WORLD BANK FINANCED

LOG IN GEORGIA PROJECT

(P169698)

Stakeholder Engagement Plan

last updated on June 19, 2025

Contents

Introduction

The Log in Georgia Project aims to increase access to affordable broadband internet, and to promote its use by individuals and enterprises, in targeted rural settlements. Through a combination of IBRD funding and counterpart financing the on-going Project supports activities in rural areas across Georgia that: (1) extend access to affordable broadband internet services in targeted settlements; and (2) promote its use by individuals and enterprises.

The Project is being implemented by Open Net NNLE[1], under the overall guidance of the Ministry of Economy and Sustainable Development of Georgia (MOESD). Other agencies, such as the Georgian National Communication Commission (ComCom), and MOESD, are also involved in the project implementation process as joint implementors for specific activities under their mandate.

This is an updated Stakeholder Engagement Plan (SEP), which was originally prepared by Open Net for the Log-In Georgia project in accordance with the World Bank's Environmental and Social Framework, and specifically Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure. Preparation and implementation of the SEP represents a commitment for the Government of Georgia and Open Net under the Loan Agreement for the Log-In Georgia project, and as referenced in the Project's Environmental and Social Commitment Plan (ESCP).

Purpose of SEP

Stakeholder Engagement Plan (SEP) is developed in accordance with the World Bank (WB) requirements. The objective of the SEP is to effectively engage with all stakeholders who have an interest in or may be affected by the project.

The involvement of the local population as well as all other interested parties is essential to the success of the project, to ensure smooth collaboration between project staff and local communities, minimize and mitigate environmental and social risks related to the project, as well as expand project benefits to all targeted beneficiaries including ones that may be traditionally vulnerable, disadvantaged, disproportionally affected or excluded from partaking in benefits from local development projects.

The purpose of the present Stakeholder Engagement Plan (SEP) is to outline the target groups and methods of stakeholder engagement and the responsibilities in the implementation of

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[1] non-entrepreneurial and non-profit legal entity

stakeholder engagement activities. The intention of the SEP is to activate the engagement of stakeholders in a timely manner during project preparation and implementation. Specifically, SEP serves the following purposes:

   I. stakeholder identification and analysis;
  II. planning engagement modalities and effective communication tools for consultations and disclosure;
 III. defining role and responsibilities of different actors in implementing the SEP;
 IV. defining the Project's Grievance Mechanism (GRM); and
  V. providing feedback to stakeholders;
 VI. monitoring and reporting on the SEP.

Project Description

The objectives of the on-going Log in Georgia Project are to increase access to affordable broadband internet, and to promote its use by individuals and enterprises, in targeted rural settlements. The Project consists of three components:

Component 1: Increasing access to broadband

This Component helps expanding access to broadband internet in rural settlements across Georgia and improve the enabling environment for digital development. Subcomponent 1.1 supports the Government's Open Net Program, which seeks to expand access to broadband services to targeted rural settlements. Subcomponent 1.2 finances activities to enhance the enabling environmental for Georgia's digital infrastructure development.

Subcomponent 1.1: Supporting the Open Net Program

The Government's Open Net Program aims to develop infrastructure to offer national open access, wholesale, broadband telecommunications services. The ON Program fills the existing gap in middle-mile broadband infrastructure that will not be filled by private investment alone within a reasonable period. This subcomponent finances the design, building and installation, and activation of infrastructure in up to 800 settlements identified by the ComCom as eligible for being connected by the ON network (of a total of 2,500 settlements across Georgia). The network deployment is phased based on objective criteria, including technical feasibility and assessment of demand in coordination with service providers.

Subcomponent 1.2: Improving the enabling environment for digital infrastructure

This subcomponent supports activities to improve the enabling environment for digital infrastructure development in Georgia. This includes support to develop the legal, policy, and

regulatory instruments, and design of investment attraction measures included in the action plan of the national broadband development strategy (adopted in 2020). The subcomponent will also include support to engage with foreign and private investors to attract investments into and develop Georgia's telecommunications infrastructure.

Component 2: Promoting the use of broadband-enabled digital services

This Component supports the development of Georgia's digital economy through a strengthened enabling environment, promoting digital use-cases of broadband, and addressing barriers to the participation of individuals in the digital economy. Subcomponent 2.1 strengthens the enabling environment to develop Georgia's digital economy. Subcomponent 2.2 identifies and promotes broadband-enabled digital use-cases to help solve meaningful problems in the targeted settlements and for specific user-groups. Subcomponent 2.3 supports activities that ensure the digital inclusion of specific groups of individuals that are at risk of missing out on digital opportunities.

Subcomponent 2.1: Enabling environment for digital economy development

This subcomponent supports activities to improve the enabling environment for digital economy development in Georgia. This includes support to develop the legal, policy, and regulatory instruments, and design of investment attraction measures that are identified in national digital economy development strategy for 2025-2030.

Subcomponent 2.2: Promoting use-cases

The subcomponent promotes the use-cases of improved broadband connectivity in targeted rural settlements. Specific tasks include stakeholder and citizen engagement to develop and implement programs to promote use-cases in targeted settlements (in the first phase, education, health, and financial services), and mobilization of facilitators to coordinate and deliver training and outreach activities in targeted settlements. These activities are implemented in coordination with other public agencies and entities to informing the development of digital platforms and services related to identified use-cases.

Subcomponent 2.3: Increasing digital inclusion

This subcomponent finances targeted interventions to boost the digital inclusion of rural populations, including of persons who are likely to face greater barriers either with digital literacy or affordability such as elderly women and men, ethnic minorities, persons with disabilities, and inactive youth. This includes the design and implementation of a mobilization and training program to address the causes of digital exclusion of the identified groups (initial focus will be on ethnic minorities, elder people, persons with disabilities, women-headed

households, and youth not in employment, education or training). The project also supports the design and implementation of a pilot program to provide accessible technologies to facilitate digital accommodation for persons with disabilities and limited abilities in targeted rural settlements. Support for monitoring of the impact of all Project activities, with a focus (as applicable to the settlement) on digital inclusion of elderly women and men, households headed by women, older people, social minorities, and persons with disabilities, are also included in this subcomponent.

Component 3: Project implementation support

This component supports the management and implementation of the Project and associated activities, including capacity building. This includes hiring of consultants needed for key areas such as project management, technical expertise, procurement, financial management, environment and social protection, monitoring and evaluation, communications, and citizen and stakeholder engagement, to enable Project implementation. Relevant public officials also receive trainings on climate change adaptation measures in the context of the Project, such as on emergency response procedures at times of natural disasters, to ensure rapid restoration of the telecom networks and minimize service outage.

Additional Financing (AF) to the Parent Project is requested by the Government on account of a cost overrun under Subcomponent 1.1 pertaining to the deployment of middle mile fiber optic infrastructure. The cost overrun stems from a sustained increase in construction costs for network development between 2022 and 2024 (per km cost doubling in this period). The increase in cost is attributed to post COVID-19 related inflationary pressures and subsequent supply chain challenges (for cement and ducts, for example) which were further impacted by Russia's invasion of Ukraine. Additionally, contractors have not been able to benefit from economies of scale regarding raw materials and goods, such as cement, compared to similar works in larger countries. As a result, the available financing from IBRD and EIB for network deployment would not allow for completion of the construction of the network as designed, thereby preventing the Project from covering all planned rural settlements and achieving its PDO. As seen in Figure 1 below, the planned network in Eastern and Southern Georgia (light blue lines) would remain incomplete without additional funds. This impacts the operational sustainability of Open Net since its business model depends on a resilient pan-national network that also enables cross-border transit to neighbor countries requiring border-to-border infrastructure.

Figure 1: Open Net Infrastructure Deployed, Under Construction, and Planned
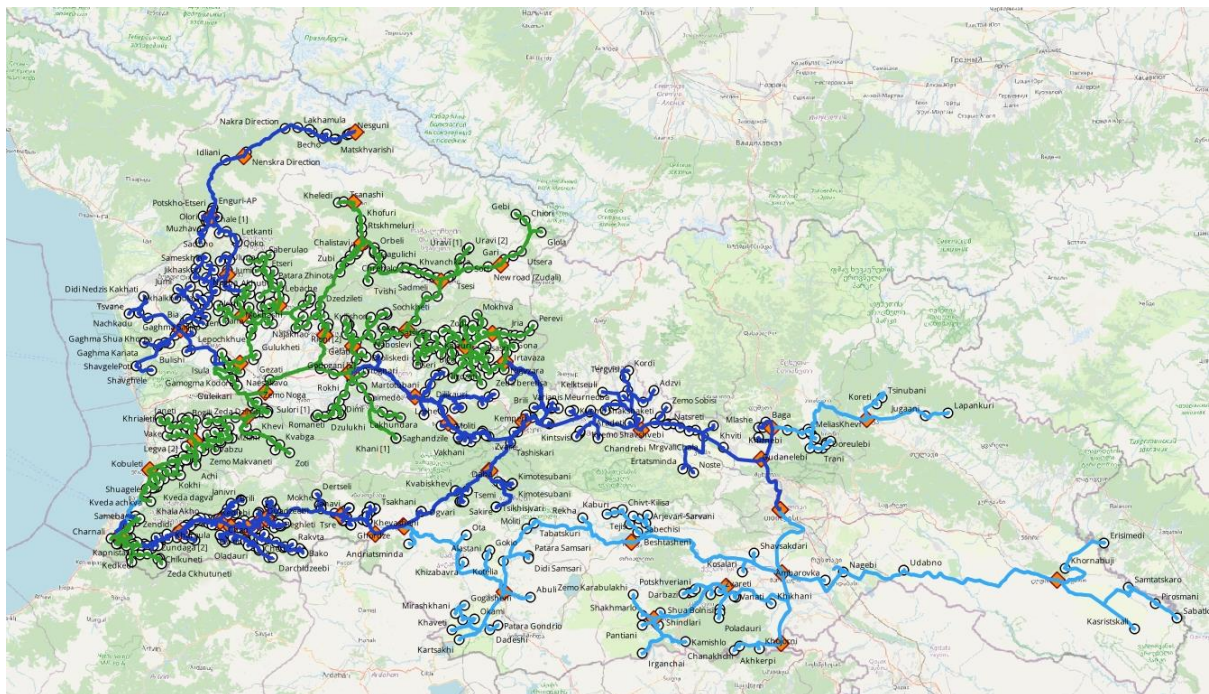
Summary of Prior Stakeholder Engagement Activities Relevant to the Project

The Log in Georgia project finances the design and delivery of the awareness or capacity-building or training programs to promote multiple use-cases of digital connectivity in settlements connected by the ON network. At this stage, five types of use-cases have been identified. This includes education, health, financial inclusion, employment, and access to government services. The first three of these will form part of a first phase of activities under the Project. In addition to the identified use-cases, the project will use a bottom-up approach through community-led consultations, mobilization, and community prioritization activities to identify and develop capacity and skills pertaining to locally prioritized areas (component 2). This component is led by the ComCom. The project will design a system for ingoing beneficiary to support the monitoring of stakeholder engagement and adapt it for greater impact in the course of project life.

Before the commencement of the parent Project prior surveys and consultations were conducted to better understand the views of different stakeholders (key government agencies), as well as the needs and expectations of local communities to inform the initial selection of priority use-cases. These are described in Table 1 below.

Official Use Only

Table 1. Summary of prior stakeholder engagement activities

Date & Location	Stakeholders	Format and Objectives	Outcome
April 2018 Tbilisi	• Telecom operators • Internet Service Providers (ISPs)	Workshop / Survey Provide pertinent insights into the market dynamics within the sector – both on the supply and demand sides.	Challenges pointed out by the operators were: competition, fair regulation, access to infrastructure, access to information, permit granting, and the wholesale market prices.
June 2018 Tbilisi	• Government agencies • Telecom Operators • Energy Operators • CSO representatives • Academia	Workshop Present findings of the broadband market diagnostic assessment and WB recommendations on the National Broadband Development Strategy (NBDS).	Consultations helped identify specific policy and regulatory actions that could facilitate broadband network roll-out, activation of alternate sources of infrastructure (e.g. those owned by utilities), and promote competitive and non-discriminatory access to telecommunication networks. The team has also found broad consensus that Georgia should follow EU approaches to State Aid, by crowding in private investments, and utilizing policy and regulatory tools to expand the market, even as it invests public resources to extend access to commercially non-viable segments of the market.
September 2018 Tbilisi	• Government agencies • EU Delegation	Workshop Present WB recommendations on the National Broadband Development Strategy (NBDS)	Workshop participants provided significant inputs, reflecting practical considerations in implementing the strategy. They reiterated their agreement with the recommended targets and supported the recommended NBDS direction and priorities.

October 2018 • Lanchkhuti • Batumi • Lagodekhi • Telavi	• High-school students university/college students • Employed/unemployed individuals • Private sector representatives • Small business owners • Tourism industry representatives • Online shopping services • Sexual/ethnic minorities • IDP community	Focus Group Discussions and In-Depth Interviews[2] Conduct in-depth interviews with focus groups in four targeted locations to observe how local people perceive the Internet, how do they benefit from it, quality of Internet they receive, whether or not it helps them save money/time or earn money, to what extent is it used as a source of information, how does it help them in getting education, how does it help with building skills, etc.	31 interviews conducted and findings of the survey were reflected in the Report. Based on the interviews, the story - "Lives Changed, Thanks to the Internet" comprising of 7 short real-life stories were prepared.

July 2019
Korbouli
	Citizen focus groups:
	    Group 1:
	High school student
	Unemployed man/woman
	Employed Adult man/woman
	Entrepreneur
	House Wife
	Elderly
	    Group 2:
	NGO Worker
	Government Administrator
	School/Kindergarten Principal
	Community Leader
	Village Head
	ISP (Internet Service Provider)
	Representative of the Church
	Other
		Focus Group Discussions
		
		Conduct 'digital inclusion and exclusion' FGDs to collect citizen's opinion towards using the internet, the level of their digital inclusion and the reasons for being excluded
			The discussions reflected citizens' attitudes and perceptions, information on internet access, internet use, awareness and skills, and barriers for digital inclusion.

September 2019 • Zemo Kedi • Kvemo Khedi	Citizen focus groups: Group 1: High school student Unemployed man/woman Employed Adult man/woman Entrepreneur House Wife	Conduct 'digital inclusion and exclusion' focus group discussions to collect citizen's opinion towards using the internet, the level of their digital inclusion and the reasons for being excluded	The discussions reflected citizens' attitudes and perceptions, information on internet access, internet use, awareness and skills, and barriers for digital inclusion.

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[2] Focus group discussions and interviews during project preparation have been conducted by World Bank task team, Open Net, and World Bank Youth Voices Group with groups of general population and in diverse locations across Georgia representing eastern, western, central, mountainous and valley locations.

	Elderly Group 2: NGO Worker Government Administrator School/Kindergarten Principal Community Leader Village Head ISP (Internet Service Provider) Representative of the Church		
November 2019 Tbilisi	• MOESD • MOF • ComCom • OpenNet • MDF	Face-to-face consultations to prepare LIG Project IPF and discuss with stakeholders Project PDO, Project components and results indicators with a focus on the scope and implementation plan for Open Net.	As a result of the consultations key agreements were made: (i) updating Government Resolution on ON program implementation, (ii) organize a hands-on workshop with the Lithuania RAIN Project management team to review program design and implementation
December 2019 • Chkhorotsku • Zugdidi • Ozurgeti • Lanchkhuti	Citizens of all ages, gender, occupation and place of residence	Internet (facebook) survey followed by face-to-face workshops in the four locations Familiarize citizens of four municipalities of Georgia with benefits of proper usage of the Internet through training – "Internet for Growth and Development". It covered the following topics: • The benefits of the Internet • Tools for searching the news: How to identify real and fake news • Online education/training courses for personal growth and development • Using the Internet to promote your business • How to identify real and fake news • Using online planning tools for increased productivity	110 participants in total. The workshops were conducted to familiarize participants with topics of their interest (for example, using internet for learning, starting a business, etc.) based on the online survey findings on how young people in the regions use internet and what are the internet-related topics they are willing to learn.

		• The Internet-related threats	

Based on consultations with potential beneficiaries for the project, reference to Government programs, and analysis of current usage trends, five initial use-cases we identified for development. These are:

(1) *E-learning*: Online learning was growing over the past decade, but in the post-COVID-19 period, it is likely to be integrated more into how education is delivered or supplemented. Potential beneficiaries, especially the youth and teachers in rural areas, have expressed a strong interest in improved access to learning online. This activity will also link with the I2Q (education) Project, financed by the World Bank, to increase access to high-quality internet services to schools.

(2) *Health information and services*: Only 40 percent of rural Georgians reported seeking health-related information online, compared with 58 percent in urban areas. With the COVID-19 pandemic demonstrating the need for accurate, reliable, and timely access to information and to services, the Project will also prioritize increasing awareness of connected settlements about the Government's health services and information available online.

(3) *Employment*: Only 11 percent of rural Georgians reported using the internet to look for a job or to send a job application in 2019, compared with 21 percent in urban areas. This in despite the widespread popular understanding among rural Georgians that most good-jobs are in the cities. World Bank analysis has found that Georgia is "highly segmented between formal urban and informal rural work, is characterized by high educational qualifications and low female participation. The Project will thus highlight the possibilities for beneficiaries to search and apply for jobs online and to expose them to the possibilities of improving their skills (via e-learning) and even working online.

(4) *Financial inclusion*: One-in-five rural Georgians engaged in internet banking in 2019. This is low compared with the level of financial account ownership, at 61 percent. Only 9 percent of rural Georgians used the internet to pay bills in 2017. The Project will seek to increase the awareness of digital financial services, with special attention on the rural poor, drawing on the findings of planned Bank ASA on digital financial inclusion.

(5) *Municipal services*: The Government has rolled out a range of e-services for citizens. Among these, and supported by the World Bank, are municipal-level e-services. The

Project will supplement this work through awareness building of citizens on how they can access those online services and engage with their local governments.

The Project will also promote other use-cases identified through overall citizen and stakeholder engagement. These could include support for agribusiness, small-scale tourism, or natural resource management. Implementation will avoid duplicating existing programs; where existing programs exist (e.g. for e-commerce support, tourism), the Project will involve those agencies in program delivery. Prior consultations have specifically inquired on the types of information, consultation and engagement channels that are most convenient and preferred by local residents. These include a combination of virtual and physical mediums such as social media, local authorities' locations, print and audio-visual media, as well as through interactions with regional contact persons appointed by the project to implement project activities.

Given the impact of the COVID-19 pandemic and its aftermath, the Project will support three use-cases that form a first response to the measures imposed and their impacts. These are to support education, delivery of non-emergency health services, and financial inclusion.

Throughout the project implementation phase Open Net continued implementation of the Stakeholder Engagement Plan. The representative of Open Net traveled to the selected settlements and met the local communities. The stakeholders were provided with general information about the Log in Georgia Project, benefits of the internet service and new opportunities for local communities, nature and scope of the broadband cable construction and installation works, approximate completion date of the project, nature of grievance redress mechanism, environmental, social, health and safety aspects of construction activities. Stakeholder engagement activities are summarized in Table 2 below.

Table 2. Summary of stakeholder engagement activities during the implementation phase of the program

Date & Location	Stakeholders	Format and Objectives	Outcome
April 2022 Oni, Ambrolauri, Tsageri, Lentekhi and Tskaltubo municipalities;	Representatives of local community; Local school principals and teachers; Representatives of local medical centers; Representatives of local municipalities and kindergarten	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;

	teachers; (villages Ghebi, Nikortsminda, Uravi, Chrebalo, Tvishi, Lentekhi, Okureshi, Tskhunkuri).		
June 2022, Tskaltubo Municipality	Representatives of local municipality;	Meeting with the representative and discuss the claims of local residents about the planned construction of aggregation point.	New location for aggregation point was selected.
August, 2022 Abasha, Chokhatauri and Samtredia municipalities;	Representatives of local community; Local school principals and teachers; Representatives of local medical centers; Representatives of local municipalities; (villages Sujuna, Ketilari, Sachamiaseri, Bjolieti, Zemo Nogha, Gormaghali);	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;
October 2022 Amborlauri, Oni and Tsageri municipalities.	Village Nikortsminda local community; Village Kvatskhuti local workers; Village Tsesi local community; Village Okureshi school representatives.	Meeting and telephone call; Discussion of construction work related environmental and social issues;	No claims regarding working conditions or environmental and social issues were recorded.
March 2023, Khelvachauri municipality;	Representatives of local community; Local school principals and teachers; Representatives of local municipalities; (Villages Zemo Chkhutuneti, Acharisaghmarti, Tkhilnari, Ortabatumi);	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;

September, 2023; Khelvachauri municipality;	Representatives of local community; Local school principals and teachers; Representatives of local municipalities; (Villages Zemo Chkhutuneti, Acharisaghmarti, Tkhilnar, Ortabatumi);	Meeting; Discussion of construction work related environmental and social issues;	No claims regarding environmental and social issues were recorded.
November 2023; Khobi, Zugdidi and Chkhorotsku municipalities;	Representatives of local community; Local school principals and teachers; (villages Shavghele, Bia, Torsa, Jumi, Alertkari; Qokho, Kirtski);	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;
March, 2024; Bagdati, Terjola, and Vani municipalities;	Representatives of local community; Local school principals and teachers; Representatives of local municipalities; (Town Bagdati, Villages Khani, Sakraula, Godogani, Saprasia);	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;
May, 2024, Khoni and Martvili municipalities;	Representatives of local community; Local school principals and teachers; Representatives of local municipalities; (villages Dedalauri, Inchkhuri, Gordi, Kurzu, Godogani, Noga, Kitsia);	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism;
September, 2024; Sachkhere, Terjola and Chiatura municipalities;	Representatives of local community; Local school principals and teachers; Local kinder garden teachers; Representatives of local municipalities;	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any).	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document,

	(villages Korbouli, Argveti, Perevi, Tuzi, Etseri, Khreiti)		grievance redress mechanism. Claims about the reinstatement of construction corridor near Korbouli School have been recorded and communicated to the Supervision Consultant for remediation actions.
Ocotober, 2024; Chiatura municipality;	Residents of village Perevisa, representatives of local municipality, small business owners;	Meeting; Discussion of fiber-optic cable alternative route;	The construction company, in agreement with the Client and Engineer, bypassed the original route of broadband cable;
February, 2025; Kharagauli, and Khashuri municipalities;	Representatives of local community; Local school principals and teachers; (villages Nadaburi, Ghoresha, Saghandzile, Tezeri, Qvishkheti, Tashiskari)	Meeting; Providing general information about the project; Construction schedule; Recording claims (if any). Discussion of fiber-optic cable alternative route;	The representatives of local communities obtained detailed information about the project, last mile connection issues, ESMP document, grievance redress mechanism; Alternative route options were communicated to the supervising engineer and construction company;

Lessons Learned from the Stakeholder Engagements under the Parent Project

The implementation of the SEP of the Parent Project revealed several challenges for the Open Net team. Community engagement efforts in rural project areas are shaped by logistical, cultural, and infrastructural realities that demand adaptive communication strategies. Given the impracticality of visiting every settlement simultaneously, outreach activities prioritize either relatively remote villages or those functioning as local community hubs. Schools and local administrations often serve as preferred venues for stakeholder meetings, not only because they are accessible and familiar gathering points, but also because they facilitate broader outreach—many teachers commute from surrounding areas, informally spreading information across settlements. This strategy also strengthens gender inclusion, as women

constitute the majority of school staff, thereby enhancing their representation in public consultations.

Communication is most effective when tailored to local preferences and technological constraints. In communities with limited internet access, verbal interactions—whether through direct conversations during site visits or informal discussions near construction zones—are more impactful than printed materials or emails. Experience shows that residents are more comfortable voicing grievances orally rather than through formal written channels, reinforcing the need for flexible and responsive grievance redress mechanisms. Core community concerns consistently revolve around tangible service delivery issues: the construction schedule, expected completion timelines, last-mile connectivity, and the affordability of internet services. These insights underline the importance of accessible, trusted spaces and interpersonal communication in fostering meaningful stakeholder engagement and early identification of social risks. Below is the list of the challenges and the lessons learned for Open Net stakeholder engagement activities:

- It is challenging to visit every settlement simultaneously for effective dissemination of project information and/or for identifying any concerns or claims. Therefore, site visits are conducted in villages that are either relatively remote areas or serve as local community centers (also referred to as community centers).
- In nearly all cases, the main concerns of local residents relate to the construction schedule, expected completion dates, last-mile connectivity, and the prices of internet services.
- Schools and local administrations are typically chosen as venues for stakeholder meetings. In rural areas, schools often serve as informal centers communities. Many teachers commute from neighboring villages as well, which facilitates the spread of information to surrounding settlements. Additionally, since women comprise the majority of school staff, this arrangement supports better representation of women in public meetings.
- Occasionally, residents living in close proximity to the construction corridor are approached directly to determine if they have any complaints related to the construction activities. In such cases, oral communication proves more effective than written channels.
- Experience shows that, in most instances, people prefer to express grievances verbally and tend to avoid formal, written communication channels.
- In communities with limited internet access, verbal communication, are more effective than emails or printed flyers.

Stakeholder Identification and Analysis

Project stakeholders are defined as individuals, groups or other entities who:

1. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
2. may have an interest in the Project ('other interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development also requires the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders.

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

- *Openness and life-cycle approach*: public consultations for the project(s) are 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 is provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, 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 are encouraged to be involved in the consultation process, to the extent the current circumstances permit. 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, in particular women, youth, elderly, persons with disabilities, and the cultural sensitivities of diverse ethnic groups.

The Log in Georgia Project through construction of broadband 'middle-mile' networks and promotion of digital use-cases has stakeholders from government, private sector, citizens of the certain region/village and a range of other interested parties.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. These will include, among others:
    - Landowners or land users along the rights of way (ROW) of the construction works whose properties or incomes may be impacted;
    - Residents and community members who may be inconvenienced by construction works (e.g., by noise, dust, vibration, accidental damages);
    - Business owners who may be inconvenienced and/or financially impacted by construction works;
    - Local authorities in settlements connected and those through which the network will pass;
    - Internet service providers as primary customers of the service provided;
    - Schools, hospitals, and other public service providers in target settlements;
    - Internet service providers and other telecommunication whose terms of service, customer base may be affected by the changing market conditions;
    - Local households and businesses whose activities may be positively impacted by Component 2 (use-case) pilots.

    Other Interested Parties – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. This will include among others:
    - Individuals, businesses, and institutions in the settlements being connected;

- All users of broadband services in rural areas, on account of improvements in affordability and reliability of broadband services
- Local municipalities and village trustees;
- Public and private service providers (of education, health, financial services);
- Line Ministries, public agencies, and their regional offices, providing public services, for example Education, Health, Social Protection / Social Service Agency, Police, Justice, etc.;
- Civil society organizations;
- International organizations who implement projects in the targeted areas;
- Community and social organizations;
- Workers unions and Trade unions.

- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[3] and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. These include among others:
  - Women;
  - Youth;
  - Elderly;
  - Internally displaced persons;
  - Persons with disabilities;
  - Poor and unemployed persons;
  - Ethnic and language minorities.

Where other affected parties, interested parties, and vulnerable groups are identified in the course of the project implementation their needs will also be taken into consideration and reflected in the SEP document.

Stakeholder Engagement Plan

The Stakeholder Engagement Plan envisages that consultation meetings will take place with relevant interested parties prior to the commencement of the Project as well as during the project implementation, on an as-needed basis.

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[3] Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. Consultations will take place, as much as possible in face-to-face interactions within the affected and beneficiary settlements.

Local public institutions, such as community centers and public service halls will be equipped with dissemination materials, contact point information, and other project related information. The citizen and stakeholder engagement coordinator will have access to mechanisms under project activities—such as demand assessment surveys, training activities etc.—to proactively disseminate information and collect feedback from local population, organize consultations, support survey works, and ensure functioning of the project grievance redress mechanism (GRM) at the local level. In addition, stakeholders will be able to use several channels (phone, e-mail, social media and project website) for receiving more details about the project or state their comments, ideas throughout the project life cycle.

Detailed record of all public consultations will be kept. Minutes should be supported with photo material taken during consultation and lists of attendees with their contact information and original signatures.

Engagement with stakeholders will continue during the construction phase and records of environmental and social issues raised, and complaints received during consultations, field visits, informal discussions, formal letters, etc., will be followed up.

The records will be kept in the project office at Open Net. The project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups outlined above will have the chance to participate and benefit from project activities. This will include among others, household-outreach through SMS, telephone calls, social media etc., depending on the social distancing requirements, in local languages including Azerbaijani and Armenian in communities with high concentration of these groups. Further, while country-wide awareness campaigns will be established, specific communications in every region will be timed according to the need, and also adjusted to the specific local circumstances of the region.

Table 3. Stakeholder Engagement Plan

Target stakeholders	Topic(s) of engagement	Method	Location/frequency	Responsibilities

Public and private institutions	Project information incl. E&S instruments, benefits of the project, Grievance Redress Mechanism, Feedback	Information meetings, Outreach via email, phone; Inclusion as respondents in project surveys, Demand assessment studies prior to network deployment,	At offices of or direct outreach to the targeted stakeholders at least three times at the beginning, mid-term and end of Project Channels for continuous feedback will also be in place (information desks, phone, email, web-platform)	Open Net
Individuals and businesses in rural areas where Log in Georgia project connects	Project information incl. E&S instruments, project progress, , benefits of the project, Grievance Redress Mechanism, Feedback	Information meetings, Focus group discussions, Surveys, training programs, Demand assessment studies prior to network deployment,	Within the respective municipalities at least three times at the beginning, mid-term and end of Project. Channels for continuous feedback will also be in place (information desks, phone, email, web-platform)	Open Net
Internet Service Providers and other Media channels	Project progress, project information, benefits of the project, transparency of the project	Information meetings, Periodic consultations for demand assessment, Demand assessment studies prior to network deployment,, Client engagement activities by ON	Centrally and within regions prior to construction commencement.	Open Net
Village and Region Authorities	Project progress, project	Information meetings,	Within the respective municipalities prior to	Open Net

	information, benefits of the project, Grievance Redress Mechanism, Feedback	Demand assessment studies prior to network deployment, Outreach via email, phone; Inclusion as respondents in project related surveys	commencement of construction as part of demand assessment. Channels for continuous feedback will also be in place (information desks, phone, email, web-platform)	
Civil society organizations	Project progress, project information, benefits of the project, partnerships and joint programs, Feedback	Periodic project consultations, Project related surveys, Trainings	Centrally managed and implemented consultations with wider stakeholder group	Open Net
Potential investors	Project progress, project information, benefits of the project, Grievance Redress Mechanism, Feedback	Information meeting, presentation	Investor and/or Open Net offices [on ongoing basis or at the beginning/end of the project]	Open Net
Educational Institutions, Schools, Universities	Improvement of Education, new possibilities, Involvement of educational institutions in the program, ensuring connectivity and remote education in rural areas	Demand assessment studies prior to network deployment, Training programs financed by the project, surveys, focus groups and interviews	In each settlement as part of demand assessment studies and project related surveys	Open Net

Vulnerable groups (Women and women-headed households; elderly; persons with disabilities and their caregivers; ethnic minorities; youth NEETs)	In addition to including them in all consultation activities listed above, vulnerable groups will be targeted for: Involvement in digital literacy programs, increasing literacy of the poor and unskilled people, supporting of sustainable economic development of the region	Digital literacy camps, literacy programs, connecting with other stakeholders for training purposes, information meetings, presentations, workshops	In each settlement as part of demand assessment studies and project related surveys; Training programs and activities implemented under component 2 at each settlement connected by the project	Open Net; ComCom
Other interested parties	Project progress, project information, benefits of the project, Grievance Redress Mechanism, Feedback	Information meeting, presentation	Open Net offices and within municipalities throughout project implementation on a need basis	Open Net

Resources and Responsibilities for Implementing Stakeholder Engagement

A tentative budget for implementing the stakeholder engagement plan over six years is reflected in Table 3 below. The stakeholder engagement activities featured above cover a variety of issues, which may be part of other project documents, so it is possible that they have also been budgeted in other plans. Specifically, demand assessment and stakeholder consultation activities pertaining to the deployment of the ON network (component 1.1) have

been budgeted for in the specific component itself, as have stakeholder and citizen engagement activities pertaining to the implementation of component 2, to be led by ComCom.

The Project will finance the implementation of training programs to promote the use of digitally enabled services and increase digital inclusion of vulnerable populations. Implementation of these activities will entail the establishment of regional level presence to coordinate the various training programs and partnerships with other institutions and organizations in Georgia. These individuals will also coordinate implementation of component 2 activities at each settlement, providing a physical medium for stakeholders in the regions to engage with the project through.

The table below summarizes key stakeholder engagement activities in one place for better coordination and monitoring. Open Net will review this plan on an annual basis to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated and the budget will be revised accordingly.

Table 4. Estimated SEP Budget (6 years)

Stakeholder Engagement Activities	Q-ty	Unit Cost, USD	Total cost (USD)
Trainings on outreach and GRM for Open Net staff, local authorities, other stakeholders	4	500	2,000
Trainings for PIE staff and consultants, for vendors involved in works and field assignments	4	500	2,000
Communication materials (leaflets, posters, PR kits including design, per settlement)	-	-	20,000
Travel expenses of staff (cost for 5 years)	-	5,000	25,000
Subtotal			**49,000**
Contingency			6,000

Total			55,000

The overall responsibility for implementation of SEP lies with Open Net. The Environmental and Social Specialist of Open Net will continue his activities to oversee the implementation of the SEP, including the functions of the Grievance Redress Mechanism (GRM).

Grievance Redress Mechanism (GRM)

GRM is established to allow a PAP to complain about any decision about activities regarding, assets or source of incomes and their compensation, as well as other problems or concerns regarding the project. All types of grievances are recorded by the GRM. Anonymous grievances are also accepted, recorded, and investigated to the extent feasible.

Multiple channels for receiving grievances are provided including by phone, social media, email, mail, web-based comment box, and in person to local or Open Net headquarters project team. Verbal complaints delivered on site will also be recorded and processed via the GRM. A project / GRM brochure was prepared and disseminated to all project locations. Local information desk officers, local authorities, contractors / consultants / NGOs operating in project sites are fully trained by Open Net on the grievance receipt and processing to ensure functioning of the Project GRM.

Stage 1 - At each locality, local municipality or trustee officers, information desk officers, contactors, consultants, or other project implementation related stakeholders working on site are aware of the GRM and requested to assist with recording and local-level resolution of grievances. All grievance records will also be forwarded to the Open Net GRM designated focal point / Community Engagement officer. This individual will ensure overall functioning of the GRM and maintain a consolidated grievance log. The Contractor/ Consultant on site are instructed that all complaints they may receive from PAPs shall be immediately submitted to the contact persons of Open Net who will then organize a meeting and review the complaint with the aggrieved PAP.

Stage 2 – Complaints which cannot be resolved locally will be referred to a Grievance Redress Commission (GRC) within Open Net. The GRC will be established by order of the Open Net director and comprise at least 3 members, including the Citizen and Stakeholder Engagement Manager. The GRC will investigate the complaint as needed and inform the PAP of the decision.

At any stage in the process the aggrieved PAPs can pursue further action by submitting their case to the appropriate court of law.

All complaints should be acknowledged within 48 hours of receipt and response with resolution provided to the complainant within 10 business days. If the complaint would require a longer resolution process, the complainant will still be informed within 10 business days of the actions taken and required next steps. No complaints should take more than one month to be resolved unless complaint is referred to court or other adequate justification prolonged delay is provided by Open Net.

A detailed grievance log will be maintained and submitted to the Bank along with regular progress reports or upon request by World Bank team.

All information regarding the grievances submitted during the project implementation, received complaints and ways and means for their effective and timely solution will be collected in the semiannual reports prepared by Open Net and submitted to the WB.

During the implementation of the project, five grievances were identified—all of which were verbal complaints. One grievance related to delayed salary payments; another concerned the quality of trench reinstatement works. Two grievances involved changes to the fiber-optic cable route, and one requested a change the location of the aggregation point. To expedite the resolution process, ON specialists met with local community and municipality representatives onsite to discuss their concerns. The outcomes of these meetings were communicated to the construction company and the supervising engineer. As a result, the claims were addressed and resolved. Information about received complaints are included in ON six-months reports to the WB.

The Project introduces SEA/SH prevention and mitigation measures such as a Code of Conduct and awareness raising for all workers, SEA/SH sensitive grievance mechanism, awareness raising sessions for local communities on these measures as well as on available support service. The GRM systems allows anonymity for the victims of SEA/SH. If needed, Open Net will refer to the relevant available services in the country. This includes security/safety assistance by police, legal aid, healthcare assistance/mental health counselling, psychological aid, shelter protection, and other types of assistance provided by support groups from NGOs. In emergency cases police may be reached through a countrywide emergency hotline 112 (also linked to emergency healthcare), who respond promptly by arriving to the place of the incident and, in case of domestic violence, are authorized to issue a restrictive order and/or initiate criminal investigation. The State Fund for Protection and Assistance of (Statutory) Victims of Human Trafficking (ATIPFUND) is the primary entry point and the key State institution providing assistance to survivors of GBV including domestic violence, sexual violence and human

trafficking. The ATIPFUND manages a network of services provided via shelters and crisis centers in different parts of the country. These include psychosocial assistance, rehabilitation, arrangement of medical assistance, legal aid (including representation at courts and law enforcement), translation, reintegration into society, shelter and online consultations, a 24/7 hotline (116 006) operational for information in 8 languages. The ATIPFUND partners with non-governmental organizations (NGOs) to conduct awareness campaigns and provide services in parts of the country where it has weaker regional presence.

Monitoring and Reporting of the SEP

The SEP is periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. The SEP is monitored by the Director of the PIE and implemented by the Citizen and Stakeholder Engagement Manager supporting the PIE. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions, are collated by the designated GRM officer / Citizen and Stakeholder Engagement Manager , and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in an adequate, timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- An annual report on project's interaction with the stakeholders.
- Monitoring of a beneficiary feedback indicator on a regular basis. The indicator will be determined in the updated SEP and may include: number of consultations, including by using telecommunications carried out within a reporting period (e.g. monthly, quarterly, or annually); number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; number of press materials published/broadcasted in the local, regional, and national media.

Annex: the list of participants at consultation meetings

[Removed due to confidentiality considerations]