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Tbilisi Metro Project and Tbilisi Bus Extension

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ACRONYMS AND ABBREVIATIONS

CLO	Community liaison office
EBRD	European Bank for Reconstruction and Development
ESP	Environmental and Social Policy
FGD	Focus Group Discussions
PIP	Public Information Policy
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SPP	Stakeholder Participation Programme
TTC	Tbilisi Transport Company

1. INTRODUCTION

1.1. BACKGROUND

EBRD is considering provision of a sovereign loan of up to EUR 60 million to Georgia, for the benefit of the Tbilisi Transport Company Ltd (the “Company”), a municipal company which operates public buses, the metro system and cable cars in Tbilisi.

The loan proceeds will be used to finance the acquisition of approximately 40 modern metro cars (10 train sets) for the Company, to replace the existing outdated rolling stock. The metro system’s current condition creates major concerns. In spite of the continued efforts of the Company to keep maintenance activities on track, most components of the metro systems are worn out due to decades of under-investment. Out of 141 units of rolling stock, on average 35 per cent is over 41 years old and 65 per cent over 27 years. The average lifespan of existing metro cars is 35 years, thus the urgency of replacement is acute. The technical Due Diligence has been already undertaken by an independent technical consultant.

EBRD is also considering the second tranche of EUR 15 million under the existing loan agreement for the rehabilitation of bus depots.

The Projects are part of a broader programme aiming to assist the City in reforming its management of public transport by financing the renewal of bus and metro systems, and network restructuring.

1.2. OBJECTIVES OF THE PLAN

This document is update revision of existing Stakeholder Engagement Plan as a part of assignment Metro Cars and Bus Depot Extension Project: *Update the existing Stakeholder Engagement Plan (SEP)*.

As part of EBRD’s investment, Mott MacDonald has been contracted to provide TTC with institution-building assistance in the form of a Corporate Development Programme and Stakeholder Participation Programme (SPP). The SPP comprises two overarching components: 1. Information Disclosure; and, 2. Stakeholder Consultation and Participation.

To ensure that the SPP is completed in compliance with the policy requirements of the EBRD, this Stakeholder Engagement Plan (SEP) has been designed to promote TTC’s approach to stakeholder engagement throughout the lifecycle of the SPP.

This SEP is a strategic document for planning a comprehensive and culturally appropriate approach to consultation and disclosure for the lifecycle of the SPP. The purpose of this SEP is to provide a framework consultation and participation strategy for the SPP which:

- Defines the applicable legal requirements concerning disclosure and consultation.
- Identifies stakeholder groups that could be affected or may have an interest in TTC services.
- Ensures that such stakeholders are appropriately engaged through a process of information disclosure and meaningful consultation on issues that could potentially affect them.
- Maintains a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during implementation of the SPP.
- Provides a grievance mechanism to allow service users and other stakeholders to register complaints, queries or comments that are addressed in a timely manner by TTC.
- Plans for stakeholder engagement which is free of manipulation, interference, coercions, and intimidation and is conducted on the basis of timely, relevant, understandable and accessible information in a culturally appropriate format.

These engagement objectives will enable the SPP to achieve its ultimate goals of:

- Promoting the benefits of using public transport for Tbilisi residents and visitors
- Encouraging active participation of customers in consultation processes concerning the safety, accessibility, affordability and reliability of TTC's services
- Disclosing information about changes and updates to TTC's services in a clear and transparent manner

Being clear about why stakeholder engagement is important, both to impacted communities and project implementers, will help to create an action plan more focused and meaningful for the implementation of existant engagement plan. A helpful starting point is to brainstorm and develop an overarching stakeholder engagement strategy that articulates the purpose and objectives of the engagement plan, guiding principles, commitments and success indicators, organisational roles and responsibilities related to stakeholder engagement activity, and any other elements that communicate the goals, structure and requirements of stakeholder engagement and information disclosure.

1.3. OVERVIEW OF TTC

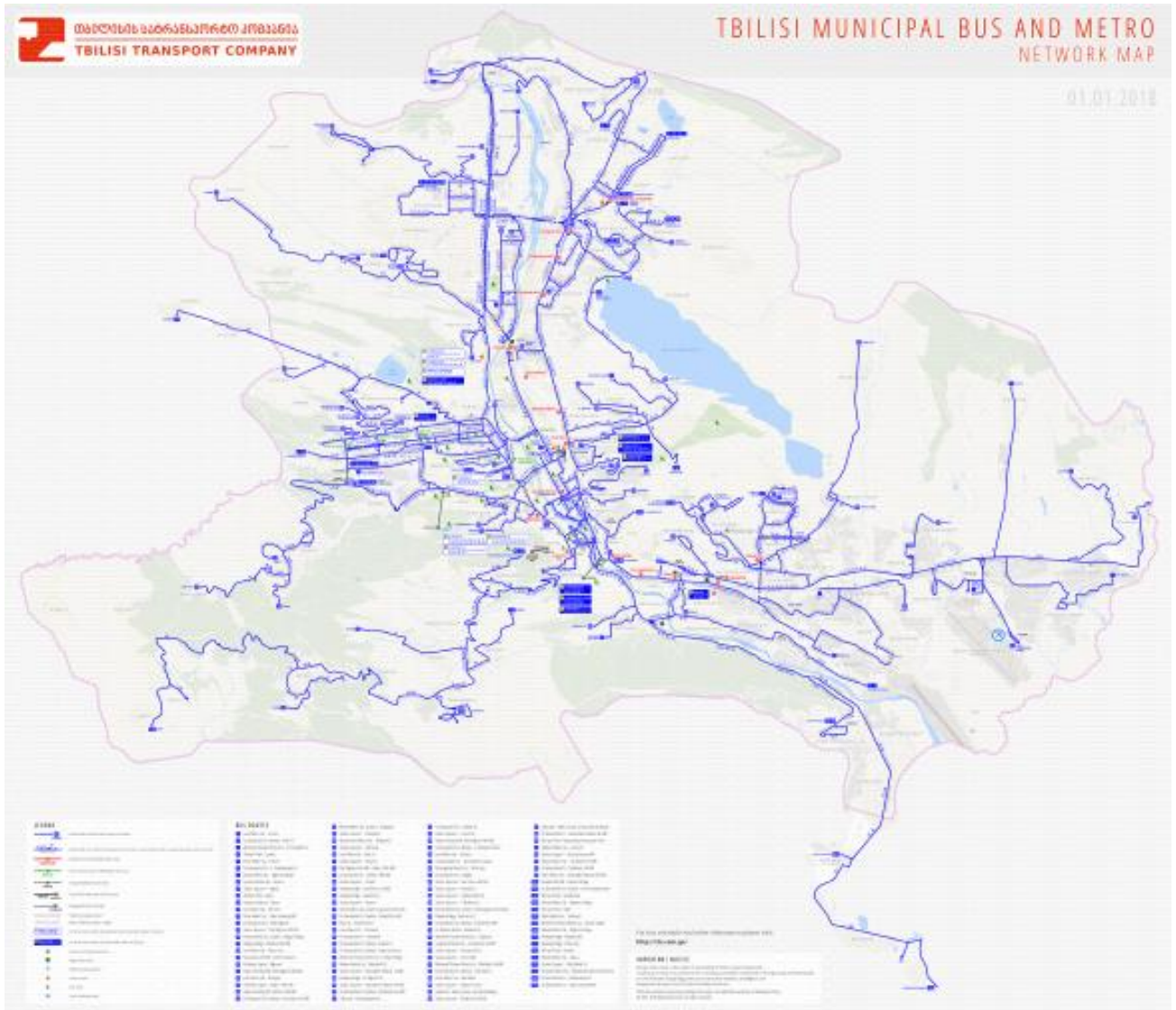
Tbilisi Transport Company (TTC) is a municipal company owned by Tbilisi City Hall, has been in operation since 1966. It operates 3 subdivisions – bus, metro and cable road. It assets include 2 metro maintenance depots (1 being owned by TTC – provides regular maintenance and another with a majority stake owned by a Russian company – provided capital repair of the rolling stock) 3 bus maintenance depots in Tbilisi, 1 service centre (for capital repairs of the buses). All the facilities are pretty much depreciated and in need of reconstruction.

The company employs up to 6 492 people who work continuously to provide high-quality transport services to travelers and city guests alike and to make their journey as safe and comfortable as possible.

According to the daily updated statistics on official website for the beginning of March 2020 there are provided by TTC:

- Bus transportations – 382 195;
- Cable car transportations – 1934;
- Subway train transportations – 355 688.

See below Tbilisi Municipal bus and metro network map below.



Map 1. Tbilisi Municipal bus and metro network

1.4. PREVIOUS AND CURRENT STAKEHOLDER ENGAGEMENT ACTIVITIES

TTC does not currently have a public engagement system or procedure in place. No consultations have been undertaken concerning the Project. Information disclosure is largely limited to ongoing communication about its services through the following mechanisms.

External communication channels include:

- Customer hotline to address all external queries and concerns: +995 32 293 44 44.
- Website with information on routes, fares, timetables and parking, recent news, press releases, journey planner and contact details: <http://ttc.com.ge/index.php>
- Social media pages (Facebook page: <https://www.facebook.com/ttc.com.ge/>)
- Passenger information is also available through:
 - Mobile phone app for users on Android and IOS phones with information on TTC services
 - Real time information display boards at bus stops and metro stations
 - Announcements in transport with information (see below announcements in metro vagon).



Photos 1-2. Announcements in metro vagns



Photos 3-4. Announcements in metro vagns

1.5. PLAN STRUCTURE

This SEP is structured according to the following sections:

- Stakeholder engagement requirements
- Identification of stakeholders and communication methods
- Stakeholder engagement program

- Public grievance mechanism
- Monitoring, evaluation and reporting

2. STAKEHOLDER ENGAGEMENT REQUIREMENTS

2.1. OVERVIEW

This chapter sets out the regulatory requirements relevant to the engagement of stakeholders. This SEP has been produced to meet the legislation and policy regulations of the Government of Georgia and to meet the information disclosure, consultation and stakeholder participation requirements of the EBRD. These requirements are summarised below.

2.2. NATIONAL REGULATIONS

The Constitution of Georgia (1995) guarantees public access to information and stipulates the right of an individual to obtain full, unbiased, and timely information regarding his/her working and living environment. In the context of Project development, the Georgian legislation precisely governs freedom of stakeholder engagements.

According to the General Administrative Code of Georgia as of 1999, everyone may gain access to official documents kept by an administrative body. A person has the right to receive information in any form, without specifying the grounds or purposes for requesting the information within the set timeframes.

Georgia is a signatory to the Aarhus Convention¹, which requires public access to environmental information and decision-making.

2.3. EUROPEAN BANK OF RECONSTRUCTION AND DEVELOPMENT (EBRD) REQUIREMENTS

The Project is seeking finance from the EBRD, and thus is structured to meet EBRD's 2014 Environmental and Social Policy (ESP) including Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement and to satisfy the Bank's commitment to disclosing Project information as set out in EBRD's 2014 Public Information Policy (PIP) document. In addition, EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves:

- Public disclosure of appropriate information
- Meaningful consultation with stakeholders
- An effective procedure or mechanism by which people can make comments or raise grievances
- The process of stakeholder engagement should begin at the earliest stage of planning and continue throughout the life of the Project. The EBRD requires that stakeholder engagement:

¹ UNECE Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters

- Provides affected communities and other interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion, and intimidation
- Involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders
- Be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment, and the level of public interest
- Be based on clearly defined roles, responsibilities, and authority
- Designates personnel of the company to be responsible for the implementation and monitoring of consultation and disclosure activities.

Special provisions will be made to identify individuals and groups that may be differentially or disproportionately affected by TTC's service offerings because of their disadvantaged or vulnerable status, and to allow such groups or individuals to be informed about relevant TTC information and give their views where appropriate. The specific vulnerable groups that have been identified are discussed in section 3.3.

3. IDENTIFICATION OF STAKEHOLDERS AND COMMUNICATION METHODS

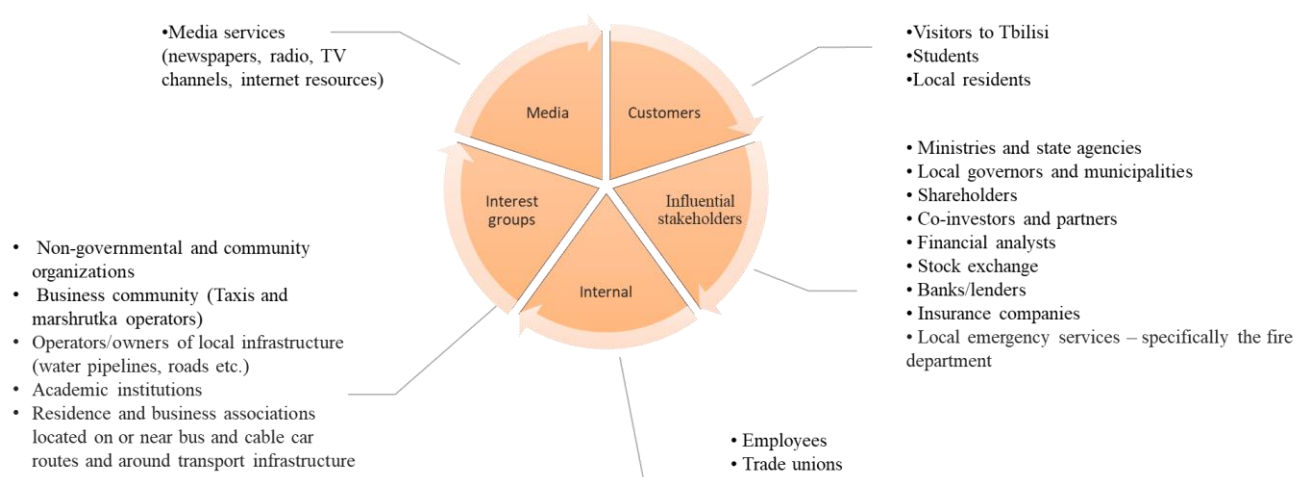
3.1. OVERVIEW

For the purpose of the SPP, stakeholders are defined within the following overarching groups:

- (i) Customers: Those who make use of TTC's transport services, regardless of how often they use them. These include Tbilisi residents who are likely to be interested in changes and updates to TTC's service offerings
- (ii) Interest groups: Groups and communities of interest representing businesses (including those surrounding or neighbouring transport infrastructure), special needs groups, connecting transport providers (such as taxis and marshrutka operators), residents' groups, and local communities
- (iii) Influential stakeholders: Those who could influence the formulation and implementation of TTC's policies and services such as governmental authorities
- (iv) Internal stakeholders: TTC workers including customer-facing employees, corporate employees and trade unions
- (v) Media: Media channels that are able to disseminate information about TTC services and consultation activities

These individuals and groups have been identified, including analysis of the best ways to engage with them according to the types of media that they are likely to use and be most comfortable with. Stakeholders with diverse perspectives can contribute to new understanding of local circumstances and/or impacts, risks and benefits leading to identification of further opportunities for action. Over time it will be necessary to modify the list of stakeholders and/or methods of communication to meet changing circumstances. TTC will therefore undertake periodic reviews of their stakeholders and maintain an updated stakeholder database.

Stakeholder map



A stakeholder “map” is a visual representation of a stakeholder analysis and is critical to the success of any engagement plan. It helps organise people and interest groups according to specific criteria related to the activity, for example, peoples’ positions (what they want) and interests (why they want it) in a project; their expectations; their relative influence on a project and/or influence within a community or organisation; their emotional stake in an issue or a project; their financial or political positions; and their potential contributions to a project or activity.

Stakeholder maps are typically “dynamic”. This means people’s perspectives and interests can sometimes change throughout the life of a project, or even over the course of a stakeholder assessment or engagement process. New set of stakeholders may be identified during the project’s implementation as a result of continuing consultations and communication. The guidance for meaningful consultations, including the requirements and process for engagement, may also be applied for stakeholders that are identified at later stages of project implementation.

3.2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

A stakeholder mapping exercise was carried out to provide a strategically focused stakeholder list with targeted means of engaging with them. An analysis of TTC’s stakeholders, interests, and suggested main communication and consultation methods is summarised in Table 3.1.

Table 1. Identification of stakeholders and consultation methods

Stakeholders	Communication methods	Focus group(s)
External stakeholders		
Customers		

Tbilisi residents	Public consultations, TTC website, social media pages, grievance mechanism, information campaign materials	
Women users of public transport	Public consultations, TTC website, social media pages, information campaign materials	√
Elderly, differently abled, and mobility impaired individuals	Public consultations, TTC website, social media pages, information campaign materials Communication via local residents' groups	√
Low-income individuals	Public consultations, letters, information campaign materials Communication via local residents' groups	√
School and University Students including foreign university students	Public consultations, TTC website, social media pages, information campaign materials Communication via educational institutions	√
Government services (for instance education and health facilities) whose customers use transport to access them	Public consultations, TTC website, individual meetings, information campaign materials	√
Recreation, arts, sports and tourism destinations whose customers use transport to access their venue facilities	Public consultations, TTC website, individual meetings, information campaign materials	√
Visitors from other parts of Georgia and abroad	TTC website, social media pages, grievance mechanism, information campaign materials Communication via tourism organisations	
Migrants from neighbouring countries including Azerbaijan, Armenia, Turkey	Public consultations, TTC website, grievance mechanism, information campaign materials Communication via NGOs	
Interest groups		
Residence and business associations located on or near bus and cable car routes and around transport infrastructure	Public consultations, TTC website, individual meetings, information campaign materials	
Private transport user groups including: - Cyclists - Motorcyclists - Motorists - Taxi drivers - Large vehicle/truck drivers	Public consultations, TTC website, individual meetings, information campaign materials	√
Non-governmental and community organisations		
Residents' neighbourhood groups	Individual meetings and public consultations	√
Youth groups	Individual meetings and public consultations	√
Religious congregations along the routes	Individual meetings and public consultations	√
World Vision International Georgia (WVG)	Individual meetings and public consultations	
Environmental NGOs including: - Greens Movement of Georgia / Friends of	Individual meetings and public consultations	

the Earth Georgia ² ; - CENN ³ ;		
Other relevant NGOs as identified, focusing on issues affecting women, poor households, and minority ethnic populations such as: - Georgia Alliance for Safe Roads: Advocacy and public awareness campaigns for safe roads; - IDP Women’s Association “Consent”: Focusing on rights of internally displaced persons and conflict affected people; - Helping Hand ⁴ : Aimed at inspiring and equipping Georgian youth as volunteers to meet needs of communities and strengthen the civil society network; - Disabled People’s Rehabilitation and Employment Union of Georgia ⁵ ; - Women's Information Center (WIC): ⁶ Promotes development of networks of women NGOs and supports women leaders; - Azeri Popular Movement Geyrat: Promoting rights of Azerbaijanis in Georgia; - Civic Integration Foundation: Assisting ethnic minorities’ integration into Georgian society ⁷ ; - Active Ageing Georgia ⁸ .	Individual meetings as applicable, public consultations, information campaign materials; Some of their representatives may be invited to participate in relevant focus groups	
Governmental agencies		
Tbilisi City Hall	Individual meetings, information campaign materials	
Tbilisi City Assembly (Sakrebulo)	Individual meetings and public consultations	
10 District (Gangebels) governmental authorities of Tbilisi	Individual meetings and public consultations	
Relevant municipality departments including Transport, Urban Planning	Individual meetings	
Georgian Chamber of Commerce and Industry	Public consultations, TTC website	
Ministry of Economy and Sustainable Development.including the LEPL Land Transport Agency	Public consultations, TTC website	
Department of Urban Development	Public consultations, TTC website	
Academic institutions		

² <http://greens.ge/>

³ NGO working to protect the environment by fostering sustainable development throughout the South Caucasus <http://www.cenn.org/>

⁴ <http://www.helpinghand.ge/>

⁵ Organizes assistance for the rehabilitation and social integration of veterans and persons with disabilities.

⁶ <http://www.wicge.org/home.php?cat=7&sub=1&mode=2&lang=ge>

⁷ <https://cif.org.ge/>

⁸ <https://www.facebook.com/acitveageinggeorgia/>

Higher education institutions including Tbilisi State University, Georgian Technical University, University of Georgia (Tbilisi)	Public consultations, TTC website	
Businesses		
Regional, international bus companies and Georgian Railways	Individual meetings and public consultations	
Taxi companies	Individual meetings and public consultations	
Microbus (Marshrutka) operators (Tbilisi Minibus Company)	Individual meetings and public consultations	
Tbilisi Airport (operated by TAV)	Individual meetings and public consultations	
Tourism industry associations	Individual meetings and public consultations	
Media organisations		
Newspapers including 24 Saati, Rezonansi, Alia, Georgia Today	Press releases, advertisements and public consultations	
National radio channels including Imedi Radio (105.9 FM), Fortuna, Radio 105 Tbilisi radio stations including 5 Lines Radio (93.8 FM), Europe +Tbilisi (99.6 FM)	Press releases, advertisements and public consultations	
TV channels including Rustavi 2, Imedi TV Maestro and the Public Broadcasting Channel	Press releases, advertisements and public consultations	
Internal stakeholders		
Employees at corporate office	Information in contract, bulletin board, newsletters, grievance procedure, code of conduct, staff meetings, company announcements	
Customer-facing employees including bus drivers and conductors/controllers, and metro and cable car drivers, engineering and depot staff	Information in contract, bulletin board, newsletters, grievance procedure, code of conduct, TTC materials published as part of information campaign	
Trade unions	Union meetings and notifications, bulletin board, grievance procedure	

3.3. ENCOURAGING PARTICIPATION OF WOMEN AND VULNERABLE⁹ GROUPS

The EBRD requires that specific attention is paid to impacted women and vulnerable groups to ensure that their views are heard, recorded and taken into account in the Project planning and implementation. TTC recognises that vulnerable, marginalised and disadvantaged groups are likely to experience impacts differently from mainstream society.

In the context of TTC and the SPP, the following groups are considered to have potential vulnerabilities that need to be taken into account in the development of consultation activities:

⁹ As defined in the EBRD's ESP vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by Project impacts than others and who may be limited in their ability to claim or take advantage of Project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

- Women who are likelier to experience cases of physical and sexual harassment and lack of safety on public transport¹⁰
- Differently abled, mobility impeded, pregnant women, users accompanying multiple children, and elderly individuals who may experience difficulties in accessing public transport and participating in consultation events, due to accessibility issues. Particularly in Tbilisi, the population is aging which will increase the proportion of the city residents who experience mobility issues going forward. Elderly female residents have been shown to have particular lack of mobility.¹¹
- Low-income households who may experience difficulties with the costs of public transport
- Migrants from neighbouring countries who may be marginalised in mainstream Georgian society and experience difficulties communicating in Georgian, and participating in consultation events

Consultation will be used to facilitate these groups' active participation in stakeholder engagement activities and gather information and opinions on how they will be affected by TTC's services. Consultation and information disclosure activities will take into consideration logistical and cultural factors such as language, physical access, gender roles, literacy levels, time availability, and ability of such groups to access and participate in social and mass media engagement activities. For instance, given that women in Georgia tend to be responsible for the majority of domestic duties such as childrearing, cooking and cleaning, TTC will aim to hold focus group meetings and public consultations at times and locations that accommodate the availability of such women.

Separate focus group meetings will be arranged with the above groups to gather their views on TTC's services and encourage their participation in the general consultation meetings. There is increasing recognition that females face more sexual harassment on public transportation than males and focus groups will also consider this issue.

For further assistance to engage and support vulnerable or marginalised populations, non-governmental organisations identified in section 3.2 will be engaged.

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. OVERVIEW

This section describes the key roles and responsibilities and the two main components comprising the SPP: Information Disclosure, and Stakeholder Consultation and Participation. The objectives of these components respectively are to promote the benefits of using public transport to Tbilisi residents and visitors, and to obtain diverse stakeholders' perspectives on the safety, accessibility, affordability and reliability of Tbilisi's public transport services.

The two components of the SPP have the ultimate aim of developing a transport system that is used by all segments of the Tbilisi population, is responsive to the needs and opinions of various stakeholder groups, and actively engages stakeholders in the development of its practices and service offerings through a participatory approach.

4.2. ROLES AND RESPONSIBILITIES

TTC currently does not have staff capacity to handle community liaison matters in one hand gathering all the directions of community communications activity. Company divided the responsibilities among different departments/responsible specialists. As for the date of the audit (February 2020),

¹⁰ Several studies indicate that nearly half of women in Tbilisi have experienced harassment on public transport. Sources: Policy brief: A safe public transportation environment for women and girls. Asian Development Bank (2015); Georgia: Rapid Assessment of Sexual Harassment in Public Transport and Connected Spaces in Tbilisi. ADB (2014)

¹¹ http://tbilisi.gov.ge/img/original/2018/4/20/THS_Final_Report_Eng.pdf

company has Passengers' service quality department manages a hotline where 14 people are employed. All information received via hotline (TTC customer hotline +995 32 293 44 44) is daily reflected in the company's database.

The service of external calls includes information received from the citizens regarding the:

- Bus schedules (also a passenger can receive information about the bus in a real time);
- Fines -When the calls regarding administrative fines are received, the operator first helps customer to find the act of fine and provides general information. In case of additional questions, the customer is addressed to the fine's section (Administrative law violation department).
- Things that were lost;
- Reduction of buss intervals;
- Tabloids- Information on the damaged tabloids is reported to the IT services group;
- Passenger cards.
- Information calls- citizen's complaints regarding the controllers, conductors, and drivers. Besides, missing the stops when requested by the passengers and calls related to the company.
- In addition, there are some calls that are immediately addressed to the relevant services.
- Information regarding the complaints is addressed to the Internal Audit Service and they carry out an investigation.
- The hotline also serves the Company's internal calls regarding the types and reasons of employee's absence, sick leave, shifts exchange, termination of work, and dismissal from work. These kinds of calls are registered in the appropriate program (vabanco), later the data is sent to Human Resources Management Service.

The e-mail of TTC (info@metro.ge) is managed by the Company's Office. The website is managed by the TTC media relations manager - Tamaz Robakidze (Director General's Office). Information regarding complaints is not received on the website. In the nearest future, an online support service will be launched on the website and it will allow users to receive information, express their claims and make complaints online. The online support service will be provided by hotline operators.

The Company's Facebook page is managed by two employees: Tamaz Robakidze - TTC media relations manager at Director General's Office and PR manager of Tbilisi City Hall- Lela Seturidze. Different kind of information is published on Facebook page: notifications on the schedules, Metro issues, information about fines, tabloids, various misconceptions. Based on the contents of the information received, the message is addressed to the appropriate services for responding. If requested by the customer, he/she receives feedback about the measures taken regarding the information provided by him/her.

Basically, news and information on the ongoing projects is spread via media. Besides, information regarding the company's service delays are spread indenting timely warnings of the customers with the delays and temporary restriction of service. News is prepared in agreement with the PR service of the City Hall. This information is then technically distributed to social and traditional media and is covered by all news channels: television, radio, newspaper, and social media. Tbilisi City Hall is a 100% shareholder of Tbilisi Transport Company; accordingly, any process in TTC is managed by the City Hall's active involvement.

Nevertheless, it is recommended for TTC to hire CLO (or give responsibilities to existing personnel) who will be responsible for:

- Receiving grievances and queries through the customer hotline, email address, social media pages and grievance forms, logging them in a register, forwarding them to applicable departments within TTC, responding to the enquirer, and ensuring their timely resolution;
- Overseeing external communication channels including public announcements and social media pages;

- Organising and recording stakeholder engagement activities, through keeping minutes of consultation meetings with dates, venue, list of participants and photos;
- Maintaining regular lines of communication with key stakeholders;
- Listing disclosure activities, adverts placed in newspapers and other media;
- Retaining original written consultation correspondence including comments left as evidence of the process and outcomes;
- As time permits, media monitoring.

Should the resources be identified, TTC will appoint additional personnel to provide support to the CLO to deliver the responsibilities, to be seconded from the City Hall. TTC will be responsible for translation of additional key materials into Georgian as needed, the publication of relevant documents and ensuring they are distributed to the appropriate stakeholders, as well as publication of relevant media notices and press releases.

Following the handover of public transport responsibilities to the municipal transport authority in 2021, TTC's CLO and the seconded City Hall staff will organise a formal, phased transfer of the above responsibilities and relevant staff to the authority's own community liaison team to be appointed. The handover will serve as a timely opportunity for the authority to increase staff capacity as required for the stakeholder engagement activities.

For indicative purposes, the following number of staff are suggested for the community liaison team to manage the stakeholder engagement system in an effective and timely manner:

- One stakeholder engagement manager
- One media coordinator to manage communication on social media pages and website, liaise with media channels, and monitor how TTC is portrayed through external media reporting
- Two staff to manage grievances and queries received through customer hotline, email and website

Some of these roles may be fulfilled by existing staff capabilities of TTC or the Municipality, such as the media/public relations coordinator and hotline staff.

4.3. INFORMATION DISCLOSURE

The information disclosure components' objective is to raise public awareness of the benefits of using Tbilisi's public transport services. It will first entail a scoping exercise to identify the most relevant information to publicise to external stakeholders, and subsequently the launch of a city-wide information campaign to disseminate the topics identified through scoping.

4.3.1. SCOPING OF KEY INFORMATION TO DISCLOSE

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 2 below. The objectives of external communications are to provide continuous engagement with local communities and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, PR 10 and Georgian national legislation.

The SEP is a live document that will be revisited and updated if necessary on an annual basis to reflect the changes in stakeholder engagement due to project developments and new stakeholders if any. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 2 are not exclusive and TTC may choose to disclose more information upon request by stakeholders.

Table 2. Stakeholder Engagement Programme

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
Interest groups	Public consultations, TTC website, individual meetings, information campaign materials	Details on planned construction works, route information including timetables and routes, service updates including changes to fares, service disruptions and delays	During reconstruction / during operation
Customers	Public consultations, TTC website, social media pages, information campaign materials	Convenience due to set schedule, reduction in social exclusion, increased accessibility to natural, touristic and heritage sites	Before reconstruction / during reconstruction / during operation
Non-governmental and community organisations	Individual meetings and public consultations	Environmental benefits of public transport including reduced pollution and energy consumption; improved air quality, improved safety of roads and reduced risk of vehicle accidents, improved mobility for those with physical or other impediments	Before reconstruction / during reconstruction / during operation
Governmental agencies	Public consultations, TTC website, information campaign materials	Service updates including changes to fares, service disruptions and delays, investment data	Before reconstruction / during reconstruction
Academic institutions	Public consultations, TTC website	Linkages between increased use of public transport, fares, and their contribution to improved quality of services, possibilities to get job for graduates	Before reconstruction / during reconstruction
Businesses	Individual meetings and public consultations	Modernizations implemented and renewed vehicle numbers, details on planned construction works, route information including timetables and routes	Before reconstruction / during reconstruction
Media organisations	Press releases, advertisements and public consultations	Time savings from use of public transport due to reduced road congestion and need to find parking spaces, improved mobility for those with physical or other impediments and other positive components for the society	Before reconstruction / during reconstruction / during operation
Internal stakeholders	Information in contract, bulletin board, newsletters, grievance procedure, code of conduct, staff meetings, company announcements	Potential dust generation and other H&S indicators, the potential impacts of transport to site, and employment opportunities	Before reconstruction / during reconstruction / during operation

Based on this preliminary list, key stakeholders will be engaged through scoping consultations to obtain their feedback on the proposed topics to include in the information campaign and the best means to raise awareness, including:

- Tbilisi City Hall
- NGOs working on public safety issues
- Selection of service users including local residents' and business groups

The information list will be finalised based on the outcomes of these scoping consultations.

4.3.2. INFORMATION CAMPAIGN

Following finalisation of the information list and understanding of key themes to disseminate, an information campaign will be launched through a variety of channels as detailed in Table 4.2 below.

Table 3. Information disclosure channels

Channel	Indicate types of information	Target stakeholders	Key performance indicators
Brochures at strategic locations including municipal offices, tourism centres, universities, hospitals	Benefits of use of public transport	<ul style="list-style-type: none"> • Visitors to Tbilisi • Students • Local residents 	Number of brochures produced and distribution details
Posters at bus stops, metro and cable car stations	Service updates	Regular customers	Number of queries received on information provided
Radio announcements	<ul style="list-style-type: none"> • Service updates • Advertisements on benefits of public transport 	<ul style="list-style-type: none"> • Local residents • Elderly and differently abled • Customers who prefer oral information, for instance those with low levels of reading literacy 	Number of queries received on information provided
Social media pages	Weekly posts with thematic focus relating to use of public transport such as fitness, cost savings	<ul style="list-style-type: none"> • Youth • Local residents • Businesses and government services whose customers use public transport • Interest groups 	<ul style="list-style-type: none"> • Number of post views, comments and likes • Changes to number of subscribers on pages
TTC website	Service updates	<ul style="list-style-type: none"> • Local residents • Youth • Businesses and government services whose customers use public transport • Interest groups 	Number of visits to website, and trackable interest in specific content

4.4. STAKEHOLDER CONSULTATION AND PARTICIPATION

The Stakeholder Consultation and Participation component will facilitate a two-way dialogue between customers and TTC concerning Tbilisi’s public transport services, using a forum and focus groups which is discussed below.

4.4.1. FOCUS GROUP DISCUSSIONS (FGD)

To enable the collection of views of a diverse range of stakeholders, focus group discussions targeting specific stakeholder groups will be held by the transport authority, commencing in 2021.

The outcomes of the forum series will help identify the key stakeholders and topics to engage through the focus groups, while the local residents' groups and NGOs operating in Tbilisi will also be engaged to identify individuals to participate in the groups. As the transport authority will oversee various aspects of transport in Tbilisi including but not limited to public transport, parking, and regulations on taxis, FGDs will be held with a wide variety of stakeholders to address relevant topics.

The stakeholder groups to be targeted include:

- Women users of public transport
- Elderly, differently abled and mobility impeded individuals
- Low-income individuals
- Migrants from neighbouring countries such as Azerbaijan, Armenia and Turkey
- Residential neighbourhood groups
- Youth groups
- Private transport users including pedestrians, cyclists, motorcyclists and motorists
- Government services (for instance education and health facilities) whose customers use transport to access them
- Recreation, arts, sports and tourism destinations whose customers use transport to access their venue facilities

The focus groups will centre around issues of safety, accessibility, affordability and reliability that affect these particular demographics, and suggested improvements to encourage increased use of public transport services.

At least one FGD will be held each month, covering a different location and targeting a different stakeholder group. The FGD will comprise a group of seven to 10 participants, and the discussions will follow pre-defined scripts to ensure that the full range of themes related to the issues of safety, accessibility, affordability and reliability are covered.

The inputs obtained through the focus groups will be compiled and communicated to TTC's relevant technical teams and provide further direction for the ongoing Information Campaign strand.

4.4.2. FORUM "WOMEN IN TRANSPORT IN GEORGIA. THE EXPERIENCE OF TBILISI MUNICIPAL TRANSPORT COMPANY. EQUAL OPPORTUNITIES. THE RIGHT WAY FORWARD."

The Equal Opportunities Project began in 2017 with a gender audit of TTC. Some of the issues identified by the project team included the poor awareness of health and safety issues, the aging of the predominantly male bus drivers, and the absence of an equal opportunities policy. However, some positive elements were also identified, including the excellent employee database disaggregated by sex and age, and the gender-neutral wage policy.

Based on the recommendations of the audit, an Equal Opportunities Action Plan was designed following the Women's Empowerment Principles that are promoted by UN-women. The plan was thoroughly discussed with TTC staff and directors until full consensus was reached regarding the specific objectives and target set for the action plan.



There are 7 Women`s Empowerment Principles:

- Principle 1: Establish high-level corporate leadership for gender equality
- Principle 2: Treat all women and men fairly at work – respect and support human rights and non-discrimination
- Principle 3: Ensure the health, safety and well-being of all women and men workers
- Principle 4: Promote education, training and professional development for women
- Principle 5: Implement enterprise development, supply chain and marketing practices that empower women
- Principle 6: Promote equality through community initiatives and advocacy.
- Principle 7: Measure and publicly report on progress to achieve gender equality

Since 2017 TTC has made tremendous progress in promoting and putting in practice an Equal Opportunities Strategy. The company has made qualitative leaps forward, as is the case with the training of female bus drivers, and the communication and branding of TTC as an EO Company.

The statistics shows that from the beginning of promoting this program for women (2017) and until nowadays there were 0 accidents with female bus drivers. Total amount of female drivers is 22 (out of 1300 total). As for the total numbers of employed women in TTC since the beginning of the project, the number of women employed in TTC has increased by 76 women. Though it has not changed the percentage which is still 22%.

Increase of female employees in TTC

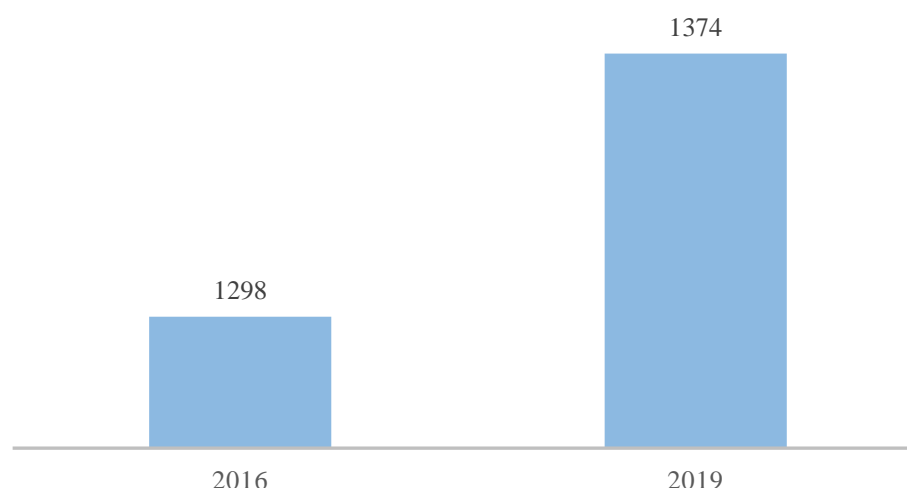


Diagram 1. Results of Equal Opportunities Project

During the final conference (19th of November) in Tbilisi, TTC puts the crown on the project by officially signing the Women`s Empowerment Principles (WEP) of UN-Women. This gives TTC the opportunity to benefit from future UN-Women`s capacity building programmes regarding the practical application of the WEPs at company level, and to continue the right way to move forward with Equal Opportunities.

5. PUBLIC GRIEVANCE MECHANISM

5.1. OVERVIEW

Having a public grievance mechanism to manage external grievances is an EBRD requirement for the TTC. Using the mechanism must be a voluntary activity for the complainant. As required, this grievance mechanism permits anonymous complaints, respects the confidentiality of the role players involved, and protects both the complainant and the company from retaliation. The public grievance mechanism is based on the principles of being legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, and dialogue based. The grievance mechanism can be used to determine lessons learned and identify ways for continuous improvement.

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, the TTC will work proactively towards preventing grievances through community liaison.

Anyone will be able to submit a grievance to the TTC if they believe a practice is having a detrimental impact on the community, the environment, or their quality of life. They may also submit comments and suggestions. Any type of issue can be raised. This grievance mechanism pertains to grievances submitted by external parties only and does not consider grievances submitted by employees within the TTC. The sections below present the TTC`s grievance resolution process and consider confidentiality and anonymity.

5.2. GRIEVANCE REPORTING AND RESOLUTION

The main steps for handling grievances are: receive, categorise, acknowledge, investigate, respond, allow for recourse/appeal and follow-up, and close out.

Grievances will be recorded in a formal logging system for which the CLO will be responsible. The grievance log will be separate from a stakeholder log which details interactions with communities and stakeholders. People may register grievances using the form in Appendix A, by contacting the

CLO, phoning the hotline, or online using the TTC website. Contact details for the CLO will be included in appropriate communication materials such as the information brochures to be disseminated through the Information Campaign strand.

The CLO will classify grievances according to Table 5.1. Where investigations are required, TTC staff and outside authorities as appropriate will assist with the process. The CLO will collaborate with TTC, to identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

Table 4. Grievance Classification Criteria

Classification	Risk level (to health, safety or environment)	Detail and response
Low	No or low	The grievance may not be related to TTC performance, it may be a comment, or a request. CLO will acknowledge complaint within 7 days and conduct an investigation if required. The CLO will document findings and provide a resolution response within 30 days of receiving. The response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO will acknowledge complaint within 7 days. The CLO and an appropriate investigation team will conduct investigation. The CLO will provide a resolution response within 30 days of receiving complaint. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO will acknowledge the complaint within 7 days and will get the applicable TTC personnel to organise a major investigation team for prompt investigation and resolution. The CLO will provide a resolution response within 30 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to the complainant within 30 days of receiving complaint. As necessary the response will include a press release. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

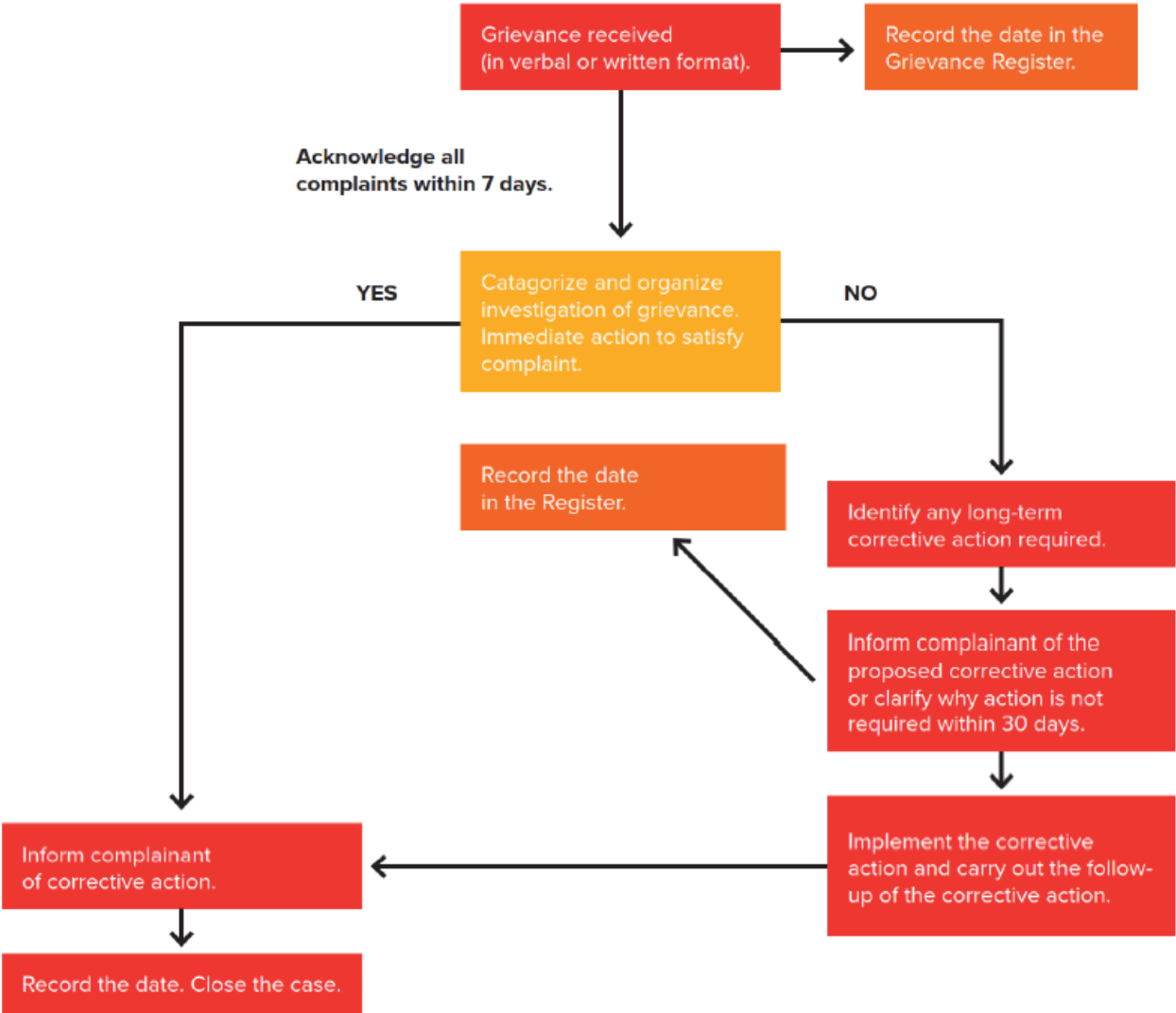
The CLO will explain to the complainant in writing (or where literacy is an issue, orally backed up with documentation for the file) the grievance review process, the investigation results, any changes to activities that will be undertaken to address the grievance, and how the issue is being managed to meet TTC’s commitments and environmental and social management system. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. The grievance will be closed out in the register as:

- Resolved - the resolution has been communicated, agreed and/or implemented.
- Unresolved - the complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- Abandoned - the complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

The CLO will summarise grievances within the annual stakeholder engagement report, removing identification information to protect the confidentiality of the complainant and guaranteeing

anonymity. The procedure will be at no cost and without retribution to the complainant and stakeholders. The procedure for processing grievances is summarised in Figure 5.1.

Figure 1. Flowchart for processing grievances



Grievances collected by TTC staff will be sent to the contact shown in section 5.4, where possible by using the form provided in Appendix A. Grievances may also be raised via the TTC website and social media pages, hotline, and forms will be available at metro stations and bus and tram stops.

5.3. CONFIDENTIALITY AND ANONYMITY

TTC will aim to protect a person’s confidentiality and will guarantee anonymity in annual reporting. Individuals will be asked permission to disclose their identity in situations when TTC wants to reference the stakeholders. Investigations will be undertaken in a manner that is respectful of the complainant, following the principle of confidentiality. The complainant will need to recognise that there may be situations when disclosure of identity is required, and the Project will identify these situations to see whether the aggrieved party wishes to continue with the investigation and resolution activities.

5.4. COMMUNITY LIAISON OFFICER (CLO) CONTACT INFORMATION

All general comments, queries and grievances can be submitted to the TTC staff member provisionally appointed to be the CLO, through contact details as shown below:

- Name: Tamaz Robakidze
- Company: TTC
- Postal Address: [Placeholder: TBC by TTC]
- E-mail address: TRobakidze@metro.ge
- Dedicated Grievance Telephone Number: personal +995 577 788 008; hotline number: +995 32293 44 44
- Website: www.ttc.com.ge
- Facebook page: <https://www.facebook.com/ttc.com.ge/>

6. MONITORING, EVALUATION AND REPORTING

6.1. MONITORING

TTC will monitor its level and type of stakeholder engagement by developing a set of indicators which will review progress on the following items:

- Grievance mechanism: Number of complaints received, type of complaints and how they were resolved
- Engagement meetings: Number of meetings and presentations conducted, and types of stakeholders engaged
- Media relations: Number of mass media articles and/or announcements published
- Web and social media presence: Number of visitors and inquiries and comments submitted on the websites and social media pages

6.2. STAKEHOLDER ENGAGEMENT PLAN REPORTING

Successful stakeholder engagement plans include a monitoring process to understand not only how well engagement activities are working and why, but also to respond to unexpected events as they unfold, for example in cases where there are changes in the scope, activities, locations or policy settings of the project that may introduce new environmental and social risks and impacts or elevate the level of risks and impacts, and to identify and correct what is not working well.

Evaluation should be included as part of the overall engagement strategy, with monitoring activities being undertaken at regular intervals throughout the life of a project or activity, and involving communities and stakeholders following participatory processes.

Monitoring and evaluation of stakeholder engagement processes and outputs consider factors such as:

- Number and diversity of stakeholders participating in various engagements and at what levels;
- Feedback from stakeholders on the effectiveness of the plan, level of trust generated, satisfaction with the level of engagement and outputs, and disclosure and provision of information about the activity;
- Completion of agreements and commitments; and
- Extent of involvement of women, vulnerable or minority groups, and other more traditionally under-represented stakeholders.

This SEP identifies a number of reporting activities. The SEP and the monitoring indicators referenced above will be reviewed by TTC and the subsequent transport authority throughout the course of its mandate as deemed necessary or at least once a year in order to assess whether:

- The type of consultation and disclosure activities are appropriate for the different stakeholders
- The frequency of consultation activities is sufficient
- Grievances are being adequately dealt with
- The stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders

Additional updates may be required based on changes to TTC's services and practices.

One overarching goal of the monitoring and evaluation process should be to determine (a) which aspects of the engagement plan are contributing to success, and (b) which aspects need improvement. In addition, monitoring and evaluating the successes and challenges associated with an engagement plan can help build trust, demonstrate transparency and strengthen stakeholder willingness to participate and engage.

6.3. ANNUAL REPORTING

An annual report summarising TTC's performance on stakeholder engagement and grievances will be produced. Information about stakeholder engagement will be included in TTC's annual reports.

6.4. PERFORMANCE EVALUATION

Performance of stakeholder engagement will be evaluated against the goals and objectives set out in this SEP. The evaluation will review to what extent the SEP activities have been completed and how the identified goals have been achieved. Evaluation results will be documented, and any lessons learned will be incorporated in the respective SEP updates.

ANNEX 1. GRIEVANCE REGISTRATION FORM

Full Name	
Contact Information	By Post: Please provide mailing address
Please identify how you wish to be contacted (mail, telephone, e-mail)	By telephone: By e-mail:
Preferred language of communication?	Georgian EnglishOther
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only Grievance received by: Date: Reference number:	

ANNEX 2. GRIEVANCE LOG TEMPLATE

No.	Date received	Name/ Anonymous	Type of grievance	Classification	Brief description	Person responsible for follow-up	Actions taken	Date resolved	Action taken to avoid future similar grievances