INTERIM ADVICE FOR IFC CLIENTS ON SAFE STAKEHOLDER ENGAGEMENT IN THE CONTEXT OF COVID-19

The current COVID-19 pandemic presents many challenges globally, including for IFC clients, who provide key products and services, as well as jobs and livelihoods for workers and their families. Preventing the spread of COVID-19 through their operations and within the communities where they operate is of paramount importance for all companies and for society in general. Because of the outbreak, many countries have mandated measures that will affect the way IFC clients engage with communities and other stakeholders to manage environmental and social (E&S) risks for their operations and to maintain constructive relationships. Since engagement is at the core of IFC's Performance Standards, it is imperative for IFC and its clients to explore different approaches and alternatives for communicating with their stakeholders. The engagement processes should be conducted through safe but effective channels, while adhering to the health directives issued by applicable national and local authorities.

The main objective of this Interim Advice is to assist IFC clients in identifying alternative approaches and mechanisms for engaging stakeholders, for continuing to deliver project-related information to the communities within their areas of operations and for receiving feedback, while taking all feasible steps to protect the health and safety of those involved. Due to COVID-19 circumstances, it may not be possible for companies to conduct stakeholder engagement as they would under normal circumstances. This document presents a framework for developing alternative approaches to engagement and access to grievance mechanisms offering advice on key aspects of decision-making and other relevant issues.

CONSIDERATIONS FOR DESIGNING A SAFE PARTICIPATION AND ENGAGEMENT PROCESS

As a result of mandated social distancing, and in some cases restrictions of movement and large gatherings, many clients and their operations have been required to limit activities, including those related to stakeholder engagement, consultation processes linked to new and existing projects, community development projects, ongoing resettlement and compensation programs, and other income-generating activities (for example, local services provided to operations) and managing grievances.

Developing safe and effective COVID-19 stakeholder engagement and grievance management is an important part of maintaining a proactive communication process and providing communities with information in a timely manner. Key elements to consider during the development of a robust interim stakeholder engagement process to support communication and sharing of information include the following:

Define a clear protocol for external communications and designate points of contact based on the company's existing protocols and communications contingency planning.

Closely monitor health advisories and guidelines so that any stakeholder engagement activity conforms to applicable national and local regulations, as well as advice and guidance from national and international health authorities. Given the dynamic nature of the COVID-19 situation, companies should be able to adapt their approaches to deal with new or modified requirements.

Creating Markets, Creating Opportunities

Identify critical E&S risks of the company's operations that could be exacerbated by COVID-19 and communicate these and the corresponding mitigation measures to deal with these risks to stakeholders. Examples include measures taken: to protect workers and surrounding communities; to address situations resulting from workers influx; to address the risk of potential excessive use of force by security forces that may result from enforcement of movement restrictions; and to deal with the possibility of increased public surveillance and retaliation in cases of workers or general community members protesting the suspension of their economic livelihoods.

Identify critical stakeholder engagement activities that were planned or ongoing prior to the outbreak to define essential and nonessential activities. Decisions to continue planned activities and/or to commence new ones should be taken based on a thorough understanding of the potential risks of exposure to the company's employees, any consultants engaged by the company to conduct such activities and stakeholders, including communities, and equally important, the potential implications for stakeholders, communities, and the company of not undertaking these activities at this time.

Design or adapt multiple channels of outward communication and access to the company's grievance mechanism that reflect the local context (urban or rural), the current situation, and different project activities, while at the same time taking all feasible steps to protect the safety and confidentiality of employees, consultants, stakeholders, and community members. Radio announcements, mobile phones, and announcements on bulletin boards are methods that can be used to provide specific information as well as to disseminate the various channels of communication that are available. In some contexts, there may be fear of increased surveillance, violence, or arrests of workers, civil society and community members (who express concerns), carried out by governments, security forces, or other actors, who may be able to act with greater impunity during lockdown. Creating secure communications channels, such as encrypted apps (with 2-factor authentication enabled, like WhatsApp), can provide safer communications channels.

Build on and coordinate with established national/regional/local platforms currently being used as communication forums and tools in response to COVID-19. Companies can use these channels and adapt them for their projects.

Identify existing channels and social structures (for example, community leaders, community-based organizations, and women's cooperatives) in situations where communities or a subset of a community have limited connectivity and access to technology, or where there are literacy issues. By utilizing existing social structures and identifying the preferred communication method(s), companies can disseminate information and engage target audiences while adhering to government directives related to safety, group sizes, and social distancing.

Pay attention to vulnerable, marginalized, and remote groups as they assess options available to them for consultation in the context of COVID-19, including identifying potential barriers to achieving meaningful engagement (for example, where in-home isolation and gender roles may limit participation, or where physically disabled people have limited access) and design an outreach approach that supports access and participation. In situations where indigenous peoples are present, impacts associated with COVID-19 may be magnified and thus additional precautions should be taken. In some contexts, project stakeholders who raise concerns or voice opposition may be at higher risk of retaliation, for example through movement restrictions, increased surveillance, or the presence of security forces. Providing safe avenues for workers and communities to raise grievances should be put in place, their presence communicated and made easily accessible.

Understand operational challenges to communicating important messages, including connectivity, information technology (IT) literacy, remoteness, violation of privacy, fear of retaliation, trust issues, concerns about surveillance, and reluctance to rely on proposed alternatives.

Review and adjust engagement approaches to reflect changes in circumstances and applicable national and local regulations surrounding COVID-19. Maintain flexibility to adapt approaches and respond to these changes in order to better meet the objectives of the engagement process and grievance management.

SAFE STAKEHOLDER ENGAGEMENT AND DISCLOSURE OF INFORMATION

Companies should consider (a) the design of an interim stakeholder engagement process, and (b) alternative approaches to engagement. The guidance below is intended to inform development of a robust engagement process and grievance mechanism in the context of COVID-19 that: i) enables two-way communication; ii) prioritizes engagement activities; iii) communicates timely updates; iv) is accessible to different groups; v) is culturally appropriate and context specific; and vi) provides timely resolution of complaints and protects against retaliation.

A. Design of an Interim Stakeholder Engagement Process:

Companies should design an interim process or adapt an existing program that is commensurate with the current level of risks, project activities, and concerns raised by the stakeholders and communities. To manage expectations, companies are advised to clearly communicate the limitations of the interim approach and the extent of what goals a company can or cannot achieve until it resumes normal operations.

Stakeholder Engagement, Information Disclosure and Grievance Mechanism

COVID-19 Impacts on Engagement & Related Activities	Safe Stakeholder Engagement	Information Disclosure	Grievance Management
How has C-19 impacted community engagement and other critical or time sensitive activities? Has the company communicated these disruptions to the communities?	Identify C-19 specific stakeholder engagement methods that the company can implement considering its operational context, and in some cases potential heightened risks of reprisals (e.g. government surveillance, security force presence).	Identify the types of information for disclosure and safe approaches for dissemination.	Consider alternative grievance management channels. Identify protocols for protections against retaliation. Communicate to complainants how open complaints will be handled. Reinforce to stakeholders their ability to raise issues safely via the grievance mechanism, without fear of retribution.
Examples: Discontinuation of engagement activities related to community development, resettlement/compensation programs, restricted access to villages, suspension of local sourcing, etc.	Examples: virtual, remote, and safe engagement approaches such as online communication tools, audio options, offline communication channels.	Examples: online platforms, and nonelectronic communication channels.	Examples: secure online and offline channels for grievance receipt and resolution.

B. Alternative Approaches to Engagement: Prior to designing virtual engagement and remote participation processes, companies should:

- Identify essential stakeholder engagement activities (such as coordination with local government and health authorities, regular communication of delays in E&S assessment or mitigation implementation, handling of environmental and social impact assessment (ESIA) consultations, resettlement processes, and grievance management), and assess the purpose of the engagement activities and the desired outcomes;

- Prioritize critical engagement activities (for example, ESIA completion and design of mitigation) and consider virtual and remote alternatives that best meet the objectives of the planned activities;

- Analyze factors such as access to and quality of connectivity, use of social media platforms, mobile phone coverage, internet access, mobile network providers, language barriers, and alternate nonelectronic engagement channels to provide a range of options to meet different stakeholders' needs; and

- Evaluate options for providing alternate secure channels for grievances to protect complainants against potential retaliation. These options should consider factors such as accessibility, confidentiality, privacy, anonymity, digital protections, and secure communication through electronic and nonelectronic methods (for example, encrypted apps).

Based on these considerations, companies are advised to tailor a program that utilizes a diversified set of communications tools and formats.

Virtual and Nonvirtual Communication Channels

Online Communication Channels – Information Dissemination	Online Communication Channels Stakeholder Engagement	Non-electronic Communication Channels	Specific Considerations for Vulnerable and Marginalized Groups
Digital platforms, social media, and messaging platforms (Facebook, Twitter, WhatsApp), company websites and online community forums for posting project information related to E&S and critical activities.	Online stakeholder engagement workshops, webinars using live web streaming (such as YouTube, Vimeo).	Traditional/religious leaders, community based organizations, networks (such as women and youth groups, etc.) to disseminate information and gather feedback.	Tailored engagement (language, cultural and accessibility barriers factors). Accessible formats such as print material in Braille or large fonts or pictorial.
Partner with mobile networks to push alerts (such as when information is posted online, and dates/time for online engagement), surveys or questionnaires related to resettlement activities, etc.	Virtual consultation seeking feedback via email, text messages, feedback forms on dedicated project webpage.	Public announcements (such as community billboards, TV, radio, newspapers, standard mail). Pictorial leaflets, printed materials (written and visual project information).	Multiple communication options, such as closed captioning for video/conference calls, or sign language in meetings, audio provision, and graphics.
Develop a dedicated project webpage to share project information and post announcements. Provide a secure grievance portal for logging, tracking, and communicating directly with complainants.	Recorded messages posted to webpage, shared through social media with options to submit questions, feedback. Leverage encrypted message apps (e.g. WhatsApp), to share information and engage with stakeholders, especially in contexts where fears of government surveillance/retaliation may be high.	Radio programs to share information, host live engagement sessions with call-in options for Q&A and providing feedback.	Communication channels accessible to vulnerable stakeholders to enable participation and raise grievances (such as secure telephone hotlines or a trusted local focal point).

COVID–19 SPECIFIC COMMUNICATION TO STAKEHOLDERS

COVID-19-driven changes to company operations that may have community impacts should be communicated. These may include, but are not limited to:

- Changes to project activities – construction and/or operations as a result of COVID-19;

- Changes to delivery of community development programs;

- Changes to implementation schedules of resettlement and livelihood restoration programs;

- Changes to employment, sourcing from local business, and so forth;

- Changes to project security arrangements, such as an increased public security presence in project areas;

- Changes to timelines for resolving open grievance cases; and

- New or modified health awareness communication campaigns related to COVID-19 that are coordinated with relevant authorities and based on information from recognized sources, such as the World Health Organization (WHO).

IFC clients and users of this document are expected to follow advice from applicable national and local authorities and international health organizations (such as WHO) regarding measures to prevent and manage outbreaks of COVID-19 in the workforce and communities where they operate. The dissemination of information related to measures to prevent COVID-19 is an effective way to reduce the risk for both the company, its employees and workforce and surrounding communities.

This Interim Advice should be read in conjunction with the following IFC COVID-19 documents (available from www.ifc.org/sustainabilitypublications):

- Interim Advice for IFC Clients on Preventing and Managing Health Risks of COVID-19 in the Workplace

- Interim Advice for IFC Clients on Supporting Workers in the Context of COVID-19

- Interim Advice for IFC Clients on Developing a COVID-19 Emergency Preparedness & Response Plan

- Corporate Governance Tip Sheet for Company Leadership on Crisis Response

---

ANNEX 1. SOURCES AND USEFUL LINKS:

European Union CDC COVID-19 page https://www.ecdc.europa.eu/en/novel-coronavirus-china

United Nations – COVID-19 page: https://www.un.org/coronavirus

United States CDC – COVID-19 page https://www.cdc.gov/coronavirus/2019-ncov/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Fnovel-coronavirus-2019.html

United States OSHA (2020) Infectious Diseases Website https://www.osha.gov/SLTC/healthcarefacilities/infectious_diseases.html#cdc_guidelines

WHO COVID -19 page: https://www.who.int/emergencies/diseases/novel-coronavirus-2019

COVID-19. WHO (2020) *Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19. Preparedness and Response.* https://www.who.int/publications-detail/risk-communication-and-community-engagement-(rcce)-action-plan-guidance

United Nations, The Inter-Agency Standing Committee, COVID-19: *How to include marginalized and vulnerable people in risk communication and community engagement.* https://interagencystandingcommittee.org/covid-19-how-include-marginalized-and-vulnerable-people-risk-communication-and-community-engagement

WHO (2020) Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV). https://www.who.int/publications-detail/risk-communication-and-community-engagement-readiness-and-initial-response-for-novel-coronaviruses

WHO (2020) *A guide to preventing and addressing social stigma associated with COVID-19.* https://www.who.int/docs/default-source/coronaviruse/covid19-stigma-guide.pdf

---

Learn more about IFC and the work we do to improve ESG practices: ifc.org/sustainability
2121 Pennsylvania Avenue, N.W.
Washington D.C., 20433 USA
Internet: www.ifc.org

Creating Markets, Creating Opportunities