



PT PLN (PERSERO)
ENERGY TRANSITION AND SUSTAINABILITY DIVISION

**Stakeholder Engagement
MANAGEMENT GUIDELINE**

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Document Status

Version : 1.0

Document No	Date of Issuance	Subject of Amendment
9.0	31- May - 2024	Not Apllicable

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1. Introduction

PLN recognizes the importance of open and transparent engagement with project stakeholders in improving the environmental and social sustainability of projects and enhancing project acceptance among broad stakeholders. PLN understands that stakeholder engagement is an inclusive process conducted throughout the project life cycle, commencing early in project or activity development as an integral part of project decisions processes. Supporting this is the recognised need for an inclusive and functioning Grievance Redress Mechanism (GRM) that allows for proactive management of concerns and grievances from project affected parties and helps to achieve and maintain a “social license to operate”.

This guidance is developed based on the international stakeholder engagement process as well as main guidance on stakeholder engagement in PLN. The main reference for Stakeholder Engagement Management Guideline (SE MG) is detailed in chapter 11. References

2. Disclaimer

This guideline provides an overall guidance to the PLN staff when a project or activity is implemented where a specific stakeholder engagement approach is needed, however, additional requirements may be applied to respective project or activity depending on the policy or standard of the financier. This guideline will also be updated from time to time based on the changes in applicable policies, standards and regulations.

This guideline should not be taken as a standard, regulation, or manual. It provides general guidance to PLN staff on how to engage with broad stakeholders including but not limited to project affected people. The guideline does not provide detailed work instructions such as how to engage with specific stakeholder groups for respective projects. Such detailed work instructions will be provided in project level Stakeholder Engagement Plan (SEP) as stakeholder groups and their interests will vary between projects. This guideline is also not directly applicable in circumstances where impacts to Indigenous People requires projects to secure Free, Prior, and Informed Consent (FPIC), with the consultation mechanisms to be defined through an Indigenous Peoples Plan (IPP) which will supplement any SEP.

Any revision that needs to be made to this guideline will be made following the terms and conditions in the ESMS' Management of Change. If any revision is made; references, rationales and amended parts should be clearly defined. Also, any changes to this guideline may potentially trigger updates to such procedures.

This guideline should be reviewed, implemented, and/or enforced by and to PLN staff with relevant authorities and competencies specified in the ESMS Manual Chapter 3. Any changes to this guideline may potentially trigger the need to update other related guidelines or procedures.

This guideline should be read with relevant parts of other guidelines, such as the guideline on land acquisition and resettlement guideline, and Indigenous peoples guidelines.

3. Objective of Stakeholder Engagement

PLN will engage with broad stakeholders and develop the Stakeholder Engagement Plan (SEP) for respective projects or investments to achieve the following objectives:

- Allows the project to ask for and receive diverse views from broad stakeholders regarding project design, implementation risks, impacts, and mitigation measures;
- Helps the project in developing strong, constructive and responsive relationships with people impacted by the project, including through development of accessible Grievance Redress Mechanism (GRM);
- Support project supervision and help identify potential environmental and social issues early;
- Improve the environmental and social sustainability of the sub-projects, their acceptance and outcomes, and contribute to successful project design and implementation.

4. Key Principles for Stakeholder Engagement

The PLN commits to applying the following principles in engaging with its stakeholders.

- **Provide clear, accurate information and timely communication:** the Project should provide information that is clear, accurate, relevant and timely, recognizing the different communication needs and preferences of various stakeholders and that effective communication involves two ways communications;
- **Accessibility and Inclusivity:** the Project will seek out stakeholders potentially affected by, or interested in, the activities, processes, or decisions of PLN or participating governments and provide them with whatever information they need to participate in an appropriate and meaningful way; particularly for people with special needs/ people with disabilities.
- **Transparency:** management should clearly identify and explain the engagement process, stakeholders' role in the engagement process, and communicate how their input was considered and how it informed the decision or Project;
- **Measurability:** evaluating engagement activities will assist in identifying effective stakeholder engagement methods and improve the quality of stakeholder engagement over time.
- **Sensitivity and oriented towards public health safety:** as Covid-19 or other pandemic cases are still a concern of public health in Indonesia (and across the globe), all stakeholders engagement activities will have to follow the health and to adjust the plan as appropriate, while meeting the engagement objectives.
- **Anonymity:** the grievance redress mechanism allows the submission of grievances without the identity of, or the information that may suggest the identity of, the grievant.
- **Confidentiality:** the grievance redress mechanism ensures that all information provided by complainants is treated with strict confidentiality with strategy in place to limit grievance details only to those directly involved in the resolution process.

5. Stakeholder Identification and Analysis

5.1 Stakeholder Identification

Project stakeholders can be classified into three groups, namely, project-affected parties, vulnerable groups, and other interested parties:

“Project-affected parties” are persons, groups, communities and other entities within the Project Area of Influence (PAI/AOI)¹ 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. This group of stakeholders include those who are likely to be affected by the project because of actual or potential risks or impacts to their physical environment, health, security, cultural practices, well-being, or livelihoods.

“Vulnerable Groups” are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status², and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Examples of vulnerable groups in the community are people under poverty line, women headed households, people with special needs, and indigenous people.

“Other interested parties” are 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. They include 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, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

The process to identify stakeholders captures the following:

(a) First, at the beginning of the environmental and social assessment for the project, the PLN develops a list of project-affected and other interested parties, paying special attention to classifying and identifying disadvantaged or vulnerable groups. Information from any preliminary social impact assessment or screening exercises (eg RESA) can inform this list.

(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

¹ PAI/AOI is decided based on impact assessment study based on each project activities. These areas are usually identified during the environmental permits process. The stakeholder’s groups involved are identified based on the project activities and can be updated regularly.

² To be defined in accordance with prevailing regulations and project context, and typically includes elderly, households with disabled family members, female headed households, illiterate community members etc

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implementer, and any other relevant factors related to the sector and location that help anticipate local and external responses to the project.

(c) Third, it is advisable to conduct discussions with representatives of the stakeholders identified and with persons knowledgeable about the local, country, and sector contexts. In some circumstances, media and social media searches may help to verify the list and identify any other project-affected or interested parties and to contact them. Specific attention is given to identifying any disadvantaged or vulnerable groups.

Depending on the societal context, women, children, youth, and the elderly or other groups may need to be considered as **stakeholder groups** of their own, and separate consultation formats may be needed to capture suggestions and concerns.

PLN will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable³. Based on this identification, PLN 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.

Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to sociopolitical, societal conflict, educational, or practical factors. For example, barriers can exist for ethnic, linguistic, and religious minorities; low-income households; women; youth; persons with limited mobility; or persons with disabilities. An array of strategies can be deployed to mitigate these obstacles by focusing on issues of accessibility, communication, empowerment, and/or confidentiality. It is important to put in place measures for ensuring that stakeholders, and especially vulnerable and disadvantaged groups, are able to safely participate in consultations and that consultations are free of coercion and duress.

An inclusive engagement process aims to empower all relevant stakeholders to participate. This participation includes systematic engagement with, for example, women, children, youth, the elderly, people with disabilities, and other vulnerable or disadvantaged groups.

³ 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.

In the absence of an environment and social impact process, this condition can make stakeholder analysis more challenging. There are still several steps for a project to start the stakeholder engagement process with this condition:

1. Define the project or initiative: Clearly articulate the goals, objectives, and scope of project. Understand what the project aims to achieve and the potential risk and impact it may have on the environment and social aspect.
2. Identify potential stakeholders: Brainstorm among internal project implementation teams and make a list of individuals, groups, or organizations that could be affected by or have an interest in the project. Think broadly and consider various categories, such as local communities, project affected people, government agencies, non-profit organizations, industry associations, contractors, and employees.
3. Prioritize stakeholders: Once the project has identified potential stakeholders, prioritize them based on their level of influence and impact on the project. Consider factors such as their position, authority, expertise, and the potential consequences they may have on your project's success.
4. Gather information of similar project components (typical solar power plant or distribution line or transmission line): Research and gather information about each stakeholder to better understand their interests, concerns, values, and objectives. Look for publicly available information, such as websites, annual reports, news articles, and social media profiles. Additionally, reach out to relevant contacts or organizations to gather insights and perspectives.
5. Analyze stakeholder interests and influence: Evaluate the interests and concerns of each stakeholder and assess their potential influence on the project. Consider their potential to affect the project positively or negatively, and how important their support or opposition may be.
6. Engage with stakeholders: Develop a plan to engage with the identified stakeholders. This could involve conducting meetings, workshops, surveys, or interviews to gather their input and feedback about the project design. Seek to understand their perspectives, address their concerns, and explore potential collaboration opportunities.
7. Update stakeholder information: As the project progresses, continuously update and refine the stakeholder information. Stakeholders and their interests can change over time, so it is important to stay informed and adapt stakeholders' engagement strategies accordingly.

While the absence of an environment and social impact process may limit the available resources and guidance, these steps can help a project to begin the stakeholder analysis and identification process. It is important to remain proactive, flexible, and open to feedback from stakeholders to ensure their interests are considered throughout the project.

5.2 Stakeholder Mapping and Analysis

As mentioned, stakeholders can be broadly classified into three groups, namely, project-affected parties including vulnerable groups, and other interested parties. For the purposes of effective and tailored engagement, stakeholders are to be mapped and analysed in light of the following aspects:

1. **Influence:** Assess the level of influence each stakeholder has over your project. Consider factors such as their decision-making power, authority, resources, and expertise. Stakeholders with high influence can significantly impact the success of your project, so it's important to identify and engage with them effectively. Example of high influence stakeholders in general: A head of village has higher influence due to their current position compared to a villager without any position in the village government body.
2. **Interest:** Evaluate the level of interest each stakeholder has in your project. Determine how much they are affected by or involved in your project's outcomes. Stakeholders with high interest are more likely to actively engage, so it's crucial to address their concerns and incorporate their feedback. Example of high interest stakeholders in general: Land owners (vegetable farmers) living in the project's footprint have higher interest in the land acquisition consultation process compared to a community member who is living 5 KMs away from the project's footprint that only comes to this location for buying a small quantity of vegetables.
3. **Goals and Objectives:** Understand the goals and objectives of each stakeholder. Identify their motivations, priorities, and desired outcomes related to your project. This understanding will help you tailor your communication and engagement strategies to align with their interests.
4. **Attitudes and Influence Networks:** Consider the attitudes and relationships between stakeholders. Identify potential alliances, conflicts, or dependencies among stakeholders. Understanding their influence networks can help you navigate complex stakeholder dynamics and anticipate potential challenges.
5. **Communication Preferences:** Recognize the preferred communication channels and styles of each stakeholder. Some stakeholders may prefer face-to-face meetings, while others may prefer written communications or online platforms. Adapting your communication approach to suit their preferences can enhance engagement and collaboration.
6. **Prioritization:** Once you have assessed influence, interest, goals, and attitudes, prioritize stakeholders based on their significance to your project. Categorize stakeholders into groups such as primary stakeholders (high influence, high interest), secondary stakeholders (low influence, high interest), key influencers, or potential blockers. This prioritization helps allocate resources and focus efforts on engaging with stakeholders effectively.
7. **Ongoing Monitoring and Updates:** Stakeholder mapping is not a one-time activity. Stakeholder dynamics can change throughout the course of a project, so it's important to regularly review and update stakeholder mapping diagrams. Keep track of any changes in stakeholders' interests, influence, or relationships to ensure your engagement strategies remain relevant.

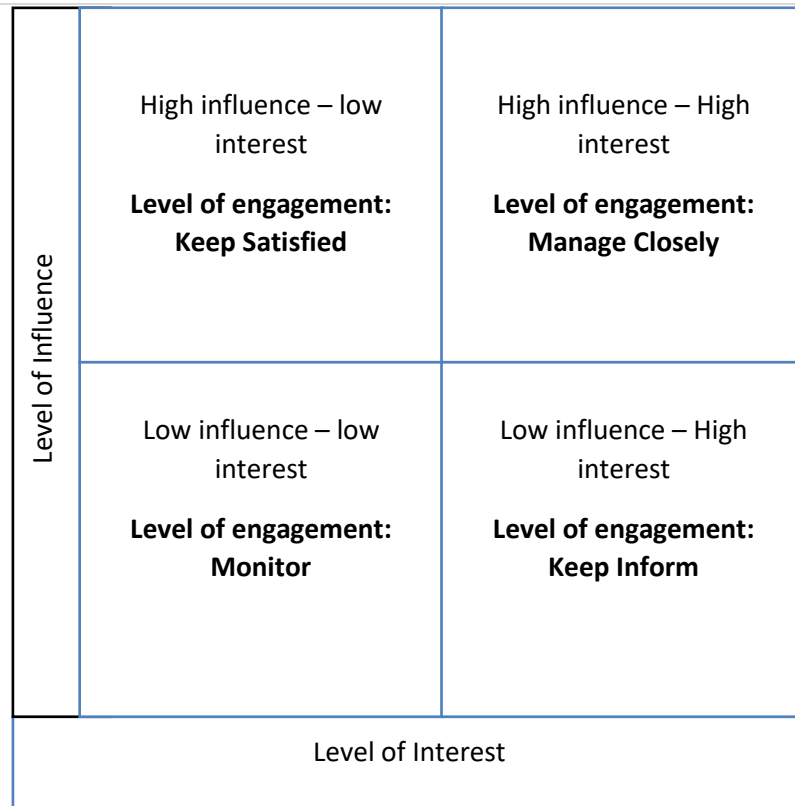


Figure 1 Stakeholder Mapping Diagram

The higher the influence and interest, the project needs to find out the most effective way to engage stakeholder in this group. While Identification of vulnerable groups helps the Project further identify individuals and sub-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. The results of stakeholder identification, analysis, and mapping is a living document and must be periodically re-analyzed and reviewed to ensure that approaches for consultation based on the analysis remain current and effective.

6. Stakeholder Engagement Approach

6.1. Meaningful consultation

Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for PLN to learn from the experience, knowledge, and concerns of the affected and interested stakeholders, and to manage their expectations by clarifying the extent of the PLN responsibilities and resources. The level and frequency of stakeholder engagement conducted is proportionate to the risks and impacts of the project, and PLN will develop and implement a Stakeholder Engagement Plan (SEP) accordingly.

Based on the result of stakeholder identification, mapping and analysis, PLN will undertake a process of stakeholder engagement in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows PLN to consider and respond to them. Meaningful stakeholder engagement will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves. PLN will provide all stakeholders with timely, relevant, understandable, and accessible information, tailored to their needs and priorities, and consult with them in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation.

Meaningful stakeholder engagement 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 time frame that enables engaging 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 PLN.

PLN or project owner or contractor will deploy staff with relevant expertise to engage with different stakeholder groups meaningfully.

For affected community members, PLN / project owner/ contractor may deploy a community liaison officer (CLO)⁴ who can regularly engage with local community members as a bridge between the affected community members and the project. The CLO is particularly useful when impact is significant; affected communities are not homogenous and information may not flow smoothly within the community; and they present distinctive cultural, linguistic and ethnic characteristics that may

⁴ In PLN, this position is suggested to be handled by Focal Point or Facilitator appointed to handle grievance mechanism - based on PT-K3L-34 Prosedur Mekanisme Penanganan Pengaduan dan Keluhan

make direct engagement by PLN staff difficult. CLO may or may not be hired locally, but it is important to select a CLO who knows the affected local communities well.

Experts with academic background may provide useful information about stakeholders (e.g., affected IP communities), and technical experts can provide valuable information about the project impact. Care needs to be exercised about the deployment of such experts in stakeholder engagement processes since communication and people management skills are often as or more important for the success of stakeholder engagement than expert knowledge on impacts or stakeholder groups. The experts can be hired as a stakeholder engagement facilitator which understands the various types of barriers among stakeholders, able to facilitate meaningful discussion during the stakeholder engagement process, and choose types of stakeholder engagement to gather stakeholders' feedback.

For other interested parties, PLN may appoint particular staff members with experiences in public relations and trained with communication skills to hold CLO's role. Some stakeholders may have particular concerns or interests that may go beyond the project. It is important to develop a corporate strategy or talking points on some critical concerns to ensure consistencies in messaging.

During different project stages, the project owner (independent power producer, IPP) and EPC contractor are responsible for direct stakeholder engagement, coordinated with PLN. PLN will provide IPP, EPC contractors, and any contractors with tasks adjacent to or impacting the community, with a standardized approach to stakeholder engagement and grievance mechanisms. This ensures consistent communication and addresses community concerns effectively.

6.2. Stakeholder engagement information

PLN will provide stakeholders with access to the following information as early as possible, but no later than the start of the project in a time frame 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) The process and means by which grievances can be raised and will be addressed.

Meaningful stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available project-related information as early as possible in the project cycle and in a manner, format, and language appropriate for each stakeholder group is important. Formats to provide information may include presentation printouts, nontechnical summaries, project leaflets, and pamphlets. Ideally, maps of the project area and non-technical drawings is included in the materials. Documents used in stakeholder engagement is made available to stakeholders, for example on community public notice boards, and, where possible, on PLN's website.

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).

6.3. Stakeholder engagement type

In engaging with stakeholders, there are a multitude of methods and forums that can be utilised to effectively engage with all stakeholder groups. This includes, town halls, workshops, focus groups, written consultations, online consultations as described in the below table:

Table 1 Types of stakeholders group engagement method

No	Types of engagement	Consideration
1	Town halls	<ol style="list-style-type: none"> 1. Purpose: A town hall meeting is a public event where members of a community, organization, or a specific group come together to discuss and address issues, concerns, or ideas. It typically involves open communication between leaders, officials, or representatives and the community members. 2. Format: Town hall meetings are usually more formal and structured, with designated speakers, moderators, or panellists leading the discussion. There may be presentations, Q&A sessions, and opportunities for the audience to share their thoughts and ask questions. 3. Interaction: While there is an opportunity for audience interaction, it is generally limited to asking questions or sharing opinions from the floor, rather than active participation in activities.
2	Workshop	<ol style="list-style-type: none"> 1. Purpose: Workshops are organized gatherings focused on learning, skill-building, and problem-solving. They provide a more hands-on and participatory experience, allowing

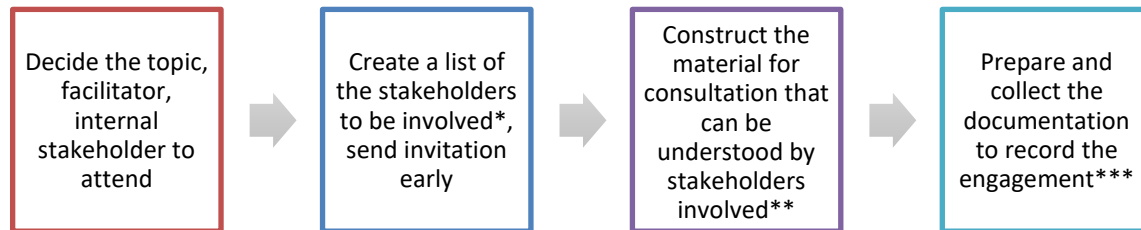
		<p>participants to engage actively and collaborate with each other.</p> <ol style="list-style-type: none"> 2. Format: Workshops are interactive and practical in nature. They involve facilitators or trainers leading participants through exercises, group activities, discussions, and practical tasks related to a specific topic or skill. 3. Interaction: Active participation is a central element of workshops. Attendees are encouraged to contribute, collaborate, and apply their knowledge or skills during the session.
3	Focus group	<ol style="list-style-type: none"> 1. Purpose: Focus group discussions are used primarily for gathering qualitative data and insights on a specific topic or issue. They aim to explore participants' perceptions, opinions, attitudes, and experiences related to a particular subject. 2. Format: In focus group discussions, a moderator or facilitator leads a group of participants through an open-ended and semi-structured discussion. The moderator poses questions, encourages dialogue, and ensures that all participants have an opportunity to express their thoughts. 3. Interaction: Participants in focus group discussions actively share their views, respond to each other's comments, and build on ideas presented by others. The group dynamic fosters a rich exchange of perspectives.
4	Written consultations	<ol style="list-style-type: none"> 1. Purpose: Written consultation refers to seeking feedback or input from stakeholders, experts, or the public through written documents, forms, or surveys. It can be used in various contexts, such as government policymaking, organizational decision-making, or public opinion gathering. 2. Format: Written consultation often involves distributing questionnaires, surveys, or open-ended prompts in physical or digital formats (e.g., printed paper, email attachments, or downloadable PDFs). 3. Interaction: The interaction in written consultation is primarily one-way. The organization or entity seeking input

		<p>provides the questions or prompts, and respondents provide their feedback or answers in writing. There is generally limited direct interaction or real-time discussion between the parties involved.</p> <p>4. Response Time: Written consultation allows respondents to take their time to provide thoughtful responses. It may have a specified deadline for submission, but the respondents have the flexibility to choose when to respond.</p>
5	Online consultation	<p>1. Purpose: Online consultation involves seeking input, feedback, or advice from stakeholders, experts, or the public through online platforms and digital tools. It is commonly used in various fields, including public policy, development planning, market research, and customer engagement.</p> <p>2. Format: Online consultation can take various forms, such as online surveys, web-based questionnaires, discussion forums, social media polls, or interactive webinars. It leverages the internet and digital technology to facilitate communication.</p> <p>3. Interaction: Online consultation allows for two-way interaction between the parties involved. Respondents can provide their feedback or answers online, and there may be opportunities for real-time discussions, follow-up questions, and interactions with the facilitators or organizers.</p> <p>4. Response Time: Online consultation often has a specified time frame for responses. Participants are expected to provide their feedback within the given time limit, which can be helpful in gathering timely data.</p>

The stakeholder engagement type is a strategy chosen to reach as much as possible or the majority of stakeholders' groups in an efficient and effective manner. In preparing or after a big group consultation, other types of engagement can be used such as regular meetings with community leaders, brochures, notice boards. The project should consider the project's resource and accessibility to choose stakeholder engagement strategy.

6.4. Implementation of stakeholder engagement activities

Defining stakeholder engagement methodologies and moving through to implementation is a progressive process as shown within the below figure.



5

Figure 2 Stakeholder engagement activity implementation

Notes:

*Based on stakeholder identification and analysis

**Consider limiting technical words and translating technical words into information that can be understood by stakeholders, as well as the possibility to deliver information in local languages.

***See Annex 3 for stakeholder engagement documentation notes

To achieve meaningful consultation, this process needs to further consider the following as relevant to the specific context in which an activity or project is being conducted:

1. The coordination and invitation of consultation are delivered and conducted at least 5 working days before the consultation of which the invitations must be sent to all of the Project Affected People who will join the consultation process and must be displayed outside the

⁵ Note:

*Based on stakeholder identification and analysis

**Consider to limit technical wordings and translate the technical wordings into information that can be understood by stakeholders, as well as possibility to deliver information in local language.

***see Annex 3 on stakeholder engagement documentation record

meeting room where the consultation takes place. The invitations and discussions are clearly specified the purpose of the consultation.

2. Public consultation is conducted by PLN and/or its contractor during as scheduled along the project lifecycle. The stakeholder engagement is designed in a timely manner to ensure all of the affected community representatives are involved and the information is disclosed with sufficient time to receive information, pose questions and obtain responses from PLN.
3. Minutes of meetings which record the result discussion from stakeholder engagement are disclosed on information/notice boards located in public areas such as in village head offices, district offices, recreational and worship areas.
4. Stakeholder engagement can be arranged into groups of stakeholders to make sure all stakeholders groups can be reached as early as possible in the project stage and throughout the project stages.
5. When the vulnerable people have limited capability (i.e. physical limitation or health limitation) to join the stakeholder engagement, PLN field team will come to the identified impacted vulnerable household to gather their perspective/ concerns.
6. The approach of stakeholder engagement is implemented in the form of meetings/discussions that enable transparent and interactive communications. Meeting is set with an agenda of discussion and actions are recorded. When the participant numbers exceed 15 persons, the meeting has a meeting facilitator to enable an active and fair discussion process, allowing all to have an opportunity to speak.

Practical guidance for application of these principles is further described within the boxes below.

Meaningful stakeholder engagement aims to deliver information and to identify any issues or concerns as well as gather responses from the stakeholders associated with the project and any

decisions made by PLN. The issues, concerns, responses must be recorded in the minutes of meeting and preferably populated in a consultation database.

Example box A for stakeholder engagement activities

The PLN feasibility team's approach in engaging stakeholders is aimed to demonstrate a commitment to effective stakeholder engagement, thorough data collection, and informed decision-making for the power plant project. The systematic collection of information, transparent communication, and thorough documentation contribute to a well-organized and informed project planning process.

Scenario: Stakeholder meeting during feasibility survey

PLN feasibility study team has decided to choose a site for project location. The team sent a notification letter 5 days before the site visit activity to the head of sub district. Mentioning the objective of meeting is to understand the community perception if a small power plant project is planned to be built in the sub district. The meeting is planned at 10 am, on 23 September 2021 in the subdistrict office for 2 hours. The notification letter is delivered on 15 September 2021, to the office of subdistrict office.

Before this meeting, the team has planned to bring some general information about the power plant project such as timeline of development, size of land potentially needed from similar power plant. The team consist of UIP/UIW power plant engineering, community relation (who speaks local language) and land acquisition team.

During the meeting, the discussion between PLN team and sub district leader is recorded in the minutes of meeting and reported to the UIW/UIP team. PLN team mentioned the general information to the leader so that the leader can provide information about the community potential perception towards the PLN plan, existence of cultural heritage, indigenous people location, and location of biodiversity protected area based on the subdistrict leader's and his/her team's understanding.

After the meeting, this minute of meeting is considered as feasibility survey information to take the next step in planning the project activities. For documentation purposes, PLN team collected notification letter, minutes of meeting, attendance list, and a photo of meeting with sub district leader.

Evaluation box A of stakeholder engagement activities scenario**Notification Letter and Objective:**

The PLN feasibility team sent a notification letter to the head of the subdistrict five days before the site visit activity. The letter clearly communicated the objective of the meeting, which is to understand the community's perception of the planned power plant project and other contextual information.

Meeting schedule arrangement:

PLN feasibility team has decided to choose a site for project location. The team sent a notification letter 5 days before the site visit activity to the head of sub district. Mentioning the objective of meeting is to understand the community perception if a small power plant project is planned to be built in the sub district. The meeting is planned at 10 am, on 23 September 2021 in the subdistrict office for 2 hours. The notification letter is delivered on 15 September 2021, to the office of subdistrict office.

Preparation:

Before the meeting, the PLN team planned to bring relevant information about the power plant project. This includes details such as the project's development timeline and the approximate size of land required, drawing from similar power plant projects.

The PLN team includes members from different departments, including UIP/UIW power plant engineering, community relations, and land acquisition teams. This suggests a holistic approach to engagement and project planning.

The PLN team shared the general information about the power plant project with the subdistrict leader. This allowed the leader to provide information based on their understanding and knowledge, including community perceptions, cultural heritage, indigenous people's locations, and biodiversity-protected areas.

Implementation:

PLN team explains the general information agreed internally. The team brings easy to understand information and conducts the meeting in the subdistrict office to make sure there is no intimidation and stakeholders can speak freely. The team can also conduct the meeting in local language as one of the team members can speak local language.

Documentation:

During the meeting, the discussion between the PLN team and the subdistrict leader is recorded in the minutes of the meeting. This ensures that all important points, insights, and decisions are captured accurately. The minutes of the meeting are considered as valuable feasibility survey information. This information will guide the PLN team's next steps in planning the project activities. For documentation purposes, the PLN team collects various materials, including the notification letter, minutes of the meeting, an attendance list, and a photo of the meeting with the subdistrict leader. This comprehensive documentation ensures accountability and transparency. The discussion and outcomes of the meeting are reported back to the UIP/UIW power plant engineering team. This ensures that the information collected is integrated into the overall project planning and decision-making process. Overall, the PLN feasibility team's approach demonstrates a commitment to effective stakeholder engagement, thorough data collection, and informed decision-making for their power plant project. The systematic collection of information, transparent communication, and thorough documentation contribute to a well-organized and informed project planning process.

7. Grievance Redress Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties (external) and PLN's workers as well as contractor's workers (internal) with redress and helps address issues at an early stage and along the project lifecycle (pre-construction, construction, operation).

7.1. GRM Principles

- Grievance procedures should mandate that all complaints are handled with strict confidentiality⁶, fairly, impartially, and promptly. PLN may involve external parties to assist with complaint submission. Those utilizing the grievance mechanism should be safeguarded against any form of retaliation, mistreatment, or discrimination. GRM process limits the access to grievance details only to those directly involved in the resolution process, such as designated grievance officers or relevant authorities.
- Transparent and participatory: The community is informed and involved in the problem-solving process, facilitated by local facilitators or consultants.
- Proportional and accountable: Problem-solving must be commensurate with the scope of the case and accountable to the community according to applicable regulations.
- Objective and easily accessible: Complaints are handled impartially, ensuring they can be submitted by every member of the community through easily accessible channels.
- Prompt, accurate, and recorded: Each complaint and issue are addressed promptly and accurately, with all information, complaints, and grievances recorded for traceability in handling.

7.2. GRM Management

A GRM is established as early as possible in project development and supported by appropriate human and financial resources. The mechanism provides specific places and ways whereby grievances would be received and the means by which they can be submitted (for example, mail, text message, e-mail, website, telephone, suggestion / complaint boxes, grievance form); specifies a person, an office, or an institution responsible for processing grievances; and establishes timelines for processing a complaint and a process for registering and monitoring grievances. GRM 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.

There are several types of GRM channel available, such as: internal GRM for workers can be submitted through direct supervisors, or email to eac@pln.co.id (employee assistance centre/EAC). The EAC email can be used to submit grievances related to gender-based violence; external GRM for consumer can be submitted to multiple channels like phone, PLN website, social

⁶ Confidentiality in grievance mechanism process refers to the protection and non-disclosure of complainants' identities and information to maintain privacy and trust.

media or PLN mobile app; external GRM for affected people/stakeholders can be submitted to PLN unit (Unit Induk/Unit Pelaksana/Proyek) and PLN's contractor onsite.

Anonymous grievance handling: Anonymous grievance submission in grievance mechanism process allows individuals to report concerns or complaints without revealing their identities, ensuring confidentiality and encouraging participation from those who may fear retaliation. Option for complainants to submit grievances anonymously is provided. These options allow complainant to express concerns without revealing their identity. This can be done through anonymous hotlines, suggestion boxes, or online forms where personal information is not required.

Non-Disclosure Agreements: Implement non-disclosure agreements (NDAs) or confidentiality agreements to formally commit to keeping complainants' information confidential. This can provide reassurance to individuals that their privacy will be respected. PLN only disclose complainants' identities or details of their grievances on a need-to-know basis and with their explicit consent in NDA. PLN avoids sharing information unnecessarily or with individuals who are not directly involved in the resolution process.

Grievance handling will be done in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the needs and concerns of the external and internal stakeholders. The mechanism will also allow for anonymous complaints to be raised and addressed. Protection and a safe environment are given especially for gender-based violence issues (GBV). Refer to PLN guidance on GBV (sexual harassment) for community and workers. Example of topics that can be reported through the project's GRM are:

- For external stakeholders: land claim information about the project footprint during pre-construction, disruption of increase noise to the surrounding community during construction, and unfair worker selection (submission of these issues may start from reporting it to Onsite Security Officers and they continue the report process to K3L division)
- For internal stakeholders: gender-based violence topic: sexual abuse, bullying; other: unsafe behaviour in workplace⁷, thief, and harassment (submission of these issues may start from reporting it to Human Resource or dedicated whistle blower personnel/platform or K3L division)

GRM registration, identification, classification and tracking

A. Registration:

- ☐ See Annex 2 for template example
- ☐ Provide a code number for suggestions/complaints (Grievance) as agreed upon by each project implementation unit. This number will then be used as a tracking number for the status of resolving suggestions/complaints and will be communicated to the complainant submitting the suggestion/complaint.
- ☐ Provide detailed date and time
- ☐ Complete the identity of the reporter as required in the complaint form

⁷ utilizing a record under Incident report mechanism

- ☐ If the reporter or complainant refuses to provide identity information, make a written report or provide a signature, the form is filled out by the PLN focal point, for example: This anonymous report is received through Mrs. Diana (focal point UIP Makassar)

B. Complaint classification and Identification are based on:

- ☐ See Annex 2 for template example
- ☐ Complaints originating from various delivery methods are grouped into: Direct Visit — Email — Social Networking — Electronic Messages — Other
- ☐ The issue or material of the complaint to determine the complaint category and the level or person in charge of complaint handling and issues;
- ☐ The department to which the complaint is addressed; and
- ☐ Complaint status, for example, new cases, old cases, follow-up cases, collateral impacts of existing issues, or additional information on issues that have been previously addressed.
- ☐ Complaints with possible gender inequality elements experienced by the reporter or represented should be handled by representatives with competence in understanding, counseling, and handling sexual violence.

C. Complaint Tracking and Resolution:

- ☐ Grievance code number is utilized as tracking number in PLN's grievance log / grievance record
- ☐ The complaint resolution status must be updated and followed up by Grievance Vocal Point. Grievance vocal point distributes the grievance to the person in charge who needs to solve the grievance. Then, weekly update and follow up process for each grievance is suggested.
- ☐ Complaints and grievances are responded to or resolved within approximately 30 working days from the date of receipt of the complaint or grievance. Resolution here includes but is not limited to archiving received and resolved complaint records, and informing complainants about the decisions made.

D. Evaluation and monitoring:

- ☐ Monitoring the implementation of the complaint handling mechanism needs to be conducted to assess the progress of complaint follow-up activities, the level of success, effectiveness, and efficiency, and it should be done continuously. Evaluation is carried out to refine the document by reviewing the steps that have been taken and improved, conducted every six (6) months.
- ☐ Some aspects considered in conducting the evaluation are:
 - a. Types of complaints received so far
 - b. Number of complaints resolved within six months
 - c. Challenges in implementing complaint handling

8. Resource allocation

PLN must identify and describe the responsibilities of all parties (PLN, contractor or other relevant third parties) and competent authorities in implementing the stakeholder engagement process. PLN must also identify the roles and responsibilities of individual positions within these organizations.

SEP includes cost estimates for each of activity or set of activities implementation, including long-term recurrent costs (when specific approach needs to be implemented regularly such as grievance resolution). Confirm that an adequate budget has been allocated toward stakeholder engagement activities and where the source adequate budget sourced from. The budget for the implementation of the Stakeholder Management at the corporate level is under the budget for implementing the Corporate Secretary program. While Stakeholder engagement budget in each Unit is allocated under each Implementing Sub Units and are included in the Work Plan and Budget Company (RKAP) for each work unit. The stakeholder engagement is implemented along the project stage/lifecycle as such the resource allocation (fund and human resource for all components of stakeholder engagement activities) is built in within the project budget.

Each project has a dedicated liaison officer to coordinate, record and manage the stakeholder engagement process including managing grievance process. The corporate safeguard team guides the appointment of this officer as early as possible in project lifecycle.

8.1 Authority of PLN unit in stakeholder engagement

PLN staff that might be assigned for role on managing stakeholder engagement can be located in:

- PLN head quarter (Kantor Pusat)
- Main Unit (Unit Induk)
- Project Implementing Unit (Unit Pelaksana Proyek) and Sub Implementing Unit (Sub Unit Pelaksana)

GRM vocal points are appointed within an organisation structure as a responsible person to monitor and to coordinate the grievance resolution. See also the task in detail in PLN Grievance Redress Mechanism Procedure PT-K3L-34. See details on stakeholder engagement role in PLN based on PerDir PLN NO: 0119P/DIR/2017 Pedoman Tata Kelola Stakeholder (Pemangku Kepentingan) Di Lingkungan PT PLN Persero

A. Role of head quarter in stakeholder engagement:

- Developing policies, guidelines, and programs for Stakeholder Governance.
- Developing relationships between PLN and external Stakeholders
- Develop, foster, and evaluate the relationship between PLN and external Stakeholders at the national level.
- Implement the Stakeholder Governance program at the national and international levels.
- Supervise the implementation of the Stakeholder Governance program at the regional level.
- Conducting coordination meetings on the implementation of the Stakeholder Governance program at the regional level with other units on a regular basis.

B. Role of main unit in stakeholder engagement:

- Implementing policies, guidelines, and programs on Stakeholder Governance at the regional level.
- Develop, foster and evaluate the relationship between PLN and Stakeholders at the regional level.
- Supervise the implementation of the Stakeholder Governance program at the regional level.
- Conduct coordination meetings on the implementation of the Stakeholder Governance program with the Implementing Unit on a regular basis.

C. Role of Implementing Unit in stakeholder engagement:

- Implementing policies, guidelines, and Stakeholder Governance programs at the regional level.
- Developing, fostering, and evaluating the relationship between PLN and Stakeholders at the regional level.
- Supervise the implementation of the Stakeholder Governance program at the Sub Implementation Unit level.
- Conducting coordination meetings on the implementation of the Stakeholder Governance program with the Implementing Sub Units on a regular basis.

8.2 Roles of key personnel in stakeholder engagement

PLN staff assigned to stakeholders' engagement should play an important role in terms of:

- Provide clear, factual and accurate information in a transparent and sustainable manner to community stakeholders through free, prior and informed consultation;
- Provide opportunities for community stakeholders to raise issues, make suggestions and voice their concerns and expectations regarding the Project;
- Responding to issues and requests for permission;
- Provide feedback to stakeholders on how their contributions have been considered in the preparation of relevant studies and plans. Community and stakeholder engagement in the preparation of the ESIA (AMDAL) will be incorporated at the time of approval of the RKL-RPL documents through consultation with the ESIA (AMDAL) Technical Team. This also applies at the time of public consultation to determine proposed project sites that require land acquisition. Input and suggestions from relevant stakeholders will be used to refine the project documents with specific mentions to indicate where stakeholder input has been taken.

To fulfil the role the key project personnel involved in stakeholder engagement must have sensitivity and empathy towards the target group by means of:

- Treat all community stakeholders with respect, and ensure that all Project personnel and contractors in contact with community stakeholders do the same;
- Willing to listening and learning about local language and local custom;

- Pay attention to and prioritize the presence of vulnerable groups affected by the project, such as persons with disabilities, the elderly, the poor, indigenous peoples, as well as those with authority and power;
- Employ appropriate communication modalities for each target group, and take into account additional measures needed to reach persons with disabilities.

9. Development of Stakeholder Engagement Plan

A Stakeholder Engagement Plan (SEP) will be developed before the commencement of the project, or per requirements of the financier. It must adhere to the principles defined within this guideline and ensure that the scope and level of detail is commensurate with and proportionate to the nature and scale, potential risks, and impacts of the project and the concerns of the stakeholders who may be affected by or are interested in the project. Depending on the nature of the scale of the risks and impacts of the project, the elements of a SEP may be adjusted, for example:

- Low risk rating projects: a preparation of a stand-alone SEP may not be necessary. SEP can be designed as part of ESMP (Environment Social Management Plan)
- Moderate risk rating projects: a simplified standalone SEP is required.
- High to very high-risk rating project: estimated engagement for every stage of the project should be planned carefully in a standalone SEP.

The SEP should be clear and concise. The main function of SEP is to record the list of stakeholders identified, inputs received from them during the preparation stage and how the project will engage with them differently depending on their needs and preferred communication channels throughout the project lifecycle. Annex 1 provides the structure of a typical SEP, with the steps involved in its preparation shown within Figure 3 below and described further below.

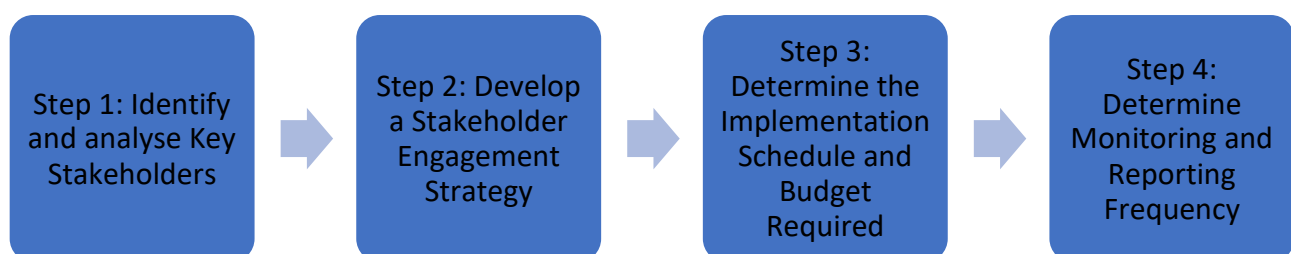


Figure 3 Steps for developing stakeholder engagement plan

Step 1: Identify and analyse key stakeholders

See chapter 3 on stakeholder identification and analysis, based on the process of stakeholder identification, Mapping, and analysis. The below table defines the minimum level of information required in developing this component of the SEP:

Table 2 Example of data result from stakeholder analysis

Community	Stakeholder group	Details	Interest	Authority	Stakeholder engagement level	Stakeholder Priority
Village A	Women group	20 persons per village	High interest	Low influence	Keep inform	Secondary external stakeholders
Village B	Hamlets leaders	Each village has 5 hamlet leaders (a, b, c, d, e)	High interest	High influence	Keep satisfied	Primary external stakeholders
Local Worker	Labor unions	20 local workers in project site A	High Interest	High Influence	Keep satisfied	primary internal stakeholders

Beside three categories of stakeholders as mentioned in chapter 5, PLN and project owner under PLN must include the identification of stakeholder from Internal and External PLN's Project, as defined below:

- a. Internal Stakeholders: Work units, Subsidiaries, Employees and families, Labor unions, Retirees, Family Association of State Electricity Pensioners
- b. External Stakeholders: All stakeholders that are not mentioned above

The stakeholder's list is developed as early as possible in the project stage, is the core basis for development of the SEP, and must be updated regularly along the project Lifecycle. The SEP accompanying documents will require the project to maintain stakeholder contact details, concern about the project, and as much as possible information about the stakeholder's interaction with / attitude towards the project to decide stakeholders' priority. Information may also vary on stakeholders needs⁸ and expectation. This information could be gathered through surveys, interviews, and analysing existing data.

⁸ Examples may include (i) Women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design online and in-person surveys and other engagement activities so that working women can participate; consider provisions for childcare, transport, and safety for any in-person community engagement activities; there may also be women who face multiple challenges, for example, indigenous women, women with disabilities, etc. (ii) Elderly and

Step 2: Develop a Stakeholder Engagement strategy

Referring to chapter 4 on stakeholder engagement approaches, the information of arising from stakeholder identification, analysis and assigning stakeholder priority can be used to decide type of stakeholder engagement method to gather information or to engage the particular group or individual. The stakeholder engagement map results can be used to decide the stakeholder engagement type as follow:

- **High-Power/High-Interest Stakeholders:** These stakeholders are both influential and highly interested in the project. Engage them through more interactive methods that allow for in-depth discussions and collaborative decision-making. Examples include workshops, focus groups, advisory panels, and partnership collaborations.
- **High-Power/Low-Interest Stakeholders:** Even if they are not highly interested, these stakeholders have significant influence. Use methods that efficiently deliver essential information and updates, such as targeted emails, personalized briefings, and occasional one-on-one meetings.
- **Low-Power/High-Interest Stakeholders:** These stakeholders are interested but lack substantial influence. Engage them through methods that provide platforms for sharing their opinions and concerns. Online surveys, open forums, and social media campaigns can be effective.
- **Low-Power/Low-Interest Stakeholders:** With limited influence and interest, these stakeholders might require minimal engagement. Standard communication channels like newsletters, general announcements, and informational web pages can suffice.

Ensure that the chosen methods are accessible to all stakeholder groups, considering factors like language, technology access, and physical constraints. Additionally, evaluate the resources (time, budget, personnel) needed to execute each method effectively. These aspects can be integrated into tables as shown below, which define the minimum level of information required in developing this component on an SEP.

Table 3 Example of engagement strategy

Community	stakeholder group	Preferred notification	Specific needs	Stakeholder mapping result	Engagement strategy
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people with existing medical conditions: develop information on specific needs and explain why they are at more risk and what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; (iii) People with disabilities: provide information in accessible formats, such as braille or large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for the hearing impaired, and online materials for people who use assistive technology; and (iv) Children: design information and communication materials in a child-friendly manner and provide parents with skills to handle their own anxieties and help manage those in their children.

Village Women group A,	Affected parties	Written information, radio	Child care for meetings—late afternoon preferred timing	Low-Power/High-Interest Stakeholders	Open forum
Village Hamlets leaders B,	Affected parties	Visit with translator and civil society representative	Graphics, education on process	High-Power/High-Interest Stakeholders	Advisory meeting

Table 4 Example of engagement strategy for each project lifecycle

Project stage	List of information to be disclosed	Methods proposed	General Timetable	Target stakeholders	Percentage reached	Responsibilities
Construction	Traffic management plan	Notification Radio News 100.6 and copy in village hall Poster on community bulletin board	Radio twice daily in weeks of disclosure	Villagers, including pedestrians and drivers	Radio News 100.6 reaches 60% of village Poster on bulletin board reaches another percentage of the population	Community Liaison Officer

The stakeholder engagement strategy needs to be flexible and adjusted based on the stakeholder response and changing circumstances. This is defined through an ongoing monitoring process that solicits feedback from stakeholders to assess whether their needs are being met and whether adjustments are required.

Step 3: Determine the Implementation Schedule and Budget Required

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Once the overall strategy has been developed, the community liaison team makes a comprehensive list of all the engagement activities planned to undertake. This could include events, meetings, surveys, communication materials, workshops, and more. The engagement activities are broken down into smaller components. For example, if the project is planning a workshop, consider expenses like venue rental, materials, facilitator fees, refreshments, and travel. A sample of a schedule and methodology is shown within the below table.

Table 5 Example of stakeholder engagement schedule

Project stage	Topic of consultation	Method used	Exact Timetable: Location and dates	Target stakeholders	Responsibilities
Construction	Traffic safety	Discussion with village schools Public meeting	ABC elementary school September 4, 3:00 p.m. Village A town hall September 8, 5:30 p.m.	Parents and children in village Community	Community Liaison Officer (CLO) Transportation Engineer, Manager, CLO

This needs to be accompanied by calculation of the costs of personnel who will be involved in planning, organizing, and executing the engagement activities. This includes staff time, salaries, and any additional support required. Budget allocation includes technology platforms, tools, or software for communication, surveys, or virtual meetings, considering their associated costs. The costs of materials, supplies, printed materials, signage, and any resources needed for engagement activities are estimated during each engagement or during campaign to disclose information. A review of the total budget estimated and prioritized activities is based on their importance and alignment with the project engagement objectives. As the engagement plan progresses, monitor actual expenses and compare them to the budget, with adjustments made accordingly and reacting to any required changes in engagement strategy. A sample budget format is shown within the below table.

Table 6 Example of stakeholder engagement budget

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
1. Estimated staff salaries* and related expenses					
1a. [E.g., communication consultant]					
1b. [E.g., travel costs for staff]					

1c. [E.g., estimated salaries for Community Liaison Officers]					
2. Events					
2a. [E.g., organization of focus groups]					
3. Communication campaigns					
3a. [E.g., posters, flyers]					
3b. [E.g., social media campaign]					
4. Trainings					
4a. [E.g., training on social/environmental issues for PIU and contractor staff]					
4b. [E.g., training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff]					
5. Beneficiary surveys					
5a. [E.g., mid-project perception survey]					
5b. [E.g., end-of-project perception survey]					
6. Grievance Mechanism					
6a. [E.g., training of GM committees]					
6b. [E.g., suggestion boxes in villages]					
6c. [E.g., GM communication materials]					
7. Other expenses					
7a. [insert]					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

Step 4: Determine Monitoring and Reporting Frequency

The SEP will be periodically revised and updated as necessary in the course of project implementation. Summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. Every six months summaries report will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a

timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways such as through PLN website or community meeting.

10. Monitoring and Review

Monitoring

PLN must call for monitoring of stakeholder engagement activities, in order to ensure compliance with the applicable national law and regulation or the international standard, as set in the stakeholder engagement objectives. IPP and Contractor should maintain a monitoring and review process in an alignment with PLN standards for SEP. The SEP should specify:

- Indicators to be monitored for SEP and GRM;
- Monitoring location/position;
- Regulatory criteria (if applicable);
- The required qualifications of persons who will conduct the monitoring, and of any members of the public who may participate in monitoring;
- Records that must be kept and the person responsible for keeping the records;
- Reports that will be prepared, to whom the reports are to be submitted for review, and the length of time records will be kept. This will include summary reports at intervals and to which institution it is submitted.

Monitoring indicator

A key component of data required for monitoring will be both the Stakeholder Engagement Log and Community Grievance Log which are aspects of SEP implementation required to be maintained and updated in real time. From this data, the project can show effectiveness, progress, or impact of stakeholder engagement activities to inform future decision-making and strategy adjustments.

Here are some examples of meaningful indicators in a project stakeholder engagement implementation. PLN may choose some of the indicators below during monitoring and evaluation process:

1. Stakeholder Participation Rate: Percentage of stakeholders actively engaged in project activities, such as attending meetings, providing feedback, or participating in consultations.
2. Stakeholder Satisfaction Score: Ratings or feedback provided by stakeholders regarding their satisfaction with the level of engagement, communication, and responsiveness of the project team.
3. Level of Trust: Measurement of stakeholders' trust in the project team and the project's ability to address their concerns and interests.

4. Number of Grievances/Complaints Resolved: Quantification of the grievances or complaints received from stakeholders and the percentage resolved satisfactorily within a specified timeframe.
5. Stakeholder Knowledge Level: Assessment of stakeholders' understanding of the project's objectives, potential impacts, and mitigation measures through surveys or interviews.
6. Incorporation of Stakeholder Feedback: Percentage of stakeholder feedback incorporated into project plans, decisions, or mitigation measures, demonstrating responsiveness to stakeholder input.
7. Diversity and Inclusivity: Measurement of the representation and inclusion of diverse stakeholder groups in engagement activities, ensuring equitable participation across different demographics.
8. Level of Collaboration: Evaluation of the extent to which stakeholders are collaborating with the project team and with each other to achieve shared goals and address challenges.
9. Impact on Stakeholder Decision-making: Assessment of the project's influence on stakeholder decision-making processes, such as changes in attitudes, behaviors, or policy advocacy.
10. Long-term Relationships: Measurement of the strength and sustainability of relationships between the project team and stakeholders, including indicators like repeat engagement, referrals, or continued support.

These indicators provide insights into the effectiveness, responsiveness, and impact of stakeholder engagement efforts, helping project teams gauge their performance and adapt their strategies to better meet stakeholder needs and expectations.

The monitoring frequency and reporting of stakeholder engagement activities are based on commitment between PLN and Lenders. SEP implementation is monitored, periodically (at least every 6 months or annually) or at the end of the activity, depending on the type and time span. The frequency of monitoring is specified for each activity, including the resource/person in charge required for monitoring, person qualified to conduct the monitoring, and the record that must be kept. The SEP document itself may also define more frequent monitoring or monitoring as a follow-up to a significant planned activity (e.g. environmental and social impact assessment disclosure) or a significant unplanned activity (e.g. evaluation of incident involving damage to community or individual property). Additionally, both the Stakeholder Engagement Log and Community Grievance Log must be maintained in real time and continually referred to for the purpose of ongoing monitoring and whether community acceptability and “social licenses to operate” is being maintained.

The monitoring result is reported, the Plan specifies to whom the reports are to be submitted for review, and the length of time records will be kept. This will include summary reports at intervals and to which institution the monitoring report is submitted. Finally, the result of monitoring includes the decision whether the SEP document should be updated and disclosed to the public or not.

Review

The Environmental and Social Management Plan (ESMP) is a living document, as stated in the ESMS manual (Chapter 6). Therefore, a SEP under ESMP is also a living document where it has to be referred to every time along the project stage. Its target and approach are reviewed, modified, or renewed as deemed necessary to find the best possible result. Regular review of a Stakeholder Engagement Plan needs to be conducted at minimum annually.

Regular review of the management plan and the party responsible for conducting a review, making an amendment and the party approving the results of the review and the changes made (if any) must be stated in the management plan.

11. References

National Standards

- The Law No. 32/2009 on Environmental Protection and Management states that “environmental protection and management shall be executed on the basis of participation.”
- Law No. 14/2018 on Public Information Transparency, which guarantees the rights of citizens on public policy decisions and fosters public participation in such decision making.
- Law No. 32/2009 on Environmental Protection and Management also covers communities’ right to raise objections to proposed projects and the government’s obligation to develop and implement policies on the management of public complaints related to protecting and managing the environment.
- Law No. 7/1984 on the Enactment of the Convention on the Elimination of All Forms of Discrimination Against Women.
- Presidential Instruction No. 9/2000 on Gender Mainstreaming in National Development emphasizes women’s participation in development processes.
- Minister of Environment Regulation No. 17/2012 on Guidelines for Public Participation in Environmental Impact Assessment and the Environmental Permit Process.
- Minister of Environmental Regulation No. 9/2010, provides guidelines for handling community grievances caused by Environmental pollution and degradation. As a final recourse, Articles 84 and 85 of Law No. 32/2009 provide for citizen lawsuits with respect to environmental disputes resulting in court ordered or out-of-court settlements, including provisions for environmental restoration and compensation.
- Government regulation number 22 of 2021, the implementation of environmental protection and management, article 32 on the involvement of directly affected communities includes indigenous peoples as parties that need to be involved in the public consultation process

International Standards

- ESS10 Worldbank Stakeholder Engagement and Information Disclosure

- Guidance Note Environmental & Social Framework for IPF Operations ESS10: Stakeholder Engagement and Information Disclosure

Internal PLN regulation to date with relation to stakeholder engagement activities:

- PT-HSSE-03 Prosedur Komunikasi;
- PT-HSSE-25 Prosedur Komunikasi Eksternal dan Publikasi Dokumen Lingkungan
- PT-K3L-34 Prosedur Mekanisme Penanganan Pengaduan dan Keluhan
- PerDir PLN NO: 0015P/DIR/2020 Perlindungan, Pencegahan dan Penanganan Pelecehan Seksual di Lingkungan PT.PLN Persero
- PerDir PLN NO: 0119P/DIR/2017 Pedoman Tata Kelola Stakeholder (Pemangku Kepentingan) Di Lingkungan PT PLN Persero
- PLN.PST-SMP-IK-09-07 PENANGANAN DEMONSTRASI (AKSI MASSA)
- PLN.PST-SMP-PR-07-06 KOMUNIKASI, KONSULTASI DAN PARTISIPASI
- PLN.PST-SMP-PR-07-07 PENYAMPAIAN DAN PENANGANAN KELUHAN SISTEM MANAJEMEN PENGAMANAN
- Environmental Safeguards Technical Guidelines (Draft Edition 3, September 2021)

12. Annexes

Annex 1: General Template of Stakeholder Engagement Plan

Stakeholder Engagement Plan (SEP)

The scope and level of detail of the plan should be commensurate and proportionate with the nature and scale, potential risks, and impacts of the project and the concerns of the stakeholders who may be affected by or are interested in the project. Depending on the nature of the scale of the risks and impacts of the project, the elements of an SEP may be included as part of ESMP, and preparation of a stand-alone SEP may not be necessary.

The SEP should be clear and concise and focus on describing the project and identifying its stakeholders. It is key to identify what information will be in the public domain, in what languages, and where it will be located. It should explain the opportunities for public consultation, provide a deadline for comments, and explain how people will be notified of new information or opportunities for comment. It should explain how comments will be assessed and taken into account. It should also describe the project's grievance mechanism and how to access this mechanism. The SEP should also commit to releasing routine information on the project's environmental and social performance, including opportunities for consultation and how grievances will be managed.

1. Introduction/Project Description

Briefly describe the project, the stage of the project, its purpose, and what decisions are currently under consideration on which public input is sought.

Describe location and, where possible, include a map of the project site(s) and surrounding area, showing communities and proximity to sensitive sites, and including any worker accommodation, lay-down yards, or other temporary activities that also may impact stakeholders. Provide a link to, or attach a nontechnical summary of, the potential social and environmental risks and impacts of the project.

2. Brief Summary of Previous Stakeholder Engagement Activities

If consultation or disclosure activities have been undertaken to date, including information disclosure and informal or formal meetings/or consultation, provide a summary of those activities (no more than half a page), the information disclosed, and where more detailed information on these previous activities can be obtained (for example, a link, or physical location, or make available on request).

3. Stakeholder identification and analysis

Identify key stakeholders who will be informed and consulted about the project, including individuals, groups, or communities that:

- Are affected or likely to be affected by the project (project-affected parties); and

- May have an interest in the project (other interested parties).

Depending on the nature and scope of the project and its potential risks and impacts, examples of other potential stakeholders may include government authorities, local organizations, NGOs, and companies, and nearby communities. Stakeholders may also include politicians, labor unions, academics, religious groups, national social and environmental public-sector agencies, and the media.

a. Affected parties

Identify individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively. The SEP should focus particularly on those directly and adversely affected by project activities. Mapping the impact zones by placing the affected communities within a geographic area can help define or refine the project's area of influence. The SEP should identify others who think they may be affected, and who will need additional information to understand the limits of project impacts.

b. Other interested parties

Identify broader stakeholders who may be interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

Moreover, civil society and nongovernmental organizations may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the Borrower to consider and address in the assessment process. Some groups may be interested in the project because of the sector it is in (for example, mining or health care), and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open to anyone interested.

c. Disadvantaged / vulnerable individuals or groups

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events,

accessibility of venues, disability, lack of understanding of a consultation process).

- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.)
- If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

Example: Summary of project stakeholder needs

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Village A	Parents with young children	Approximately 180 households affected; 300 children	Official language	Written information, radio	Child care for meetings—late afternoon preferred timing
Village A	Refugees	38 extended families, poverty level	Language alternative	Visit with translator and civil society representative	Graphics, education on process

4. Stakeholder Engagement Program

a. Purpose and timing of stakeholder engagement program

Summarize the main goals of the stakeholder engagement program and the envisaged schedule for the various stakeholder engagement activities: at what stages throughout the project's life they will take place, with what periodicity, and what decision is being undertaken

on which people's comments and concerns. If decisions on public meetings, locations, and timing of meetings have not yet been made, provide specific information on how people will be made aware of forthcoming opportunities to review information and provide their views. For some projects, a stand-alone SEP may not be necessary and its elements may be incorporated into the ESMP.

b. Proposed strategy for information disclosure

Briefly describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience. For each media example, identify the specific names (for example, *The Daily News* and *The Independent*, *Radio News 100.6*, television *Channel 44*). The selection of disclosure—both for notification and providing information—should be based on how most people in the vicinity of the project routinely get information, and may include a more central information source for national interest. A variety of methods of communication should be used to reach the majority of stakeholders. The project should select those that are most appropriate and have a clear rationale for their choices. The plan should include a statement welcoming comments on the proposed engagement plan and suggestions for improvement. For remote stakeholders, it may be necessary to provide for an additional newspaper outlet or separate meeting, or additional documents that should be placed in the public domain. The public domain includes:

- Newspapers, posters, radio, television;
- Information centers and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings;
- Website, social media.

The strategy should include means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts. Following such consultation, an updated will be disclosed.

Example

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities

Construction	Traffic management plan	Notification Radio News 100.6 and copy in village hall Poster on community bulletin board	Radio twice daily in weeks of disclosure	Villagers, including pedestrians and drivers	Radio News 100.6 reaches 60% of village Poster on bulletin board reaches another percentage of the population	Community Liaison Officer
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c. Proposed strategy for consultation

Briefly describe the methods that will be used to consult with each of the stakeholder groups. Methods used may vary according to target audience, for example:

- Interviews with stakeholders and relevant organization
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topic
- Participatory methods
- Other traditional mechanisms for consultation and decision making.

Example of stakeholder engagement log

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Construction	Traffic safety	Discussion with village schools Public meeting	ABC elementary school September 4, 3:00 p.m. Village A town hall September 8, 5:30 p.m.	Parents and children in village Community	Community Liaison Officer (CLO) Transportation Engineer, Manager, CLO

d. Proposed strategy to incorporate the view of vulnerable groups

Describe how the views of vulnerable or disadvantaged groups will be sought during the consultation process. Which measures will be used to remove obstacles to participation? This may include separate mechanisms for consultation and grievances, developing measures that allow access to project benefits, and so forth.

e. Timelines

Provide information on timelines for project phases and key decisions. Provide deadlines for comments.

f. Review of Comments

Explain how comments will be gathered (written and oral comments) and reviewed, and commit to reporting back to stakeholders on the final decision and a summary of how comments were taken into account.

g. Future Phases of Project

Explain that people will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. Projects should report at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction, then annual reports during implementation).

5. Resources and Responsibilities for implementing stakeholder engagement activities

a. Resources

Indicate what resources will be devoted to managing and implementing the Stakeholder Engagement Plan, in particular:

- What people are in charge of the SEP Confirm that an adequate budget has been allocated toward stakeholder engagement
- Provide contact information if people have comments or questions about the project or the consultation process; that is, phone number, address, e-mail address, title of responsible person (individual names may change).

b. Management functions and responsibilities

Describe how stakeholder engagement activities will be incorporated into the project's management system and indicate what staff will be devoted to managing and implementing the Stakeholder Engagement Plan:

- Who will be responsible for carrying out each of the stakeholder engagement activities and what are the qualifications of those responsible?
- How involved will management be in stakeholder engagement?
- How will the process be documented, tracked, and managed (for example, stakeholder

database, commitments register, and so forth)?

6. Grievance Mechanism

Describe the process by which people affected by the project can bring their grievances and concerns to the project management's attention, and how they will be considered and addressed:

- Is there an existing formal or informal grievance mechanism, and does it meet the requirements of PLN ESMS standard? Can it be adapted or does something new need to be established?
- Is the grievance mechanism culturally appropriate, that is, is it designed to take into account culturally appropriate ways of handling community concerns? For example, in cultures where men and women have separate meetings, can a woman raise a concern to a woman in the project grievance process?
- What process will be used to document complaints and concerns? Who will receive public grievances? How will they be logged and monitored?
- What time commitments will be made to acknowledge and resolve issues? Will there be ongoing communication with the complainant throughout the process?
- How will the existence of the grievance mechanism be communicated to all stakeholder groups? Are separate processes needed for vulnerable stakeholders?
- If a complaint is not considered appropriate to investigate, will an explanation be provided to the complainant on why it could not be pursued?
- Will there be an appeals process if the complainant is not satisfied with the proposed resolution of the complaint? Not all projects will necessarily have an appeals process, but it is advisable to include one for more complex projects. In all cases, complainants need to be reassured that they still have all their legal rights under their national judicial process.
- A summary of implementation of the grievance mechanism should be provided to the public on a regular basis, after removing identifying information on individuals to protect their identities. How often will reports go into the public domain to show that the process is being implemented?

7. Monitoring and Reporting

Design and provide insight into the level of stakeholder participation, satisfaction, influence, or any other relevant aspect of stakeholder engagement efforts. Meaningful indicators are essential for evaluating the success of the stakeholder engagement process and informing future decision-making and strategy adjustments.

a. Involvement of stakeholders in monitoring activities

Some projects include a role for third parties in monitoring the project or impacts associated with the project. Describe any plans to involve project stakeholders (including affected communities) or third-party monitors in the monitoring of project impacts and mitigation

programs. The criteria for selection of third parties should be clear.

b. Reporting back to stakeholder groups

Describe how, when, and where the results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholder groups. It is advised that these reports rely on the same sources of communication that were used earlier to notify stakeholders. Stakeholders should always be reminded of the availability of the grievance mechanism.



STAKEHOLDER ENGAGEMENT MANAGEMENT GUIDELINE

Annex 2: General Template of GRM

Example of grievance log

PLN Wilayah:

PLN UP3:

Submitted by:

Period:

No	Grievance Code	Grievance Information				Follow up Actions			
		Location/ grievance form number:	Date, Day, Time	Grievant Name	Grievance Topic	Person in charge	Date, day. time of process	Follow up action	Status (Resolve/ Investigatio n/ Unresolved)
1									
2									

Example of grievance form

Grievance Form Number: Topic (choose): Air pollution, Water pollution, Vibration, Noise, Asset compensation, Work relations, Worker standards (e.g. discrimination), Interference with Occupational Health and Safety (K3) Else, please specify: Submission Media(choose): Direct Visit — Email — Social Networking — Electronic Messages — Other	
Date & Time: PLN Office Unit Location : Focal Point - Grievance Receiver (Name, Position):	
Grievant Name and ID number	
Address	
Contact Number	
Complaint Issue (When, Where, What, why, Who, How)	
Grievant signature	
Follow up action	
Date & Time	
Complaint Answered/Person In Charge by (Name, Position)	
Action Taken (evidence attached: Photo, working order, Corresponding letter/email (if any exist))	
Grievance Status After Follow up	Resolve/ Investigation/ Unresolved (Choose one)
Grievant signature	

PLN official signature and stamp	
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Annex 3: Stakeholder Engagement Framework

Please read this in conjunction with the Stakeholder Engagement Plan Template

In certain instances where the specifics for creating a detailed Stakeholder Engagement Plan are not available, a stakeholder engagement framework (SEF) may be adopted. The SEF will guide the development of an SEP, as soon as the specific locations, stakeholder groups, and schedule of activities are known. The scope and level of detail of the framework SEP should be commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project area. However, since adequate information is not yet available on which people can comment, more detail is needed on the range of issues under consideration than in a specific SEP, which is often attached to or accompanied by a nontechnical summary of the project.

It is important to remember that people make their minds up about a project, whether positive or negative, at an early stage. If only limited information is provided to people from the project, they will form opinions based on their own informal discussions, and perhaps on the basis of less credible information. While it is important to manage expectations, it is typically a mistake to delay providing information to stakeholders, as opinions can be quite firmly established, even when more information is later provided.

When the details of the project location, technology, or other key factors are not known and will be decided at a future date, the Stakeholder Engagement Plan should be presented as the approach to stakeholder engagement that is envisaged, following the information note above, but with the following changes:

- The stakeholder identification may expand to a wider area than the project will affect, if a location has not yet been identified. Be careful to provide information on the range of options under consideration and how these options will be narrowed down.
- Provide information on the process that will be followed in developing a specific stakeholder engagement plan and the objectives of the consultation.
- Provide details on the early stages of consultation, when more information will be gathered to draft the Stakeholder Engagement Plan, and welcome input on the best methods of notification, information disclosure, and consultation.
- The framework needs to be specific about the way people will be informed when more information is known, including specific names of media and websites. It should outline the general process that will be followed, and the number of days/weeks/months that people will have to comment on information when it is available.
- When locations and dates of meetings are not known, provide a general range of the number of meetings planned and the approach to consultation.
- The contact information for the project needs to be provided in full in the framework for

people who have more questions or concerns.

- The grievance mechanism needs to be provided in full in the framework. Stakeholders can have problems even during the project planning stage.

Annex 4: Stakeholder Engagement Documentation

All processes and documentation from the stakeholder engagement activities e.g:

- a. material presented during the consultation,
- b. photographs,
- c. invitations,
- d. attendance lists,
- e. minutes of meetings (all the above items are attached to minutes of meeting)

Basic sample form for minutes of engagement covers the following notes:

PLN Wilayah:

PLN UP3 /UP2K:

PLN Project/Activity:

Date/ Stage:

Location Village;

Sub-district;

District/City;

Province:

Attendees:

☐ Non-Indigenous People

☐ Indigenous People (please check if any involved, please mark the IP participants name in attendance list for data population process)

Topic of Discussion:

- xxx
- xxx

Points of Discussion:

- xxx
- xxxx
- Please note carefully if discussion may relate to conflict between the project with community

Key Question and the project response

- Xx
- Xxx

Next steps or Agreement or Disagreement (If any exist)

- Xxx

- XXXX

Basic sample form for summary minutes of engagement from multiple engagement activities the following notes:

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