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Stakeholder Engagement Plan (SEP)
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Abbreviations and Acronyms

AI	Artificial Intelligence
CE	Citizen Engagement
CERC	Contingent Emergency Response Component
CSO	Civil Society Organization
DPI	Digital Public Infrastructure
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FM	Financial Management
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
HEIS	Hands-On Implementation Support
IBRD	International Bank for Reconstruction and Development
IT	Information Technology
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OMSAR	Office of the Minister of State for Administrative Reform
PCM	Presidency of the Council of Ministers
PIU	Project Implementation Unit
PPP	Public-Private Partnership
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan

1. Introduction and Project Description

The Lebanon Digital Acceleration Project (the “Project”) aims to strengthen digital foundations and enablers and improve the delivery of high-impact public services. It includes the following components:

Component 1: Digital Foundations will ensure the provision of secure, efficient, low-carbon, and climate-resilient data infrastructure for hosting government data and will enhance Lebanon’s overall cybersecurity posture through targeted investments.

- *Subcomponent 1.1: Secure, Scalable, and Resilient Data Hosting Capabilities* will support building the government’s capabilities to securely and sustainably host national data on resilient, AI-ready data infrastructure, leveraging modern cloud computing technologies.
- *Subcomponent 1.2: Cybersecurity* will build and reinforce Lebanon’s national cybersecurity capabilities.

Component 2: Digital Enablers will invest in cross-cutting digital enablers to enhance the resilience, security, inclusivity, and scalability of digital services across both the public and private sectors. By reinforcing the digital trust environment and facilitating service digitalization and AI adoption, it will strengthen institutional capacity to respond to crises, conflicts, climate disasters, and other adverse events.

- *Subcomponent 2.1: Enabling Environment, Capacity Building, and Digital Upskilling* will strengthen the legal, institutional, and human capital foundations of a trusted and inclusive digital transformation. It will support the effective implementation of infrastructure and platforms under component 1 and subcomponent 2.2, while also preparing the ground for component 3 by addressing regulatory barriers, building public trust, enhancing the public sector’s ability to design and deliver high-impact digital services, and integrating climate adaptation and mitigation considerations.
- *Subcomponent 2.2: Safe and Interoperable Data Platforms* will develop cross-cutting, interoperable DPI to enhance the resilience, inclusivity, and scalability of digital services, and to enable trusted AI adoption. Financing activities include systems for digital ID, e-signature, and trusted data sharing, a refreshed national ID card and digitalized civil registration system, and a national open data portal.

Component 3: Digitalization of High-Impact Services will build on the national-level digital foundations and enablers financed under components 1 and 2 to pilot the digitalization of select public services with high potential to improve government transparency and efficiency, citizen benefits, climate resilience, and environmental sustainability. The specific services to be digitalized and piloted will be identified during implementation through a consultative process and will be prioritized based on defined criteria. The services may be integrated into a one-stop e-government portal to facilitate universal access.

Component 4: Project Management and Citizen Engagement will finance project management and coordination, including procurement, financial management (FM), monitoring and evaluation (M&E), and environmental and social (E&S) safeguards. This includes the setup and staffing of a project implementation unit (PIU), as well as funding for project communication, stakeholder engagement, training and institutional capacity building, audit, grievance redress, and logistics.

Component 5: Contingent Emergency Response Component is included to allow for the rapid mobilization of uncommitted funds in response to future emergencies. The CERC may be financed during project implementation through the reallocation of funds from other components.

Both the social and environmental risks are rated ‘Moderate’. The applicable Environmental and Social Standards (ESS) include ESS1, ESS2, ESS3, ESS4, and ESS10. The Project does not involve civil works or infrastructure activities and will not directly finance data center construction or rehabilitation. However, private investors will deploy the government community cloud platform in new and/or rehabilitated data centers, which are considered Associated Facilities. Construction or upgrade of these data centers poses potential risks related to labor and working conditions, occupational and community health and safety, as well as dust, noise, and waste generation. During the operational phase, data centers are associated with high energy consumption and emissions, significant water use, and potential e-waste generation. The Project will address these impacts through multiple mitigation measures, including adoption of energy efficiency certifications for the data centers and all IT equipment. Additionally, site-specific Environmental and Social Management Plans (ESMPs) will be prepared and implemented for any new data centers established with private sector financing. Since data centers and IT equipment procurement generate e-waste from obsolete or damaged devices, proper disposal and recycling protocols will be implemented to prevent environmental pollution. The main social risks include potential exclusion of certain end users due to unreliable or unavailable internet connectivity; personal data protection concerns linked to digitalization; weaknesses in the grievance mechanism; and OMSAR’s limited capacity to implement the Environmental and Social Framework (ESF) requirements. These E&S risks can be mitigated through (i) utilization of renewable energy sources; (ii) implementation of advanced cooling technologies to minimize water and energy use; (iii) adoption of sustainable design practices, including the use of recycled materials and minimization of land use to reduce the ecological footprint of data center construction; (iv) establishment of robust recycling and e-waste management protocols; (v) setup of an effective grievance mechanism; (vi) conduct of comprehensive stakeholder consultations; (vii) recruitment of a qualified E&S specialist within the PIU; and (viii) application of Good International Industry Practice (GIIP) in accordance with the WB’s ESF, Environmental, Health, and Safety (EHS) guidelines, and e-waste management protocols. The Project incorporates specific legal, organizational, and technical measures to mitigate personal data protection risks. OMSAR has received Hands-On Implementation Support (HEIS) for the drafting of the SEP and Environmental and Social Commitment Plan (ESCP).

2. Objective of the Stakeholder Engagement Plan

The objective of the Stakeholder Engagement Plan (SEP) is to define a structured approach for engaging stakeholders through public information disclosure and consultation across all phases of the project cycle. In line with ESS10 on *Stakeholder Engagement and Information Disclosure*, implementing agencies are required to provide stakeholders with timely, relevant, understandable, and accessible information, and to consult them in a culturally appropriate manner—free from manipulation, interference, coercion, discrimination, or intimidation.

The SEP outlines how the PIU, housed within OMSAR, will engage with stakeholders throughout the Project. It also includes a grievance mechanism (GM) that allows individuals to raise concerns, provide feedback, and submit complaints related to project activities. The SEP places particular emphasis on approaches to engage vulnerable groups at risk of being excluded from project benefits.

3. Stakeholder Identification and Analysis

3.1 Methodology

To align with best practices, the Project's stakeholder engagement will adhere to the following core principles:

- *Openness and lifecycle approach:* Public consultations will be conducted throughout the Project's entire lifecycle in an open manner, free from manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be widely distributed to all stakeholders in appropriate formats, with opportunities for submitting feedback and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification will support effective communication and relationship-building. The participation process will be inclusive, actively encouraging all stakeholders to engage in consultations and ensuring equal access to information. Engagement methods will be selected with sensitivity to stakeholders' needs, with special attention to vulnerable groups at risk of exclusion from project benefits, including women, elders, persons with disabilities, displaced persons, migrant workers and communities, and ethnically diverse groups' cultural sensitivities.

3.2. Affected Parties and Other Interested Parties

Affected Parties are individuals or groups likely to be impacted by the Project due to actual or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. This includes those directly or indirectly affected—whether actually or potentially, positively or adversely—or those identified as particularly vulnerable to project-related changes. These stakeholders require close engagement in identifying impacts, assessing their significance, and informing decisions on mitigation and management measures.

Other Interested Parties are individuals, groups, or organizations with an interest in the Project, often due to its location, characteristics, potential impacts, or broader public interest considerations. Examples include regulators, government officials, the private sector, the scientific and academic communities, unions, women's organizations, other civil society groups, and cultural institutions. While these stakeholders may not experience direct project impacts, they may perceive their interests as affected or have the capacity to influence project implementation.

Stakeholders' values, perceptions, and concerns; their potential to support, oppose, or otherwise influence project activities and services; the likelihood and extent of their being affected; and their level of interest have been assessed. Tables 1 and 2 below present a preliminary list of identified affected and other interested parties, based on desk review and consultations.

Table 1: List of Project-Affected Parties

Stakeholders – Project-Affected Parties	Main Influence and Interest in the Project
Citizens nationwide will benefit from improved and equitable access to a broad range of government services and economic opportunities, particularly during crises or forced displacement. By lowering barriers to digital access and service delivery, the project will empower individuals to participate more fully in the economy and society, enhancing their resilience and enabling better access to health, education, social protection, and livelihood support services. These improvements will help close the digital divide and promote social inclusion.	Directly benefiting from the Project

Businesses and entrepreneurs will benefit from a stronger trust environment for electronic transactions, which will support the development and commercialization of trusted digital products and expand access to international markets. The Project will also facilitate digital entrepreneurship and remote work—including for women and displaced populations—stimulate demand for local ICT services through outsourcing and cloud adoption, and foster a competitive domestic market for cloud services. In parallel, the government's outsourcing strategy will create jobs for digital entrepreneurs involved in delivering public services, securing public data, and operating digital infrastructure. All businesses—startups, small, medium, and large—and entrepreneurs across all sectors will benefit. The Project's digital foundations and enablers will encourage them to develop, market, and expand their businesses online to international markets.	Directly benefiting from the Project
Government—including all public administrations, institutions, ministries, and municipalities—will benefit from enhanced digital platforms, strengthened capacity to harness data and AI, more efficient operational and service delivery workflows, and improved continuity and resilience of public services.	Directly benefiting from the Project
Women nationwide will benefit from improved access to digital government services and economic opportunities, especially during crises or forced displacement, enabled by the availability of sector-specific digital platforms. They will also benefit from opportunities in digital entrepreneurship and remote employment. This access to digital services will particularly support stay-at-home mothers, offering them not only better service access but also flexible work-from-home opportunities.	Directly benefiting from the Project
Internally displaced persons will benefit from improved access to digital government services and economic opportunities, especially during crises or forced displacement, enabled by the availability of sector-specific digital platforms. They will also benefit from opportunities in digital entrepreneurship and remote employment. Given their frequent lack of transportation, displaced people will gain broader access to governmental and various social services through nationwide availability of digitalized services.	Directly benefiting from the Project

Table 2: List of Other Interested Parties

Stakeholders - Other Interested Parties	Main Influence and Interest in the Project
All government ministries Presidency of the Council of Ministers	Successful implementation of the Project

Presidency of the Republic Parliament	
Independent authorities and committees such as the Banking Control Commission of Lebanon, Banque du Liban, Central Inspection, Civil Service Board, and the Higher Council of Defense	Successful implementation of the Project
Private data hosting and cloud providers	Potential interest in the data center public-private partnership (PPP) under subcomponent 1.1 Successful implementation of the Project
Private financial institutions, including commercial banks, fintech companies, digital payment providers, and money transfer services	Successful implementation of the Project
Technology, IT, telecom, and cybersecurity companies	Successful implementation of the Project
Nongovernmental organizations (NGOs), civil society organizations (CSOs), professional associations and syndicates, and independent organizations involved in digital, IT, and social development initiatives in Lebanon.	Successful implementation of the Project
Universities, schools, and other academic or research institutions	Provision of data, research and analysis to support project activities, as needed Successful implementation of the Project
National media	Ensure broad and regular dissemination of Project information to enhance visibility and facilitate stakeholder engagement at the national level.

3.3. Disadvantaged and Vulnerable Individuals or Groups

Within the Project, vulnerable or disadvantaged groups include, but are not limited to:

- Persons lacking reliable internet access or adequate digital literacy may not fully benefit from the Project's digital services.
- Elders and persons with disabilities, as part of marginalized communities, often lack the digital literacy, financial means, and transportation needed to access digital technology, attend consultation meetings, or obtain information easily. Unadapted language further limits their access to information.
- Individuals facing poverty typically lack the financial capacity to acquire advanced internet-connected devices such as mobile phones, personal computers, and laptops. Even if they possess such devices, limited financial resources often preclude maintaining monthly internet subscriptions.
- Women, integral to both community and household, often face imbalanced community engagement and heightened challenges accessing digital services due to increased childcare responsibilities. The added pressures of housework and childcare can limit their available time for internet use or engaging with project digital platforms and tools. Additionally, women—particularly stay-at-home mothers not contributing to family income—may encounter greater financial hurdles in accessing technology or digital services.
- Individuals with low digital literacy may have difficulties accessing the Project's digital services and often require support to acquire fundamental digital skills, including general internet

navigation and specific project-related service use. Providing guidance materials such as leaflets, graphics, and instructional videos could greatly assist these stakeholders in utilizing the digital services offered by the Project.

- Internally displaced persons and refugees have suffered significant losses due to past wars and conflicts, forcing them to abandon their homes and livelihoods. These groups often face dangerous conditions and ongoing risks even after seeking safety. Severe financial constraints limit access to basic services like medical care and education. Combined with low digital literacy, these factors prevent them from owning digital devices and accessing the Project's digital services smoothly.

Vulnerable groups in project-affected communities will be identified, confirmed, and consulted through dedicated methods, as needed. The following sections describe the engagement methods the Project will use.

4. Stakeholder Engagement Program

4.1. Summary of Stakeholder Engagement during Project Preparation

During project preparation, six in-person stakeholder consultation workshops were held on June 11-12, 2024, July 15-16, 2024, January 15, 2025, and April 30, 2025. These workshops were preceded by individual stakeholder consultation meetings. A list of institutions represented at these workshops is provided in annex 1.

The first and second workshops, held on June 11-12, 2024, focused on digital ID and electronic signatures, drawing over 175 participants from public institutions, private entities, civil society organizations, diplomatic missions, and international organizations—including ministers, parliamentarians, and high-ranking officials. These consultations highlighted the urgent need for digital transformation in Lebanon and concluded that a multistakeholder approach involving active cooperation among public institutions, private sector entities, civil society, and international partners is essential for sustainable digital transformation.

The third and fourth workshops, held on July 15-16, 2024, focused on e-government and data hosting, each attracting over 75 representatives from public institutions, telecom and data center operators, security agencies, private companies, and international organizations—including directors general, presidents of oversight bodies, lawyers, judges, and technical experts. The consultations reinforced the critical importance of a multistakeholder approach for successful e-government and data hosting. Participants emphasized that collaboration and strong political will are key to developing a national data hosting strategy and unified e-government platform.

The fifth workshop, held on January 15, 2025, centered on service digitalization and drew approximately 75 attendees from public institutions, private entities, and international organizations. This third round of consultations focused on sectoral digitalization efforts and highlighted the essential role of sector-specific digital services in enhancing resilience during crises. The workshop underscored the foundational importance of digital ID and e-signature for sustaining digitalization efforts. Priorities identified included improving digital ID and civil registration, as well as health, education, financial, social welfare, legal, and transport services. Key actions to accelerate digitalization included prioritizing data hosting, migrating government forms online, building disaster recovery plans for critical data, establishing data governance

policies, setting up cross-agency interoperability, piloting key projects, ensuring adequate staffing, and avoiding duplication across ministries.

The sixth workshop, held on April 30, 2025, focused on cybersecurity and attracted over 100 attendees from public institutions, private entities, NGOs, and international organizations. Technical discussions identified four imperatives for Lebanon: proactively audit high-risk assets; define institutional mandates early; resource foundational controls such as patch management and real-time monitoring despite austere budgets; and communicate transparently to maintain citizen confidence. The workshop also addressed security risks posed by emerging technologies, particularly artificial intelligence and weaponized generative models for exploit creation and large-scale phishing. Participants expressed concern over Lebanon's growing brain drain and proposed immediate retention stipends, accelerated career paths, and long-term alignment of university curricula with professional certifications, coordinated by a coalition of government, academia, and industry. Overall, the consultations emphasized three national priorities: (i) mandatory cybersecurity training across the civil service and critical industries; (ii) strong political commitment to cybersecurity and a legally empowered lead agency to coordinate policy with business, academia, and civil society; and (iii) benchmarking progress against recognized standards to ensure transparency and accountability.

In addition to the stakeholder consultation workshops, individual interviews with key stakeholders were conducted throughout 2024, informing project design.

4.2. Summary of Project Stakeholder Needs and Engagement Approaches

The PIU will maintain a commitment to comprehensive stakeholder engagement throughout all phases of the Project. To support this, a consultation meeting will be organized with a diverse group of stakeholders, including public institutions, private entities, telecommunications and data center operators, security agencies, and civil society organizations. During this meeting, a detailed presentation will be given covering the Project overview, relevant environmental and social documents, and the established grievance mechanism (GM), which will be strictly implemented throughout the Project's lifecycle. All discussions and viewpoints expressed by attendees will be carefully documented and formally integrated into the SEP.

During these consultations, stakeholders will receive information on data protection and privacy. It is important to recognize that data privacy relies on robust data protection, which itself depends on effective information security. Digital transformation projects introduce new risks, as implementers must manage personal data, data classification, protection, and security. Implementing agencies must ensure the safeguarding of any information related to an identified or identifiable natural person. The system for protecting public and private data of citizens must comply with applicable laws, decrees, codes of conduct, and decisions issued or approved by the competent authorities—whether currently in effect or established in the future—that oversee data protection within Lebanon's public sector.

The SEP outlines the engagement process, methods—including their sequencing—consultation topics, and target stakeholders. Both the World Bank and the Borrower maintain a zero-tolerance policy toward reprisals or retaliation against project stakeholders who express their views on Bank-financed projects.

4.3. Stakeholder Engagement Plan: Needs, Methods, Tools, and Techniques

Once finalized, the relevant E&S documents, including the SEP, ESCP, and site-specific ESMPs, will be published on OMSAR's website. Additionally, the established GM procedures will be made available on the PIU's website and social media channels. As needed, regular updates on project developments may also be disseminated through these platforms throughout the Project's duration. Should public consultations be held during project implementation, invitations will be broadly circulated via appropriate channels such as the PIU's website, social media, press releases, emails, and phone calls. All disclosed information and public invitations will be communicated in language that is easily understood by the target stakeholders and communities.

More details regarding the consultation methods and timeframe are presented in Table 3 below.

Table 3: Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
During project preparation	Different documents, including the SEP and ESCP, will be presented during consultations.	<ul style="list-style-type: none"> Present an overview of the Project, ESCP, SEP and GM Share project details and gather feedback on project activities Consult on key E&S risks, impacts, and proposed mitigation measures, including the SEP Provide detailed information about the GM 	<ul style="list-style-type: none"> Posting documents on OMSAR's website. Sharing updates, information, documents, and download links via social media. Distributing printouts, leaflets, brochures, and hard copies of documents during consultation meetings Conducting targeted focus group discussions with affected parties, as needed <p>All communications and engagement methods will use language that is clear, easily understandable, and culturally appropriate for the targeted stakeholders.</p>	<p>Affected and interested parties</p> <p>Vulnerable groups</p>	OMSAR
Throughout project implementation	Throughout project implementation and as needed, based on project activities and updates.	<ul style="list-style-type: none"> Provide updates on project progress Consult on key E&S risks, impacts, and measures to address them, including SEP and site-specific ESMPs Share updates on any new E&S risks and impacts Update stakeholders on GM implementation and remind them how to report concerns. 	<ul style="list-style-type: none"> Posting documents on the PIU's website. Sharing updates, information, documents, and download links via social media. Distributing printouts, leaflets, brochures, and hard copies of documents during consultation meetings Conducting targeted focus group discussions or roundtables with affected parties, as needed <p>All communications and engagement methods will use language that is clear, easily understandable, and culturally appropriate for the targeted stakeholders.</p>	<p>Affected and interested parties</p> <p>Vulnerable groups</p>	OMSAR through PIU
Project Completion	End of project	Dissemination of project outcomes and achieved results	<ul style="list-style-type: none"> Environmental and Social Performance Report Project Results and Evaluation Report 	All stakeholders	OMSAR

4.4. Reporting Back to Stakeholders

Stakeholders will be regularly informed about the Project's progress, including updates on E&S performance, SEP and GM implementation, and overall project advancement. At a minimum, one dedicated stakeholder meeting will be held to review project progress and E&S performance, complemented by ongoing information sharing through the PIU's website.

5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1. Resources

The PIU will oversee all stakeholder engagement activities. Once the SEP budget is finalized, it will be formally incorporated into this document. For reference, a sample budget table is included in annex 2.

5.2. Management Functions and Responsibilities

The PIU will be responsible for executing all stakeholder engagement activities. Documentation will include minutes of meetings and detailed notes from consultations. When recordings are planned, attendees will be informed beforehand, and recordings will only proceed with their explicit consent.

6. Grievance Mechanism

The primary objective of the GM is to ensure the timely, effective, and efficient resolution of complaints and grievances, with the goal of achieving mutually satisfactory outcomes for all parties involved. At present, OMSAR does not have an established operational GM for stakeholders and communities. To address this, a dedicated focal point within the PIU will be appointed prior to the start of project activities. This individual will be responsible for developing and implementing a comprehensive GM to be operational throughout the project lifecycle. The focal point will also manage the GM's day-to-day operations, including its regular dissemination to stakeholders, the maintenance of accessible grievance submission channels, the efficient intake and processing of grievances, the upkeep of a grievance log, and the timely resolution and follow-up of all complaints in accordance with defined procedures.

6.1. Description of the GM

The GM process is described in Table 5 below. Prior to the commencement of project implementation, the PIU will develop a structured and comprehensive GM. Once finalized, Table 5 will be updated to reflect the established procedures.

Table 4: Description of the GM Process

Step	Description of Process	Timeframe	Responsibility
GM implementation structure	<p>Prior to the implementation of project activities, the PIU will establish an operational GM to serve stakeholders and communities. A Grievance Focal Point and a Complaint Committee will also be designated within the PIU. In addition, the PIU will develop a detailed process outlining each step and activity within the GM, clearly specifying the roles and responsibilities of all involved parties.</p> <p>The GM structure will be subject to approval by the World Bank and will be implemented throughout the Project's duration.</p>	Before project implementation	OMSAR through PIU
Grievance uptake	<p>Grievances may be submitted through various channels, including:</p> <ul style="list-style-type: none"> • A toll-free telephone hotline operated by a designated staff member • Short Message Service (SMS) • Email • Written letter • In-person submission at a designated physical location • Grievance or suggestion boxes placed at identified sites • Social media platforms • An online submission form available on the PIU's website <p>The specific grievance submission channels to be used for this Project will be finalized and formally documented in the GM prior to project implementation. Following the development of the GM, the SEP will be updated to reflect full details of the established mechanism.</p>	Throughout project implementation	Grievance Focal Point

Step	Description of Process	Timeframe	Responsibility
Registration of complaints and acknowledgement of receipt	Upon receipt of a grievance—regardless of the submission channel—the Grievance Focal Point will promptly update the Grievance Log (Annex 3). Within three working days, the Focal Point will contact the complainant to acknowledge receipt and request any additional information needed to proceed with the resolution process.	Throughout project implementation	Grievance Focal Point
Assessment and investigation	<p>Each grievance will be assessed, and an Assessment Report will be prepared by the designated party or the Complaint Committee within 15 working days of grievance registration. The Grievance Focal Point is responsible for delegating the investigation to the Complaint Committee, depending on the nature of the grievance. The Complaint Committee will review and approve the investigation findings before sharing the report with the complainant.</p> <p>For grievances related to minor issues, the investigation may be completed in fewer than 15 working days. The investigation process will involve a thorough review of the circumstances, interviews with relevant parties, and consultations with stakeholders as needed. The Assessment Report will outline the proposed resolution steps based on the findings.</p> <p>If the proposed resolution entails financial implications, the case will be referred to the PIU Coordinator for further review and decision.</p>	Throughout project implementation	Complaint Committee
Response with a proposed resolution	<p>The local Grievance Focal Point will inform the complainant of the investigation outcome and proposed resolution steps within 20 working days of the grievance's registration. This communication should take place through an in-person meeting whenever feasible and all relevant parties are available. If an in-person meeting is not possible, the discussion may be conducted remotely using communication methods accessible to the complainant.</p> <p>If the complainant accepts the proposed resolution, the agreed actions will be implemented within the designated timeframe. The complainant will then be asked to sign a confirmation of acceptance, allowing the case to be formally closed in the Grievance Log. The target is to resolve and close all grievances within 30 working days of registration.</p> <p>Additionally, feedback will be collected from the complainant to assess his/her satisfaction with both the resolution and the overall grievance process.</p>	Throughout project implementation	Complaint Committee, Grievance Focal Point

Step	Description of Process	Timeframe	Responsibility
Referral to GBV service providers if and as needed	<p>The Project will implement additional measures to manage sensitive and confidential complaints, particularly those related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), in accordance with the World Bank's ESF and the Good Practice Note on SEA/SH. Prior to the commencement of project activities, a formal referral pathway will be developed to ensure that survivors can access appropriate services. All Gender-Based Violence (GBV) complaints will be handled with the utmost confidentiality and will include referrals to qualified GBV service providers, as needed.</p> <p>Reporting procedures for GBV, SEA/SH, and other forms of abuse will be publicly disclosed to ensure transparency and accessibility. Community members will be encouraged to report any witnessed or experienced incidents of violence occurring in or around project sites and associated public spaces. This approach is designed to empower women and girls to safely voice concerns or report incidents during project implementation.</p> <p>Where relevant, awareness campaigns will be conducted to promote safe and anonymous reporting channels, and to inform community members of the redress mechanisms available through the Project and existing local institutions.</p>	<p>Throughout project implementation</p>	<p>Complaint Committee, Grievance Focal Point</p>
Opportunity to appeal	<p>The GM will include a clear appeals process for complainants who are not satisfied with the proposed resolution. In the event an appeal is requested, the local Grievance Focal Point will engage an independent entity—such as a non-governmental organization, civil society group, or independent expert—to mediate the case. This entity will appoint one or more neutral representatives to support the mediation process.</p> <p>At any stage of the grievance resolution process, complainants retain the right to seek independent legal counsel or pursue their claims through the judicial system.</p> <p>To ensure inclusive access, vulnerable groups will receive specific support in lodging grievances. The Beirut Bar Association may provide voluntary legal representation for such individuals, while NGOs involved in the Project may advocate on their behalf and help safeguard their legal rights.</p> <p>The Grievance Focal Point will be responsible for monitoring and following up on the appeals process in a timely and effective manner to ensure swift and appropriate resolution.</p> <p>If all grievance redress avenues have been exhausted and the complainant remains unsatisfied, they will be informed of their right to pursue legal action through formal judicial channels.</p>	<p>Throughout project implementation</p>	<p>Grievance Focal Point</p>

Step	Description of Process	Timeframe	Responsibility
Follow-up and conclusion	<p>Once a resolution has been agreed upon or a decision has been made to close the complaint, the final step will involve implementing the agreed-upon measures, monitoring their effectiveness, and formally closing the grievance case.</p> <p>Where applicable, the E&S Specialist will prepare a “lessons learned” report outlining the root causes of the grievance, the actions taken to resolve it, and the preventive measures adopted to avoid recurrence. These insights will be disseminated throughout the Project team via toolbox talks, visual signage, internal meetings, and other relevant communication channels to foster continuous improvement in the Project’s environmental and social performance.</p>	End of project	Grievance Focal Point

The GM does not replace or restrict access to formal legal remedies available under national law. If a grievance remains unresolved after all steps within the Project's GM have been exhausted, the affected party retains the right to pursue legal action in accordance with national laws, including appeals to the relevant courts.

Both the World Bank and the Borrower maintain a strict zero-tolerance policy against any reprisals or retaliation toward project stakeholders who express their views or raise concerns related to Bank-financed projects.

7. Grievance Mechanism for Workers

The PIU will develop and implement a grievance mechanism for direct workers to address workplace concerns. This mechanism will be established prior to hiring project workers and maintained throughout the entire project duration.

The PIU will also require contractors, including subcontractors, to establish and implement a grievance mechanism for their workforce before commencing work. At a minimum, the workers' grievance mechanism will include:

- A procedure for receiving grievances, such as comment/complaint forms, suggestion boxes, email addresses, telephone hotlines, or designated focal point departments.
- Defined timeframes for responding to and addressing grievances.
- A register to record and track the timely resolution of grievances.
- A designated department responsible for receiving, recording, addressing, and monitoring grievance resolution.

The Supervision Consultant will oversee contractors' grievance recording and resolution activities and report these to the PIU through monthly progress reports. The grievance process will be monitored by the E&S Specialist, a PIU representative who will be responsible for managing the Project's Grievance Redress Mechanism (GRM).

The workers' grievance mechanism will be explained during staff induction trainings, which will be provided to all project workers. The mechanism will adhere to the following principles:

- *Transparency*: Workers can freely express concerns and file grievances without fear.
- *Non-retaliation*: No discrimination or retaliation will be tolerated against those raising grievances, and all complaints will be handled confidentially.
- *Equal consideration*: Anonymous grievances will receive the same attention as those with identified complainants.
- *Responsiveness*: Management will take all grievances seriously and respond promptly and appropriately.
- *Inclusivity*: All workers, including subcontracted staff, may raise concerns or grievances at any time without fear of retribution.
- *Fairness and respect*: All grievances will be handled respectfully and fairly.
- *Timely acknowledgment*: Upon receipt, grievances will be acknowledged within two business days, with information provided on next steps, response timelines, and a contact person.
- *Comprehensive documentation*: All grievances, including those reported directly to supervisors or managers, will be logged in the grievance system.

- *Specialized procedures:* The mechanism will include dedicated processes to address workplace harassment and sexual harassment complaints. These will be managed by trained staff, with complaints securely recorded and stored in a protected database.

Information about the grievance mechanism will be made widely available to all project workers—both direct and contracted—via notice boards, suggestion/complaint boxes, and other appropriate communication channels.

Designated GRM Focal Points will receive training to effectively operate the grievance mechanism while ensuring confidentiality.

Finally, the workers' grievance mechanism will not limit or restrict workers' access to judicial remedies or other legal protections available under national law.

8. Monitoring and Reporting

8.1. Summary of how SEP Implementation will be Monitored and Reported

All stakeholders will be regularly consulted throughout the Project to assess their satisfaction levels and gather suggestions, comments, and concerns. The frequency of feedback collection, as well as the selection of appropriate quantitative or qualitative participatory methods—such as surveys, focus group discussions, and key informant interviews—will be tailored to the Project's evolving needs. Depending on project progress and emerging requirements, the PIU may recommend conducting stakeholder feedback collection every six to twelve months. Additionally, stakeholder and beneficiary feedback will also be obtained through the Project's grievance mechanism.

Quantitative reporting on the implementation of the GM will follow the template below:

Category of grievances	Number of grievances received in the reporting period (e.g. Jan – June)	Number of grievances closed in the stipulated timeframe in the reporting period	Total number of grievances received since the beginning of the project	Number of grievances closed in the stipulated timeframe since the beginning of the project	Total number of open grievances	Number of grievances open for more than 30 days
Total						

8.2. Reporting Back to Stakeholder Groups

The SEP will be periodically reviewed and updated as needed throughout project implementation. Responsible staff will compile quarterly summaries and internal reports on public grievances, inquiries,

and related incidents, including the status of corrective and preventive actions. These reports will be submitted to the Project's senior management and will serve as a key tool for assessing both the volume and nature of complaints and requests for information, as well as the Project's effectiveness in addressing them promptly and appropriately.

Information about public engagement activities conducted during the year will be communicated to stakeholders through various channels, such as beneficiary information sessions, posters, and social media platforms. During these outreach efforts, beneficiaries will be reminded of the grievance mechanism's availability.

Where relevant, the SEP will include tailored measures to ensure the effective participation of disadvantaged or vulnerable groups. This may involve allocating additional resources or adopting specialized communication approaches to engage these groups effectively.

8.3 Citizen Engagement

Efficient and demonstratable citizen engagement (CE) is central to project implementation. CE will be implemented throughout the Project's lifecycle through consultations with civil society to inform about the overall design and ensure responsiveness to user needs, and by ensuring all elements of the Project are planned and designed through participatory processes, as outlined in the SEP. User-centered design principles will be followed for services digitalized by the Project, including focus groups and iterative feedback loops, as well as pilot testing and surveys, to refine digital platforms in real time. Ongoing communication campaigns will build trust and awareness, while citizen feedback and grievance redress mechanisms will allow tracking of citizen inputs. These mechanisms will enable the Project to maintain continuous dialogue with intended users, foster transparency around service offerings, and adapt interventions based on feedback, ultimately promoting more effective and inclusive digital service delivery.

Three indicators will track CE progress: (a) number of public stakeholder consultations held, with actions subsequently taken to respond to concerns; (b) percentage of beneficiaries of digital skills training reporting satisfaction; and (c) project-related feedback received that is addressed and responded to within a timeline that has been specified and publicly communicated by the Project. Women will be specifically targeted in citizen engagement activities through separate consultations in small groups facilitated by a woman to ensure that the activities of the Project are fully accessible to them. Those consultations will also be used to identify any risks to women while taking part in project activities and ways on how to best mitigate them, as well as to assess whether the grievance redress service developed by the Project is accessible and safe for women and responds to the needs of anyone affected by GBV or SEA/SH.

Annexes

Annex 1

The non-exhaustive list below includes the institutions that participated in the stakeholder consultation workshops held on June 11–12, 2024; July 15–16, 2024; January 15, 2025; and April 30, 2025.

List of Institutions Represented
Absega
Alfa Telecommunications
American University of Beirut
Arab Internet and Telecommunications Union
Areeba
Atria Solutions
Audit Court of Lebanon
Bank Audi
Banking Control Commission of Lebanon
Banque du Liban
BLOM Bank
Capital Outsourcing
Center for Educational Research and Development
Central Inspection
Cirrus
Citibank
Civil Service Board
CME Offshore
Critical Infrastructure Technologies Consultancy (CITC)
Customs
Cyber & AI Advisors
Digital Transformation & Governance Network
DxTalks
Edtech Syndicate in Lebanon
General Security
Immersive Labs
Intalio
Internal Security Forces
Internet Society (ISOC) Lebanon Chapter
Interpay
IP Engineering Pro
ITG
Johnson Luke
Lebanese IT Syndicate
Lebanese University
Lebanese Executive Council
Military Court
Mindflares
Ministry of Agriculture
Ministry of Economy and Trade
Ministry of Education

Ministry of Energy and Water
Ministry of Environment
Ministry of Finance
Ministry of Foreign Affairs and Emigrants
Ministry of Industry
Ministry of Interior
Ministry of Justice
Ministry of Labor
Ministry of Public Health
Ministry of Public Works and Transport
Ministry of Social Affairs
Ministry of Telecommunications
Ministry of Tourism
Monty Finance
Murex
National Association for Science and Research
National Cybersecurity Committee
National Poverty Targeting Program
Neumann
Ogero
OMSAR
OMT
Order of Lawyers
Potech
Presidency of the Council of Ministers
Presidency Of The Lebanese Republic
Professional Computer Association
Public Procurement Authority
Reform NGO
Roland Berger Consultants
Saint George University of Beirut
SE Factory
Shelt
Siren
Social Media Exchange (SMEX)
Sodetel
Software Solutions and Consulting
Supreme Council of Defense
Technical and Vocational Education and Training
Telecommunications Regulatory Authority
Touch
UNESCO
Visa
Whish Money
Wicked.Design
World Bank
2S2C-lb

Annex 2

Example of a SEP budget table

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
1. Estimated Staff salaries* and related expenses					
1a. <i>E.g., Communications consultant</i>					
1b. <i>E.g., Travel costs for staff</i>					
1c. <i>E.g., Estimated salaries for Community Liaison Officers</i>					
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. <i>E.g., Project launch meetings</i>					
2b. <i>E.g., Organization of focus groups</i>					
3. Communication campaigns					
3a. <i>E.g., Posters, flyers</i>					
3b. <i>E.g., Social media campaign</i>					
4. Trainings					
4a. <i>E.g., Training on social/environmental issues for PIU and contractor staff</i>					
4b. <i>E.g., Training on Gender-Based Violence (GBV) for PIU and contractor staff</i>					
5. Beneficiary surveys					
5a. <i>E.g., Mid-project perception survey</i>					
5b. <i>E.g., End-of-project perception survey</i>					
6. Grievance Mechanism					
6a. <i>E.g., Training of GM committees</i>					
6b. <i>E.g., Suggestion boxes in villages</i>					
6c. <i>E.g., GM communication materials</i>					
6d. <i>E.g., Grievance investigations/site visits</i>					
6e. <i>E.g., GM Information System (setting up or maintenance)</i>					
6f. <i>Other GM Logistical Costs</i>					
7. Other expenses					
7a. ...					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

Annex 3

Grievance Log

Upon receiving information that a grievance has been lodged by any party, the PIU's E&S Specialist shall promptly record the complaint in the Grievance Log. The Grievance Log will include the following details:

- A unique reference number assigned to the complaint.
- The date and time the grievance was submitted.
- The channel through which the grievance was received (e.g., hotline, email, suggestion box).
- Complainant information, including name, gender, telephone number, preferred contact details, place of residence, and address; the complainant also has the right to submit the grievance anonymously.
- Use of the referral pathway, if applicable.
- A brief description of the complaint, including details such as location and individuals involved, to facilitate the creation of a timeline of events.
- The complaint category.
- An indication of whether the grievance constitutes a major incident requiring reporting to the World Bank within 48 hours.
- The date and time the complaint was closed or resolved.
- Whether the complainant has chosen to appeal the resolution.