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Republic of Lebanon**

Education Programme Lebanon (School Construction)

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Stakeholder Engagement Plan (SEP)

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Acronyms

DOPS	Direction d’Orientation Pédagogique et Scolaire (Department of Scholastic and Pedagogical Guidance)
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESMF	Environmental and Social Framework
ESDD	Environmental and Social Due Diligence
FPIC	Free, Prior and Informed Consent
GM	Grievance Mechanism
IC	Implementation Consultant
IEE	Initial Environmental Examination
ISF	Internal Security Forces
MEHE	Ministry of Education and Higher Education in Lebanon
MoE	Ministry of Environment
NGO	Non-Governmental Organization
PAP	Project Affected Person
PEA	Project Executing Agency
PPD	Project and Programs Department
RACE	Reaching All Children with Education Strategy
S2R2	Support to Lebanon's Reaching All Children with Education Plan II
SEA/SH	Sexual Exploitation and Abuse/Sexual Harrassment
SEP	Stakeholder Engagement Plan
STC	Special Tendering Committee

Table of Contents

Acronyms2

1. Introduction5

1.1. Institutional and Implementation Arrangements6

2. Regulations and Requirements7

2.1. National Requirements for Stakeholder Engagement7

2.2. International Requirements for Stakeholder Engagement7

3. Summary of any previous stakeholder engagement activities10

4. Project Stakeholders12

4.1. Methodology12

4.2. Affected Parties, Other Interested Parties, and Disadvantaged/Vulnerable individuals or Groups 12

4.3. Summary of Project Stakeholder Needs16

5. Stakeholder Engagement Program18

5.1. Purpose and goals of Stakeholder Engagement Plan18

5.2. Strategy for Consultation and Information Disclosure18

5.3. Meetings and Consultations19

5.4. Detailed Planning20

5.5. Proposed Strategy to Incorporate the Views of women and Vulnerable Groups25

5.6. Review of Comments25

6. Timetable26

7. Site-Specific Stakeholder Engagement Plans27

8. Resources and Responsibilities27

8.1. Management Functions and Responsibilities27

8.2. Resources27

9. Grievance Mechanism30

9.1. Objectives of a Complaints Management Mechanism30

9.2. Raising Awareness of the Grievance Mechanism30

9.3. The Proposed GM30

9.4. GM Uptake Channels31

9.5. The Grievance Mechanism Process31

10. Monitoring and Reporting37

Annex 1- MEHE Grievance Form38

Annex 2 – Grievance Mechanism Log40

Table of Tables

Table 1- KfW Requirements for Stakeholder Engagement under the Sustainability Guideline..... 8

Table 2- Stakeholders Engagement Principles12

Table 3- Identified Key Stakeholders.....13

Table 4 Stakeholder Power–Interest Matrix14

Table 5- Stakeholders Communication Means.....16

Table 6 – Proposed Strategy for Consultation and Possible means for Information Disclosure21

Table 7– SEP Implementation Budget28

Table 8 - Overview of the Steps and Associated Timelines32

Table 9 – Classification of Grievances33

Table of Figures

Figure 1 – Steps in Managing Grievances.....32

Figure 2 – Grievance Resolution Process.....36

1. Introduction

The Ministry of Education and Higher Education (MEHE) in Lebanon developed the RACE II Strategy (Reaching All Children with Education Strategy 2017-2021) with technical support from UNICEF, the World Bank, UNESCO, and other education partners. This national education strategy which was endorsed by the Government of Lebanon aims at ensuring access to quality education for Lebanese and non-Lebanese children, especially in response to the Syrian refugee crisis. This strategy has three pillars namely (1) Access (enrolling more children), (2) Quality (teacher training, learning outcomes) and (3) System strengthening (capacity, governance, data). The strategy identified the deficits in the public-school infrastructure as one important bottleneck to improve the access and quality of public education.

The S2R2 (Support to Lebanon's Reaching All Children with Education Plan II 2017-2021) is a program designed to support the RACE II strategy with a focus on equitable access, enhanced quality, and strengthened systems within the education sector. As part of S2R2, rehabilitation and extension works were carried out for 52 public schools to improve learning environments and expand access.

In May 2017, the Lebanese Government requested support from the German Government to improve its school infrastructure, specifically to construct new schools especially that preliminary result indicate that only 36% of public schools are in "good" condition in terms of building fabric and equipment. 34% are in an "acceptable" state, another 30% in a "bad" condition. Furthermore, some schools operate in buildings rented by the Project Executing Agency (PEA), which were not designed as school buildings or are not in accordance with the Lebanese or international design standards applicable to educational buildings.

Following several assessment missions, the German Government decided to make a grant available for this purpose. The planned KfW-financed project will support MEHE in improving access to public education and learning conditions for school-aged children in Lebanon by providing adequate additional public-school infrastructure, especially in remote areas whereby at least 4,000 additional school places are to be created which will bring many benefits for the students, teachers, school staff and the respective communities. This shall improve the personal and economic development perspectives for all school-aged children in the country. Furthermore, by building new schools or expanding existing schools owned by the PEA the number of rented schools shall be decreased to reduce its financial burden. This will free additional financial resources for the public education sector and make investments in public education infrastructure more sustainable.

The project with an overall budget of EUR 30.85 million will be implemented in two phases:

- 1- Phase 1 (EUR 20.36 million): concerns the construction of "all-through schools", whereby at least four new schools (greenfield) will be built.
- 2- Phase 2 (EUR 10.2 million): will witness the extension of at least four schools combined with light rehabilitation of existing buildings including adequate furnishing and equipment as well as associated consulting services (including broader technical assistance / capacity support for the Project Executing Agency PEA) to improve the overall quality of school infrastructure. Extensions of schools owned by the PEA shall also be considered, provided that they are advantageous in terms of economic efficiency and demand compared to a new building.

The German contribution of EUR 30 million in form of two grants (Phase I: EUR 20 million; Phase II: EUR 10 million) will be used for construction works (new schools, potentially also expansion of existing schools), financing of equipment and furniture for the constructed / expanded schools, the services of the IC (including extensive technical support and capacity building at MEHE).

The Lebanese Government contribution amounts to EUR 0.85 million and will be used for financing equipment and furniture for the newly constructed / extended schools. Furthermore, MEHE will provide the required land for constructions as well as all connections to basic infrastructure required to operate the schools according to the specific needs.

The construction measures are to be implemented on the basis of individual, child-friendly designs that lead to an improved learning environment in the interior and exterior of the school buildings (e.g. appropriate acoustics, pleasant indoor climate, design of the schoolyard with shaded areas and play facilities), energy-efficient, and barrier-free. The furnishings and fittings of newly built or extended

schools shall include furniture and other equipment, in particular whiteboards, laboratory equipment and computers.

The Project has the character of an “Open Program” because the final school sites for construction/extension/rehabilitation are not known yet. This means that the number of schools and their dimensions can only be defined at a later stage based on the final site selection. The criteria that will be used as a basis for the selection of schools include measures such as accessibility, green schools, qualitatively appropriate learning conditions and possible efficiency gains in the administration of schools (caza by caza assessment).

The Project has been categorized as “B” Project¹, which implies moderate E&S risks. In view of the type and scope of the planned school construction measures, negative environmental and social impacts and risks are expected to be limited to the construction sites and are likely to be reduced or mitigated by measures and standard technological solutions available. Furthermore, these will be covered and detailed in the Environmental Impact Assessment (EIA) or Initial Environmental Examination (IEE) if required (details provided in section 2). In addition, it cannot be precluded that further social risks arise due to potential physical and/or economic displacement as a consequence of land provision for school construction. These will be mitigated through a careful selection of the sites for the construction of new schools whereby it has to be ensured that any land donations have been or will be voluntary and that the implementation of the project will not require any resettlements.

1.1. Institutional and Implementation Arrangements

- **The Ministry of Education and Higher Education (MEHE)** is responsible for setting national education policies, overseeing public and private schools and universities, ensuring access to and quality of education, and managing programs and projects that strengthen the education system.
- Within the MEHE, the **Project and Programs Department (PPD)** is responsible for the implementation of school construction and rehabilitation. Consequently, the PPD is the responsible unit within the PEA assigned with the implementation of the Project. The PPD will be responsible for the management of all procurement and contracts under the program. This would include the management of construction site possession, review and advice on technical specifications, developing of bidding documents, managing tender processes, participation in bid evaluation committees, making recommendations on the award of contracts, contract management to ensure compliance with timelines and budgets, monitoring the quality of works, participation in handover committees as well as submitting regular reports to the Director of General Education as well as to KfW on the progress of the Program. The PPD consists of a small number of employees (architects and civil engineers), most of whom are financed by international donors. Within the PPD, a Special Tendering Committee (STC) will be responsible for all tasks related to the procurement of services, works, and goods. Furthermore, MEHE will assign a Project Manager as focal point for the whole duration of the Project. The Project Manager shall be entrusted with a delegation of authority by MEHE to be able to take decisions directly as far as possible.
- An International Consultant in cooperation with a local consultant –referred to as the **Implementation Consultant (IC)** – is to support the PEA in the preparation, implementation and monitoring of the individual project measures in all technical and financial matters. This includes the selection of the school sites (including back up sites), the design, detailed technical planning, the tendering and awarding of the construction services as well as supplies, the construction supervision including compliance with environmental and social standards and the final acceptance, including monitoring during the defects liability period. In addition, the IC shall support the PEA in the preparation of sustainable school operations and where necessary in capacity building. The IC will implement both Phases I and II. The IC will also liaise with the various donors providing funds and technical assistance targeting the modernization and improvement of the public-school infrastructure in Lebanon.

¹ KfW categories comprise: A (high E&S risks), B+ (relevant E&S risks), B (moderate E&S risks) and C (low E&S risks).

2. Regulations and Requirements

2.1. National Requirements for Stakeholder Engagement

The project may require the preparation of an Environmental Impact Assessment (EIA) or an Initial Environmental Examination (IEE).

The basic law for environmental and social impact and associated stakeholder engagement is Decree 8633/2012, “Fundamentals for Environmental Impact Assessment” (EIA), which requires project owners to conduct a screening process to make a determination of the likely level of environmental and social impacts the project could cause. Projects whose impacts could be moderate to major require a full Environmental Impact Assessment, and public participation is mandatory at several stages of the assessment process, including the scoping consultations and disclosure of the draft ESIA.

For such projects, the Ministry of Environment requires that all concerned stakeholders, including ministries, municipalities and nongovernmental organizations be notified that an EIA is being prepared. The concerned municipality (or the governor or commissioner in case there is no municipality) must immediately advertise the Project to the public and invite comments for at least 30 days, ensuring early access to information. The project owner then submits a scoping report that includes a summary of all stakeholder’s feedback as well as minutes of all meetings held with stakeholders. The ESIA is then prepared and disclosed for public review. In general, national regulations require the consultation process to be initiated at the outset of the assessment process and to provide ‘for continuous access to information related to the Project.

For lesser projects, including brownfield projects, expansions, extensions, and others whose level of impacts may be less clear or that are known not to rise to the level they would require an EIA, the owner must prepare an Initial Environmental Examination, whose results would determine if an EIA was required. If screening and/or the Examination confirms that impacts would be minor or negligible, no further assessment is needed and no consultations are required for projects that do not progress to an EIA, although the Ministry and/or owner would typically engage at least the Municipality during project planning development.

2.2. International Requirements for Stakeholder Engagement

All KfW-funded projects are required to comply with international best practice in environmental and social risk management, including meaningful stakeholder engagement and public consultation. In line with KfW’s Sustainability Guideline and its alignment with the World Bank/IFC Environmental and Social Standards, project executing agencies must ensure that stakeholders and affected communities are informed and consulted throughout the project cycle, and that their concerns are integrated into project planning and implementation.

The project stakeholder engagement activities should be robust, and enough disclosure of information should be made in order to promote better awareness and understanding of its strategies, policies and operations. During this disclosure, the project requires to:

- Identify people or communities that are or could be affected by the project as well as other interested parties;
- Ensure that such stakeholders are appropriately engaged on issues that could potentially affect them, through a process of information disclosure and meaningful consultation; and
- Maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.

As defined by the 2018 ESF and specifically ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. A project’s Stakeholder Engagement Plan (SEP) is required to be proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism (GRM or GM) that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

The key elements of ESS10 are shown in Table 1.

Table 1- KfW Requirements for Stakeholder Engagement under the Sustainability Guideline

Objective	Key Requirements
Stakeholder identification	Identify and engage with all relevant stakeholders affected by the project. Conduct comprehensive stakeholder analysis to understand interests, influence, and potential project impacts. For higher risk projects (Category A and B+), develop a formal Stakeholder Engagement Plan (SEP) outlining strategies and methods for engagement throughout the project lifecycle. Regularly update and review stakeholder mapping to ensure inclusiveness, with attention to vulnerable or marginalized groups.
Information disclosure	Disclose project-related information in a timely, transparent, and culturally appropriate manner. Establish processes for systematically collecting, organizing, and disseminating information. Provide information in clear language and formats suitable for the cultural and linguistic context of stakeholders. For Category A projects, Environmental and Social Impact Assessments (ESIAs) must be disclosed prior to project approval; for other categories, disclosure requirements are proportionate to risk and impact.
Meaningful consultation	Facilitate meaningful, inclusive consultation and ensure stakeholders can influence decision-making. Develop a consultation plan (objectives, methods, timelines). Provide opportunities for stakeholders to express views, concerns, and suggestions during planning, implementation, and monitoring. Ensure consultations are free from manipulation or coercion and culturally appropriate. Where indigenous peoples are affected, ensure Free, Prior and Informed Consent (FPIC) is obtained.
Ongoing engagement and external reporting	Maintain continuous engagement throughout the project cycle. Establish mechanisms for regular updates on project performance, changes, and emerging issues. Prepare periodic reports documenting activities, progress, and status of environmental and social commitments. Include stakeholder feedback on the accuracy and completeness of reporting. Ensure that monitoring and reporting on stakeholder engagement are integrated into Environmental and Social Due Diligence (ESDD) follow-up reports submitted to KfW.
Grievance redress mechanism	Establish a clear, accessible, and culturally appropriate GRM for stakeholders to raise concerns and seek remedies. Publicize procedures and ensure multiple channels for submitting grievances, including anonymous submissions.

Objective	Key Requirements
	Record, acknowledge, and address grievances promptly and fairly. Provide feedback on actions taken and remedies implemented. For higher risk projects, GRMs must include referral pathways for Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), ensuring confidentiality, survivor-centric handling, and consent-based referral. Integrate grievance records into project monitoring reports to KfW.

3. Summary of any previous stakeholder engagement activities

The following stakeholder engagement activities have been undertaken to date. This section will be updated on an ongoing basis as further stakeholder engagement activities are carried out under the Project:

Date	Municipality / Location	Key Attendees	Purpose & Key Discussion Points	Outcome / Status
11 August 2026	Al Mina Municipality (office of the President of Al Mina Municipal Council)	Mr. Abdallah Kabbara (President, Al Mina Municipal Council); Mr. Rachid Issa (Council member, Head of Media Committee); Mr. Mourad Khalil (responsible for education); Project team: Mr. Yorgo Helou, Ms. Lamia Chamas, Mr. Haytham El Eid, Mr. Jens Sohr (Chehab & Partners)	Preparatory meeting to introduce the Project, discuss its scope and the ongoing ESMP preparation process, and establish initial coordination with the Municipality.	Completed. Agreed that coordination would continue with Al Mina Municipality to support organizing the broader participatory stakeholder consultation and facilitate the participation of relevant local stakeholders.
11 August 2026	Chekka Municipality (office of the President of Chekka Municipal Council)	Mr. Gaby Boutros (President, Chekka Municipal Council); Project team: Mr. Yorgo Helou, Ms. Lamia Chamas, Mr. Haytham El Eid, Mr. Jens Sohr (Chehab & Partners)	Preparatory meeting to introduce the Project and the ESMP preparation process and obtain the Municipality's initial views. The Municipality confirmed strong support for the proposed school and had previously provided land for its construction. Discussion covered anticipated traffic (considered minor, given the site's location), the importance of adequate on-site (including possible underground) parking, sports facilities with potential after-hours community use, and a possible auditorium/multipurpose hall for	Completed. Agreed that coordination would continue with Chekka Municipality to support organizing the broader participatory stakeholder consultation; the Municipality offered a suitable room for holding it. Suggestions on parking, sports facilities and multipurpose space noted for consideration by the Project design team. The Municipality's offer to assist with site clean-up and to help secure geotechnical equipment has been noted for coordination ahead of the site investigation phase.

Date	Municipality / Location	Key Attendees	Purpose & Key Discussion Points	Outcome / Status
			shared community use. The mayor further indicated that the Municipality is ready to assist with cleaning the land and removing rubbish from the site, and to help secure the safety of geotechnical equipment during any site investigation works.	
11 September 2026	Zahle Municipality (office of the President of Zahle Municipal Council)	Mr. Salim Ghazaly (President, Zahle Municipal Council); Project team: Mr. Yorgo Helou, Ms. Lamia Chamas, Mr. Haytham El Eid, Mr. Jens Sohr (Chehab & Partners)	Preparatory meeting to introduce the Project and the ESMP preparation process, and obtain the Municipality's initial views. Discussion covered the steep slope of the site and the need for a technical study of ground support, including a possible retaining wall; the design's approach to school entrances (no open/unenclosed entrances, consistent with a modern school design); the need to secure adequate on-site parking to avoid street parking, particularly given the slope; measures to avoid, to the extent possible, the cutting of the pine and cypress trees present on the site; and the contractor selection process, to be carried out through a competitive tender for which Chehab & Partners will develop the ToRs/BoQs and support MEHE, subject to KfW's review and clearance.	Completed. The Mayor confirmed strong support for the Project and committed to providing all needed support. Agreed that the design will address the site's slope (including a possible retaining wall) and secure on-site parking, and will seek to avoid cutting existing trees where possible. Agreed that coordination would continue with Zahle Municipality to support organizing the broader participatory stakeholder consultation, to be held in the Municipality's conference room; the Municipality's Environment, Youth and Sports, Social Affairs, and Women's Affairs committees are to be invited to attend and provide input.

4. Project Stakeholders

4.1. Methodology

This section outlines the key stakeholders who will be informed and consulted about the project.

To meet best practice approaches, the project will apply the following principles for successful stakeholder engagement:

Table 2- Stakeholders Engagement Principles

Principles	Corresponding Best-Practice Principle	Explanation of Alignment
Openness and life-cycle approach	Early Engagement & Continuous Engagement	Engaging stakeholders throughout the project ensures early identification of concerns and maintains dialogue across the project lifecycle, consistent with openness and transparency.
Informed participation and feedback	Transparency & Access to Information + Two-Way Communication	Providing clear, culturally appropriate information and actively seeking stakeholder feedback ensures stakeholders are well-informed and can meaningfully participate.
Inclusiveness and sensitivity	Inclusiveness & Equity + Cultural Sensitivity & Respect	Identifying stakeholders, ensuring vulnerable groups are considered, and adapting engagement methods to local needs reflects inclusivity, equity, and respect for cultural and social norms.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

4.2. Affected Parties, Other Interested Parties, and Disadvantaged/Vulnerable individuals or Groups

Key stakeholders including project affected parties, other interested parties, and disadvantaged/vulnerable individuals or groups are outlined in **Table 3** below. Any additional stakeholders that might be identified or proposed during implementation shall be added to this list.

Table 3- Identified Key Stakeholders

Category	Stakeholder/Group	Role/Interest in the Project
Project-Affected Parties (PAPs)	Students (current and future)	Direct beneficiaries; interested in safe, quality learning environments, adequate facilities, and uninterrupted education
	Parents / Guardians	Concerned about children's safety, access to education, school quality, and reduced travel distance.
	Teachers / School Staff	Interested in improved teaching conditions, classroom resources, safety, and support facilities; may provide feedback on design/rehabilitation needs.
	School Administration / Principals	Responsible for school operations; ensure project aligns with school functioning and curriculum requirements.
	Local Communities near the school site	May be affected by construction activities (noise, traffic, safety); interested in benefits of improved education infrastructure.
	Formal and Informal Land settlers/users	Especially relevant if the project involves greenfield construction or rehabilitation on occupied land. They require inclusive, transparent consultation, with careful attention to social and legal sensitivities.
Other Interested Parties	Ministry of Education and Higher Education (MEHE)	Project owner and implementing agency; responsible for planning, supervision, and ensuring alignment with national education strategy (RACE II).
	KfW (German Development Bank)	Funding agency; interested in project compliance with sustainability, quality, and international environmental and social standards.
	Local Municipalities / Authorities	Facilitate permits, access to utilities, and local coordination; interested in community development and public safety.
	NGOs / Education Partners (UNICEF, UNESCO, etc.)	May provide technical support, monitoring, or complementary programs; interested in improving access, equity, and quality of education.
	Contractors / Construction Companies	Implement the physical works; responsible for health, safety, and adherence to project specifications.
	Children with disabilities	Require accessible infrastructure and inclusive facilities.

Category	Stakeholder/Group	Role/Interest in the Project
Disadvantaged / Vulnerable Groups	Girls and marginalized youth	Benefit from equitable access to safe school environments; ensure gender-sensitive design and inclusive policies.
	Refugee children (e.g., Syrian, Palestinian)	May face barriers to education; project ensures safe, culturally sensitive, and accessible learning spaces.
	Low-income families	Benefit from reduced financial and travel burdens; may require targeted support for participation.

To ensure resources are allocated effectively and engagement is tailored, stakeholders are prioritized based on their relative influence over the project and their level of interest in its outcomes (Table 4 presents the power/interest matrix). This prioritizing aids in identifying the kind, frequency, and depth of involvement that is necessary, it ensures that the project devotes resources proportionately and maintains focus on both compliance and inclusiveness. While stakeholders with less influence or interest might be informed through targeted updates, those with more influence and interest – such as MEHE, KfW, and school administrations – need ongoing, close interaction.

Table 4 Stakeholder Power–Interest Matrix

Stakeholder Group	Influence (High/Medium/Low)	Interest (High/Medium/Low)	Engagement Strategy
Ministry of Education (MEHE)	High	High	Close partnership; continuous consultation; joint decision-making
KfW (Financing Agency)	High	High	Regular reporting; strategic dialogue to ensure compliance and alignment
Local Municipalities/Authorities	High	Medium	Frequent coordination meetings; involvement in permitting and community outreach
School Administrations/Principals	Medium	High	Regular updates; workshops to integrate operational needs and ensure buy-in
Teachers & School Staff	Medium	High	Focus groups; consultations on design/rehabilitation needs
Parents	Low	High	Community meetings; feedback surveys; accessible

Stakeholder Group	Influence (High/Medium/Low)	Interest (High/Medium/Low)	Engagement Strategy
			communication channels
Students	Low	High	Child-sensitive consultations; participatory design workshops; surveys
NGOs/Education Partners (UNICEF, UNESCO, etc.)	Medium	Medium	Targeted consultations for technical inputs and alignment with broader programs
Contractors/Construction Firms	High	Low	Contractual oversight; compliance monitoring on OHS and safeguards
Refugee Children	Low	High	Dedicated inclusive focus groups; culturally sensitive engagement
Children with Disabilities	Low	High	Accessibility audits; participatory consultations with advocacy groups
Low-Income Families	Low	Medium	Targeted outreach to ensure participation in consultations

Stakeholders are categorized according to their respective interest and power (influence), which offers an organized method of figuring out the right kind and level of engagement. This guarantees that the project avoids both over-and under-consulting important groups and that resources are directed where they are most required.

- **High Interest/High Influence: Closely Monitor** The success of the project depends heavily on these stakeholders, including MEHE, KfW, and school administrations. They must be given timely information, actively participate in decision-making, and be engaged through frequent consultations and cooperative planning sessions.
- **High Influence/Low Interest-Maintain Satisfied:** Although some players (such as contractors and some municipalities) may not be personally interested in the project's results, they do have the power to help or impede its execution. When decisions impact their mandate, they should be kept happy through targeted engagement, compliance monitoring, and organized communication.
- **High Interest/Low Influence: Stay Updated** Although they have little control over project outcomes, parents, students, instructors, refugee children, individuals with disabilities, and low-income households are greatly impacted. To guarantee diversity and equity, extra efforts will be made to collect feedback, integrate their goals, and give clear, accessible information.
- **Low Interest/Low Influence: Monitor with Little Work:** This group may include a limited number of external or peripheral stakeholders. The project will keep minimum interaction

to monitor new concerns and make sure no important issues are missed, even if they won't demand systematic engagement.

4.3. Summary of Project Stakeholder Needs

A summary of key stakeholder needs is provided in **Table 5** below.

Table 5- Stakeholders Communication Means

Stakeholder Group	Language Needs	Preferred Notification / Engagement / Consultation Methods / Approaches	Specific Needs (Daytime Meetings / Accessibility)
Students (current & future)	Arabic	Classroom sessions, student councils, surveys, focus group discussions, workshops	Meetings during school hours; accessible classrooms; interactive sessions adapted to age group; provide visual aids or translated material if needed
Parents / Guardians	Arabic	Phone calls, letters, WhatsApp or social media messages, parent-teacher meetings, focus group discussions, workshops	Meetings in accessible school locations; accommodate working parents’ schedules; provide childcare if needed
Teachers / School Staff	Arabic / English / French	Email, staff meetings, workshops, phone calls	During school or working hours; virtual options if needed; consider workload constraints
School Administration / Principals	Arabic / English / French	Email, phone calls, one-on-one interviews, coordination meetings, workshops	During working hours; flexible timing depending on school schedule
Local Communities near school sites	Arabic	Community meetings, local announcements, flyers, social media, workshops	Accessible venues; daytime meetings; ensure safety and minimal disruption from construction activities``
Ministry of Education and Higher Education	Arabic / English	Written correspondence, official reports, virtual meetings, workshops	During working hours; standard office meeting arrangements
Ministry of Environment	Arabic / English	Written correspondence, email, official meetings, site visits, technical workshops	During working hours; formal office arrangements; may require prior notice for site visits
KfW / Donor Agencies	English	Reports, email updates, virtual meetings, site visits	Flexible; virtual meetings possible; aligned with donor schedules

Stakeholder Group	Language Needs	Preferred Notification / Engagement / Consultation Methods / Approaches	Specific Needs (Daytime Meetings / Accessibility)
Local Municipalities / Authorities	Arabic	Letters, official meetings, phone calls, coordination sessions, workshops	During office hours; may require formal invitations
NGOs / Education Partners (UNICEF, UNESCO, etc.)	English / Arabic	Email, phone calls, focus groups, workshops, site visits	Flexible; remote or in-person meetings as appropriate
Children with Disabilities	Arabic	Direct visits, participatory activities, accessible workshops, liaison through specialized NGOs	Accessible venues, ramps, adaptive equipment; meetings scheduled to accommodate caregivers
Girls / Marginalized Youth	Arabic	Focus group discussions, school workshops, liaison through NGOs	Safe, accessible locations; consider childcare and transportation support if needed
Refugee Children (Syrian, Palestinian, etc.)	Arabic	School-based sessions, NGO-facilitated focus groups, parent liaison, visual/translated materials	Accessible venues; culturally sensitive scheduling; support for transportation if required
Low-Income Families	Arabic	Community meetings, phone calls, liaison via NGOs or parent committees, workshops	Accessible venues; timing considerate of work schedules; provide transportation support if needed
Formal and Informal Land Settlers / Users (if any)	Arabic	Direct meetings, community consultations, focus group discussions, letters, liaison via local leaders or NGOs, workshops	Accessible locations near the site; consider cultural sensitivities; timing suitable for work schedules; ensure transparent communication about land use, project impacts, and grievance mechanisms

5. Stakeholder Engagement Program

5.1. Purpose and goals of Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) for this KfW-funded, MEHE-implemented school construction and rehabilitation project in Lebanon aims to ensure that all affected and interested stakeholders—including students, parents, teachers, school staff, local communities, vulnerable groups, and relevant government institutions—are identified, informed, consulted, and meaningfully engaged throughout the project cycle.

The SEP promotes transparency, inclusivity, and accountability by providing timely, accessible, and culturally appropriate information, creating opportunities for stakeholders to express their views, and integrating feedback into project planning, design, and implementation. Special attention is given to vulnerable and marginalized groups, including children with disabilities, girls, refugees, and low-income families, while documenting consultations and responses to strengthen social acceptance, project sustainability, and effective risk management.

It is a vital tool to establish clear and transparent communication channels with stakeholders and to link them to the project's Grievance Redress Mechanism (GRM), which will include confidential pathways for sensitive issues such as Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH). Based on stakeholder feedback, the scope of the project and related mitigation measures can be modified to address raised concerns.

MEHE will hold a series of consultation meetings throughout the project cycle, with flexibility to include additional stakeholders as the need arises. These will be reflected in updated versions of the SEP. The approved SEP will be disclosed prior to project implementation, following consultation with identified stakeholders.

As the SEP is a living document, it will be updated periodically by the PPD in consultation with KfW and with the support of the IC whenever required. Records of consultations and stakeholder feedback will be systematically integrated into monitoring reports.

5.2. Strategy for Consultation and Information Disclosure

This section describes the types of information that will be disclosed; the disclosure formats, as well as the methods that could be used to communicate this information to each of the stakeholder groups, these methods may vary according to target audience, they can include for example:

- One to one meetings or organization of World Cafes², Focus Group meetings on specific topics and Key informant Interview with stakeholders and relevant organizations;
- Surveys, polls, questionnaires and an online review platform that will be posted on MEHE's website as well as on the concerned municipalities website and/or social media to reach out to the stakeholders and to enable them to provide comments on the various deliverables associated with the project,
- Use of traditional mass media and social media;
- Organization of workshops.

² A world café is a structured conversational process for knowledge sharing in which groups of people discuss a topic at several small tables like those in a café.

The information that will be disclosed covers the following:

- This Stakeholder Engagement Plan that will be announced by MEHE and will be made available to the public via MEHE websites and/or via the concerned municipalities websites or social media and in public meetings in the municipalities where the projects are located.
- Information related to the proposed school construction/rehabilitation project will be made available in respective Municipalities and updated as needed throughout the project life cycle
- Environmental Impact Assessment/Environmental and Social Impact Assessment (EIA/ESIA) if required will be announced in news media and made available for public review and comment when complete. Following public meetings to receive information, comments, and opinions, the final documents will be disclosed, including a summary of comments and how they were addressed.
- A description of how any stakeholder can submit grievances or other issues to MEHE and the process by which they will address all grievances.
- The Environmental and Social Commitment Plan (ESCP) and the Environmental and Social Management Framework (ESMF) prepared for the Project will be disclosed on MEHE's website. The ESCP sets out the key measures and actions that MEHE has committed to implement in order to meet the requirements of KfW's Sustainability Guideline. The ESMF provides guidance for identifying, evaluating, and managing all environmental and social risks of the Project, in line with applicable national regulations and relevant international standards.
- A summary of grievances and complaints that were received on the projects, including how they were resolved or otherwise addressed, will be disclosed on an annual basis by MEHE and made available in their regional and Beirut offices.

5.3. Meetings and Consultations

MEHE will consult with stakeholders to provide information and receive information and opinions. Specific consultations will include:

- Meetings in the municipalities or any other available venue where the schools will be constructed or rehabilitated in which information presented will cover the Planned Works and Activities (such as the site selection, expected time of works, the school capacity, etc.), the Stakeholder Engagement Plan including the Grievance Redress Mechanism as well as , the Environmental and Social Commitment Plan and the Environmental and Social Framework; and in which comments and recommendations will be received from stakeholders on the projects and on associated environmental and social matters.
- As needed, meetings or communication will be held with civil society organizations and NGOs concerned with education, child protection, disability rights, and community development to discuss the school project, particularly in relation to inclusive education, accessibility, and social support measures. Their cooperation will be solicited to ensure that the new or rehabilitated schools respond to the needs of all children, including vulnerable groups, and that those schools are integrated into and supported by the surrounding communities.

Also, as needed, MEHE will have meetings or other communications with any stakeholder who wishes to provide or receive information or to express concerns with the projects.

5.4. Detailed Planning

Table 6 summarizes and provides an indicative timeline for the various disclosures and consultations that will be held and provides indicative timelines. Precise dates for these activities cannot be confirmed until the sites have been selected and the schedule for the project activities is fixed.

Table 6 – Proposed Strategy for Consultation and Possible means for Information Disclosure

Project Stage	Objectives of Consultation	Stakeholders	Methods / Formats	Disclosure means	Frequency / Timeline	Responsibility
Preparation / pre – Construction or renovation	- Present project objectives, components, site selection criteria, and expected benefits to gather input and allow design adjustments if feasible - Gather feedback on community needs and concerns including the needs of women, persons with disabilities and vulnerable groups. - Share and consult on SEP and ESMF as they relate to early design considerations. - Introduce the project timeline and relevance of future consultations, including GRM -	National ministries (MEHE, MoE, CDR), municipalities, NGOs, local communities, school administrations, parents, teachers, older students, vulnerable groups	- Public consultations to be held at the concerned municipality or in any other available local venue - Focus group meeting to address the needs of women, persons with disabilities and vulnerable groups (these could be held in parallel to the public consultation meeting and could be facilitated by concerned NGO's) - Meetings in the municipalities to present the	- SEP, ESCP, ESMF, GRM via MEHE/municipal websites & social media - Project information made available and updated as needed at municipal offices - EIA/ESIA announced in news media - Annual grievance summary (including resolutions) disclosed at MEHE regional and Beirut offices	At least 1 meeting per school location before works start. 1 meeting per school location	MEHE / PPD + IC

Project Stage	Objectives of Consultation	Stakeholders	Methods / Formats	Disclosure means	Frequency / Timeline	Responsibility
			works, SEP/GRM, ESCP/ESMF - Meetings with NGOs/CSOs as needed - Additional stakeholder meetings on request			
	- Present site-specific environmental and social mitigation measures relevant to construction. - Explain construction timeline, traffic management, anticipated noise/dust, and immediate community impacts. - Explain grievance channels (GRM) for construction-phase issues. - Present health and safety arrangements,	Municipalities, NGOs, local communities, school administrations, parents, teachers, older students, vulnerable groups	- Community meeting in the presence of the contractor to explain construction impacts (traffic, noise, dust), ESMP measures, GRM, health & safety, and SEA/SH pathways. - Q&A session with the community, with clarifications	- ESMP construction-phase measures, GRM, H&S/SEA-SH information disclosed to community through the public meeting.	1 meeting per school location	MEHE / PPD + IC Contractor

Project Stage	Objectives of Consultation	Stakeholders	Methods / Formats	Disclosure means	Frequency / Timeline	Responsibility
	including SEA/SH referral pathways. - For EIA/ESIA (if required): disclose construction-phase mitigation measures and clarify how community feedback was integrated.		provided jointly by MEHE/PPD+IC and the Contractor			
End of Project/Handover phase	Present completed works (new/rehabilitated school facilities), highlight achievements, and address any final community concerns. Collect feedback on safety, accessibility, quality, and overall satisfaction (especially in newly constructed schools as these will feed into the next phases of the project notably the	Parents, teachers, municipalities, NGOs, donors.	One meeting per school to include a school walk-through; Feedback Publication of achieved works on MEHE website/social media if applicable.	- Publication of completed works and handover summary on MEHE website/social media; GRM and SEA/SH information provided during handover meeting	Once per school at the end of construction (during handover phase)	MEHE / PPD+IC/ Contractor

Project Stage	Objectives of Consultation	Stakeholders	Methods / Formats	Disclosure means	Frequency / Timeline	Responsibility
	rehabilitation of existing schools). Share information on the Grievance Redress Mechanism (GRM) for post-completion issues, remind the SEA/SH referral pathway and document lessons learned for future projects.					

5.5. Proposed Strategy to Incorporate the Views of women and Vulnerable Groups

Within the targeted project areas and considering the scope of this project, vulnerable/disadvantaged groups at this stage can be identified to be mainly poor women, youth, elderly and persons with disabilities. In order to ensure those groups are adequately involved in the project, specific engagement methods will be applied. Since the mentioned groups are cross-cutting throughout different stakeholder groups, the envisioned methods are being applied throughout consultations with any of the listed stakeholders. Those methods include:

- **For Women:** Women-only consultation sessions (for women as part of the communities or NGOs) whereby the engagement sessions will be held in locations and at times considered safe and accessible for women sessions such as times that accommodate household responsibilities. Female facilitators will be prioritized for these sessions.
- **For Persons with Disabilities:** Consultation venues having physical accessibility will be prioritized. Where possible, materials will be made available in accessible formats (e.g., large print).
- **For Refugees:** Liaise with established refugee-led organizations and NGOs known to these communities (e.g., Beyond, UNICEF/UNESCO) to co-facilitate discussions and build trust. Sessions will be organized outside the working hours for daily laborers.
- **For low-income families and informal workers:** consultations in each implementation areas will be held. They will be identified through close coordination with the local authorities/municipalities. Where travel is required, transport support may be provided.

5.6. Review of Comments

Communication and feedback from stakeholders will be taken into consideration at each stage of this project. The stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the Stakeholder Engagement Plan and Grievance Mechanism. MEHE/PPD plan to have consultations at two key stages — prior to construction and at project handover, (as detailed in **Table 6**), including one consultation per school at the end of works to present results and collect feedback. These engagements during and post-implementation will serve to receive reviews and comments that will be reflected in progress reports and the future updated SEP.

A systematic process will be used to incorporate stakeholder input into project execution in order to guarantee that stakeholder involvement produces observable results. All remarks and recommendations gathered during consultations will be recorded in a feedback log and examined by MEHE/PPD and the Implementation Consultant in order to show how stakeholder remarks have a direct impact on project implementation. Relevant points will then be translated -when possible- into clear follow-up actions—such as adjustments to school design features, or improvements in the communication with parents.

Feedback from the end-of-project consultations will also inform the next phases of the project notably related to rehabilitation of existing schools. Feedback will be communicated back to stakeholders through the use of infographics such as the "You Said – We Did" structure. Communication will be made through the MEHE website. By demonstrating to stakeholders how their input has influenced project delivery, this process guarantees openness, accountability, and meaningful participation in accordance with KfW's Sustainability Guideline and ESS10.

6. Timetable

During the implementation stages, consultative meetings will be held with stakeholders and vulnerable groups covering all activities associated with the project lifecycle (refer to **Table 6** for details). Deadlines for comments will be one week after the proposed consultation meetings.

The SEP will be published on the MEHE’s website for the entire period of project development and the PPD will continue to review the SEP throughout project implementation and update it as needed. The implementation of SEP will be reflected in the progress reports, through its various phases, to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project including any feedback received from them that support successful project implementation. The methods of engagement will also be revised periodically and as needed to maintain their effectiveness and relevance to the project’s evolving environment.

7. Site-Specific Stakeholder Engagement Plans

In addition to the project-level stakeholder engagement described in this SEP, site-specific stakeholder engagement will be planned and documented for each Program site, in line with the guidance and template provided in Annex 5 of the Environmental and Social Management Framework (ESMF). Site-specific engagement will build on the stakeholder identification, engagement principles, and Grievance Redress Mechanism established in this SEP, while addressing considerations specific to each site, including the nature and scope of works, site-specific risks and impacts identified through the environmental and social screening process, and the stakeholders directly relevant to the site (e.g., school administration, teachers, students, parents/caregivers, and nearby residents).

Site-specific stakeholder engagement will be prepared and documented prior to the commencement of consultation and construction activities at each site, and will be updated as necessary once the scope of works is confirmed. For the remaining Phase 1 sites and for all Phase 2 sites, site-specific stakeholder engagement will be prepared once the respective schools and the detailed scope of works are confirmed, using the site-specific stakeholder engagement planning table and guidance set out in ESMF Annex 5. Responsibility for preparing and updating site-specific stakeholder engagement will rest with the IC E&S/Social Specialist, under the oversight of MEHE/PPD.

Site-specific engagement has already commenced at three Program sites: preparatory meetings have been held with the municipalities of Al Mina and Chekka on 11 August 2026, and with the Mayor of Zahle on 11 September 2026 — see Section 3 above for details.

8. Resources and Responsibilities

8.1. Management Functions and Responsibilities

The SEP will be managed and implemented by MEHE/PPD, with the support of the E&S Specialist at the IC. The main tasks and responsibilities include:

- Approval of all documentation containing project information that will be used for stakeholder engagements, before they are used;
- Approval of any revision of the content of the SEP;
- Preparation of Environmental and Social Progress Reports and their meaningful and widespread disclosure;
- Operation of the grievance mechanism,
- The preparation and issuing of invitation letters.
- Preparing and printing disclosure and media tools used for the stakeholder's engagement activities;
- Providing information to stakeholders using the disclosure materials;
- Organization of stakeholder engagement sessions including contacting stakeholders to arrange meeting times/locations, venue reservation and logistics;
- Recording key issues raised during each stakeholder consultation session;
- Generating an accurate record of stakeholder engagement sessions and noting future actions required; and
- Ensuring that stakeholder engagement results are compiled into a summary with the aim of informing the project design.

8.2. Resources

The SEP and the Grievance Mechanism will be managed by the MEHE/PPD with the support of the E&S Specialist with the IC when needed.

The budget for the SEP is estimated to be around EUR 43,400 and need to be covered from project budget (e.g. contingencies, etc.). It is distributed as shown in **Table 7**.

Table 7– SEP Implementation Budget

Budget Category	Quantity	Unit Costs EUR	Times / Years	Total Costs EUR	Remarks
1. Estimated staff salaries and related expenses					
1.1. E&S specialist ³	48 months	-	Years 1 - 4	-	Covers SEP/GRM implementation, consultations, reporting
2. Events					
2.1. Public Consultations (one per school)	4 sessions	1,500	Year 1	6,000	Pre-construction/renovation consultations to present project and collect feedback before design finalization
2.2. Public Consultations (one per school)	4	1,500	Year 1	6,000	Construction-phase consultation conducted in the presence of the contractor to present ESMP measures, construction timeline, traffic/noise/dust impacts, GRM, and H&S/SEA-SH arrangements.
2.3. Focus Group meetings (one per school)	4	500	Year 1	2,000	Targeted engagement with women, persons with disabilities and vulnerable groups to ensure inclusive design
2.4. End-of-Project Community Meeting (one per school)	4	1,000	Year 4	4,000	Present completed works, gather feedback, share post-completion GRM/SEA-SH information, and document lessons learned; success stories may be shared via MEHE platforms.
3. Trainings					
3.1. Training on social /environmental/OHS issues for PPD, IC and contractor staff	4	800	Years 1 – 4	3,200	Specialized content For PPD, IC, contractor staff
4. Grievance Mechanism					

³ ESHS experts are part of the Consultant's staffing and are, therefore, not calculated / indicated here.

4.1. GM Training for Staff & Stakeholders	2	800	Years 1 - 2	1,600	For relevant MEHE staff, schools, focal persons, contractor
4.2. GM Materials (Forms, Hotline, QR Codes)	1 (lump sum)	3,000	Year 1	3,000	Outreach material includes setup of digital + physical channels

5. Communication & Outreach

5.1. Awareness Campaigns	2	4,000	Years 1 - 4	8,000	Broad messaging on SEP/GRM through Social media, SMS/WhatsApp, digital platforms (less reliance on printing)
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6. Other expenses

6.1. Transportation for vulnerable participants	8 trips	400	Years 1 & 4	3,200	Support for travel to meetings to ensure inclusion
6.2. Translation & Interpretation	8 events	800	Years 1 &4	6,400	For materials and live interpretation
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				43,400	

9. Grievance Mechanism

A grievance is an expression of concern or complaint voiced by anyone who believes they will be or have been or will be negatively impacted by an action taken by another party or who has other concerns about an activity. A Grievance Mechanism (GM) is a locally based, formalized way to accept, assess, and resolve feedback or complaints. A GM offers an accessible point for complaints to be received and a predictable process and timeline to obtain a response.

This section summarizes the main steps and procedures of a formal and documented Grievance Redress Mechanism to be followed throughout the project implementation.

9.1. Objectives of a Complaints Management Mechanism

According to provisions and requirements of the WB's ESS10 (Stakeholder Engagement and Information Disclosure), MEHE will put in place a functioning, accessible, and inclusive Grievance Mechanism (GM) that is proportionate to the potential social risks and impacts of the project. Nevertheless, the key purpose of this GM is to provide an avenue for complaints and suggestions regarding project's components.

The implementation of this procedure will result in the reduction of social risks, generate systemic change to reduce the volume of grievances and enhance the quality of the relationship between the project and its stakeholders.

9.2. Raising Awareness of the Grievance Mechanism

The existence of the grievance mechanism will be consistently publicized during stakeholder engagement activities verbally during meetings and focus group discussions. It will also be posted on the MEHE website, as well as on the concerned municipalities boards or social media accounts (in case they exist). Mobile signs that are visible to passersby will also be displayed along the work sites, these will include the relevant contact details (such as the Project GM contact details, contractor's site contact where applicable, email address, and other communication channels) for raising a complaint in both Arabic and English languages. These measures will ensure that the Grievance Mechanism is widely known and easily accessible to all project-affected people,

9.3. The Proposed GM

MEHE already operates a central Grievance Mechanism (GM) through its national call center, which receives and registers all complaints submitted to the Ministry. Every grievance is automatically logged and transferred to the relevant MEHE department for follow-up. This existing system will serve as the primary uptake channel for this Project. Any grievance received through the call center and identified as related to the school construction/rehabilitation activities will be flagged and immediately forwarded to the Project Planning Directorate (PPD), which will notify the International Consultant without delay to ensure timely follow-up investigation and resolution. To support this process, call center operators will receive targeted training and clear guidance to help them recognize project-related grievances and ensure that these are promptly flagged and transferred to PPD without delay.

To strengthen outreach and accessibility, MEHE will develop dedicated communication materials, including brochures and leaflets, explaining all available grievance channels and procedures. The call center number will be displayed at all project sites, as well as on bulletin boards within the concerned Municipalities.

To strengthen accessibility and ensure timely follow-up, the Project has established a dedicated grievance mobile number (+961 76 399 882), managed by the Environmental and Social Specialist of the Implementation Consultant (IC). This number will serve as a dedicated Project GM channel for receiving grievances, inquiries, and requests for information via phone calls and WhatsApp messages. All grievances received through this channel will be registered in the Project Grievance Log, acknowledged, and managed in accordance with the Project Grievance Mechanism.

The GM will be accessible to all stakeholders, enabling them to submit grievances directly or through intermediaries. It will allow anonymous submissions, consistent with good international practice. The GM will address a wide range of potential concerns, including construction-related impacts such as dust, noise, and traffic; incomplete or poor-quality works; inappropriate conduct by workers; environmental or social tensions; labor-related issues; and land or access concerns. Any grievance related to Sexual Exploitation and Abuse (SEA) or Gender-Based Violence (GBV) will be handled confidentially and immediately referred to DOPS (Direction d’Orientation Pédagogique et Scolaire) following national safeguarding protocols and survivor-centered principles. The Project Planning Directorate (PPD) will be informed that an SEA/SH case has been received—without any personal details or sensitive information being disclosed—solely for the purpose of reporting and compliance monitoring.

9.4. GM Uptake Channels

The Project GM will operate through the following channels:

- Dedicated Project GM mobile number (calls and WhatsApp): +961 76 399 882, managed by the Environmental and Social Specialist of the Implementation Consultant (IC);
- MEHE call center (primary channel for all grievances): +961 1 77 28 88 / 77 22 88 / 77 22 99, calls can be received Monday to Friday, from 9:00 to 15:00;
- Dedicated project Email address (to be activated and inserted in the SEP once operational);
- Written grievance form that will be available at the Municipalities in which the school sites are located. Examples of grievance registration forms are provided in **Annex 1**;
- Postal submissions addressed to MEHE’s headquarters (Habib Abi Shahla roundabout, near the UNESCO Palace, Beirut – Lebanon); the letter should indicate the project name and location.

These channels will be fully operational **prior to the commencement of project implementation** and will be widely disseminated through Municipalities, project signage, community meetings, and the MEHE website.

For more complex grievances, the complainant will be informed of the expected timeline for resolution and will receive periodic updates until the case is closed. If the complainant wishes to provide their contact details, follow-up updates will be sent directly to them. In all cases, the caller will be provided with the contact details of the designated PPD/IC focal person responsible for grievance follow-up.

9.5. The Grievance Mechanism Process

The project undertakes to respond to all grievances within 30 calendar days of submission (see the detail in table below) – and more quickly in cases where there is high risk of escalation.

While the GM process is described in the sections below, **Table 8** and **Figure 1** below provide a visual overview of the steps and associated timelines, **Figure 2** summarizes the Grievance Resolution Process.

Table 8 - Overview of the Steps and Associated Timelines

Step Number and Timeline	Title
Step 1 (Day 1)	Uptake and registration in GM log
Step 2 (Day 2)	Sorting and Processing
Step 3 (Day 7)	Acknowledgment and follow up
Step 4 (Day 7-15)	Verification, investigation, and action by MEHE investigation committee
Step 5 (Quarterly)	Monitoring and Evaluation
Step 6 (Day 15-30)	Providing feedback



Figure 1 – Steps in Managing Grievances

Step 1: Uptake

A range of channels will be made available for submission of feedback (these are detailed in section 9.3 above).

Queries, suggestions and complaints must be specific and concise to the extent possible, and contain basic information including: the name of the subproject, the location, the timeline of the issue/incident, persons involved, and contact details for non-anonymous GM users, and details of the incident/issue.

Step 2: Sorting and Processing

Complaints will be forwarded to PPD who, with the support of the IC E&S Specialist, will compile and record the grievances in a register (refer to **Table 9** for the classification of grievances and **Annex 2** for the Grievance Mechanism Log).

The grievance register will record the complainant's identity, where provided, the details of the grievance, and the actions taken throughout the resolution process. Anonymous grievances will be accepted and processed in the same manner as other grievances; however, where no contact information is provided, the complainant cannot be directly informed of the outcome.

SEA/SH-related grievances will be handled separately and confidentially in accordance with survivor-centered principles. No survivor name or other identifying information will be recorded in the grievance register. Only the minimum information necessary for reporting and referral will be

recorded. SEA/SH cases will be referred to DOPS and/or the designated qualified service provider, as applicable, and only the status and date of resolution will be recorded by the Project.

Table 9 – Classification of Grievances

Type of required feedback	Type of issues/complaints received	Action to be taken
Standard- Level Feedback	- Concerns or complaints that do not pose an immediate or significant risk to the environment, workers, communities, or natural resources; - Issues related to day-to-day project activities, such as noise, dust, traffic disturbances, or inconvenience to local communities, which can be resolved through routine corrective measures; - Requests for information, clarifications, or minor grievances regarding school construction or rehabilitation processes, timelines, or access; - Situations where corrective actions can be implemented quickly without long-term or irreversible impacts.	- If the identity of the aggrieved person is known and the grievance is classified as 'standard', the acknowledgement of grievance will be within 7 business days. - At the 20 business-day mark, if a complaint/question is still pending, the PPD will provide an update to the non-anonymous GM user, inform them if there will be delays in resolving their case, and provide the date for which they will be able to provide a response.
High-Level Feedback	- Incidents that caused or may potentially cause significant or great harm to the environment, workers, communities, or natural resources, including issues of gender-based violence and SEA/SH; - Incidents which entail failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies; - Incidents for which failure to address may potentially cause significant impacts that are complex and/or costly to reverse; and - Incidents that may result in fatality or some level of lasting damage or injury.	- This type of feedback will be acknowledged, and an investigation will be launched within 24 hours during workdays and within 48 hours if the feedback was received over the weekend. - Incidents related to SEA/SH will be immediately forwarded to DOPS for follow-up. KfW will be informed through an e-mail sent by the director of the Call Center or the PPD director depending on who receives the complaint. - It should be noted that some types of incidents, including accidents and fatalities need to be reported within 48 hours to IC ESS Specialist who immediately informs the PPD Director who will then report to KfW. The PPD Director will also need to report

Type of required feedback	Type of issues/complaints received	Action to be taken
		this issue to the upper management.

Step 3: Acknowledgement and follow-up.

Within seven (7) days of the date a complaint is submitted, the responsible person (see below) will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. If complaints are not resolved within 15 days, the responsible person will provide an update to the complainant about the status of the complaint/question and again provide an estimate of how long it will take to resolve the issue. Every two weeks, the grievance manager will report to senior management in charge of the project weeks on grievances that have remained unresolved for 30 days or more.

Step 4: Verification, Investigation, and Action

Verification and investigation involve gathering information about the complaint to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. This process normally includes site visits, document reviews, a meeting with the complainant (if known and willing to engage), liaising with the IC ESS specialist(s) (who will ensure informing and coordinating with PPD) and meetings with other individuals and/or entities who can assist with resolving the issue. For complaints related to the misuse of funds, it may also require meetings with suppliers and contractors.

It is expected that many or most grievances would be resolved at this stage, with the goal to resolve within two weeks. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

Step 5: Monitoring and evaluation.

This step would involve the IC ESS Specialist tracking grievances and assessing the progress that has been made toward resolution and keeping the PPD Director informed of any progress. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions.

A grievance will be considered “resolved” or “closed” when a resolution satisfactory to both parties has been reached, and after any required corrective measures have been successfully implemented. When a proposed solution is agreed by the complainant, the time needed to implement it will depend on the nature of the solution. Once the solution is being implemented or is implemented to the satisfaction of the complainant, the complaint will be closed out and acknowledged in writing by both parties.

In certain situations, it may not be possible to reach a satisfactory resolution. This could occur if a complaint cannot be substantiated or is proved to be speculative or fraudulent. In such situations, the efforts to investigate the grievance and to arrive at a conclusion will be well-documented and the complainant advised of the situation. It is also possible that a complainant will not be satisfied with a proposed resolution. In such cases, if more cannot be done by MEHE, the complainant will be asked to acknowledge refusal of the proposed resolution in writing. MEHE will then decide whether to implement the resolution without the agreement of the complainant and the complainant will decide whether to pursue legal remedies.

Step 6: Providing Feedback.

This step involves informing those who submit complaints or feedback about how their issues were addressed and resolved. Whenever possible, complainants would be informed of the progress of the grievance resolution process on a weekly basis, and then informed of the proposed resolution in

person. The goal is to resolve all grievances as soon as possible, but not more than 30 days. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through KfW, as described below, or through avenues afforded by Lebanon law. Similarly, if a grievance cannot be resolved, the complainant will be notified, if possible in person.

Step 7: Procedure for Appeal

Aggrieved people who are dissatisfied with the outcome of their complaint can appeal the decision by resubmitting their complaint through the Call Center within 30 working-days of receiving a response to the original submitted grievance. Subsequently, further investigations need to be carried within 30 working-days to address the issue. The director of the Call Center can forward this appeal to the PPD or to any other department within MEHE based on prerogatives, in such case the PPD will be informed to register the appeal in the log. Additional 10 working-days can be taken to prepare a comprehensive response, including the findings of the investigation and the rationale of the determination. Accordingly, within a maximum of 40 working days, the appeal case should be closed.

Lastly, if the aggrieved person is still not satisfied with the solution provided, they have the option to go to court.

GRIEVANCE RESOLUTION PROCESS

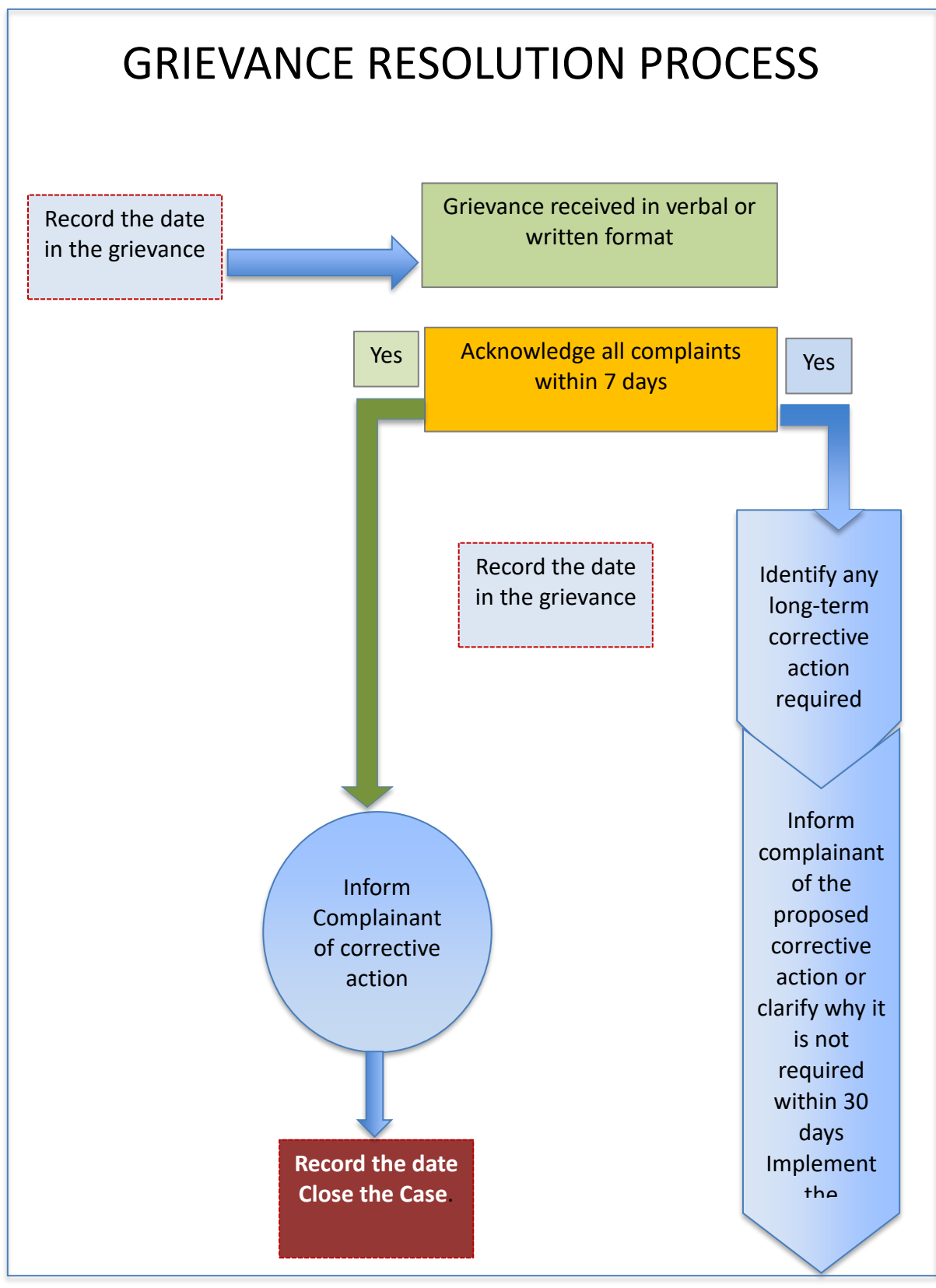


Figure 2 – Grievance Resolution Process

10. Monitoring and Reporting

The SEP will require regular consultations with stakeholders to obtain feedback regarding the effectiveness of facilitation measures and will seek to gather suggestions for further improvements. These consultations will also be used to gather information about the project's progress in meeting the results indicators, as noted in the project's results framework.

The metrics used for monitoring and improving the stakeholder engagement performance could be as follows:

- Number of public consultation events held and number of participants that attended them segregated by gender when possible;
- Key issues raised by stakeholders during consultations and how they were addressed;
- Number and type of grievances received, including their status (open/resolved);
- Percentage of grievances resolved within the planned timeframe;
- Engagement activities specifically targeting vulnerable groups, including women; refugees, low-income families, and persons with disabilities.

The SEP will be revised if needed to incorporate feedback from consultations and adapt stakeholder engagement practices during implementation.

Following each meeting or consultation event, MEHE will prepare a summary of discussions and decisions and will disclose information on the Ministry's website. The documentation will include the following:

- Date and location of each meeting;
- Purpose of the engagement such as presenting the project or collecting feedback on potential environmental and social impacts;
- Number and categories of participants;
- List of documentation disclosed to participants;
- Summary of main points and concerns raised by stakeholders; including the preparation of a non-technical summary (in simple Arabic) of the feedback received and the actions taken;
- Summary of how stakeholder concerns were or will be addressed and taken into account;
- Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions; and
- Specific measures adopted to reach out to vulnerable groups.

ANNEX 1- MEHE GRIEVANCE FORM

Ministry of Education & Higher Education Grievance Form				
Grievance reference number (to be completed by MEHE:				
Contact details (may be submitted anonymously)	Name(s):			
	Address:			
	Telephone:			
	Email:			
How would you prefer to be contacted (check one)	By mail/post: ☐	By phone: ☐	By email ☐	No contact ☐
Preferred language	☐ Arabic	☐ French	☐ English	
Provide details of your grievance. Please describe the problem, what happened, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.				
What is your suggested resolution for the grievance, if you have one? Is there something you would like LRA or another party/person to do to solve the problem?				
How have you submitted this form to the project?	Website ☐	email ☐	By hand ☐	
	☐ WhatsApp	☐ By telephone	☐ Other (specify)	
Who filled out this form (If not the person named above)?	Name and contact details:			
Signature				
Name of LRA HPP person assigned responsibility				
Resolved?	☐ Yes	☐ No	Date:	
Completion				
Final resolution (briefly describe)				

	Short description	Accepted ? (Y/N)	Acknowledgement signature
1 st proposed solution			
2 nd proposed solution			
3 rd proposed solution			

ANNEX 2 – GRIEVANCE MECHANISM LOG

ID	Date and Time	Name of Grievant	Contact Details	Preferred Language	Requested Anonymity?	Description of the Problem	Responsible Person	Actions to be Undertaken	Due Date	Results of the Actions	Closing Date	Evidence (if Applicable)