



REPUBLIC OF CROATIA
Ministry of Science and
Education

Stakeholder Engagement Plan

FOR

“SEE CROATIA”

**TOWARDS SUSTAINABLE, EQUITABLE AND EFFICIENT
EDUCATION PROJECT (SEE CROATIA)**

(DRAFT)

Zagreb, June 2021

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ABBREVIATIONS

AMEUP	Agency for Mobility and EU Programs
AVETAE	Agency for Vocational Education and Training and Adult Education
BM	Bank Management
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ETTA	Education and Teacher Training Agency
GRM	Grievance Redress Mechanisms
GRS	Grievance Redress Service
IP	Inspection Panel
M&E	Monitoring and Evaluation
MSE	Ministry of Science and Education
MoF	Ministry of Finance
NCEEE	National Centre for External Evaluation of Education
SEP	Stakeholder Engagement Plan
SEST	Strategy for Education, Science and Technology
TUs	Trade Unions

1. Introduction / Project Description

1.1. Introduction

The Croatian Ministry of Science and Education (MSE) is keen on transforming the way the education system is managed and financed. The 2014 National Education, Science and Technology Strategy recommended the adoption of an array of modern policy solutions and mechanisms aimed at achieving a comprehensive, flexible and efficient education system, available to all on equal terms, in accordance with every individual's abilities. The Strategy sets ambitious goals for the sector, with a strong focus on providing equal opportunities for all. Importantly, the Strategy has provided the direction for several recent reforms, including the (i) national curriculum framework in early childhood education and care, primary, and secondary education, (ii) implementation of a state exam that serves as a secondary school-leaving/university-entering assessment, and (iii) introduction of performance-based financing in higher education. The Strategy also identifies many underlying structural weaknesses in the system that need to be addressed to improve performance, including high levels of inefficiencies. Moreover, the Strategy prescribes changes to the structure of compulsory education, and discusses preconditions for the changes (e.g. availability of physical space).

Guided by the Strategy, the Government of Croatia has launched several important reform initiatives to improve the performance of the sector, with the curricular reform rolled out nationally in school year 2019/20. The new curriculum places increased focus on modern teaching practices and building problem-solving skills in students. While the new curriculum lays the foundation for better performance, the sector faces institutional challenges that will need to be addressed for the new curriculum to take hold and translate into better performance in the sector.

The new National Development Strategy 2030 further expands on educational reforms and sets specific targets related to the increase of compulsory teaching hours.

To support the Government of Croatia in delivering its education reform initiatives, the World Bank supported project will aim to improve the equity and efficiency of basic education by optimizing the school network to improve efficiency and allow for increased instruction time and prioritize equity and quality-enhancing measures and introducing whole-day schooling. The project development objective is to improve equity in selected schools joining the Whole Day School (WDS), and to increase the institutional capacity of the Ministry of Science and Education to implement education reforms.

This report presents the Stakeholder Engagement Plan (SEP), which has been prepared and will be implemented by the MSE, in preparation for the *SEE Croatia: Towards Sustainable, Equitable and Efficient Education Project* (Project), which will support the Whole Day School (WDS) reform in Croatia.

Implementation of the WDS reform aims at:

1. **Improving students' achievements** by increasing the number of hours of instruction
2. **Assuring equal opportunities** for all children to explore and develop their full potential
3. Assure students to be **competitive on the global market** and benefit from the 4th industrial revolution

4. Provide children with **safe environment** during the time when their parents/guardians are working (better work-life balance) and improve their well-being.

The Project is designed based on the following three pillars: a) efficiency, b) equity and c) sustainability. The project will support the Government in implementing the WDS through four instruments: i) optimization, ii) institutional strengthening, iii) learning environment, and iv) teaching and learning.

The Project is meant to have three components:

Component 1: Ensure that more hours translate into more learning

This component will foster the **optimal use of expanded instructional time** aligned with the curricular reform by helping the Croatian school system to **improve the quality of classroom instructional practices** through training, classroom observations, and formative and summative assessments.

Within this component, the MSE and the Teacher Training Agency (TTA) will be supported in the process of **designing the WDS model**, which entails operational and pedagogical aspects for basic education (grades 1-8), and **refining the model** in the following years based on the indicators and feedback from stakeholders (teachers, parents, school principals, etc.). The first WDS model will be implemented experimentally in selected demonstration schools. External assessment of students from demonstration and other schools will be implemented in order to measure the results of this intervention. Surveys of parents, teachers', and pupils' satisfaction will also be implemented. Results of assessment and surveys will be taken into account when refining the WDS model for full implementation. The component is key to complement the ongoing efforts to support the implementation of the new curriculum while increasing learning time for all students. Furthermore, this component will support the development of consultants/mentors cadre from the Education and Teacher training agency - experts in teaching and learning available centrally to support teachers, schools and school founders in their school and system improvement efforts. The central – albeit intangible – outcome of this component will be the lessons learned by the MSE and its partners, about what works and what needs improvement in the WDS reform, which will be reflected in revised approaches and tools for next phases of the reform.

Moreover, this component will help support the implementation of **external assessments** in selected demonstration schools and schools that will continue implementing the existing curriculum, to compare the results of students from demonstration schools and non-demonstration schools, with a focus on children from lower socio-economic background, who are expected to benefit most from the reform. Also, the project will help design and implement an **Education Data strategy**, to identify more effective and systematic ways of using and merging existing administrative and student performance data to improve student learning, teacher professional development, and school improvement. Finally, this component will support establishing a **“peer-mentoring program”** to pair school principals with poor academic performance with principals from top-performing schools.

The component will be implemented through two subcomponents:

Subcomponent 1.1: Develop the WDS model and refine the model following experiences during initial years of reform

Subcomponent 1.2.: Help (i) expand assessment data and (ii) how such data are used

Component 2: Demonstrate infrastructure solutions for WDS

This component will support the **design of new infrastructure standards** for Croatian schools, which will encompass best practice OECD-EU climate, environment and energy efficient standards. It will support **developing standard designs** for new modern schools that could be funded under EU and Bank funds. Furthermore, the component will support **developing terms of references** to accelerate preparation of technical documentation for infrastructure modernization and **guidelines** supporting national and subnational authorities in procurement, permitting, and supervision. Developing **high-quality data on school infrastructure** to inform prioritization of capital investments and funding **implementation of initial analytical studies** will also be financed. Also, **financing and guidance to local governments** to help them prepare project documentation for school infrastructure, as well as setting up mechanisms to foster **peer-to-peer learning** around novel ways of using learning spaces will be supported.

Moreover, it will finance preparing and launching a **call for proposals for demonstration schools** for the new model, as well as **supporting infrastructure investments** that will allow an initial group of schools to adopt the WDS model, and necessary school **furniture and equipment**. The demonstration schools will serve to inform the future design and implementation of the reform across the country. The demonstration schools will be selected by the MSE through a competitive 'open call' process.

The component will be implemented through two subcomponents:

Subcomponent 2.1: Prepare new/updated infrastructure standards for schools

Subcomponent 2.2: Finance expenditures associated with creating "demonstration schools"

Component 3: Strengthen Ministry's capacity to implement reforms

This component will **strengthen the MSE's capacity** and provide direct support to key aspects of implementing the reform. In particular, within this component, establishing a **reform unit** within the MSE and hiring a **core group of experts** to support the WDS reform implementation will be financed. Furthermore, this component will support the MSE in developing an effective **communication and outreach strategy**, to inform and engage with all stakeholders and the community-at-large about the comprehensive WDS reform. The project will finance **technical assistance** and the production and distribution of **communications materials** associated with the WDS.

Moreover, this component will support **analyzing and revising national** regulation on students with special needs. It will also support **revising the costing of the WDS reform**. Furthermore, it will finance the **needs assessments** of school founders; engage school founders in doing more detailed **analysis of their school networks**; conduct regional workshops; offer an option to each school founder to conduct founder-level analyses and simulations; build ownership of the WDS and strengthen the quality of the model; and prepare local **"school network plans for 2030"**.

In addition to designing and implementing the WDS, this project will help the Croatian Government **design reforms** related to early childhood and care and pre-school education, general and vocational secondary education, and effective and relevant higher education. Such a comprehensive approach to reforms across the education sector will enable significant improvements in education quality, student learning outcomes and equity.

Furthermore, within this component, a **research program** will be established to monitor and analyze the impact of the WDS reform, to inform future reform activities on a timely and evidence-based manner, and to leverage the expertise of other Croatian institutions for the benefit of students and teachers. Furthermore, an in-depth **review of the current governance and financing structures** of basic education, with a focus on areas for improvements and recommendations for options forward will help the Government initiate a public dialogue on these topics. Finally, this component will support the MSE in **adjusting the legislation** required for the scaling up of the WDS reform and further optimization of the school network.

The component will be implemented through four subcomponents:

Subcomponent 3.1: Support establishment of the reform unit to facilitate delivery, including communications

Subcomponent 3.2: Update costing of the reform and prepare local school network plans, including work on special needs students

Subcomponent 3.3.: Support the design of other educational strategic reform initiatives

Subcomponent 3.4.: Fund a research program to allow for adaptive implementation and document results

1.2. Project overview

Results of activities related to the support of the WDS reform design, development of assessment and class observation tools, finance and governance system strengthening will be applicable to the overall primary education system in Croatia and their impact goes beyond the project timeframe. The majority of these activities will be implemented in Zagreb, where the MSE is located.

Locations of demonstration schools will be decided following the call for proposals to schools and founders, meaning that participation supported by the project will be voluntary. Criteria for selection of schools will, among others, take into account equal geographical distribution.



The governance of each school is organized through several bodies: i. Teachers' Council comprised of all teaching staff and principal, ii. Workers' Council comprised of all school employees, iii. Parents' Council comprised of parents/guardians that represent each class in the school (one parent/guardian per class), and iv. Students' Council comprised of students that represent each class in the school (one student per class). The school is governed by the School Board comprised of 3 representatives of the school founder, 2 representatives of the Teachers' Council, 1 representative of the Workers' Council and 1 representative of the Parents' Council. All members represent and express decisions of the body they represent. Decisions within each body are reached according to the School Statute. Based on previous experiences in introducing reforms in phases, application to the call will have to be supported by the approval of all the key stakeholders. This method was used in the introduction of the curricular reform project. The MSE had published a Call for proposals to schools to participate in the Experimental program *School for Life* on 16 February 2018. School principals organized and held consultation meetings with school bodies. Each application to the Call had to be accompanied by the approval of the Teachers' Council, Parents' Council and the Founder of the school. More than 200 schools applied, and 74 were selected in March 2018, based on criteria related to size, geographical distribution, motivation letter and consent of all the above mentioned stakeholders.

Based on the experiences from the curricular reform, the MSE will provide all the relevant information to stakeholders through different communication channels: website, promotional events, media advertisement and through regular communication activities with stakeholders (e.g. replying to written requests for information) before the publication of the call for proposal for the

WDS reform. Moreover, the use of additional channels, such as social media, will be decided on within the component 3 of the project.

In this case the consent of stakeholders will also be required, which means that, besides the communication and stakeholders consultation led from the top down, the key stakeholders themselves will have to organize consultation processes to decide whether to apply to be demonstration schools, thus ensuring that schools where a consensus among all stakeholders has been agreed will participate in the initial phases of this important reform. The call will also contain the email address to which all questions and concerns of stakeholders can be sent. Answers and comments will be periodically published on the MSE website ensuring timely response and provision of same level of information to all stakeholders. In addition, a template for school-based consultation will be provided containing all the relevant information about the WDS model and how it will impact all stakeholders.

1.3. Purpose and objectives of SEP

The purpose of the present SEP is to define the stakeholder engagement strategy, explain how stakeholder engagement will be implemented throughout the course of the Project and which methods will be used as part of the process; as well as to outline the responsibilities of the MSE and other actors in project implementation. The SEP will allow to assess the level of stakeholder interest and support to the Project and enable stakeholders' views to be heard and taken into account.

The SEP objectives are to:

- **Identify stakeholders** who are directly or indirectly affected by and/or interested in the Project;
- Outline **modalities for information dissemination** and **stakeholder engagement activities** including their purpose, frequency and location during project preparation and implementation;
- Promote and provide **means for effective and inclusive engagement with project-affected parties** throughout the project life on issues that could potentially create an impact;
- Define the **roles and responsibilities of different actors** to implement and monitor these activities;
- Ensure functional **grievance redress/beneficiary feedback mechanism** to raise issues;
- Ensure that appropriate project information on **environmental and social risks and impacts** is disclosed in a timely, understandable, accessible format; and
- Promote and maintain **effective and inclusive stakeholder engagement** throughout project life.

The SEP will be disclosed to the public on the Ministry's website www.mzo.hr

2. Brief summary of Previous Stakeholder Engagement Activities

The project builds on reforms of the education system realized by the MSE in the education sector and represents a continuation of MSE's efforts to increase the quality of education in Croatia. Therefore, the stakeholders for this project are the same stakeholders that were identified in the

implementation of the curricular reform, that is, founders of schools, principals and school staff, pupils, parents/guardians, education agencies, trade unions, academic community.

The WDS reform has already been included in the regular communication between the MSE and the stakeholders and it was presented to all primary and secondary school principals as a continuation of the reform efforts aimed at increasing the quality of education in Croatia. The table below includes a list of events that took place before the national roll-out of the curricular reform, where WDS was included in the Minister's presentations and discussions.

Moreover, as is also presented in the table below, following the new Partnership agreement between the World Bank and Croatia, the information about the WDS was announced to the media and the press. The initiative received significant attention and information was published in all the major news outlets, as well as specialized education portals¹.

In addition, during the project identification phase, several consultations took place involving the representatives of school founders, principals and education staff.

The WDS reform was also presented to social partners (education trade unions and employers' association representatives) in the context of preparation of the 2020 National Reform Program.

Furthermore, relevant stakeholders (representatives of the labor market, health and education, including regional development agencies) have been informed about the WDS reform in the context of development of program documents for the following EU financial period (2021- 2027), for funding within the European Social Fund Plus and European Regional Development Fund.

Table 1. List of information disclosure efforts and stakeholder engagement activities conducted during project preparation

DATE	PLACE	STAKEHOLDER	TOPICS DISCUSSED
March 2019	Daily and weekly national and regional newspapers (Večernji list, 24 sata, Glas Slavonije, Novi list) News portals (Jutarnji list, T-portal, srednja.hr, skolskiportal)	General public including parents/guardians	WDS reform and World Bank loan

¹ See for example:

<https://www.jutarnji.hr/vijesti/obrazovanje/skole-u-jednoj-smjeni-cjelodnevna-nastava-od-9-do-16-sati-pocinje-2021-no-potrebna-su-ulaganja/8471846/>

<https://www.tportal.hr/vijesti/clanak/plan-blazenke-divjak-cjelodnevna-nastava-od-9-do-16-sati-u-svim-osnovnim-skolama-20190313>

<https://www.srednja.hr/zbornica/ucenici-vise-nece-imati-domacu-zadacu-skola-jednoj-smjeni-najavljena-razini-cijele-drzave/>

<https://www.skolskiportal.hr/clanak/11569-sve-vise-djece-trazi-produzeni-boravak/>

April 2019	Split Zagreb Rijeka Varaždin Osijek Virovitica	Around 900 primary school principals	National roll-out of the curricular reform, WDS was presented as a continuation of reform efforts
April 2019	Primošten	Around 400 secondary school principals	National roll-out of the curricular reform, WDS was presented as a continuation of reform efforts
August 2019	Osijek Bakar Split Zagreb	Around 900 primary school principals	National roll-out of the curricular reform, WDS was presented as a continuation of reform efforts
September 2019	Zagreb	Around 400 secondary school principals	National roll-out of the curricular reform, WDS was presented as a continuation of reform efforts
September 2019	Split and Splitsko dalmatinska county	Founders of schools - Grad Split and Splitsko-dalmatinska county	Strategic goals and the concept of the WDS was presented to representatives of the county and the city of Split
September 2019	Split and Splitsko dalmatinska county	Principals and staff of several primary schools in Split and Splitsko-dalmatinska county	Strategic goals and the concept of the WDS was presented to principals and part of the staff of several schools in Split and Splitsko dalmatinska county
September 2019	Zagreb	Principals and staff of one primary school and one high school in Zagreb	Strategic goals and the concept of the WDS was presented to principals and part of the staff of two schools in Zagreb
January 2020	Zagreb	Social partners	WDS reform presented in the context of development of the 2020 National Reform Program
February 2021	Zagreb	Stakeholder Representatives in the Solidary Croatia Working Group (representatives of the labor market, health and education, including regional development agencies)	WDS presented in the context of development of program documents for the following EU financial period
April 2021	Zagreb	Croatian Parliament	WDS is one of the key reform initiatives presented in the draft National Recovery and Resilience Plan

May 2021	online	General public	National Recovery and Resilience Plan containing information about the WDS reform published online
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The WDS reform has been presented as a continuation of reform efforts aimed at improving the quality of the education system and improving students' PISA results. A comparative analysis of the number of recommended annual instruction hours in primary schools has also been presented, as Croatia has one of the lowest numbers among the EU countries, according to the Eurydice report². This information initially stirred a lot of discussion, and questions were asked about the validity of information and calculation methodology. The data in the publication is accurate, the MSE participated in providing all the data and the Eurydice network publishes reports according to standard research practices, therefore in more recent discussions these questions have no longer been raised. Once this issue was resolved, no other substantial issues were raised. However, once the first WDS model is developed, we expect issues to be raised concerning the organization of the whole day school, number of contact hours, and possible adaptations of curricula. MSE will ensure taking into account stakeholders' views and will strive to consensus reaching at all activities related to the reform.

3. Stakeholder identification and analysis

In compliance with national regulations and international standards, stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Similarly, in order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process it is particularly important to identify individuals and groups who may be differentially or disproportionately affected by the project.

It is also important to understand how each stakeholder may be affected – or perceives the project so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

Key stakeholders who will be informed and consulted about the project are divided into stakeholders that will be affected or are likely to be affected by the Project (project-affected parties); and other stakeholders that may have an interest in the Project (other interested parties).

3.1. Project-affected parties

Among the project-affected parties, two categories can be identified depending on whether they have an active role in the project implementation or they are the direct beneficiaries of the Project.

The key stakeholders also perceived as the main partners in the implementation of the Project are the **MSE, national agencies from the system of primary and secondary education, teachers and**

² https://eacea.ec.europa.eu/national-policies/eurydice/sites/eurydice/files/recommended_annual_instruction_time_2018_2019.pdf

principals and their representative **trade unions, founders of schools** that will be included in project activities, as well as the **academic community**.

Students and their parents/guardians are stakeholders who are considered to be beneficiaries of the Project. Even though they will not have an active role in the implementation of the Project, their consent is one of the prerequisites for the introduction of the WDS reform. The consent is envisaged only in the experimental phase of the WDS reform. During the experimental phase, surveys and feedback will be collected and included in the refinement in the final WDS model that will be embedded in the education legislation. legislation changes will follow the national public consultation process which has prescribes high level of stakeholders' involvement (stakeholders are members of the working group that proposes legislative changes, several interested ministries must provide their opinion on the draft legislation, draft legislation is published for public debate, and adoption procedure in the Parliament undergoes two readings).

3.2. Other interested parties

Other interested parties are primarily **teachers and principals** and their representative **trade unions**, as well as **founders of schools**, who will not be included in the project activities, but their inclusion is planned in the subsequent phases of the reform that will be funded later from sources other than the World Bank loan.

Media and representatives of the press have an important role as stakeholders who can facilitate communication about the Project to the **general public**, which is also an important interested party. Their role in public awareness campaigns is crucial as envisaged in project subcomponent 3.1.

NGOs in education are also an interested party. Each year, the MSE publishes a call for proposals of NGOs for implementation of additional educational activities in primary and secondary schools in Croatia. The WDS reform could ensure additional time for such activities.

3.3. Disadvantaged/vulnerable individuals or groups

There are no identified obstacles to dissemination of information to disadvantaged/vulnerable individuals or groups, as a very high percentage of population in Croatia has access to the Internet (in 2020, 85%³ of households in Croatia had access to the Internet), and to news services. Additionally, the news service on the national television is transmitted with a sign language interpreter.

Founders of schools and schools that will apply to participate in the project will have to collect consent of parents/guardians of the students, which means that they will also take an active role in engaging other stakeholders and ensuring that all parents/guardians have received the information about the Project.

There are more opportunities than obstacles for disadvantaged/vulnerable individuals in this project. One of the main beneficiaries of the WDS reform are children from lower socioeconomic background. Empirical evidence has shown that it is that group of students that benefits the most from spending more time in an organized and stimulating school environment. Schools in Croatia already have a high level of inclusion of children with special needs. With the WDS, more time will be available to work with students that need additional support. Additionally, infrastructural investments in demonstration schools will follow Universal access guidelines and ensure there are no physical obstacles in access to schools.

³ https://ec.europa.eu/eurostat/databrowser/view/isoc_ci_in_h/default/table?lang=en

Table 2 below provides the description of the role, level of interest in and influence over the project of the various stakeholders identified above.

Table 2. List of stakeholders, their role, interest and influence

Stakeholder	Role	Interest	Influence
Project-affected parties			
Ministry of Science and Education	In charge of leading all the reforms in the education sector; Prepares the strategic background necessary for the Project implementation; Main implementing body of the Project; Lead in stakeholder engagement and consultations; Ensures coordination of different reform initiatives and ensures the complementarity of projects in the education sector.	High	High
Ministry of Finance	Contracting body (the Borrower); Provides budgetary approvals	High	High
National Centre for the External Evaluation of Education	Support to the MSE in the preparation of strategic background for the Project; The NCEE will participate in the activities that will support the preparation of standardized tests aimed at measuring students' achievements in demonstration schools; Implements other projects aimed at increasing the quality of education, which are complementary to the Project.	High	High
Teacher Training Agency	Support to the MSE in the preparation of the strategic background for the Project; Main partner to the MSE for the activities related to the training of teachers and principals; Implements other projects aimed at increasing the quality of education, which are complementary to the Project.	High	High
Agency for Vocational Education and Adult Education	Support to the MSE in the preparation of strategic background for the Project; Implements other projects aimed at increasing the quality of education, which are complementary to the Project.	High	High
Croatian Academic and Research Network – CARNET	Support to the MSE in the preparation of strategic background for the Project; Implements other projects aimed at increasing the quality of education, which are complementary to the Project.	High	High
Agency for Mobility and European Union Programs	Support to the MSE in the preparation of strategic background for the Project; Implements other projects aimed at increasing the quality of education, which are complementary to the Project.	High	High
Units of local government – school founders	Owners of schools, including both demonstration schools and those that will continue implementing the existing curriculum;	High	High

	Their consent is necessary for the schools to be included in the Project; Beneficiaries of financed needs assessments, analyses of school networks and training about improvements of the school network, regional workshops; Reconstruction and/or improvement of learning environments of selected demonstration schools will be funded by the Project.		
Trade unions representative of teachers, education staff and principals	If the Project results show that the workload of teachers will have to be rearranged in order to implement the WDS, the trade unions are the main stakeholders ensuring that conditions for teachers are satisfactory and that they are adequately remunerated in case of changes in workload.	High	High
Principals, teachers and other education staff from schools selected to participate in Project	Main partners for the implementation of the Project; Their consent is necessary for the school to be included in the Project; Beneficiaries of training and professional development.	High	High
Students from schools selected to participate in the Project	Beneficiaries of the Project; Students of demonstration schools will benefit from longer instruction hours, longer organized time spent in schools and meals.	High	Low
Disabled students from schools selected to participate in the Project	Beneficiaries of the Project; Reconstruction of demonstration schools selected to participate in the Project will ensure accessibility according to principals of universal access and national legislation.	High	Low
Parents/guardians of children from schools selected to participate in the Project	Beneficiaries of the Project; Their consent is necessary for the school to be included in the Project; Parents/ guardians will benefit in terms of having a better work-family balance.	High	High
Academic community	Will take part in the development of the WDS model; Higher education institutions will take part in the research program on the impact of the WDS reform.	High	High
Other interested parties			
School founders, principals and teachers from schools not participating in the Project	The implementation of the Project will be important for their preparation for participation in the future phases of the WDS reform (outside of the Project scope)	High	High
Media	Dissemination of information in local and national news	High	Medium
NGOs active in the education sector	Implement additional education activities	High	Medium

Stakeholders will continue to be identified on a continuing basis and following the implementation of the activities that will result with a selection of schools and founders of schools that will be included in the Project.

In general, engagement is directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagements should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

4. Stakeholder Engagement Program

4.1. Information disclosure

The MSE will disclose information about project activities to allow stakeholders to understand the impacts of the Project, and potential opportunities. Stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making project-related information available as early as possible is important.

Documentation and information on updates from the project activities and the result of consultation with stakeholders will be disclosed on the MSE's website (<https://mzo.gov.hr/>). Additionally, a website dedicated to the WDS reform will be developed within the Project, where all information and all documents related to the project will be available and updated regularly.

4.2. Strategy for consultation

Stakeholder engagement activities will aim to provide specific stakeholder groups with relevant information and opportunities to voice their view on topics that matter to them. The table below presents stakeholder engagement activities envisaged under the Project. The activity types are adapted to the three major project stages:

1. Promotion of the WDS reform
2. Call for proposals for demonstration schools – (expected number: approximately 50 schools)
3. Implementation of the WDS in selected demonstration schools based on the call for proposals

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Feedback Mechanism	Responsibilities	Month of project implementation
Promotion of the WDS reform	<i>Trade unions representatives of teachers, education staff and principals; Principals; Teachers and other education staff; Founders of schools; NGOs in the education sector</i>	Strategic background for the introduction of WDS: Reasons for the reform; State of play – school infrastructure; Phasing of the reform.	Meetings/C consultations Promotional events Media advertisement Website	Meetings/consultations will be followed by Minutes with main issues raised and conclusions reached Following promotional activities, MSE will answer questions related to WDS reforms.	MSE – Project Implementation Unit; persons responsible for communication activities	Between month 1 and 6
	<i>General public, including students and parents/</i>	Strategic background for the	Website Media advertisement	Following promotional activities, MSE	MSE – Project Implementation Unit; persons	Between month 1 and 6

	<i>guardians</i>	introduction of WDS: Reasons for the reform; Phasing of the reform	nt	will answer questions related to WDS reforms through usual channels of communication - mail, email, journalist questions.	responsible for communication activities	
<i>Call for proposals to demonstration schools</i>	<i>Principals; Teachers and other education staff; Founders of schools; NGOs in the education sector</i>	Call for proposals which will include criteria for selection of schools, WDS content and implementation	Website Promotional events Media advertisement E-mails to schools	The call will contain email address to which questions and comments/suggestions can be directed. Answers will be published periodically during the timeframe of the application process. In cases larger issues are identified that are preventing schools from applying, call for proposals may be	MSE – Project Implementation Unit; persons responsible for communication activities	Between month 5 and 10

				adapted. MSE implements the same procedure in case of EU funded projects.		
	<i>General public, including students and parents/guardians</i>	Call for proposals which will include criteria for selection of schools, WDS content and implementation	Website Media advertisement Brochures	MSE will answer questions related to WDS reforms received through usual communication channels – mail, email, journalist questions etc..	MSE – Project Implementation Unit; persons responsible for communication activities, school principals	Between month 5 and 10
<i>Implementation of the WDS in selected demonstration schools based on the call for proposals</i>	<i>Principals; Teachers and other education staff; Founders of schools; NGOs in the education sector</i>	Implementation of the WDS	Website Meetings Media advertisement Brochures	Satisfaction surveys and external assessment of students are envisaged as part of the project. Gathered feedback will be included in the refinement of the WDS model.	MSE – Project Implementation Unit; participating schools and founders	Between month 25 and 72
	<i>General public,</i>	Implementatio	Website	MSE will	MSE –	Between

	<i>including students and parents/guardians</i>	n of the WDS	Meetings Media advertisement	answer questions related to WDS reforms received through usual communication channels – mail, email, journalist questions etc..	Project Implementation Unit; participating schools and founders	month 25 and 72
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Based on the readiness of the project approval and concerning the nature of the civil rehabilitation works, the exact schedule of project activities and consultations in selected schools based on the call for proposals will be specified, published on the MSE’s website and shared with interested parties via e-mail. A site specific ESMP will be developed, disclosed and consulted upon, which will also include the school consultation schedule. Future stakeholder meetings will also be agreed upon and communicated subsequently.

The views of the stakeholders will be taken into account during the whole Project implementation period and the content of the reform will be adapted , based on the experiences and views of schools and founders participating in the first call for proposals. Surveys and external assessment of students’ achievement will be implemented, providing objective feedback that will be taken into account for the definition of WDS that will be embedded in national education legislation. Additionally, as envisaged by subcomponent 3.4: *Fund a research program to allow for adaptive implementation and document results*, empirical evidence will be used in order to come up with the best possible solution for the WDS reform.

4. Resources and responsibilities for implementing stakeholder engagement activities

Units responsible for the implementation of the Project are the Directorate for Support and Improvement of Education System and the Directorate for Education, along with the Public Relations staff from the Cabinet of the Minister of the MSE. There will be a special Project Implementation team established in the MSE, with an additional position designated to manage communication and engagement activities in support to the Public Relations staff from the Cabinet of the Minister. These units will take responsibility for and lead all aspects of the stakeholder engagement.

The existing capacities of the MSE will additionally be supported by the Project activities through the subcomponent 3.1. *Support establishment of the reform unit to facilitate delivery, including communications*. The existing means of communication (MSE's website, social media accounts, press releases and reporting to the Government) will be expanded by the Project and include a design of a resource website for the WDS reform, where all information will be timely published. The budget for the implementation of the SEP will be provided through project funds (within the 2.7 million EUR for the subcomponent 3.1) and the regular budget of the MSE.

To answer stakeholders' questions about the project or the consultation process, existing [contacts](#) on the MSE's website will be used. Additionally, a dedicated e-mail address will be created for the WDS reform, where all questions will be directed to and answered from by the special Project Implementation team established. The designated e-mail address will also allow for easier reporting about the number of stakeholders' questions and the content of their concerns.

5. Grievance mechanism

A Grievance Redress Mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints, feedback, questions and suggestions from citizens and affected communities at the level of the project.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and will follow the required procedures.

Key definitions of grievance and complaint are as follows:

→ Complaint: an expression of dissatisfaction that is related to an impact caused by a project activity, which has affected an individual or group. Adversely, the interests of an individual or group and the individual or group want a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance;

→ Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected by a project activity which, if not addressed effectively, may pose a risk to operations (through stakeholder actions such as access road

blockages) and the livelihood, well-being or quality of life of the claimant(s). The grievance mechanism described in this section includes both complaints and grievances.

Objectives of the project-based GRM

The project-based GRM is intended to serve as a mechanism to:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the project;
- Strengthen accountability to beneficiaries, including project-affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns.

Having an effective GRM in place will also serve the objectives of: reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

The GRM will be accessible to a broad range of project stakeholders who are likely to be affected directly or indirectly by the project. These may include school staff, students and their parents/guardians, as well as general public and media – all of who will be encouraged to refer their grievances and feedback to the GRM. The GRM can be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project activities. The GRM's functions will be based on the principles of transparency, accessibility, inclusiveness, fairness and impartiality and responsiveness. It will establish clearly defined timelines for acknowledgement, update and final feedback to the complainant.

The project envisages implementation of different types of activities, for which grievance mechanisms are prescribed in different national legal acts or the procedures stem from the Act on Administrative Procedure. Since the participation in the Project is voluntary and requires consent of all the project-affected parties, chances for complaints have been significantly reduced. However, five types of situations in which grievances may occur have been identified. Grievances can be directed by email or post to the MSE. Depending on the situation, the staff from the project implementation unit will address the grievance according to one of the following situations

- (i) Grievances connected to the selection of schools and founders that will participate in the Project

For the activities related to selection of demonstration schools to participate in the Project, experience from other competitive projects implemented by the MSE will be used. The call for proposals will contain clear and measurable criteria for selection, measurement scales and available funds. The MSE will form a committee that will evaluate all the proposals according to the selection criteria, ensuring that conflict of interest of the members is not present. The committee will be composed of MSE staff and staff from the project implementation unit. The evaluation will result in a provisional decision by the Minister of selected demonstration schools. With the information about the provisionally selected schools, all the applicants will also be informed of the grievance procedure. Grievances will be accepted by the MSE for 15 days following the provisional decision of selected schools, and can be sent by email or regular post. A separate committee formed by the MSE will evaluate the complaints and decide on the final list of schools that will be included. The committee

will aim to respond to all complaints received within 15 days of the grievance deadline. Each committee meeting will be followed by a written report that will contain information about the number and content of complaints.

(ii) Grievances connected to the implementation of the WDS in schools

If any grievance occurs regarding the pedagogical implementation of the WDS in schools, national legislation for such situations will be used as prescribed in the Act on School Inspection. The MSE will send the grievance in question to the School Inspection. According to the Act, the School Inspection, which operates as a separate sector within the MSE, is obliged to consider grievances received by any physical or legal person, establish whether there is a need to start an inspection procedure and inform the party within 30 days whether the inspection procedure is to be started. After the inspection procedure is finished, the party should be informed about the supervision carried out and actions taken. Inspection procedures are to be done in line with the Act on Administrative Procedures, except for issues which are differently arranged by the Act on School Inspection.

(iii) Grievance connected to public procurement

Any grievances that may occur during procurement of goods and services will be addressed according to national procurement legislation. According to the Public Procurement Act, grievance procedures are to be carried out in line with the Public Procurement Act and the Act on Administrative Procedures. Grievances are to be addressed to and resolved by the State Commission for the Control of Public Procurement Procedures, whose decisions are public. Deadlines for expressing grievances are defined by the Public Procurement Act.

(iv) Grievances connected to construction

Any grievances that may occur during the reconstruction of schools will be addressed according to national rules related to construction, as primarily defined by the Act on Construction and related legislation. According to the Act on State Inspectorate, inspection related to the implementation of legislation on construction, the use and maintenance of buildings and other related inspection tasks are done by the Construction Inspection.

(v) Grievances connected to workers' rights

Detailed information about workers' grievance mechanisms can be found in the Labor Management Procedure document.

Administrative procedure

In general in Croatia, in all administrative matters, the Act on Administrative Procedure applies, and only some questions related to the administrative procedure can be differently defined by law, if necessary and in line with the fundamental stipulations of the Act. According to the Act, procedures can be initiated at a party's request or ex officio. Administrative matters are to be resolved in form of a written decision. In cases of immediate resolving, an official person is obliged to produce a decision and deliver it to the party no later than 30 days after the submission of a request. In cases when an examination procedure is carried out, an official person is obliged to produce a decision and deliver it

to the party no longer than 60 days after the submission of a request. Against first-degree decisions, complaints can be expressed to the second-degree body, if not excluded by law. Complaints should be submitted to the first-degree body, no later than 15 days after a decision has been delivered, unless a longer deadline is prescribed. Complaints can also be submitted in case when a decision has not been reached within the deadline prescribed by the law, in this case also to the second-degree body.

Submitting grievances to the World Bank

Project stakeholders and citizens can also submit complaints regarding project activities through the World Bank Grievance Redress Service (GRS). Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to existing project-level grievance-redress mechanism or to the World Bank's (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel (IP), which determines whether harm occurred, or could occur, as a result of the WB noncompliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management (BM) has been given an opportunity to respond. Information on how to submit complaints to the World Bank's GRS is available here: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. Complaints can also be submitted to the IP of the World Bank. The IP is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a World Bank-funded project. Information on how to submit complaints to the World Bank's IP is available here: www.inspectionpanel.org.

6. Monitoring and Reporting

During all phases of project implementation, information about the stakeholder engagement activities will be published on the Project website.

Monitoring of the implementation of demonstration schools is particularly important for the further refinement of the reform. Therefore, monitoring and engagement with all project affected parties (principals, teachers, education staff, students and their parents/guardians) will be included regularly in engagement activities, where they will be invited to express their views and proposals for further improvement to the WDS reform. The results and conclusions of these engagement and monitoring activities will be implemented in the future phases in the report.

Reports about stakeholder engagement activities and use of grievance mechanisms will be part of the regular project implementation reporting activities to the World Bank.

The PIU will monitor the effectiveness of stakeholder engagement activities and their implementation through the following indicators: number of articles published in the press; number of meetings/consultations held; number of respondents to surveys; number of grievances resolved etc.)-

Please consider adding here a section on how the PIU will monitor the effectiveness of stakeholder engagement activities and their implementation: which indicators could tell us if the stakeholder engagement program is being effective? (e.g., number of articles published in the press; number of social media posts and positive reactions to them; number of workshops held and number of attendees...)