

**DRAFT FOR PUBLIC COMMENT**  
**Guidance Note for ESS10**  
**Stakeholder Engagement and Information Disclosure**

*The Guidance Notes provide guidance for the Borrower on the application of the Environmental and Social Standards (ESSs), which form part of the World Bank’s 2016 Environmental and Social Framework. The Guidance Notes help to explain the requirements of the ESSs; they are not Bank policy, nor are they mandatory. The Guidance Notes do not substitute for the need to exercise sound judgment in making project decisions. In case of any inconsistency or conflict between the Guidance Notes and the ESSs, the provisions of the ESSs prevail. Each paragraph of the Standard is highlighted in a box, followed by the corresponding guidance.*

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**Introduction**

1. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

2. Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

3. This ESS must be read in conjunction with ESS1. Requirements regarding engagement with workers are found in ESS2. Special provisions on emergency preparedness and response are covered in ESS2 and ESS4. In the case of projects involving involuntary resettlement, Indigenous Peoples or cultural heritage, the Borrower will also apply the special disclosure and consultation requirements set out in ESS5, ESS7 and ESS8.

**Objectives**

- *To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.*
- *To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.*
- *To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.*
- *To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.*
- *To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.*

**Scope of Application**

4. *ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation, as outlined in ESS1.*

**GN 4.1.** Stakeholder engagement is the continuing process by which the Borrower identifies and communicates with the people affected by its decisions and activities, and others with an interest in the implementation and outcomes of its decisions. It takes into account the different access and communication needs of various groups and individuals, especially those more vulnerable or disadvantaged. Engagement begins as early as possible in project preparation, because early identification

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of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the design of the project.

**GN4.2.** Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management. Stakeholder consultations provide input for the environmental and social assessment of the project, the Environmental and Social Commitment Plan (ESCP), and any project plans that may be prepared. The level and frequency of stakeholder engagement conducted is proportionate to the risks and impacts of the project.

**GN4.3.** The techniques and practices described in this Guidance Note are applied both to the specific requirements of ESS10, as well as any engagement, consultation and disclosure requirements set out in the other ESSs (whether or not such techniques and practices are described in the respective Guidance Notes).

5. *For the purpose of this ESS, "stakeholder" refers to individuals or groups who:*
- (a) are affected or likely to be affected by the project (project-affected parties); and*
  - (b) may have an interest in the project (other interested parties).*

**GN5.1.** The term 'project affected parties' includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, well-being or livelihoods. These stakeholders may include individuals or groups, including local communities.

**GN5.2.** The term 'other interested parties' refers to individuals, groups or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector and civil society organizations.

**Requirements**

6. *Borrowers will engage with stakeholders throughout the project life-cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.*

7. *Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will 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 and intimidation.*

8. *The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.*

9. *The Borrower will maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary*

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*of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.*

**GN9.1.** Documentation of stakeholder engagement includes the following, as appropriate:

- (a) date and location of each meeting, with copy of the notification to stakeholders;
- (b) the purpose of the engagement (for example, to inform stakeholders of an intended project or to gather their views on potential environmental and social impacts of an intended project);
- (c) the form of engagement and consultation (for example, face-to-face meetings such as town halls or workshops, focus groups, written consultations, online consultations);
- (d) number of participants and categories of participants;
- (e) summary of main points and concerns raised by stakeholders;
- (f) summary of how stakeholder concerns were responded to and taken into account; and
- (g) issues and activities that require follow up actions, including clarifying how stakeholders are informed of decisions.

**A. Engagement during Project Preparation**

**Stakeholder Identification and Analysis**

10. *The Borrower will identify the different stakeholders, both project-affected parties and other interested parties<sup>1</sup>. As set out in paragraph 5, individuals or groups that are affected or likely to be affected by the project will be identified as 'project-affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'.*

*Footnote 1. The stakeholders of a project will vary depending on the details of the projects. They may include local communities, national and local authorities, neighboring projects, and nongovernmental organizations.*

**GN10.1.** The process to identify stakeholders may include the following:

- (a) At the beginning of the environmental and social assessment for the project, the Borrower develops a list of project-affected and other interested parties, paying special attention to identifying disadvantaged and vulnerable groups.
- (b) Second, other interested parties are identified by listing relevant interest groups, and considering historical issues, social relations, relationships between local communities and the project implementer, and any other relevant factors related to the sector and location that help anticipate local and external responses to the project.
- (c) Third, discussions are conducted with representatives of the stakeholders identified and with persons knowledgeable about the local, country and sector contexts and undertake media and social media searches to verify the list and identify any other project-affected or interested parties and to find out how to contact them.

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11. *The Borrower will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable.<sup>2</sup> Based on this identification, the Borrower will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.*

*Footnote 2. Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.*

12. *Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.*

**GN12.1.** Guidance in relation to the nature and role of independent third parties is provided in ESS1, paragraph 25 and its related Guidance Note.

**Stakeholder Engagement Plan**

13. *In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP)<sup>3</sup> proportionate to the nature and scale of the project and its potential risks and impacts.<sup>4</sup> A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.*

*Footnote 3. Depending on the nature of the scale of the risks and impacts of the project, the elements of a SEP may be included as part of the ESCP and preparation of a stand-alone SEP may not be necessary.*

*Footnote 4. Where possible, stakeholder engagement will utilize engagement structures within the national system e.g. community meetings, supplemented as needed with project-specific arrangements.*

14. *The SEP will describe the timing and methods of engagement with stakeholders throughout the life-cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.*

**GN13.1.** The process of preparing the SEP is inclusive, and the draft SEP is designed to accommodate the needs and circumstances of different stakeholders. It identifies the information and types of interaction to be conducted in each phase of the project, and includes any other stakeholder engagement required by the other ESSs.

**GN13.2.** As appropriate for the nature and scale of the project and its potential risks, the SEP will include a description of the project; a list of the stakeholder groups identified; the proposed stakeholder engagement program (including topics stakeholders will be engaged on, how stakeholders will be notified, the methods of engagement, list of information/documents that will be in the public domain, languages

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they will be available in, length of consultation period, and opportunities to comment); indication of resources required for implementing stakeholder engagement activities; summary description of the grievance mechanism; and contact information and process for seeking further information.

**GN13.3.** The draft SEP is made available to stakeholders in formats and through channels that are appropriate for them. As relevant to the project, the draft SEP invites input on aspects such as: (a) whether the list of identified stakeholders is accurate; (b) the proposed methods of notification and engagement (for example, where meetings and workshops may be held and how to communicate with disadvantaged or vulnerable groups); (c) the proposed extent and format of engagement (for example, the type of meetings and duration of the consultation period); and (d) the format and language of information to be provided. Stakeholder feedback on these aspects is reviewed and incorporated in the SEP as appropriate. If significant changes are made to the SEP, a revised SEP is publicly disclosed.

**GN13.4.** The SEP is proportionate to the stakeholder concerns regarding the risks and impacts associated with the project. Where the elements of the SEP are included in the ESCP, it is important to ensure that the specific stakeholder engagement arrangements are communicated in formats suitable and understandable for the identified stakeholders. This may include, for example, a factsheet or brochure that alerts stakeholders to the information to be provided, along with locations of consultation meetings, channels for providing comments, deadlines for comments, contact information, and a summary of the grievance redress mechanism.

**GN13.5.** Because project circumstances and stakeholder concerns can change or new ones may emerge, stakeholder engagement is conducted throughout the project cycle. The SEP may need to be updated during project implementation. This allows improvement to project implementation based on stakeholder feedback, and proactive management of concerns.

15. *The SEP will be designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. The SEP will set out how communication with stakeholders will be handled throughout project preparation and implementation.*

16. *The SEP will describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them.*

17. *When the stakeholder engagement with local individuals and communities depends substantially on community representatives,<sup>5</sup> the Borrower will make reasonable efforts to verify that such persons do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner.<sup>6</sup>*

*Footnote 5. For example, village heads, clan heads, community and religious leaders, local government representatives, civil society representatives, or teachers.*

*Footnote 6. For example, by conveying, in an accurate and timely manner, information provided by the Borrower to the communities and the comments and concerns of such communities to the Borrower.*

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18. *In certain circumstance,<sup>7</sup> depending on the level of information available about the project, the SEP will take the format of a framework approach, outlining general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with this ESS that will be implemented once the location is known.*

*Footnote 7. For example, where the exact location of the project is not known.*

**GN18.1.** The use of the SEP framework approach is appropriate where the design and location of the project cannot be known during project preparation, or when a project has multiple subprojects that will only be designed during project implementation. In such cases, the framework sets out the principles to be followed for stakeholder engagement, indicates how people are notified as key information becomes known. The SEP is updated as and when specific details become known, for example the specific locations, stakeholders and schedule of activities.

### **Information Disclosure**

19. *The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design:*

- (a) The purpose, nature and scale of the project;*
- (b) The duration of proposed project activities;*
- (c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these;*
- (d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;*
- (e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and*
- (f) (f) The process and means by which grievances can be raised and will be addressed.*

**GN19.1.** Meaningful stakeholder engagement depends on timely, accurate and comprehensible information. Making available project-related information as early as possible in the project cycle and in a manner and language appropriate for each stakeholder group is important. It is good practice to make special efforts to inform disadvantaged and vulnerable groups about the impacts of the project on them, the means of obtaining access to compensation and benefits, and how and when to raise grievances.

**GN19.2.** It is important to remain responsive to requests for information from project-affected parties and other interested parties through the project cycle, and set up appropriate systems to make available project information.

20. *The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).*

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**Meaningful Consultation**

21. *The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves.*

22. *Meaningful consultation is a two-way process, that:*

- (a) Begins early in the project planning process to gather initial views on the project proposal and inform project design;*
- (b) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;*
- (c) Continues on an ongoing basis, as risks and impacts arise;*
- (d) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;*
- (e) Considers and responds to feedback;*
- (f) Supports active and inclusive engagement with project-affected parties;*
- (g) Is free of external manipulation, interference, coercion, discrimination, and intimidation; and*
- (h) Is documented and disclosed by the Borrower.*

**GN22.1.** The aim of consultations is to inform the Borrower's decisions, where appropriate. Not all stakeholder groups can agree on impacts and mitigation, so the goal of the engagement is not always to achieve consensus, but to hear from stakeholder groups and to take their comments and concerns into account in making project decisions. Security and accessibility are expected to be considered when designing a consultation program, especially in fragile and conflict situations.

**B. Engagement during Project Implementation and External Reporting**

23. *The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life-cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.<sup>8</sup>*

*Footnote 8. Additional information may need to be disclosed at key stages in the project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism have identified as of concern to stakeholders.*

**GN23.1.** As implementation of a project progresses, new impacts may arise, while other impacts may be eliminated. Borrowers provide regular updates to stakeholders on project performance and changes in scope or schedule.

24. *The Borrower will continue to conduct stakeholder engagement in accordance with the SEP, and will build upon the channels of communication and engagement already established with stakeholders. In particular, the Borrower will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures in the ESCP.*

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**GN24.1.** Stakeholder feedback is useful to assess the effectiveness of the measures designed to mitigate environmental and social risks and impacts. Consultations can also be used to assess whether the requirements of the ESCP regarding mitigation measures have been fulfilled and whether additional issues have arisen and how these are addressed.

25. *If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. The Borrower will disclose an updated ESCP, setting out any additional mitigation measures.*

**C. Grievance Mechanism**

26. *The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism<sup>9</sup> to receive and facilitate resolution of such concerns and grievances.*

*Footnote 9. The grievance mechanism to be provided under this ESS may be utilized as the grievance mechanism required under other ESSs (see ESSs 5 and 7). However, the grievance mechanism for project workers required under ESS2 will be provided separately.*

**GN26.1.** A grievance mechanism is a system, process or procedure that receives and acts upon complaints and suggestions for improvement, and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties redress, and helps address issues at an early stage.

27. *The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements. Further details on grievance mechanisms are set out in Annex 1.*

- (a) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and*
- (b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.*

**GN27.1.** A grievance mechanism is designed based on an understanding of the issues that are likely to be the subject of concerns and grievances. The appropriate design and scale of the grievance mechanism is project-specific. The design depends upon factors such as the project context, scale and scope, the number of project beneficiaries, capacity, cultural attitudes toward lodging grievances, available human and financial resources, and technological constraints. Existing formal and/or informal mechanisms may be used, provided they are deemed suitable for the project's purposes and, as needed, can be

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supplemented with project-specific arrangements. In some instances, it may be cost-effective and sustainable to build on and improve such formal or informal mechanisms for grievance redress, identified as part of the environmental and social assessment under ESS1.

**GN27.2.** An effective grievance mechanism provides specific places and ways whereby grievances would be received and means by which they can be submitted (for example, mail, e-mail, website, telephone, suggestion/complaint boxes); a person, an office, or an institution responsible for processing grievances; and a process for registering and monitoring grievances. Grievance mechanisms for larger or more complex projects may have multiple locations, means and methods to receive, process and monitor grievances, an adequately staffed team, and an appeals process.

**GN27.3.** To make grievance mechanisms accessible to all stakeholders, it is helpful to: make the procedures to submit grievances simple and easy to understand; advertise them publicly; and indicate the expected length of timelines for acknowledgement, response and resolution. The grievance mechanism is free of charge to stakeholders. Accessibility for disadvantaged and vulnerable individuals or groups is important.

**GN27.4.** An effective grievance mechanism is responsive, and the action taken on the grievance or suggestion is informed and balanced. The timeframe for grievance resolution depends on factors such as the urgency of the complaint; need for research, investigation, consultation, and funding; and capacity. The grievance mechanism sets out indicative timeframes for acknowledgement, interim responses, and, where possible, final resolution of grievances. Some grievances may require coordination between multiple departments/agencies, often outside the control of the project, or require detailed investigations. Such grievances may take longer to address and this should be communicated to the parties concerned when acknowledging receipt of the grievances. Supporting documents needed to achieve resolution form part of the files related to the grievance/feedback.

**GN27.5.** A good grievance mechanism requires all grievances to be treated confidentially, impartially, and objectively. In countries where the submission of anonymous grievances is not permitted, it is important to ensure confidentiality; in those cases, the Borrower may consider engaging third party entities to facilitate submission of grievances. Users of a grievance mechanism may not be subject to retaliation, abuse or any kind of discrimination. Allegations of retaliation, abuse or discrimination are expected to be addressed and corrected promptly by the Borrower.

***D. Organizational Capacity and Commitment***

*28. The Borrower will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.*

**GN28.1.** The Borrower should designate qualified staff to design, implement and monitor stakeholder engagement activities and, if necessary, consider supplementing the staff with external expert assistance. The number of staff should be proportionate to the nature of the project, and the types and levels of risks and impacts that are anticipated.

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**ESS10-ANNEX 1. Grievance Mechanism**

1. *The scope, scale and type of grievance mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.*
2. *The grievance mechanism may include the following:*
  - (a) *Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, email or via a web site;*
  - (b) *A log where grievances are registered in writing and maintained as a database;*
  - (c) *Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;*
  - (d) *Transparency about the grievance procedure, governing structure and decision makers; and*
  - (e) *An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.*
3. *The Borrower may provide mediation as an option where users are not satisfied with the proposed resolution.*