group                | Key messages   | Planned disclosure and stakeholder engagement   | Proposed methods   | Limitations  |
|----------------------------------|--|---|--|--|
| <i>Name of stakeholder group</i> | <i>Content</i>   | <i>Engagement and disclosure activities planned in the coming three months</i>  | <i>Proposed alternative short-term activities accounting for Covid-19 restrictions and social distancing</i>   | <i>Limitations on activities</i>   |
| <b>EXAMPLE CONTENT:</b>          |  |   |  |  |
| Workers                          | <ul style="list-style-type: none"> <li>▶ Amendments to site-operating procedures and emergency response plans (ERPs)</li> <li>▶ Job security, changes to working conditions and guidance on accessing government benefits (if available)</li> <li>▶ Actions to take if they develop Covid-19 symptoms</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Provide information updates; consult workforce on changes and seek feedback</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Email to all employees</li> <li>▶ SMS</li> <li>▶ Letters</li> <li>▶ Virtual meetings</li> <li>▶ Video messages</li> <li>▶ Webinars</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Not all employees have email access</li> <li>▶ Employees may be off sick</li> </ul>                             |
| Emergency services               | <ul style="list-style-type: none"> <li>▶ Confirmation of emergency contacts</li> <li>▶ Amendments to site</li> <li>▶ ERP and strategy</li> <li>▶ Specific assistance needed, for example, in case of shutdown of operations</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Inform of changes</li> <li>▶ Seek feedback</li> </ul>  | <ul style="list-style-type: none"> <li>▶ Official email</li> <li>▶ Teleconference</li> <li>▶ Updated ERP submitted with changes highlighted</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Local emergency services may be close to full capacity</li> </ul>   |
| Health services                  | <ul style="list-style-type: none"> <li>▶ Location of specific centers for Covid-19 cases</li> <li>▶ Opportunities for collaboration</li> <li>▶ Identify areas where the company could assist (for example, in providing spare equipment, logistics support and so on)</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Seek latest information</li> <li>▶ Consult on any opportunities to collaborate or support</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Telephone</li> <li>▶ Tracking official information on websites</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Situation and information will change on almost daily basis; information may become outdated quickly</li> </ul> |
| Transport providers              | <ul style="list-style-type: none"> <li>▶ New site access procedures or timings</li> <li>▶ Additional health and safety controls</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Inform of changes</li> </ul>   | <ul style="list-style-type: none"> <li>▶ Official email or written letter</li> </ul>   |  |
| Local community                  | <ul style="list-style-type: none"> <li>▶ Support offered by project (for example, medical services, transport)</li> <li>▶ Project measures to comply with social distancing</li> <li>▶ Measures to limit workforce or community interaction (for example, for a large expatriate workforce)</li> <li>▶ Changes to current procedures (for example, grievance mechanism)</li> </ul> | <ul style="list-style-type: none"> <li>▶ Regular updates of key information</li> <li>▶ Seek feedback on changes, for example alternative methods to access the grievance mechanism</li> </ul> | <ul style="list-style-type: none"> <li>▶ Leaflet distribution</li> <li>▶ Social media</li> <li>▶ Website</li> <li>▶ Newspaper advertisement</li> <li>▶ Postal and online questionnaires and feedback forms</li> <li>▶ Telephone calls</li> </ul> | <ul style="list-style-type: none"> <li>▶ Vulnerable people may be difficult to access with online mechanisms</li> </ul>                                  |

The second template concerns projects that have public consultation and stakeholder engagement activities planned and committed as part of project design (for example, ESIA preparation; ESIA disclosure and consultation; or resettlement planning). In these cases, a revised approach to stakeholder engagement, which

takes account of the Covid-19 restrictions, should be developed. The table below provides a template for planning such alternative arrangements. In developing this template, clients should consider which activities are critical in the short term, and which should be deferred until Covid-19-related restrictions are lifted.

**Table 3. Short-term engagement planning template – alternative approaches with COVID-19 restrictions in place – with example content**

| Stakeholder group   | Key messages   | Planned disclosure and stakeholder engagement   | Proposed methods (short-term)   | Limitations   | Proposed alternative methods (long-term - deferred)  |
|---|--|---|---|---|--|
| Name of stakeholder group   | Content  | Engagement and disclosure activities planned in the coming three months - consider additional engagement related to the project's response to Covid-19  | Proposed alternative short-term activities accounting for Covid-19 restrictions and social distancing   | Limitations of short term activities  | Proposed long-term activities to address limitations (to be implemented after Covid-19 restrictions are lifted)  |
| <b>EXAMPLE CONTENT:</b>   |  |   |   |   |  |
| Local residents in villages adjacent to proposed project, including vulnerable people | <ul style="list-style-type: none"> <li>▶ Project impacts and benefits, specific to the immediate area</li> <li>▶ Construction and operational mitigation measures</li> </ul> | <ul style="list-style-type: none"> <li>▶ Disclosure and consultation draft: ESIA, NTS, SEP, RAP, environmental and social management plan (ESMP) and environmental and social action plan (ESAP)</li> </ul> | <ul style="list-style-type: none"> <li>▶ Disclosure focusing on online methods, radio/TV/newspaper announcement</li> <li>▶ Targeted leaflet drops house-to-house in village with contact details and mechanisms for returning feedback</li> <li>▶ Follow-up calls if contact details are available</li> </ul> | <ul style="list-style-type: none"> <li>▶ Short-term engagement may not reach vulnerable people</li> </ul> | <ul style="list-style-type: none"> <li>▶ Vulnerable people identified through discussion with local authorities</li> <li>▶ Face-to-face, one-to-one interviews or discussions</li> <li>▶ Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)</li> </ul> |
| Residents living along access roads   | <ul style="list-style-type: none"> <li>▶ Project impacts and benefits, specific to the immediate area</li> <li>▶ Construction and operational mitigation measures</li> </ul> |   |   |   |  |
| Physically and economically displaced households                                      | <ul style="list-style-type: none"> <li>▶ Socioeconomic and asset surveys</li> <li>▶ Compensation entitlements</li> <li>▶ RAP consultations.</li> </ul>                       |   |   |   |  |

## Appendix B. Further resources

While this note provides general information for EBRD clients, more resources on strategies for stakeholder engagement and information disclosure, including during the Covid-19 pandemic, can be found right:<sup>2</sup>

- [IAP2 – How can IAP2A support your business practice during COVID-19](#)
- [Meaningful Stakeholder Engagement: A joint publication of the MFI Group on ESS](#)
- [EBRD Grievance Management Guidance Note](#)
- [World Health Organization – COVID-19 - Communication and Community Engagement](#)

<sup>2</sup> The EBRD is not responsible for the content of any external references.