



FIS0001140

MDF-EE Public Buildings in Georgia

Municipal Development Fund of Georgia

## Contact

Fichtner GmbH & Co. KG  
Sarweystrasse 3  
70191 Stuttgart

**Antony Humeniuk**


+49 (711) 8995 1930

+49 (163) 8995 806

[antony.humeniuk@fichtner.de](mailto:antony.humeniuk@fichtner.de)

Fichtner GmbH & Co. KG  
Stuttgart Location

## Document approval

	Name	Signature	Position	Date
Prepared by:	Gvantsa Lukava		Social Expert - PMCG	03.12.2025
Checked by:	Antony Humeniuk		Senior Project Manager	03.12.2025
Approved	Antony Humeniuk		Senior Project Manager	03.12.2025

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## Abbreviations and Acronyms

CO <sub>2</sub>	Carbon Dioxide
CSOs	Civil Society Organizations
EE	Energy Efficiency
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GR	Grievance Redress
GRM	Grievance Redress Mechanism
IA	Implementing Agency
MoESY	The Ministry of Education, Science and Youth
KfW	Kreditanstalt für Wiederaufbau (German Development Bank)
LEPL	Legal Entity of Public Law
MDF	Municipal Development Fund of Georgia
NGOs	Non-Governmental Organizations
PAP	Project-Affected Person
PMCG	Policy and Management Consulting Group
PIC	Project Implementing Consultant
PMU	Project Implementing Unit
PWDs	Persons with Disabilities
SEP	Stakeholder Engagement Plan
WB	World Bank

# 1 Introduction/Project Description

## 1.1 Introduction

The present Stakeholder Engagement Plan (SEP) describes the planned stakeholder consultation and engagement process being implemented within the project “Open Programme Energy Efficiency - Programme for Energy Efficiency in Public Buildings in Georgia”. For the purposes of this document, this project will be referred to as the “Project”.

The project aims to improve energy efficiency through reconstruction and modernization of selected public buildings in the education sector (state owned schools) in Georgia and wellbeing of the building’s users. The measures for energy efficiency rehabilitation of the buildings and structural strengthening will provide basic comfort to improve the learning environment for the pupils and teachers. The improvement of EE in public school buildings thereby aims to contributing to climate protection activities through CO<sub>2</sub>-savings and increased user satisfaction.

The Project’s scope envisages modernization of up to 50 schools, which are located in several towns in Georgia. The project activities include works, supplies and services for the rehabilitation of the selected public-school buildings, in particular the implementation of energy efficiency measures, structural reconstruction and modernization, comprising the improvement of energy controlling and optimization of operations of the buildings.

Structural measures are of basic importance for the service ability of the buildings and are related to fire protection, sewerage/drainage systems, roof repairing, façade, electrical power system, structural expansion/reconstruction and other repair works. Comfort measures that increase the comfort and the learning and working conditions of the users, such as renewing of sanitary rooms, improvement of summer heat protection. Lastly, energy efficiency measures are related to additional thermal insulation layers, heating renewal, etc. Within this overview, Consultant will also propose and implement innovative measures, solutions and state of the art materials.

The proposed project will focus on enhancing existing schools owned by the Ministry of Education, Science and Youth of Georgia (MoESYG), located in both urban and rural areas across various regions of the country. The preliminary list includes 50 schools situated in regions such as Guria, Kvemo Kartli, Imereti, Kakheti, Mtskheta-Mtianeti, Shida Kartli, and Samtskhe-Javakheti.



Table 1 - List of schools

#	Region	Municipality	Urban/Rural	School
1	Guria	Ozurgeti	Urban	Ozurgeti #4 Public School
2	Guria	Ozurgeti	Urban	Ozurgeti #2 Public School
3	Kvemo Kartli	Gardabani	Rural	Kesalo Public School
4	Kvemo Kartli	Gardabani	Rural	Vasiani #2 Public School
5	Imereti	Zestafoni	Urban	Zestafoni #3 Public School
6	Imereti	Zestafoni	Urban	Zestafoni #5 Public School
7	Imereti	Chiatura	Rural	Itkhvisi #1 Public School
8	Imereti	Chiatura	Urban	Chiatura #2 Public School
9	Kakheti	Gurjaani	Urban	Gurjaani #1 Public School
10	Kakheti	Sagarejo	Urban	Sagarejo #1 Public School
11	Kakheti	Gurjaani	Rural	Vazisubani Public School
12	Kakheti	Gurjaani	Urban	Gurjaani #2 Public School
13	Kakheti	Telavi	Rural	Karajala Public School
14	Mtskheta-mtianeti	Dusheti	Rural	JINVALI Public School
15	Mtskheta-mtianeti	Dusheti	Rural	Mchadijvari Public School
16	Kvemo Kartli	Rustavi	Urban	Rustavi #24 Public School
17	Kvemo Kartli	Rustavi	Urban	Rustavi #10 Public School
18	Imereti	Kutaisi	Urban	Kutaisi #24 Public School
19	Imereti	Kutaisi	Urban	Kutaisi #40 Public School
20	Imereti	Kutaisi	Urban	Kutaisi #15 Public School
21	Imereti	Tskaltubo	Urban	Tskaltubo #2 Public School
22	Imereti	Tskaltubo	Urban	Tskaltubo #1 Public School
23	Imereti	Khoni	Urban	Khoni #2 Public School
24	Kakheti	Akhmeta	Rural	Kvemo Alvani Public School
25	Kakheti	Akhmeta	Urban	Akhmeta #1 Public School
26	Kakheti	Dedoplistskaro	Urban	Dedoplistskaro #2 Public School
27	Shida Kartli	Gori	Urban	Gori #6 Public School
28	Shida Kartli	Kareli	Urban	Kareli #2 Public School
29	Shida Kartli	Khashuri	Urban	Kashuri #3 Public School
30	Shida Kartli	Gori	Rural	Karaleti #1 Public School
31	Shida Kartli	Gori	Urban	Gori #8 Public School
32	Shida Kartli	Khashuri	Rural	Ali Public School
33	Samtskhe-javakheti	Akhalkalaki	Rural	Vachiani Public School
34	Samtskhe-javakheti	Borjomi	Urban	Borjomi #1 Public School
35	Samtskhe-javakheti	Borjomi	Rural	Akhaldaba Public School
36	Kvemo Kartli	Dmanisi	Urban	Dmanisi #2 Public School
37	Kvemo Kartli	Dmanisi	Urban	Dmanisi #1 Public School
38	Shida Kartli	Khashuri	Rural	Gomi Public School
39	Shida Kartli	Khashuri	Urban	Khashuri #7 Public School
40	Shida Kartli	Khashuri	Rural	Surami #4 Public School
41	Kvemo Kartli	Bolnisi	Rural	Nikhaduri Public School



#	Region	Municipality	Urban/Rural	School
42	Kvemo Kartli	Tetritskaro	Rural	Koda Public School
43	Kvemo Kartli	Marneuli	Urban	Marneuli #6 Public School
44	Kvemo Kartli	Bolnisi	Rural	Ratevani Public School
45	Kvemo Kartli	Tetritskaro	Urban	Tetritskaro #1 Public School
46	Mtskheta-mtianeti	Mtskheta	Rural	Dzalisi Public School
47	Mtskheta-mtianeti	Mtskheta	Rural	Galavani Public School
48	Kvemo Kartli	Rustavi	Urban	Rustavi #16 Public School
49	Kvemo Kartli	Rustavi	Urban	Rustavi #11 Public School
50	Kvemo Kartli	Rustavi	Urban	Rustavi #23 Public School

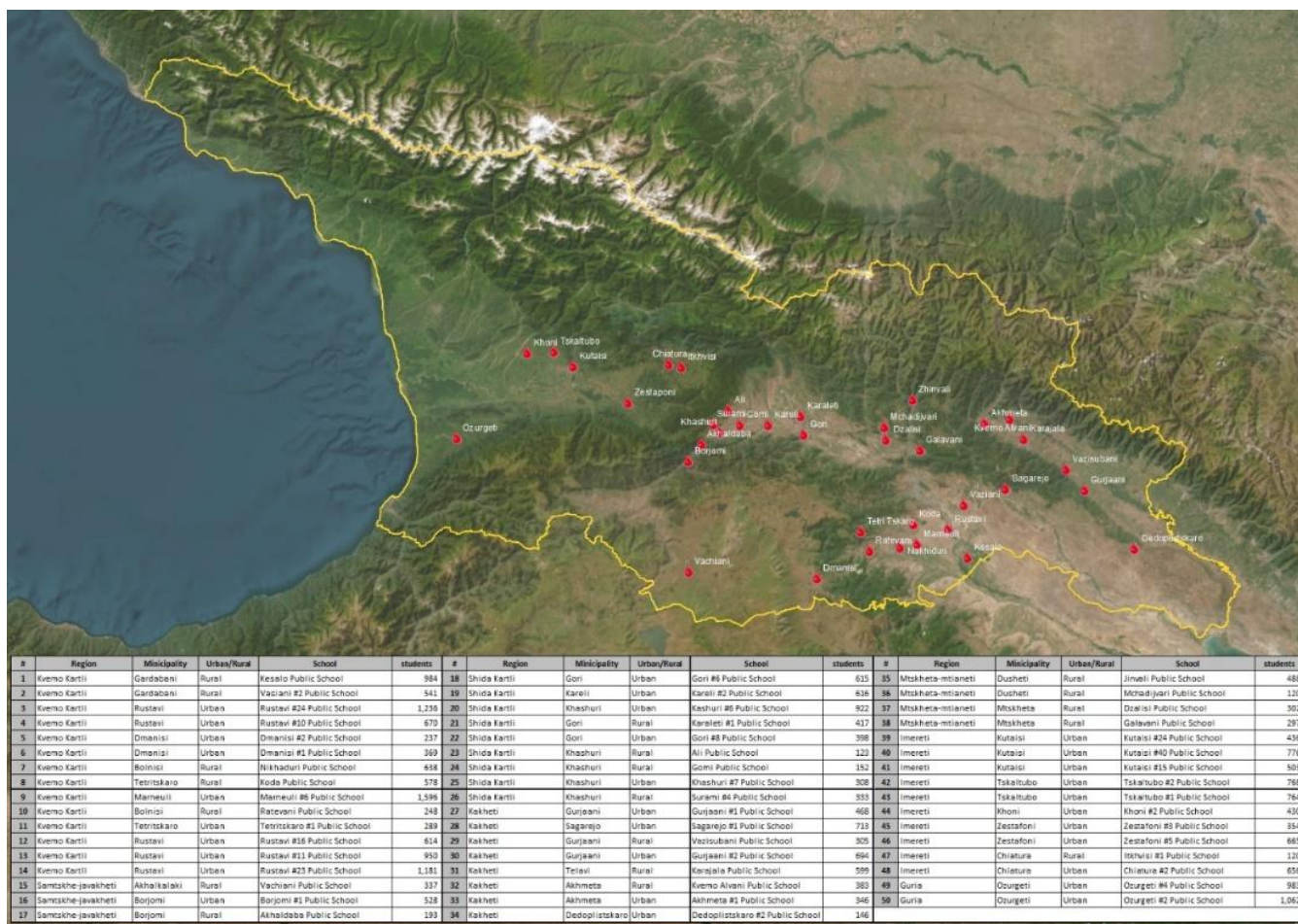


Figure 1 - Map with the approximate school's location.

The work for the rehabilitation of the selected public-school buildings will be conducted in several phases – each phase will concentrate on one cluster of buildings. The scope of services consists of Elaboration of Technical Design, Tendering, Construction, and Defect Notification Period.

The overall implementation period of the Project is estimated to be within 63 months plus 12 months of defects notification period.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agency should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

## 2 Objective/Description of SEP

The Purpose of the Stakeholder Engagement Plan is to establish a comprehensive program for stakeholder interaction, which includes the dissemination of public information and the facilitation of consultations throughout the project's entire lifecycle. This document serves as a general framework, with the understanding that the SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

This SEP delineates the approaches that the MDF together with the Ministry of Education, Science and Youth, the PIC and the Contractor, will use to engage with stakeholders, incorporating a system for stakeholders to express concerns, provide feedback, or lodge complaints about the project and its related activities. Special emphasis is placed on methods to involve groups that are most vulnerable and at risk of exclusion from project benefits.

The Project is committed to ensuring that the stakeholder engagement strategies outlined in this SEP are executed as a reciprocal communication process. This process will:

- Initiate early in the project planning stages to collect initial opinions on the project proposal and to inform the design of the project.
- Actively solicit stakeholder feedback, particularly to shape project design and to engage stakeholders in identifying and mitigating environmental and social risks and impacts.
- Continue throughout the project as risks and impacts emerge.
- Be grounded in the prior dissemination of relevant, transparent, objective, meaningful, and easily accessible information, provided in a timely manner that allows for meaningful consultations with stakeholders. This information will be presented in culturally appropriate formats and in local languages, ensuring it is understandable to all stakeholders.
- Consider and respond to feedback received from stakeholders.
- Foster active and inclusive engagement with those affected by the project.
- Be free from external manipulation, interference, coercion, discrimination, and intimidation.
- Be documented and made publicly available by the Project.

## 3 Stakeholder identification and analysis

### 3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the Project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups (if any) that may be at risk of being left out of project benefits.

### 3.2 Affected parties and other interested parties

Affected stakeholders are individuals, groups, or communities that are directly or indirectly impacted by the project, whether positively or negatively. These stakeholders have a vested interest in the project's outcomes and can either be affected by its implementation or influence its execution. Analyzing these stakeholders, understanding their interests and potential impacts is crucial for assessing how the project will affect the broader community and its various members.

#### **Key stakeholders include:**

- **Public school occupants** - This group includes teachers, students, administrative and maintenance staff. Their direct involvement will be affected by changes to school infrastructure, safety measures, and educational resources. Positive impacts may include improved facilities, while negative impacts could arise from disruptions during construction or changes to school routines.
- **Neighborhood residents near school areas (Residents or business owners if any)** - This group consists of local residents and business owners within the vicinity of the school. Construction activities might affect their quality of life, due to noise, traffic disruptions, or environmental impacts. However, the long-term improvements to the school's infrastructure are expected to enhance the local community, with better facilities potentially raising property values and improving the overall appeal of the neighborhood infrastructure.
- **Parents and guardians of students** - Parents and guardians have a direct interest in the project's outcomes, as it affects the educational environment of their children. Positive impacts include improved facilities and better educational opportunities. However, concerns may arise regarding disruptions to school schedules.

- **Disadvantaged or vulnerable groups** - This includes students with disabilities, students from lower-income backgrounds, and elderly teachers. Vulnerable groups may experience both positive and negative impacts. The project has the potential to improve accessibility and inclusion, but careful planning is needed to ensure that these groups benefit equally from the improvements and are not overlooked during construction or in the design of new facilities.

## Broader Stakeholders

In addition to those directly affected by the project, there are several broader stakeholders who play important roles in the success of the project and its wider impact. These include:

- **National Government Agencies** - The Ministry of Education, Science and Youth (MoESY) and the Municipal Development Fund (MDF) are key stakeholders in overseeing and supporting the project's alignment with national and local development goals. Their interests are to ensure that the project adheres to educational and environmental policies, as well as to monitor project progress. Potential impacts include the need for additional oversight, approval processes, and coordination with other government initiatives.
- **Project Implementation Company (PIC) Fichtner** - The project implementation company plays a central role in managing and overseeing the execution of the project. Their interest lies in ensuring the project is completed on time, within budget, and to the specified standards. Their activities could impact local communities through decisions made during the construction phase and the need for local resources.
- **International and Local NGOs and Civil Society Organizations** - NGOs may have interests in ensuring the project is inclusive, environmentally sustainable, and that it benefits the local community in the long term. Their involvement may be centered around safeguarding human rights, supporting vulnerable groups, and ensuring that the project aligns with international best practices. Local community-based organizations can help to ensure the project benefits vulnerable populations, such as by providing social support or promoting local involvement.
- **National and Local Media Entities** - The media plays a role in keeping the public informed about the progress and challenges of the project. Media coverage can shape public opinion and influence the project's reputation.
- **Business Owners and Service Providers** - Local businesses in and around the school areas are important stakeholders who may be impacted by the rehabilitation project. During construction, businesses could experience disruptions such as changes in foot traffic, temporary road closures, or noise that may affect customer visits. Additionally, service providers may face delays in deliveries or other logistical challenges. However, once the rehabilitation is completed, the improvements to the school infrastructure may lead to increased demand for local services and goods, potentially boosting economic activity in the area. Enhanced school facilities could also attract more families and communities to the neighborhood, leading to higher consumer spending and longer-term benefits for local businesses.
- **Utility Service Providers** - Utility companies (water, electricity, waste management) may be impacted by the project, especially if infrastructure upgrades are required. Their interests revolve around maintaining service continuity, coordinating with the construction timeline, and managing any service disruptions during implementation.

## Additional Stakeholders

- **Financing Entities** - These are the organizations or institutions providing financial support for the project, including international financial institutions such as KfW. Their primary interest is ensuring that the project is financially sustainable, meets its objectives, and delivers value for money. They will also have concerns about the environmental and social impacts of the project and its alignment with their funding criteria.
- **Construction Companies** - Construction companies are integral to the physical work of the school rehabilitation. Their interests lie in completing the project within the prescribed time and budget while adhering to safety and environmental standards. The construction phase may cause temporary disruptions, but it also creates opportunities for local employment and skill development within the community.
- **Local Municipalities** - Local municipal authorities have a significant interest in ensuring that the rehabilitation of public schools aligns with broader urban development plans and contributes positively to the community. Additionally, the municipality plays a key role in facilitating community engagement by providing a platform for local residents and stakeholders to voice their concerns and offer feedback.

## Stakeholder Analysis and Potential Impacts

Each stakeholder group has varying degrees of interest and potential impact. Stakeholder interests often center around ensuring that the project is beneficial to their community or organization while minimizing any negative consequences. The project team must engage these stakeholders effectively to address their concerns, provide transparent communication, and ensure that any potential risks are managed. A stakeholder engagement plan Summary (Table 2) is developed to outline how each group will be engaged throughout the project lifecycle, from planning through to implementation.



### 3.3 Disadvantaged/vulnerable individuals or groups

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

- Persons with disabilities and learners with special educational needs;
- Ethnic minorities;
- Single-parent households and socially vulnerable families (low-income or unemployed households);
- Elderly school employees;

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.



## 4 Stakeholder Engagement Program

### 4.1 Summary of stakeholder engagement done during project preparation

Stakeholder engagement activities have not yet commenced, so a summary is not available at this time. This section will be updated with detailed information once the engagement process begins (*Annex A: Template to Capture Consultation Minutes*).

### 4.2 Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below. To address these needs, various engagement methods and tool such as public meetings, community consultations, focus group meetings (if needed), one-on-one interviews (if needed), information dissemination, site visits and a grievance redress mechanism will be employed. These are tailored to each stakeholder group and are summarized in Table 2 below.

### 4.3 Stakeholder engagement plan

The Stakeholder engagement plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders.

Table 2 - SEP Summary Table

Project Stage	Target Stakeholders	Topic of Consultation/ Message	Method Used	Responsibilities	Frequency/Timeline
Pre-Construction	School Head; School maintenance personnel	Presentation of Proposed Project, Initial Detailed Design, Project ESMF, ESMP and SEP, Project Risks and Impacts, GRM, Project Benefits	One-on-one interviews; correspondence by phone/email; disclosure of Project documentation in a culturally appropriate and accessible manner on MoESY and MDF websites, community meetings	MoESY, MDF, PIC,	At least one general meeting prior to conduct of site Assessment
	Parents and representative groups, Parent-Teacher Association (PTAs); Student Leader/Council	Presentation of Proposed Project, SEP, Project Risks and Impacts, Project ESMF and ESMP GRM, Project Benefits	Disclosure of Project documentation in a culturally appropriate and accessible manner, community meeting	MoESY, MDF, PIC	At least one general meeting
	PWDs, learners with special educational needs; Ethnic minorities; Single-parent households and socially vulnerable families; Elderly school employees;	Presentation of Proposed Project, Scope of Functional Improvements, GRM, Project Benefits,	Disclosure of Project documentation in a culturally appropriate and accessible manner, community meetings	MoESY, MDF, PIC	At least one general meeting, as needed throughout the project
	Utility Service Providers	Coordination on Utility Disruptions	Direct Consultations / correspondence by phone/email	MDF, PIC, Contractors	As needed throughout the project

Project Stage	Target Stakeholders	Topic of Consultation/ Message	Method Used	Responsibilities	Frequency/Timeline
	Local NGOs and Civil Society Organizations (CSOs) if any	Project Transparency, Community Benefits, and Accountability, Non-technical summary of the Project	Disclosure of Project documentation in a culturally appropriate and accessible manner, community meetings	MDF, PIC	At least one general meeting, as needed throughout the project
	Local Government Authorities	Non-technical summary of the Project, Road safety and accessibility, Project Timeline and updates	Coordination Meetings	MDF, PIC	Regular coordination throughout the project
Construction	Relevant Government Agencies	Coordination with regulators and partner government agencies	Group meetings	MoESY, MDF	As needed
	Households and Business Representatives near the construction area	Monitoring the effectiveness of mitigating measures and addressing community grievances/feedbacks	Public consultations, Notice Board, Information Desks	MDF, PIC, Contractors	Continuous during construction, at least annually
	School Heads; School maintenance personnel	Compliance of contractors to the site-specific ESMP; addressing issues during construction.	Regular meetings	MDF, PIC, Contractors	Continuous engagement during the construction works
	Community leaders; Parent-Teacher Association (PTAs); Student Leader/Council	Monitoring the effectiveness of mitigating measures and addressing community grievances/feedbacks	Information Desks, Public meetings	MDF, PIC, Contractors	As needed, continuous during construction

Project Stage	Target Stakeholders	Topic of Consultation/ Message	Method Used	Responsibilities	Frequency/Timeline
	Commuting Public and Nearby Communities	Monitoring the effectiveness of mitigating measures and addressing community grievances/feedbacks	Information Desks, Public meetings	MDF, PIC, Contractors	As needed, continuous during construction
	Local Government Authorities	Compliance of Contractors to the site-specific ESMP; concerns and issues arising during construction / Monitoring the effectiveness of mitigating measures and addressing community grievances/feedbacks	Coordination Meetings	MDF, PIC, Contractors	As needed, continuous during construction

## 4.4 Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the Stakeholder Engagement Plan and Grievance Mechanism, and on the project's overall implementation progress.

## 5 Resources and Responsibilities for implementing stakeholder engagement activities

### 5.1 Resources

MDF is responsible for the SEP implementation. PIC in coordination with MDF will be in charge of stakeholder engagement activities. The indicative budget for SEP implementation is presented in Table 3.

Table 3 - Indicative resources

Category	Allocated Budget
<b>1. Staff and Training</b>	
Dedicated staff for implementing SEP activities, including coordination and communication efforts.	Consultant - Stakeholder Engagement Expert. Costs of salary staff included in Consultant's budget (13.5 man-month).
Capacity-building training for stakeholders, such as contractors, PIU staff, and community representatives	Consultant - Training and capacity building Expert. Costs of salary staff included in Consultant's budget (0.85 man-month).
<b>2. Communication Materials</b>	
Design, production, and installation of informational boards.	2,000 EUR
Leaflets, posters, and brochures to ensure effective dissemination of key project details.	2,000 EUR
<b>3. Grievance Mechanism</b>	
Installation of suggestion/grievance post- box facilities. Development and distribution of grievance mechanism communication materials.	2,000 EUR
<b>4. Other Expenses</b>	
Regular monitoring and evaluation of the SEP activities to assess progress and address any challenges.	Consultant - Stakeholder Engagement Expert. Costs of salary staff included in Consultant's budget (12.5 man-month), including salary and travel expenses.

## 5.2 Management functions and responsibilities

The LEPL Municipal Development Fund of Georgia is the Project Executing Agency. The MDF is responsible for the implementation of project activities including SEP implementation. This includes communication with project beneficiaries through various communication channels.

The Ministry of Education, Science and Youth is the legal owner of all public-school buildings in Georgia and will be responsible in participation in the implementation of the SEP and resolution of complaints. This includes communication with project beneficiaries through various communication channels.

The PIC, comprising of international consulting company Fichtner the PIC will be responsible for the design and implementation phases of the project. This includes ensuring financial, logistical, environmental, and social management and compliance, as well as planning, supervising, and monitoring SEP activities, assisting MDF, and reporting.

The stakeholder engagement activities will be documented by the PIC through:

**Feedback Mechanisms** - Stakeholder input will be recorded during consultations, meetings, and surveys, with details such as meeting minutes, attendance sheets, and signed participant lists.

**Grievance Redress Documentation** - All grievances will be registered, tracked, and documented through the GRM, with updates and outcomes documented systematically.

**Regular Reporting** - SEP activities, including engagement summaries, challenges, and progress, will be compiled in periodic reports shared with the MDF and other relevant stakeholders.



## 6 Grievance Mechanism

### 6.1 Description of GRM

A Grievance Mechanism is a structured process designed to receive, assess, and resolve complaints or concerns raised by stakeholders, particularly those affected by a project. It serves as a communication channel between project implementers and stakeholders, ensuring that issues are addressed promptly and fairly.

In addition to handling complaints, the Grievance Mechanism should actively encourage and collect feedback and suggestions from stakeholders. This can help identify areas for improvement and foster a collaborative relationship between the project team and stakeholders.

The GRM covers all aspects of a project's lifecycle, from preparation through implementation, addressing a wide range of issues, including environmental and social impacts.

Key Requirements of GRM:

- The GRM must be accessible to all stakeholders, including vulnerable groups. It should be available in local languages and should not involve complicated procedures or costs for the complainants.
- The process should be transparent, with clear information provided about how grievances can be submitted, processed, and resolved.
- The GRM should include specific timelines for acknowledging, assessing, and resolving grievances.
- The mechanism should ensure the confidentiality of the complainants to protect them from any form of retaliation.
- The GRM must be inclusive, ensuring that all affected people, particularly those from vulnerable groups, are aware of the mechanism and can access it easily.

#### **GRM Procedures**

MDF operate a Grievance Redress Mechanism (GRM), established previously in-line with international best practice. Any comments or concerns can be brought to the attention of the company verbally or in writing or by filling in a grievance form. The grievance form and information on the procedure (including contact persons) will be made available for the attendees during consultations, meetings. Information banners displaying the GRM contact person's details, grievance box and grievance forms (anonymous) will also be placed at each construction site.

GRM contact person will be designated from MDF as well as from MoESY. All grievances, including anonymous submissions, will be recorded in the GRM log. Supervision company, MDF and MoESY will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

Complaints can be submitted in written and verbal form, to MDF by email ([feedback@mdf.org.ge](mailto:feedback@mdf.org.ge)) or by phone call/message (+995 598 88 20 19), to MoESY (577 96 39 67, mail: [dtskitishvili@mes.gov.ge](mailto:dtskitishvili@mes.gov.ge)). Phone number of Supervision consultant will also be displayed on information banner.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- Stage 1 – Contractors with supervision company receives and solves complaints. If at Stage 1 the project-affected person's (PAP) complaint is not solved, the PAP should be informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. MDF will be aware of all the grievances submitted at Stage 1 through the logbook, and will monitor their resolution remotely.
- Stage 2 – MDF receives and solves complaint. A Grievance Redress Committee exists at MDF to resolve complaints (*Annex B: MDF GRC Chart*).

The PAP has the right to apply to the Court in case his/her complaint was not resolved on the Stage 1 and Stage 2.

Grievances can be submitted either on site by using grievance box or using other channels such as e-mail, phone number. The grievance forms will be available on site and stakeholders can fill anonymous complaints if needed. If grievances are submitted on site, contractors will be responsible for logging complaints and solve them according to Stage 1. In case contractor cannot solve the complaint MDF will be involved in the process as it is described on Stage 2. The supervision company will be responsible for receiving complaint log from contractors and sharing it to MDF. Stakeholders have the opportunity to use one of the stages for submitting grievances. They can directly apply to stage 2. (*Annex C. Grievance Form*)

All verbal or written complaints or grievances will be logged immediately after receiving to the contractors or to MDF. Complaints will be responded according to Georgian legislation. They are to be acknowledged within 2 working days and responded (first response) within 10 working days. A resolution is expected within 30 working days or more, depending on the complexity of the issue.

MDF will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt.

### Workers Grievance Mechanism

The Contractors, for the construction phase shall implement an independent grievance management system to enable the workers to raise reasonable workplace concerns. This includes complaints related to non-compliance with Health and Safety matters, discrimination cases and non-consideration of equal opportunities; working conditions; salary, etc. The Labor Grievance Mechanism should be described in detail in the Labor Management Procedures.

## 6.2. Information Disclosure for Grievance Mechanism

To ensure an effective GRM, providing stakeholders with clear, accessible, and timely information about the project is essential. Proper information disclosure helps manage expectations, prevent misunderstandings, and encourages community involvement. Therefore, a comprehensive communication plan will be implemented to disclose project information across various platforms.

### Key Information Disclosure Methods:

- **Public Information Events** - Information sessions and public consultation events will be organized, particularly in schools and surrounding communities. These events will be held at key stages of the project to inform stakeholders about upcoming activities, timelines, and the GRM process. They will also provide opportunities for stakeholders to ask questions and provide feedback directly to the project team.
- **Construction Site Information Boards** - Information banners and signs displaying GRM contact details, grievance boxes, and forms (for anonymous complaints) will be placed at each construction site. These will be easily accessible to all stakeholders and will clearly explain how to submit grievances, as well as the available channels for feedback (e.g., email, phone, in-person).
- **Community Outreach** - In addition to public events, the project team will engage with local community groups, schools, and other stakeholders to raise awareness of the GRM and encourage active participation in the grievance process.
- **Official websites** of the MoESY and the MDF.

## 7 Monitoring and Reporting

### 7.1 Summary of how SEP implementation will be monitored and reported

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

### 7.2 Reporting back to stakeholder groups

MDF's and the Project Implementing Consultant's safeguard/stakeholder engagement will keep Project-Affected Persons and other stakeholder groups informed through various communication channels, including phone calls, emails, and meetings (private or public) organized by the project. Public meeting announcements will be posted on school noticeboards and in other public gathering spaces. Quarterly reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

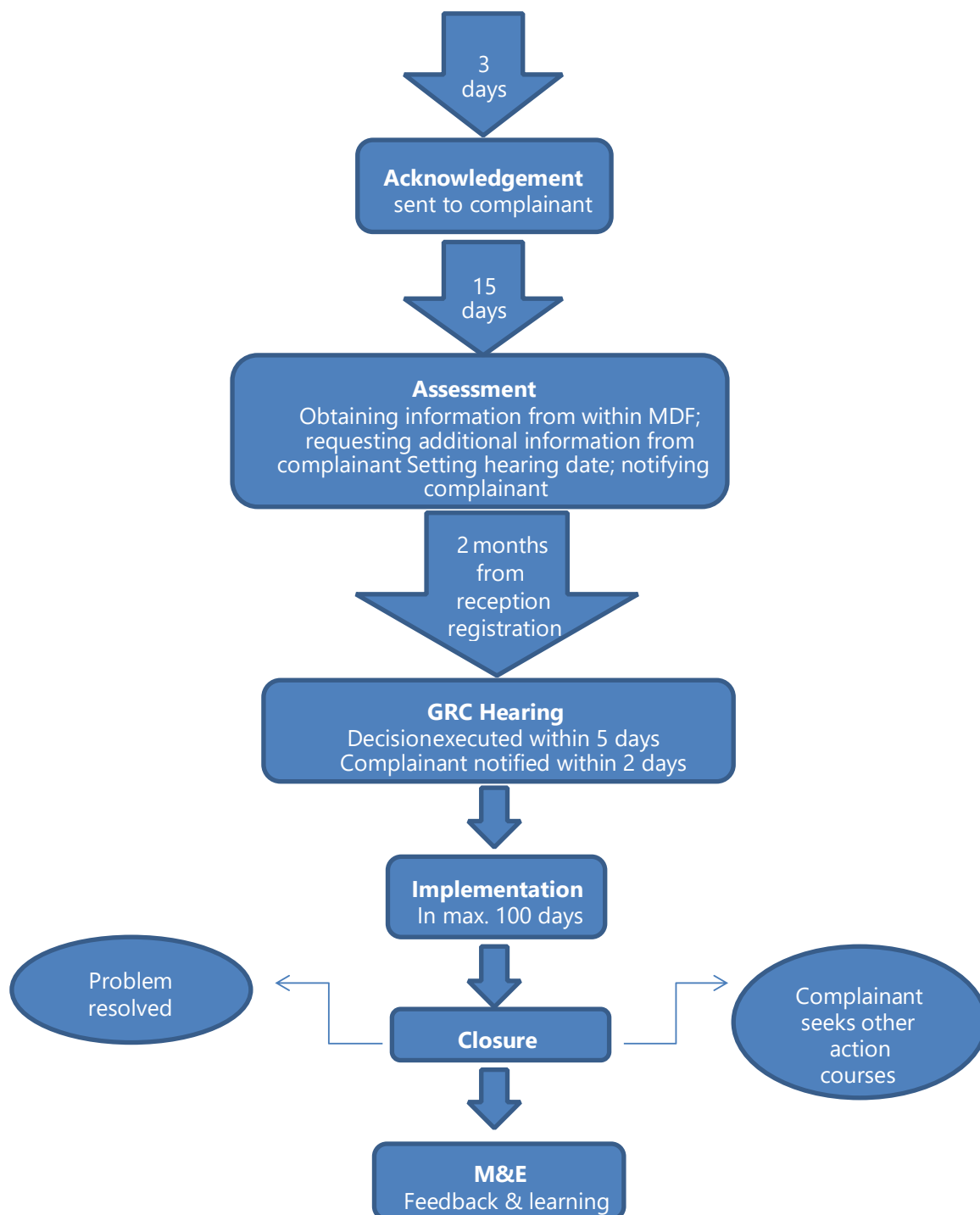
Monitoring reports documenting the environmental and social performance of the Project will be prepared by the project implementing consultants' safeguard team and submitted to MDF on a quarterly basis and to KfW annually. These reports will include a section on stakeholder engagement and grievance management.

## Annexes

### Annex A: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)

## Annex B: MDF GRC Process Chart



## Annex C. MDF Grievance Form



### Your Feedback is very important for us

*Remember that your feedback may be our opportunity to fix problems better and improve our activities*

### Share your feedback with us

1. Project name / Work Location - Municipality, Borough, Village, Town, Street

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2. Comment ☐ Information ☐ Suggestion ☐ (Please fill in case of sharing only comments, information or suggestion)

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3. Complaint ☐ (Please fill in case of making complaint )

Descriptions of the issue :

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Request:

**If you would like your feedback to remain anonymous, please provide only a date in the box below**

Date:	Phone number:
Full name: ID:	Address:
E-mail:	Signature:

## Annex D. Generic Schedule for Stakeholder Engagement Activities

Stakeholder engagement activities will be conducted in alignment with key project phases to ensure transparency and accessibility. The exact schedule of stakeholder engagement activities will be determined as the project progresses. Consultations will follow the structure outlined below:

**Pre-Construction** - Prior to site assessments and finalization of project design, consultations will be conducted with key stakeholders, including school administrations, parents, student representatives, and vulnerable groups. These meetings will focus on presenting project details, risks, benefits, and the GRM. At least one general meeting will be held for each stakeholder group, with additional consultations as needed.

**Construction** - Continuous engagement will be maintained to monitor mitigation measures and address stakeholder concerns. Consultations with school personnel, local authorities, and affected communities will be conducted through public meetings, information desks, and regular coordination sessions. Households and businesses near the construction area will be informed through notice boards and direct communication.