

Government of the People's Republic of Bangladesh

Local Government Engineering Department
Department of Public Health Engineering
Ministry of Local Government, Rural Development and Co-operatives



**Host and Rohingya Enhancement of Lives through a
Multi-Sectoral Approach (HELP)**

Project Code: P501274

Resettlement Policy Framework (RPF)

August 2024

ABBREVIATIONS

ARAP	Abbreviated Resettlement Action Plan
BBS	Bangladesh Bureau of Statistics
CBO	Community Based Organizations
CSO	Civil Society Organizations
DPHE	Department of Public Health Engineering
DRM	Disaster Risk Management
DRP	Displaced Rohingya Population
ESF	Environmental and social Framework
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GoB	Government of Bangladesh
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HELP	Host and Rohingya Enhancement of Lives through a Multi-Sectoral Approach Project
HIES	Household Income and Expenditure Survey
IA	Implementing Agency
IOL	Inventory of Loss
IP	Indigenous Peoples
IPDP	Indigenous Peoples Development Plan
IPPF	Indigenous Peoples Planning Framework
LGED	Local Government Engineering Department
LGI	Local Government Institution
LIPW	Labor Intensive Public Workfare
LMP	Labor Management Plan
MIS	Management Information System
MoLGRD&C	Ministry of Local Government, Rural Development and Cooperatives
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organizations
PAH	Project Affected Households
PAP	Project Affected Persons
PIU	Project Management Unit
RAP	Resettlement Action Plan
RCS	Replacement Cost Study
RPF	Resettlement Policy Framework
ROW	Right of Way
TOR	Terms of Reference
WB	World Bank
WBG	World Bank Group

Glossary

“Associated Facilities” means facilities or activities that are not funded as part of the project but are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist.

“Census” is a complete count of the population affected by a project activity including collation of demographic and property information. This will identify and determine the number of Project Affected Persons (PAP) and the nature and levels of impact.

“Cut-off date” is the date by which PAPs and their affected assets, as relevant, have been identified and new entrants to the site cannot make claims to compensation or resettlement assistance. Persons whose ownership, use of occupancy prior to the cut-off date can be demonstrated remain eligible for assistance, regardless of their identification in the census.

“Involuntary resettlement” means the involuntary taking of land resulting in direct economic and social impacts caused by The involuntary taking of land resulting in relocation or loss of shelter; loss of assets or access to assets; or loss of income sources or means of livelihood, whether or not the PAP has moved to another location and causes adverse impacts on the livelihoods of the project affected persons due to Involuntary restriction of access to legally designated parks and protected areas.

“Land acquisition” refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.

“Livelihood” refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.

“Negotiated settlements” refers to situations where the Borrower needs to acquire specific land or restrict its use for project purposes, but rather than doing so through an expropriation proceeding, the Borrower first tries to arrive at a mutually agreeable negotiated settlement with the landowner/user.

“Project affected persons” (PAPs) means persons who are impacted by involuntary resettlement as defined below.

“Resettlement Action Plan (RAP)” is a resettlement instrument (document) to be prepared when subproject locations are identified. RAPs contain specific and legally binding requirements to be abided by to resettle and compensate the affected party before implementation of the project activities causing adverse impacts.

“Resettlement Assistance” means the measures to ensure that project affected persons who may require to be physically relocated are provided with assistance such as moving allowances, residential housing or rentals whichever is feasible and as required, for ease of resettlement during relocation.

“Restrictions on land use” refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, restrictions on land use within utility easements or safety zones.

“Security of tenure” means that resettled individuals or communities are resettled to a site that they can legally occupy, where they are protected from the risk of eviction and where the tenure rights provided to them are socially and culturally appropriate. In no event will resettled persons be provided tenure rights that are in effect weaker than the rights they had to the land or assets from which they have been displaced.

“Voluntary Land Donation” - means communities or individuals may agree to voluntarily provide land for sub-projects for desired community benefits with “informed consent and power of choice”.

Informed consent means the people involved are fully knowledgeable about the project and its implications and consequences and freely agree to participate in the project Power of choice refers to the people involved have option to agree or disagree, without adverse consequences imposed formally or informally by others.

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A. Introduction

This Resettlement Policy Framework (RPF) is prepared for “Host and Rohingya Enhancement of Lives through a Multi-Sectoral Approach Project (HELP)” which is categorized as Substantial Risk project, consistent with requirements of the World Bank Environmental and Social Framework.ⁱ The Project will be implemented by Local Government Engineering Department (LGED) and Department of Public Health Engineering (DPHE) under Ministry of Local Government, (Rural Development and Cooperatives (MoLGRD&C), Bangladesh Power Development Board (BPDB) under the Ministry of Power, Energy and Mineral Resources and Roads and Highways Department (RHD) under the Ministry of Road, Transport and Bridges. The Government will also hire IOM and UNICEF as implementing partners. The fundamental purpose for the RPF is to establish guidelines, principles and procedures to be used by the above mentioned authorities for the preparation of Resettlement Action Plan (RAP) or Resettlement Action Plans (RAPs) if and when required as per the World Bank’s ESF.ⁱⁱ World Bank approval of RAPs will be required before project authorities invite bids for any contracts in which works are expected to involve physical or economic displacement as a result of land acquisition or restrictions on access or use of natural resources.

The RPF is intended to provide guidance for avoiding or minimizing any adverse impacts associated with physical or economic displacement, or any adverse impacts due to civil works on private land or restrictions on land use, and to ensure arrangements are in place to mitigate any adverse impacts that may occur. The LGED, DPHE, RHD and BPDB hereby agree to apply the principles, procedures, and standards incorporated in ESS5 and other relevant standards of the World Bank ESF if obtaining any sites for project use would cause economic displacementⁱⁱⁱ or physical displacement.^{iv} However, **no land acquisition or major displacement is permitted under this project**. Minor temporary impacts may occur while rehabilitating roads, marketplaces, establishing the waste treatment plants, and other project activities which will be managed through appropriate assessments, consultations, application of this RPF and implementation of RP/RAPs as needed.

This RPF is intended to utilize the existing legal and policy framework of the Government of Bangladesh (GoB), incorporating any supplementary measures necessary to achieve material consistency with ESS5 principles and standard and other relevant standards of the ESF.^v

B. Project Objectives and Description

The objective of the HELP is to improve access to basic services, and enhance disaster and climate resilience of Displaced Rohingya Population (DRP) and the host communities.

Project Components: There are four components in this project and detail of these four components are depicted below.

Component 1: Resilient Water, Sanitation, and Hygiene (WASH)	DPHE will implement this component, including: <ul style="list-style-type: none">• Constructing more mini piped water supply schemes and point source water options in Host Communities• Rehabilitating existing water supply and distribution facilities and infrastructure Operating and maintaining new and existing facilities, especially in DRP camps in Cox’s Bazar and Bhasan Char, using solar PV pumping systems• Building or upgrading twin pit toilets and public toilets in Host Communities• Improving existing household toilets and community latrines in DRP camps
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	<ul style="list-style-type: none"> Constructing integrated waste management facilities, including solid waste management and fecal sludge treatment plants, in both Host Communities and DRP camps Supplying additional menstrual health and hygiene (MHH) kits for women Operating and maintaining selected sanitation and hygiene facilities constructed under EMCRP and HELP, especially in camps.
Component 2: Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response	<p><i>Subcomponent 2.1: Rural infrastructure development (implemented by LGED)</i></p> <ul style="list-style-type: none"> Construction of multipurpose disaster shelters and expanding existing shelters cum primary schools by adding one floor Rehabilitating rural roads under LGED's jurisdiction with minor capacity enhancements, including roadside drainage and slope stabilization Reconstruction/rehabilitation of climate-resilient bridges under LGED's jurisdiction Rehabilitating landing stages in Hatiya upazila (for Host Communities) and in Bhasan Char (for the DRP) Installing lightning protection systems and solar streetlights Improving rural markets (hat-bazar) and repairing their roadside drainage networks Constructing and operating cold storage in Hatiya (for Host Communities) and in Bhasan Char (for the DRP) Constructing an Emergency Operation Center (EOC) for strategic coordination during disasters and emergencies Supplying fire safety and search and rescue equipment Conducting small-scale afforestation activities in Bhasan Char by the Bangladesh Forest Department (BFD) through a Memorandum of Understanding (MoU) with LGED Operating and maintaining existing basic infrastructure in DRP camps, including renewable energy infrastructure in Bhasan Char, until the commissioning of the proposed solar power plant <p><i>Subcomponent 2.2: Rural roads improvement (implemented by RHD)</i></p> <p>This subcomponent will improve access and connectivity through:</p> <ul style="list-style-type: none"> rehabilitation of existing rural roads with minor enhancement of capacity under RHD's jurisdiction¹ re-construction of climate resilient access and evacuation bridges under RHD's jurisdiction. installation road accessories and protective measures like drainage and slope stabilization. <p><i>Subcomponent 2.3: Renewable energy</i></p> <p>Implemented by the Bangladesh Power Development Board (BPDB), this subcomponent will finance the construction of a solar power plant in Bhasan Char DRP camps, using battery energy storage systems (BESS) backed up by a diesel generator.</p>
Component 3: Strengthening Institutional Systems to Enhance Service Provision and Support	<p><i>Different types of capacity building training including the ESF will be provided under this component. The sub-components are as follows:</i></p> <p><i>Subcomponent 3.1: GoB capacity building and technical assistance (implemented by all IAs)</i></p> <p><i>Subcomponent 3.2: Host Communities and DRP awareness raising and skills building programs</i></p> <p><i>Subcomponent 3.3: Reinforcing the Emergency Management Capacity (implemented by LGED)</i></p> <p><i>Subcomponent 3.4: Technology-driven M&E and project management:</i></p>

Integrated Resilient Development	
Component 4: Contingency Emergency Response (CERC)	This will ensure provision of immediate response to an eligible crisis. In such an event, the component will contribute to immediate and effective response. Any unused balance under the other components can be reallocated to the CERC component, in the event of an emergency.

Project activities within the camp and Host Communities will utilize government lands. The locations of sites for shelters, roads, and piped water networks, as well as the type and current use of land required for construction, will be identified during implementation. The project will utilize public lands currently designated legally for community use. Acquisition of private lands will be screened out through the application of the Exclusion List.

Initial screening confirms that existing rural roads will not require widened, and if any non-titled households or roadside shops are found affected through the screening due to roadworks, RAP will be prepared following the guidelines of this RPF. No rehabilitation works will be conducted before the implementation of the RAP.

The Project will work in the Chittagong Hill Tracts where tribal communities live. Preliminary consultation with locals including the tribal communities demonstrate great demand for the rehabilitation works for the critical roads. The Project would significantly improve connectivity for this remote area to Cox's Bazar and access to medical care, commerce, and communication. The four roads are presenting very poor, unusable conditions, but will not need widening beyond the existing alignments on public lands. Any impacts on local people will be addressed through RAPs. However, no adverse impacts on tribal communities, their lands, properties or businesses, or any land acquisition is permissible under the Project.

In Bhasan Char construction of an 8-MW hybrid power plant from solar sources may need approximately 35 acres of land which will be public land. Detailed screening will be conducted before finalizing the site for the solar plant. Other civil works are expected to have minor and temporary impacts. The island is entirely public land.

Within the camps, project may require shifting or re-alignment of some structures (expected to be few in terms of scale, involving quick rebuilding in nearby spaces within the camps) to make way for the infrastructure and service provision envisioned by the project. All such activities will be undertaken after consultation with affected people or entities (structures may belong to NGOs or UN agencies, amongst others) . The consultation process in such cases will involve the Camp-in Charge and UNHCR which are primarily responsible for planning activities within the camp, and in coordination with them and the preference of affected persons an alternative site for reconstruction will first be identified. Once construction of a similar or improved structure is completed on the agreed upon site and shifting is successfully done project related civil works can start which require the dismantling of the original structures. The tents and bamboo structures with plastic sheeting for roofs are makeshift in nature and can be quickly rebuilt by the responsible agencies. The camps are on public lands and hence no land acquisition will be needed. It is important to note that people can only be shifted within the same

camp, keeping access to amenities, networks, and proximity to original location in mind. The Project will not cause any displacement outside of the respective camps.

There may also be need for temporary land use for project activities (to keep construction material and set-up labor camps) by the existing rural roads. The extent of such impact will be known upon the confirmation of specific location of subproject and screening of sites and will be managed as per ESS5.

C. Key Principles and Definitions

Following the guidelines of World Bank ESF, all four implementing agencies (IAs) will take all feasible measures to avoid or minimize adverse impacts due to civil works and any restrictions on land use associated with project activities. The fundamental objective of ESS5 is to ensure that, if physical or economic displacement cannot be avoided, PAPs (as defined below) are compensated at the replacement cost for land and other assets, and otherwise assisted as necessary to improve or at least restore their incomes and living standards.

Other ESS5 objectives include:

- a) To avoid forced eviction^{vi}
- b) To improve living conditions of poor or vulnerable persons who are physically displaced/affected, through provision of adequate housing, access to services and facilities, and security of tenure^{vii}
- c) To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable PAPs to benefit directly from the project, as the nature of the project warrants
- d) To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

Affected persons are defined as any persons subjected to project-related adverse impacts who (a) have formal legal rights to land or assets; (b) have a claim to land or assets that is recognized or recognizable under national law; or (c) who have no recognizable legal right or claim to the land or assets they occupy or use. The term incorporates all potential categories of persons affected by land acquisition and associated impacts. This Project will not permit any land acquisition, but civil works may cause temporary impacts on businesses or require shifting of non-formal structures on road alignments amongst other impacts.

Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement materials and labor for construction of structures or other fixed assets, plus all transaction costs associated with asset replacement. In all instances where physical displacement results in loss of substandard shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets minimum community standards of quality and safety.

Based on the potential impacts and risks of the project in terms of resettlement, the following key principles are to be followed in resettlement planning and implementation. These include:

- a) All affected/displaced persons are entitled to compensation for affected assets, or to alternative but equivalent forms of assistance in lieu of compensation; lack of legal rights to the assets lost will not bar displaced persons from entitlement to such compensation or alternative forms of assistance.
- b) Compensation rates refer to amounts to be paid in full to the eligible owner(s) or user(s) of the lost asset, without depreciation or deduction for fees, taxes, or any other purpose.
- c) Compensation for structures, unharvested crops, and all other fixed assets must be paid prior to the time of impact or dispossession.
- d) Community services and facilities will be repaired or restored if affected by the project.
- e) Affected persons must be consulted during preparation of the RAP, so that their preferences are solicited and considered.
- f) The RAP (in draft and final versions) is publicly disclosed in a manner accessible to displaced persons.
- g) A grievance mechanism by which affected persons can pursue grievances will be established and operated in a responsive manner.
- h) Negotiated settlement processes are acceptable as an alternative for legal expropriation if appropriately implemented and documented.^{viii}
- i) The IAs bears official responsibility for meeting all costs associated with obtaining project sites, including compensation and other considerations due to affected persons. The RAP includes an estimated budget for all costs, including contingencies for price inflation and unforeseen costs, as well as organizational arrangements for meeting financial contingencies.
- j) Monitoring arrangements will be specified in the RAP, to assess the status and effectiveness of RAP implementation.

D. Legal and Regulatory Framework

This section briefly summarizing relevant country constitutional, legal, and regulatory provisions. Relevant provisions include expropriation, compensation standards and procedures, tenurial arrangements, treatment of persons lacking full legal title, and other topics that may be pertinent to the project context and location.

Land Acquisition Policy of Bangladesh Government: Acquisition and Requisition of Immovable Property Act (ARIPA) 2017 is the legal framework on land acquisition in Bangladesh. However, as the land acquisition is not allowed in this project, relevant sections of ARIPA 2017 related to land acquisition will not apply here.

Land Requisition Policy of Bangladesh: For requisition of land for temporary purposes, the Acquisition and Requisition of Immovable Property Act 2017 (ARIPA) is the principal legislation governing eminent domain land acquisition and requisition in Bangladesh. The Act requires compensation to be paid for: (i) vacating the requisitioned property (ii) reoccupying the property upon released from the requisition (iii) damaged the cost to the property during period of requisition including the expenses that may have to be incurred for restoring to the original condition.

Under the ARIPA 2017, The Deputy Commissioner (DC) determines the value of the requisitioned assets under section 22(1) and 22(2) with due consultation with the landowners. According to section 22(6), requisition is allowed only for 2 years. If land is required more than 2 years, a new contract is required with the landowners with an agreed compensation rate. Under section 23, DC will pay the compensation to the landowners. If the land requisitioned has standing crops cultivated by a tenant (Bargadar) under a legally constituted written agreement, the law requires that compensation money be paid in cash to the tenants as per the agreement. Under no circumstances, land requisition is not

allowed due affecting residential and community properties. However, under section 20, requisition is only allowed for emergency road repairing. Any losses for structures, trees, and business will follow the provisions of ARIPA 2017.

IAs will ensure implementation of the followings for different interventions:

Compensation and benefits for affected persons: All lands proposed to be requisitioned, affected structures, trees, business, community property and crops under the HELP will be compensated as per replacement cost consistent with both government policies and ESS5. Compensation rates may be subject to upward adjustment where negotiation strategies are employed. In all cases, a clear basis for calculation of compensation will be documented, and compensation distributed in accordance with transparent procedures.

Impacts on community properties: Project will avoid any sites that may affect community properties. However, if unavoidable and if community properties are expected to be affected due to project interventions the project will undertake adequate community consultations and identify alternative, suitable sites for the reconstruction of such properties of equivalent or improved quality and accessibility to them, provide adequate and free transportation to the facilities/properties if proximity is compromised. The relevant PIUs will rebuild the community properties before dismantling the original or based on consultations provide temporary facilities of acceptable standards while the alternative and enhanced facility/community property is built. compensation to all community groups for respective community facilities and . The PIUs/PMUs will provide all necessary assistance including finding out alternative sites for relocation of the establishments.

Vulnerable PAPs: All vulnerable PAPs including disabled-headed, elderly-headed and poor household etc are entitled to livelihood restoration/ improvement support in the form of cash, job-placement, and additional financial support in the form of grants for investments in business or re-employment related equipment and buildings, as well as organizational and logistical support to establish the PAP in an alternative income generation activity.

Tribal communities: Since the project will work in the Hill Tracts there ESS7 will be relevant, and a Small Ethnic Community Planning Framework (SECPF) has been prepared. The Project is not permitted to inflict any adverse impact on ethnic communities and their lands, properties, and businesses. The SECPF will ensure all consultative processes are duly carried out with such communities living in the vicinity of the Project with sensitivity to language, religious and cultural norms. It will provide guidance on how to avoid adverse impacts and ensure that project benefits are fully accessible to the tribal communities along with other locals. Since the roads are present on existing alignments on public lands the rehabilitation works are not expected to bring any significant adverse impacts. During initial screening and consultation, no small ethnic communities are identified in the potential project areas. However, IAs will conduct social surveys including census and if any household belonging to small ethnic communities are found affected, ESS7 will apply. ESS7 will be implemented through development of a detailed IPP with the provision of free, prior and informed consent as appropriate. Even, if tribal people are affected detailed Small Ethnic Community Plan (SECP) will be also prepared.

Affected Women and Female headed households : To ensure a clear understanding and due consideration of specific impacts on Project affected women and to safeguard their livelihoods, specific provisions for women will be adopted, including (i) collection of gender disaggregated socio-economic data; (ii) consultation of women in joint or separate meetings; (iii) due consideration of grievances lodged by women; and (iv) provision of compensation and/ or new titles to women if they are titled or recognized owners of lost assets, and provisions of restoration and rehabilitation measures to women, if households are female headed or women's livelihood is directly concerned. The RAP for relevant activities will elaborate the scope of impacts on women and where required

gender action plans will be prepared, implemented and monitored within or outside RAPs. A standalone action plan for addressing Sexual Exploitation and Abuse/Sexual Harassment in the Project has been prepared.

E. Preparing a Resettlement Action Plan

If project activities causing physical or economic displacement of the non-titled are required to prepare a RAP/s for World Bank approval. Responsibility for preparation and implementation of the RAPs) rests with the respective IAs. As necessary, IAs will exercise its authority to coordinate actions with any other involved agencies to promote timely and effective planning and implementation. At the identification stage of the sub-project, IAs will conduct screening and following steps will be followed:

The entire Project is based on a Framework approach contingent upon the application of an Exclusion List of Environmental and Social impacts. The social exclusion lists are;

- ✓ Activities requiring land acquisition and major displacement (minor temporary impacts will be managed under RPF).
- ✓ Any activities that may require relocating mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance.
- ✓ Activities that may significantly restrict access to common property resources and livelihood activities of groups and communities.
- ✓ Activities with high E&S risks and impacts
- ✓ Any displacement or adverse negative impacts on SECs like land, customary rights, livelihoods, culture requiring Free, Prior Informed Consent (FPIC)

No land acquisition or major/significant displacement/ resettlement is permissible under the Project, and any sites requiring the latter will be screened out. However, if the screened site is found appropriate but presents cases of minor or temporary resettlement a RAP will be required (these may even be abbreviated versions as the scale is expected to be minor under each agency). RAP preparation will start once potential physical locations are identified. The IAs will identify current usage and tenurial arrangements at the site and choose the site (or sites) that meets the requirements of the Exclusion List including minimizing physical and economic displacement. The relevant IAs will subsequently carry out, or cause to be carried out, a census survey to identify and enumerate all affected persons on the selected site (or sites) and to inventory and value assets that are to be impacted by/for project activities.

The census will cover 100% of affected persons. The purpose of the census is to: (i) register who the potentially affected persons are; (ii) assess their income and livelihoods; and (iii) inventory of their assets affected due to the project; (iv) gender-disaggregated and where relevant ethnicity-disaggregated in case of presence of tribals information pertaining to the economic and socio-cultural conditions of displaced persons. Before census survey, consultation must be conducted with all affected households. The purpose of the baseline socioeconomic sample survey of affected persons is to establish monitoring and evaluation parameters. It will be used as a benchmark for monitoring the socioeconomic status of affected persons. The survey will cover at least 30% of affected persons and 20% of significantly affected persons and rest 50% may cover samples from the project impact zone. The survey will also collect gender-disaggregated data to address gender issues in resettlement.

As part of the social impact assessment, the IAs will identify individuals and groups who may be differentially or disproportionately affected by the program because of their disadvantaged or vulnerable status. Where such individuals and groups are identified, IAs will propose and implement targeted measures, so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in relation to sharing the benefits and opportunities resulting from development.

The census and socio-economic survey will identify

- ✓ The scope and scale of impacts on structures and other fixed assets;
- ✓ Any project imposed restrictions on use of, or access to, land or natural resources ;
- ✓ Identifying public or community infrastructure, property or services that may be affected;
- ✓ Characteristics of displaced HHs, baseline information's on livelihood and standards of living;
- ✓ land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non- title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area;
- ✓ the patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project; and
- ✓ Social and cultural characteristics of displaced communities, including a description of formal and informal institutions that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

Based on the census and IOL, if RAP needs to be prepared, the following contents will be followed:

- a) Description of the project (with appropriate maps and illustrations), including explanation for the necessity of acquiring particular sites for project use and efforts undertaken to avoid or minimize the amount of land acquisition or other potential impacts deemed necessary.
- b) Results of a census survey of displaced persons and inventory and valuation of affected land and assets
- c) Description of any project-related restrictions on resource use or access
- d) Description of tenure arrangements, including collective, communal, or customary use or ownership claims
- e) Review of relevant laws and regulations pertaining to acquisition, compensation, and other assistance to displaced persons, and identification of gap-filling measures needed to achieve ESS5 requirements.
- f) Description of land and asset valuation procedures and compensation standards for all categories of affected assets
- g) Eligibility criteria for compensation and all other forms of assistance, including a cutoff date for eligibility.
- h) Organizational arrangements and responsibilities for RP implementation
- i) Implementation timetable
- j) Estimated budget and financial contingency arrangements.
- k) Consultation and disclosure arrangements
- l) Description of grievance mechanism
- m) Arrangements for monitoring implementation progress.

The RAP will be complemented by a separate set of individual compensation files for each displaced household or persons. These files are to be handled confidentially by the IAs to avoid any prejudice to displaced persons.

Eligibility criteria for compensation and all other forms of assistance are summarized with annex A. Project will avoid physical displacement of the non-titled. However, if unavoidable, the RAP will include planning measures relating to the following:

- a) Description of relocation arrangements, including options available to displaced persons, and including transitional support for moving or other expenses
- b) Measures to improve living standards and otherwise address particular needs of relocating poor or vulnerable households, including measures to ensure that replacement housing is at least consistent with minimum community standards and is provided with security of tenure
- c) Description of project design measures to improve living standards, access to or functioning of community services or facilities, or for providing other project-related benefits
- d) Any measures necessary to address impacts of resettlement on host communities.

F. Institutional Arrangement and Implementation

Institutional arrangements: The GoB will have overall responsibility for project implementation and management through its relevant line ministries. The project will be implemented by LGED, DPHE, RHD and BPDB with four Project Implementation Units (PIUs). PIUs will be responsible to prepare the RAPs if required. All activities will be coordinated by the Refugee, Relief and Repatriation Commissioner (RRRC) at the field level. The rationale for adopting the proposed implementation structure is to be in accordance with the mandate of government agencies, in-line with the rules of business for DRP assistance and coordination, and in order to enable most efficient decision making taking into account internal government fiduciary clearance procedures.

If RAP/s needs to be prepared, implementation of RAP for affected persons will be carried out in eight (8) steps. PIU will ensure implementation of the RAP with the support of the design and supervision firms and social specialists hired under this project.

Step-1: Formation and Preparation

- Organize inception meeting with relevant stakeholders.
- Provide safeguard orientation to the team according to ESF
- Capacity building through organizing training and workshop
- Institutional Arrangements & Logistics
- Submit inception report and require approval from RAP verification survey

Step-2: Develop Implementation Tools/Mechanism

- Develop tools and materials for information campaign (i.e. Booklet, Leaflet, etc.)
- Develop monitoring tools for implementation progress
- Develop reporting format such as monthly/quarterly/semi-annual/annual
- Develop/update GRC application form
- Develop/update focus group meeting checklist
- Develop format of Entitled Persons file and Entitlement Card
- Develop format of payment debit voucher
- Develop ID card format for the EPs
- Develop computerized Management Information System (MIS)
- Develop internal server for data management, sharing and monitoring

Step-3: Social Preparation and Information Dissemination

- Formation of focused groups with various occupation groups at the field
- Information campaign
- Disclosure of RAP policy
- Regular meetings with affected people for updating record of rights and other documents for receiving compensation from IAs
- Consult the displaced people to get ready for relocation after getting compensation
- Develop ideas, script, and mechanism for organizing and executing awareness campaign outside the RAP implementation
- Organize, follow-up and recap various awareness campaign

Step-4: Payment of Compensation

- Devise ID number for each of the entitled persons
- Preparation of EP file and EC
- Preparation indent (EP payment list)
- Opening Bank Account by the APs
- Prepare ID cards for the EPs using photograph
- Calculate Individual entitlement based on category of losses and policy of the RAP
- Prepare Debit voucher and other necessary documents for making payment of additional compensation and other benefits
- Payment of additional grants and resettlement benefits
- Assist EPs in producing Grievances, if any

Step-5: Relocation/Resettlement

- Payment of resettlement benefits to EPs
- Assess relocation options of the PAPs and provide facilities in relocation choices
- Assist displaced households/EPs in relocation and resettlement
- Support APs in retiling and updating of their record of rights

Step 6: Establishment of Grievance Mechanism

- Development/finalization of format for grievance cases following the guidelines of SEP
- Assist PAPs in producing grievances
- Conduct meetings on GRM
- Disclose GRM process among the people
- Resolve grievances and report on monthly basis.

Step-7: Submission of Progress Report

- Generate progress reports for real-time monitoring of RAP implementation progress using user-friendly menu driven software.
- Share the draft report with project authority and relevant stakeholders.
- Incorporate feedback and response.
- Submission of final reports.

Social Development Specialist at PIU: The PIU will have a dedicated Social Specialists to ensure implementation of RPF, RAP and other social management responsibilities. The Socialdevelopment Specialistwill be field based. The Specialists will also monitor construction activities to ensure that social mitigation measures are properly implemented.

RPF related activities, responsibility and approval authority

Actions	Responsibility	Approval authority
RAP preparation stage		
Census, SES, IoL and Property Valuation Survey(PVS) for RAP preparation	Design and Supervision Firm and Social Development Specialist at PIU	Respective PIU
Consultation with affected HHs and relevant Stakeholders	Design and Supervision Firm and Social Development Specialist at PIU	Respective PIU
Preparation of RAP	Design and Supervision Firm and Social Development Specialist at PIU	Respective ministry and World Bank
RAP Implementation stage		
Compensation for non-titleholder	PIU with the support ofRAP implementing NGO/firm	Respective ministry and PIU
PVAC formation	PIU	Respective ministry and PIU
GRC formation	PIU	Respective ministry and PIU
Implementation of RAP and quarterly implementation report	PIC with the support of implementing NGO/firm	PIU and World Bank
Monitoring		
Internal monitoring report	PIU with the support of PIC	PSC and World Bank

G. Consultation and Disclosure Arrangements

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. If RP needs to be prepared, IAs will follow the guidelines of the SEP to conduct consultations and grievance management.

The RP will summarize results of measures taken to consult with affected persons regarding the project, its likely impacts, and proposed resettlement measures. It also summarizes the meetings held with affected persons (dates, locations, number of participants), including comments, questions, and concerns expressed by affected persons during these meetings as well as responses provided to them. The IAs willdisclose a draft RP to the affected persons (and the public) after Bank review and solicits comments from affected persons regarding the proposed plan. Disclosure of the final RAP occurs following consideration of comments received and following Bank acceptance.

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: [http://www.dphe.gov.bd/sites/default/files/files/dphe.portal.gov.bd/notices/982efa76_d3ae_4883_846c_f67d2deed3b6/2024-04-03-06-14-67136c9cb08bc2160b020bf29aee21f6.pdf].

The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

Description of Information Disclosure Methods:As a standard practice, the Project safeguard documents including RPF and RAP released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PIUs in a formal manner. PIUs will continue applying the similar approach to disclosure for any additional safeguard appraisal materials that will be prepared as part of the project development.

The PD will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. The RPF and RAP in Bangla, and English will be made available for public review in accordance with the World Bank. The RPF will be released in the public domain simultaneously with the E&S documents and will be available for stakeholder review during the same period of time.

Distribution of the disclosure materials will be through making them available at venues and locations frequented by the community and places to which public have unhindered access. Free printed copies of the safeguard documents in Bangla and English will be made accessible for the general public at the following locations:

- ✓ IAsHeadquarters, Dhaka
- ✓ The District Administration office of project area
- ✓ The IAs Project offices;
- ✓ Affected Upazila Headquarters
- ✓ Affected Union Parishad Offices
- ✓ Other designated public locations to ensure wide dissemination of the materials.
- ✓ Brochures, leaflets, posters, nontechnical summary documents and reports;
- ✓ Official correspondence, meetings

Electronic copies of the safeguard documents will be placed on the project website. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

H. Monitoring and Evaluation

IASwill make arrangements for monitoring implementation and will provide periodic monitoring reports to the Bank regarding the status of land acquisition and implementation of the RAP. For projects with significant impacts, competent resettlement monitoring professionals will monitor implementation progress and provide advice on any necessary corrective actions and will conduct an implementation review when all mitigation measures in the RAP are substantially complete. The implementation review evaluates the effectiveness of mitigation measures in achieving RAP and ESS5 objectives and recommends corrective measures to meet objectives not yet achieved.

Monitoring of and reporting on the project must be complemented by an effective GRM proposed in SEP in order to address issues arising from project implementation. GRM will help to detect unanticipated or recurring problems, and to manage them. The project implementing agency sets up and supports the GRM, in a manner satisfactory to the World Bank, to receive, manage and facilitate

resolution of stakeholders' concerns and grievances in a timely manner. The way to make complaints needs to be simple and well publicized. The GRM is usually scaled to the risks and potential adverse impacts of the project. The following factors will be considered in the project for the effective GRM: (i) their publicity and accessibility, (ii) the transparency of their operation, (iii) the credibility of their decision-making process and structure, (iv) their confidentiality and hence protection from any potential retaliation, and (v) the effectiveness of the associated business processes to resolve grievances where appropriate.

I. Grievance Mechanism

To ensure that affected persons can raise complaints regarding the calculation or payment of compensation, provision of assistance, or other relevant matters, the RAP provides for an accessible and responsive grievance mechanism. The RAP will describe submission procedures, organizational arrangements, and responsive performance standards for handling grievances, and measures to be taken to inform affected persons or communities about grievance initiation and response standards. The grievance mechanism does not preclude affected persons from pursuing other legal remedies available to them.

The IA will keep a record of all complaints referred to the grievance mechanism, including a description of issues raised and the status or outcome of the review process.

A three Tier GM will be established in this project. Detailed grievance management procedures at host communities and the camps are described in the Labor Management Procedures (LMP) and Annex 5 of the SEP. Among the project's four IAs, LGED and DPHE have been implementing similar activities in Rohingya camps and host communities under the EMCRP. The same GM modality will continue for HELP across certain districts. RHD will adapt a similar but nuanced approach in Bandarban where there are tribal people. BPDB will operate solely in Bhasan Char. Before specialists are hired, existing GMs or designated focal points will handle grievances. Each IA will provide monthly GM reports, compiled into quarterly reports by LGED's hired Project M&E Firm. Different steps, process, timeframe and responsibilities of the GRM is attached with annex 2.

Grievance Redress Committees (GRC): Grievance redress committees (GRC) will be formed to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the project-affected persons. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law. The GRC will be established at three levels: (i) Local Level and (ii) Project level and (iii) Ministry level

Local Level GRC: All the sub-project/local level complaints will be received at local level GRC committee. This local level GRC will ensure easy accessibility by the PAPs, local communities and interested stakeholders, so that any grievance can be solved directly or within a very short period of time. All cases at the local level complaints will be heard within 15 days of their receipt. Local Level GRC Committee given below-

Chief Engineer LGED/DPHE	Convener
Representatives from respective local administrative officials	Member-Secretary
Representative of the affected people (DRP/Host communities)	Member
Woman representative of affected people in case of women aggrieved persons	Member

Project Level GRC: If the resolution attempt at the project/local level fails, the grievance will be forwarded to the project level GRC for further review. With active assistance from the social specialist of PIUs, the committee will make a decision and communicate it to the concerned GRC. The PIUs will make periodic visit to the project sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books. The decisions on unresolved cases will be communicated to the GRC within one week of the complaint receipt. PD will be the convener, and social specialist will be the member secretary of the Project level GRC. Project Level GRC Committee given below-

Project Director (PD)	Convener
Social Specialist at PIU (DPHE/LGED)	Member-Secretary
Local Government Representative	Member
Representative from respective areas Local Women's Group	Member
Representative from respective areas PAP Group	Member

Ministry Level GRC: If a decision at district level is again found unacceptable by the aggrieved person(s) or affected persons are not satisfied with the resolution, can appeal to MoLGRD&C for further investigation. Grievance resolution will be a continuous process in project level activities and implementation of those. The PIUs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PIUs also prepare periodic reports on the grievance resolution process and publish these on the DPHE/LGED website.

A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon the respective PIUs. There will be budgetary allocation for local, project and ministry committee members for participating meetings and refreshments during meeting. To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the Convener will apply the following guidelines:

- ✓ Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons.
- ✓ Remove a recommendation by any person that may separately accompany the grievance redress application.
- ✓ Disqualify a GRC member who has made a recommendation on the application or separately before the formal hearing: Where a GRC member is removed, appoint another person in consultation with the Project Director.
- ✓ The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in this RPF and the mitigation standards, such as compensation rates established through market price surveys.

To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. The DPHE and LGED will maintain the following three Grievance Registers:

Intake Register: (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

Resolution Register: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field

investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

Closing Register: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the Convener will apply the following guidelines:

- ✓ A standard application format will be used for receiving grievances which will be available at the office of INGO /Consulting firm. This application format would be concurred by the PD.
- ✓ Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons.
- ✓ Remove a recommendation by any person that may separately accompany the grievance redress application.
- ✓ Disqualify a GRC member who has made a recommendation on the application separately before the formal hearing.
- ✓ Where a GRC member is removed, appoint another person in consultation with the Project Director.
- ✓ The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in this RAP and the mitigation standards, such as compensation rates established through market price surveys.

Grievance Logs and Operation: HELP project will maintain a grievance log. This log will include at least the following information:

- ✓ Individual reference number
- ✓ Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)
- ✓ Details of the complaint, feedback, or question/her location and details of his / her complaint.
- ✓ Date of the complaint.
- ✓ Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- ✓ Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution
- ✓ Date when proposed resolution was communicated to the complainant (unless anonymous)
- ✓ Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
- ✓ Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
- ✓ If necessary, details of GRC1 and GRC2 referrals, activities, and decisions date when the resolution is implemented (if any).
- ✓ If AP's are not satisfied with the resolution, can appeal to Ministry for further investigation. Even if the case is not resolved with Ministry, can appeal to court according to the law of the land.

World Bank Grievance Redress System (GRS): Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank's Grievance Redress Service (GRS) The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and after Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

Annex A - Suggested Entitlement Matrix

Table A.1: Entitlement Matrix

Impact	Application	Affected Person	Entitlement in Principle
Loss of land	Requisition of land during construction period	Owner(s) with legal title	<ul style="list-style-type: none"> • Viability of land to be determined in consultation with landowner. • If the land is not returned and restored to pre-project condition within agreed time, the affected person will receive compensation at replacement cost for the land. A penalty clause will be included in the contractor's contract to ensure that the cost of such compensation is recovered from the contractor.
Loss of structure	Residential/ commercial structure and other assets (e.g. fences, gates, posts) structure	Owner(s) with legal title	<ul style="list-style-type: none"> • Cash compensation equivalent to replacement value of structure (or part of structure). • Option to be compensated for entire structure if remaining structure is no longer viable. • Rights to salvage materials from structure • Provision of all taxes, registration costs, and other fees incurred for replacement structure. • Shifting allowance based on actual cost of moving (e.g., truck hire, equipment, etc.) • Additional compensation for vulnerable households. • Assistance in finding alternate location. <p>Cash compensation equivalent to replacement value of structure (or part of structure) if the structure is constructed by the affected person.</p>
		Non-titled Owners	
		Tenants	<ul style="list-style-type: none"> • Compensation equal to 01 month of rent • Assistance for residential /business relocation to a agreed site
Loss of Common Property Resources and	community toilet, tubewells, grazing grounds, community center etc.	Community/ government	Reconstruction/ Cash Compensation at replacement cost.

Impact	Application	Affected Person	Entitlement in Principle
government Buildings			
Loss of crops and trees	Standing crops and trees	Owner(s) with legal title, tenant(s), leaseholder(s), sharecropper(s), non-titled owners	<ul style="list-style-type: none"> • 60 days advance notice to harvest standing seasonal crops, if harvest is not possible, cash compensation for crops (or share of crops) equivalent to prevailing market price. • Cash compensation for perennial crops and fruit bearing trees based on annual net product market value multiplied by remaining productive years. <p>Cash compensation equivalent to prevailing market price of timber for non-fruit trees.</p>
Loss of livelihood	Livelihood/ source of income	Business owner (s), Renters, tenant (s), leaseholder(s), employee(s), agricultural worker(s), hawker(s)/ vendors(s) Squatters	<ul style="list-style-type: none"> • 60 days advance notice. • Assistance in finding alternate location. • One time assistance for lost income based on one month lost income (at replacement cost) or minimum wage rates (whichever is higher). • Shifting allowance and cost of reestablishing business elsewhere (cost of truck hire, equipment, etc.). • Additional compensation for vulnerable households. • Consideration for project employment.
Temporary loss of access	Temporary loss of access to land, structure, utilities, common property resource	Owner(s) with legal title, tenant(s), leaseholder(s), sharecropper(s), encroacher(s), squatter(s)	<ul style="list-style-type: none"> • 60 days advance notice. • Provision of temporary access to alternative sites and relocation where possible. <p>Restoration/enhancement of affected land, structure, utilities, common property resource.</p>
Temporary loss of livelihood	Temporary loss of livelihood/source of income	Business owner (s), tenant (s), leaseholder(s), employee(s), agricultural worker(s), hawker(s)/ vendors(s) squatters	<ul style="list-style-type: none"> • 60 days advance notice. • Provision of temporary access where possible. • Provision of alternative sites for continued economic activity where possible. • Where provision of alternative sites is not feasible, a one-time assistance for lost income for period of disruption (if less than three months) or lump sum for three months lost income (at replacement

Impact	Application	Affected Person	Entitlement in Principle
			<p>cost) or minimum wage rates (whichever is higher).</p> <ul style="list-style-type: none"> • Compensation for agricultural losses. <p>Restoration of affected land, structure, utilities, common property resource.</p>
Impacts on vulnerable APs	All impacts	Vulnerable APs	<ul style="list-style-type: none"> • Additional allowance equivalent to Tk 10,000/- • Preference in project employment.
Any other loss not identified	All impacts		Unanticipated involuntary impacts shall be documented and mitigated based on the principles provided in this RPF and with compliance with governments and WB ESS5

Annex 2: Description of Grievance Mechanism (GM)

Step	Description of process	Timeframe	Responsibility
<p>GM implementation structure</p> <p>GM IN THE HOST COMMUNITIES</p>	<p>Local level GRC Composition (all Upazilas where IA has activities):</p> <ul style="list-style-type: none"> • Upazila Engineer/Sub-divisional Engineer (for RHD)/nominated official by the PD – Convener (from Upazila where complaint originates) • Environment Specialist and/or Social Specialist or both, from the PIU (as per nature of the complaint) – Member-Secretary(s) (will be common across the GRCs for that particular IA) • Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA - Member. • Representative from respective Union Parishad (from where the complaint originates; must be female if the complainant is female) - Member. 	<p>Specialists to be hired within 3-6 months of effectiveness.</p> <p>All cases at the local level will be heard within 10 days of their receipt.</p>	<ul style="list-style-type: none"> • All complaints will be received at the Office of the respective Upazila Engineer (LGED/DPHE) • Complaints related to BPDB will be received at the site level project office by the E&S specialist. • Complaints related to RHD will be received at the site office by the E&S specialist

Step	Description of process	Timeframe	Responsibility
	<ul style="list-style-type: none"> Representative from the community (teacher, NGO, or local person nominated by the complainant) –Member. 		
	<p>PIU Level GRC</p> <ul style="list-style-type: none"> Project Director-Convener Social Specialist and Environmental Specialist of PIU- Member-Secretary Local Government Representative (can be the same representative who was present at the local GRC hearing, or other as required; must be female if the complainant is female) - Member Representative from the community (teacher, NGO, or local person nominated by the complainant – preferably the same person who was present at the local GRC hearing) – Member 	The decisions on unresolved cases will be communicated to the PIU level GRC and will be solved within 15 working days.	If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings of the local GRC to project level for further review. With active assistance from the PIU will make a decision and communicate it to the concerned GRC. The Social/Environmental Specialist at PIU with the support of member secretary of local GRC will make periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books
	<p>PSC Level GRC</p> <ul style="list-style-type: none"> Representative of secretary from Respective ministry-Convener Project Director-Member-Secretary 	Four weeks	All the unsolved cases at the project level, decisions on unresolved cases, if any, will be made in no more than four-week representative of the Secretary, respective ministry. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon IAs.
GM for CAMPS at COX'S BAZAR	<p>Composition Camp GRC</p> <ul style="list-style-type: none"> Upazila Engineer/nominated official by the PD – 	All cases at the local level will be heard within 10	The Site Managers keep a Grievance Recording Book, reporting grievances as "Resolved"

Step	Description of process	Timeframe	Responsibility
	<p>Convener (from the Upazila where the Camps are located and from where complaint originates)</p> <ul style="list-style-type: none"> Environment Specialist and/or Social Specialist from the PIU hired by each IA (as per nature of the complaint) – Member-Secretary (will be common across the GRCs in camps for that particular IA). Environment Specialist and/or Social Specialist from the Supervision Firm hired by IA-Member. 	days of their receipt.	<p>or "Not Resolved" to the Member Secretaries. They record and convey complaints to the Convener (Upazila Engineer) of the local GRC for investigation with the respective site manager and the complainant.</p> <p>Camp GRC must record all the grievances and address</p>
GM at CAMPS in BHASAN CHAR	<ul style="list-style-type: none"> The same procedure and GRC composition will be followed in Bhasan Char. RHD will not have any activities in Bhasan Char. BPDB will only work in Bhasan Char. It does not have an Upazila level engineers and therefore the PD will be the Convener of the GRC for them in Bhasan Char when complaints are received/recorded by the site managers. 	All cases at the local level will be heard within 10 days of their receipt.	<p>The Site Managers keep a Grievance Recording Book, reporting grievances as "Resolved" or "Not Resolved" to the Member Secretaries. They record and convey complaints to the Convener (Upazila Engineer) of the local GRC for investigation with the respective site manager and the complainant.</p> <p>Camp GRC must record all the grievances and address</p>
Grievance uptake	<p>Face-to Face: There will be a few field offices by the supervision firms/contractors, and each field office will nominate an individual to register complaints. He/ She will register to note the complaints and complaint forms to fill up. The form will be signed by both the staff and the Complainant.</p>	<p>Will be operated from 7 AM to 4 PM (at camp) Will operate 7 am to 7 pm (at host communities)</p> <p>This information will be disseminated to the public</p>	<ul style="list-style-type: none"> The complaint desk will be manned during working days only. For non-working days, virtual means (SMS, Telephone, email etc.) will be suggested. The field level staff will welcome the Complainant and make him/her comfortable and begin with greetings.

Step	Description of process	Timeframe	Responsibility
			<p>The staff will note, fill up the company form, get complainant's signature and sign the form him/herself.</p> <ul style="list-style-type: none"> • The Staff will also provide estimated timeline and a tracking number. • The Staff will also intimate the local GRC level for eligibility checking. <p>After eligibility check by the local level, the Staff will inform the Complainant if the complaint is eligible to be considered or otherwise. If not eligible, the Complainant will be provided other options (NGO, police, legal etc)</p>
	<p>Telephone: 01711-XXXXXX . Phone number of the Member Secretaries (this will be a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage), and the official number of the Upazila office/Sub-division office (for RHD) of the respective IAs – (this is a cell phone number which can receive calls, SMS, WhatsApp with voice/picture of damage)</p> <p>All level telephone number is attached with SEP for LGED.</p> <p>There will be telephone numbers available for all IAs.</p>	Will be operated from 6 AM to 10 PM	<p>Grievance site focal and E&S specialist Following will be noted (Action 1):</p> <p><i>Name and address (none required if anonymity sought)</i></p> <p><i>Complaint, in summary</i></p> <p><i>Nature of Complaints</i></p> <p><i>If it is project related.</i></p> <p><i>Complaint against, if any</i></p> <p>Operator will (Action 2):</p> <p><i>Register the complaint in a register</i></p> <p><i>Provide a tracking number</i></p> <p><i>Provide a timeline</i></p> <p><i>Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing)</i></p> <p><i>Intimate the first level of GRC about the complaint</i></p> <p><i>Intimate Central GRC aggregator</i></p>

Step	Description of process	Timeframe	Responsibility
			<i>After eligibility check by first/local level, inform the complainant if the complaint is eligible to be considered or otherwise. If not eligible, the complainant will be provided other options (NGO, police, legal etc.)</i>
	Email: Project.GRM@email.com	Will be monitored as per above timing (12 hours)	Will be operated by the Social Development Specialist/Communication Specialist/ Any other nominated staff of the PIU at Project Office. If no details are given will request number (Action 1) above. If phone number is given, the Complainants will be called to get the above information, else email will suffice. Then the Staff will carry out Action 2 above.
	Website: www.helpproject.com/GRM	Will be monitored as per above timing (12 hours). The site will provide a format for complaint registration. This will include info required in Action 1 above. The complaint will be redirected to the email above with a Subject GRM From Web – Date and Time.	As above
	Letter: Social Development Specialist. Environmental Specialist XXX Project H XX, Rd XX, Sector XX Dhaka Phone: 01711-XXXXXX	Will be received and opened during office hours	After the letter is received, the complaint will be studied and if ineligible, it will be intimated to the Complainant including

Step	Description of process	Timeframe	Responsibility
			provision of other options. If eligible Action 1 and 2 above will be implemented
	Drop- Box: Suggestion Boxes will be placed in front of every field office	Will remain open round the clock. Will be opened during the beginning of office hours by the staff responsible to register complaints in each field office	As above
Sorting, processing	Any complaint received is forwarded to local GRC office; logged in by member secretary of local Recategorized according to the complaint types	Upon receipt of complaint	Local grievance focal points
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by cell or written as suitable	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	<ul style="list-style-type: none"> Investigation of the complaint is led by local GRC. Member Secretaries document unresolved complaints, promptly address non-project-related grievances and consider anonymous complaints. SEA/SH/GBV-related complaints go to the Gender and GBV Specialist. The Convener and Member Secretaries work with site managers to resolve issues. Unresolved complaints escalate to the full GRC for resolution within 10 days. 	Within 5 working days of receipt	Local GRC

Step	Description of process	Timeframe	Responsibility
	<ul style="list-style-type: none"> • Compensation follows RPF/RAP procedures; complainants are notified. • Unresolved issues may go to the PIU Level GRC and then to the Project Steering Committee GRC. • If necessary, the Project Director may conduct field investigations within 15 days. • Complainants can seek legal recourse if issues persist. • Bank-received complaints are reported to GRS and forwarded to the Project Director. • A proposed resolution is formulated by local GRC and communicated to the complainant by cell or email or physically as suitable. 		
Monitoring and evaluation	<p>Supervision Firm hired including:</p> <ul style="list-style-type: none"> • Environmental Specialist • Social Specialist <p>Both will be members of all the local level GRCs convened at the Upazilas where the IA will be active and where complaints will originate from.</p>	Within 6-9 months of project effectiveness	PIU & Monitoring and Supervision Firm
	Data on complaints are collected in every month and reported to PIU every <i>month</i>	Every month	Monitoring and Supervision Firm
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by monitoring and	Every month	Local GRC and Monitoring and Supervision firm

Step	Description of process	Timeframe	Responsibility
	supervision firm and local GRCs		
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants are grievance uptake, sorting, record, response, address, and feedback mechanism	Every quarter	Monitoring and supervision firm
Appeals process	If the aggrieved person is not satisfied with the decision of the local GRC, can appeal to the project level GRC	Within 10 working days of the decision of the local GRC	Aggrieved person with the support of local GRC or directly to the PIU

ⁱ Specifically, Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5), Annex 1B. The template is primarily intended for use in projects initially classified as Low or Moderate Risk. It may also be appropriate for use in projects with a Substantial Risk classification if risks identified as substantial do not relate directly to ESS5.

ⁱⁱ To ensure that the relevant authority is aware of its obligations, it is recommended that the RPF be accompanied by a provision of a transmittal letter, signed by the chief executive (or similar relevant authority) of the implementing agency.

ⁱⁱⁱ As described in ESS5, Paras. 33–36.

^{iv} As described in ESS5, Paras. 26–32.

^v The RPF does not supersede provisions of ESS5 or the ESF, and the World Bank remains solely responsible for determining what is required to achieve consistency with those requirements throughout the course of project implementation.

^{vi} Defined as the removal against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection, including all applicable procedures in ESS5.

^{vii} Security of tenure means that affected persons are resettled to a site that they can legally occupy, where they are protected from the risk of eviction and where the tenure rights provided to them are at least as robust as those they had prior to displacement.

^{viii} Appropriate principles for negotiated settlement transactions include (a) intended project sites are screened to identify competing claims to ownership or use, or other encumbrances that would impede two-party negotiations; (b) if the site is collectively or communally owned or used, the negotiation process includes those individuals or households who directly occupy or use it; (c) prior to negotiations, owners or users are informed by project authorities of their intent to obtain relevant land (and other assets) for project use; (d) owners or users are informed of their rights and options to pursue legal remedies or other actions, and sign a declaration indicating willingness to negotiate; (e) at the onset of negotiations, project negotiators present the owner or user with a proposed package of compensation or other beneficial considerations, along with an explanation as to the basis of this initial offer; (f) owners or users are informed that they may make counterproposals as they may see fit; (g) negotiations are conducted without resort to coercion or intimidation in any form; (h) an agreement establishing payment amounts or other agreed considerations is written, signed, and recorded; (i) payment of compensation and provision of any other agreed considerations is completed prior to taking possession for project use; and (j) owners or users retain the right of access to the grievance mechanism if they have complaints regarding any aspect of the negotiated settlement process.