

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)

Yayasan Penabulu

Framework for Managing Environmental and Social
Risks and Impacts



PENABULU



Version 2.0 - 2025

APPROVAL SHEET



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Approval Sheet

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) PENABULU FOUNDATION

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Penabulu Foundation's Environmental and Social Management System (ESMS) document serves as the official guideline for managing environmental and social risks and impacts throughout the organization's entire program and operational cycles.

This document constitutes an update to the 2021 ESMS, which has been refined to align with evolving organizational policies as well as prevailing national and international standards.

This document is effective as of the date of its enactment and shall be reviewed and updated periodically as required.

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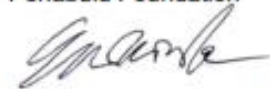

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I. INTRODUCTION

A. Background

Penabulu as a national civil society organization with local roots and connection to Oxfam's global network operates in an increasingly complex development context, which is characterized by increasing pressures on the environment, social inequality, and the dynamics of humanitarian crises. In this context, Penabulu views the importance of applying a systematic and integrated approach in environmental and social risk management as part of the implementation of sustainable development programs.

In line with the organization's strategic mandate, particularly in environmental and climate change priorities, Penabulu developed **the Environmental and Social Management System (ESMS)** as a framework that integrates environmental and social risk management policies, procedures, and practices into the entire program cycle. This ESMS is designed to ensure that every program intervention is implemented by paying attention to the *precautionary principle*, inclusivity, and protection of the environment and society.

ESMS serves as an operational reference in identifying, assessing, managing, and monitoring environmental and social risks and impacts, while ensuring compliance with applicable standards, both at the national level and those required by funding partners.

In the context of Penabulu-Oxfam Strategic Plan 2025–2030, the implementation of ESMS is also aligned with **the Triple Nexus (humanitarian-development-peacebuilding)** approach, where each activity is designed in consideration of the linkages between environmental, social and community welfare aspects holistically. Thus, ESMS is an instrument to ensure that all Penabulu activities contribute to inclusive, equitable, and sustainable development.

B. ESMS Objectives

The ESMS of Penabulu is prepared as a management system that aims to ensure that all organizational activities are carried out by considering environmental and social risks and impacts in a structured and measurable manner. ESMS is a reference in integrating risk management into all stages of the program cycle, from planning, implementation, to monitoring and evaluation.

In its implementation, ESMS aims to:

1. Ensuring that all Penabulu program activities are carried out through the process of identifying, assessing, and managing environmental and social risks and impacts adequately;
2. Minimizing the potential for negative impacts and optimizing the positive impact of activities on the environment and society;
3. Ensure compliance with applicable national laws and regulations as well as relevant standards and best practices, including international standards
4. Integrate sustainability principles into policies, planning, implementation, and program monitoring and evaluation systems.

ESMS is implemented by all work units of Penabulu as well as implementing partners within the scope of the supported program. Each activity must go through a documented risk management process, including screening, classification, mitigation determination, and implementation monitoring, in accordance with the provisions of this guideline.

Furthermore, ESMS functions as an instrument to strengthen organizational governance, by ensuring that the entire decision-making process is based on a systematic, documented, and accountable risk analysis. ESMS is also the basis for ensuring that all program interventions provide sustainable benefits within the area of influence of activities, and do not cause significant negative impacts on the environment and society.

C. Scope

The ESMS guidelines of Penabulu apply to all business processes of the organization which include the implementation of institutional functions, program management, and the distribution of funding through various schemes, including direct implementation programs, partnerships, and grant-making mechanisms. These guidelines cover all activities supported by internal and external funding sources, including grants from donors, cooperation with development partners, and other legitimate sources of funding.

The implementation of ESMS applies to all roles and functions of Penabulu in the implementation of programs and/or activities, both as an implementing entity, an intermediary/fund manager, or as a partner in collaboration schemes with other parties. In the event that the activity is carried out by a partner or beneficiary, the obligation to implement ESMS remains inherent and must be fulfilled in accordance with the level of risk and characteristics of the activity.

The implementation of this ESMS guideline refers to the following provisions:

1. Agreements stipulated in cooperation agreements with partners, donors, or related parties with;
2. Mandate stipulated in the applicable laws and regulations;
3. In the event that it is not explicitly mandated by the donor or grantor, but the results of the gap analysis show that the required environmental and social protection standards are lower/contrary to the ESMS standards of Penabulu, then these ESMS guidelines are still enforced as a minimum standard; and/or
4. In the event that the activity is carried out by partners or initiators of activities with lower environmental and social management standards, the application of these ESMS guidelines is a reference to ensure equality and improvement of protection standards.

II. POLICY & PRINCIPLES OF ESMS OF PENABULU

A. ESMS Policy Statement

Penabulu is committed to ensuring that all organizational activities are carried out by prioritizing the principles of environmental and social protection in a structured,

integrated, and responsible manner. This commitment is realized through the implementation of the ESMS as the main framework in managing environmental and social risks and impacts throughout the program cycle.

In line with Penabulu-Oxfam Strategic Plan 2025-2030, this policy also reflects the organization's commitment to promoting inclusive development, environmental protection, and respect for human rights as an integral part of the sustainable development approach.

In the implementation of the ESMS, Penabulu refers to various relevant international standards, including *IFC Performance Standards (PS1–PS8)*, *Environmental and Social Policy* as well as *Information Disclosure Policy* of the Green Climate Fund (GCF), *UN Guiding Principles on Business and Human Rights (UNGPs)*, *Sustainable Development Goals (SDGs)*, as well as *the OECD principles of Due Diligence for Responsible Business Conduct*. The ESMS is also consistent with Indonesia's national safeguard systems and regulatory frameworks, including principles reflected in KLHK's SIS REDD+ framework, ensuring coherence between global standards and national environmental and social governance systems.

These standards and frameworks serve as a reference in ensuring that the management of environmental and social risks and impacts is carried out in a systematic, risk-based, proportionate manner, and in line with international best practices and the expectations of global funding institutions.

In its implementation, Penabulu establishes policies as the for managing environmental and social risks and impacts throughout the program cycle:

1. **Compliance with Laws and Standard.** All activities are required to comply with applicable national laws and regulations and refer to relevant standards and best practices, including international standards applicable to funding partners. [*Code of Conduct 20 March 2017, Integrity Pack 20 March 2017, Anti-Corruption & Fraud Prevention Policy 1 July 2020*]
2. **Environmental and Social Risk Management & Do No Harm.** Every activity must go through the process of identifying, assessing, and managing environmental and social risks systematically, by prioritizing the precautionary principle and the principle of do no harm. [*Gender Equality and Social Inclusion Policy 1 January 2017, Child Protection Policy 20 March 2017*]
3. **Maintaining Environmental Quality and Biodiversity Protection.** Activities must avoid, minimize, and control negative impacts on the environment, including protection of ecosystems, biodiversity, and environmental functions. and ensure that any intervention does not cause a disproportionate negative impact on land access and tenure. [*Organization Governance and Ethics Policy March 2015*]
4. **Respect for Human Rights & Indigenous Peoples.** Activities must respect human rights, including the rights of indigenous peoples to land, territory, and natural resources, and ensure the application of the principle of Free, Prior and Informed Consent (FPIC) in relevant activities. [*Organization Governance and Ethics Policy March 2015, Gender Equality and Social Inclusion Policy 1 January 2017, Child Protection Policy 20 March 2017, Code of Conduct 20 March 2017*]

5. **Social Inclusion, Gender Equality, and Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH).** It is mandatory for activities to ensure inclusive, meaningful, and equal participation, as well as prevent discrimination against women and vulnerable groups. In this case, Penabulu also applies the principles of PSEAH by ensuring that all activities are free from all forms of exploitation and gender-based violence (GBV). The implementation of PSEAH includes: (i) Prevention of the risk of exploitation, harassment, and sexual violence in all activities; (ii) Provision of safe, confidential, and responsive reporting mechanisms; (iii) Case management in a fair, transparent, and victim-oriented manner (survivor-centered approach); (iv) Strengthening the capacity of staff and partners related to the prevention and case management of Sexual Exploitation, Abuse, and Harassment (SEAH). [*Gender Equality and Social Inclusion Policy 1 January 2017, Child Protection Policy 20 March 2017, Integrity Pact 20 March 2017, Code of Conduct 20 March 2017, Organization Governance and Ethics Policy March 2015*]

6. **Meaningful Engagement of Key Stakeholders.** Activities must be carried out by ensuring meaningful participation of key stakeholders, including the provision of transparent information, the implementation of participatory consultations, and the accommodation of inputs in the decision-making process. [*Gender Equality and Social Inclusion Policy 1 January 2017, Organization Governance and Ethics Policy March 2015, Complaints and Grievance Policy 2 May 2016, Code of Conduct 20 March 2017, Integrity Pact 20 March 2017, Anti-Corruption & Fraud Prevention Policy 1 July 2020*]

7. **Occupational Health & Safety.** Activities must be carried out by paying attention to occupational health and safety aspects, including the implementation of safe work procedures and the use of adequate safety equipment. [*Integrity Pact 20 March 2017, Code of Conduct 20 March 2017, Complaints and Grievance Policy 2 May 2016, Gender Equality and Social Inclusion Policy 1 January 2017, Child Protection Policy 20 March 2017*]

8. **Transparency, Accountability, and Feedback Mechanisms.** Activities must be carried out in a transparent and accountable manner, and equipped with an accessible, responsive, and documented Community Feedback Mechanism (CFM), including to manage SEAH-related cases. [*Complaints and Grievance Policy 2 May 2016, Organization Governance and Ethics Policy March 2015*]

9. **Continuous Improvement.**
The implementation of ESMS must be supported by capacity building efforts, continuous learning, and periodic evaluation and improvement of the system. [*Organization Governance and Ethics Policy March 2015*]

B. Relevant Laws and Regulations

Penabulu ESMS is formulated with reference to relevant national laws and regulations in Indonesia, including:

No	ESMS Compliance Principles Pemabulu	Applicable Laws / Regulations
1	<p>Compliance with Laws and Standards</p> <p>All activities must comply with national laws and regulations as well as relevant standards and best practices</p>	<ul style="list-style-type: none"> a. Law Number 32 of 2009 on Environmental Protection and Management b. Law No.41 of 1999 on Forestry c. Law of the Republic of Indonesia No. 20 of 2001 on Amendments to Law No. 31 of 1999 on the Eradication of Corruption
2	<p>Environmental and Social Risk Management & Do No Harm</p> <p>Identification, assessment, and risks management in a structured manner</p>	<ul style="list-style-type: none"> a. Law Number 32 of 2009 on Environmental Protection and Management b. Government Regulation Number 22 of 2021 on Environmental Permits
3	<p>Maintaining Environmental Quality and Biodiversity Protection</p> <p>Avoiding and minimizing environmental impacts and ensuring there are no disproportionate impacts on biodiversity and land</p>	<ul style="list-style-type: none"> a. Law Number 32 of 2009 on Environmental Management and Protection b. Law No. 18/2008 on Waste Management c. Law Number 41 of 1999 on Forestry d. Government Regulation No. 22/2021 on the Implementation of Environmental Protection and Management e. Regulation of the Minister of Environment No. 29/2009 on Guidelines for Biodiversity Conservation at the Regional Level f. Government Regulation No. 82/2001 on Water Quality Management and Water Pollution Management g. Regulation of the Minister of Environment No. 17/2012 on Guidelines for Community Involvement in the Environmental Impact Assessment (Analisis Mengenai Dampak Lingkungan/AMDAL)) and Environmental Licensing Process
4	<p>Respect for Human Rights & Indigenous Peoples</p> <p>Respect the rights to land, territory, and natural resources and implement FPIC</p>	<ul style="list-style-type: none"> a. Law Number 39 of 1999 on Human Rights b. Law Number 41 of 1999 on Forestry c. Regulation of the Minister of Environment and Forestry

No	ESMS Compliance Principles Pemabulu	Applicable Laws / Regulations
		Number 9 of 2021 on Social Forestry Management
5	<p>Social Inclusion, Gender Equality, and Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH)</p> <p>Prevent gender-based discrimination and violence and ensure inclusive participation</p>	<ul style="list-style-type: none"> a. Law No. 7 of 1984 on the Ratification of the Convention on the Elimination of All Forms of Discrimination against Women b. Law Number 39 of 1999 on Human Rights c. Law Number 8 of 2017 on Persons with Disabilities. d. Presidential Regulation Number 65 of 2005 on the National Commission on Anti-Violence Against Women. e. Presidential Instruction Number 9 of 2000 concerning Gender Mainstreaming (Pengarusutamaan Gender/PUG).
6	<p>Meaningful Engagement of Key Stakeholders</p> <p>Ensure meaningful engagement of key stakeholders, including the provision of transparent information</p>	<ul style="list-style-type: none"> a. Law No. 14/2018 on Public Information Transparency. b. Presidential Instruction No. 9/2000 on Gender Mainstreaming in National Development
7	<p>Occupational Health & Safety</p> <p>Ensuring health and safety (K3) in the implementation of activities</p>	<ul style="list-style-type: none"> a. Law Number 1 of 1970 concerning Occupational Health and Safety Management (K3) b. Law Number 13 of 2003 concerning Manpower
8	<p>Transparency, Accountability, and Feedback Mechanisms</p> <p>Provide a responsive and documented complaint system</p>	<ul style="list-style-type: none"> a. Law Number 39 of 1999 b. Law Number 14 of 2008 (optional if you want to add information disclosure)
9	<p>Continuous Improvement</p> <p>Regular evaluation and improvement of the system</p>	<ul style="list-style-type: none"> a. Law Number 16 of 2016 b. Law Number 32 of 2009

C. Principles of Penabulu ESMS

Penabulu’s ESMS is underpinned by nine principles that form the foundation for managing environmental and social risks and impacts throughout the program cycle. These principles serve as normative guidance for planning, implementation, and monitoring and evaluation, ensuring that all program interventions are carried out in a responsible manner.

No	Penabulu ESMS Principles	Objective	Operational Indicators
1	Compliance with Laws and Standards	<ul style="list-style-type: none"> ● Ensure that all activities comply with national laws and regulations and applicable international standards ● Ensure compliance with donor requirements and international standards ● Avoiding legal and reputational risks ● Ensure the entire process is documented and auditable 	<ul style="list-style-type: none"> ● Availability of a list of relevant regulations for each activity ● Percentage of activities that meet licensing requirements ≥100% ● No legal violations or sanctions ● Periodic compliance reviews
2	Environmental and Social Risk Management & Do No Harm	<ul style="list-style-type: none"> ● Conduct screening, identify potential environmental and social risks from the planning stage ● Assess the level of risk systematically and measurably ● Determining appropriate and proportionate mitigation measures ● Ensure the do no harm principle is applied in all activities ● Integrating risk management into the program cycle 	<ul style="list-style-type: none"> ● 100% of activities undergo environmental & social screening process ● Documented risk categorization ● Environmental and Social Management Plan (ESMP) documents are available for medium/high risk- ≥90% of mitigation plans implemented

No	Penabulu ESMS Principles	Objective	Operational Indicators
3	Maintaining Environmental Quality and Biodiversity Protection	<ul style="list-style-type: none"> ● Protecting ecosystems and biodiversity from the impacts of activities ● Avoid the use of invasive species ● Control/avoid environmental pollution and degradation ● Encourage sustainable natural resource management practices ● Ensure that there is no social/economic impact of activities on access and control/acquisition/land use 	<ul style="list-style-type: none"> ● No activity in critical habitat without mitigation ● Availability of an environmental management plan ● No significant pollution incidents ● Number of activities supporting conservation/restoration ● Provision of non-coercive land approval
4	Respect for Human Rights & Indigenous Peoples	<ul style="list-style-type: none"> ● Ensure the protection of human rights in all activities ● Respect indigenous peoples' rights to territories and resources ● Preventing social conflict and tenure conflict ● Ensure the implementation of legal and documented FPIC ● Avoiding forced land acquisition and the impact of relocation ● Ensuring equity in access and utilization of resources 	<ul style="list-style-type: none"> ● The FPIC process is carried out at the beginning of the activity ● No unresolved land conflicts ● Community consultation documentation available ● No human rights violations reported
5	Social Inclusion, Gender Equality, and Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH)	<ul style="list-style-type: none"> ● Ensuring inclusive and meaningful participation ● Promoting gender equality in access and program benefits ● Preventing discrimination against vulnerable groups ● Preventing Sexual Exploitation, Violence, and Harassment (SEAH) 	<ul style="list-style-type: none"> ● Analysis of meaningful participation GEDSI action plan is available in the program design ● Participation of women and vulnerable groups ≥20%

No	Penabulu ESMS Principles	Objective	Operational Indicators
		<ul style="list-style-type: none"> ● Provide a secure and responsive reporting system ● Ensuring Case Management based on a victim-centered/survivor-centered approach 	<ul style="list-style-type: none"> ● Gender-disaggregated data and documentation ● No cases of GBV/SEAH that went untreated ● Availability of PSEAH policies
6	Meaningful Engagement of Key Stakeholders	<ul style="list-style-type: none"> ● Ensure inclusive and meaningful stakeholder engagement ● Ensure transparent and easy-to-understand access to information ● Encourage active participation in planning, implementation, and evaluation ● Accommodating stakeholder aspirations and input ● Reduce potential conflicts through effective communication ● Ensure the involvement of vulnerable and directly affected groups 	<ul style="list-style-type: none"> ● Availability of Stakeholder Engagement Plan (SEP) ● Stakeholder mapping is carried out for 100% of activities ● Number and quality of public consultations carried out (documented) ● Percentage of representation of vulnerable groups (women, indigenous peoples, person with disabilities) ≥40% ● Availability of documentation of input and feedback from stakeholders ● The percentage of stakeholder input accommodated in the design of the activity ● The absence of unresolved social conflicts

No	Penabulu ESMS Principles	Objective	Operational Indicators
			<ul style="list-style-type: none"> ● Stakeholder satisfaction level with the engagement process (through surveys/feedback) ● Integration of the results of stakeholder involvement in the planning and evaluation of activities
7	Occupational Health & Safety	<ul style="list-style-type: none"> ● Ensuring the safety of all activity implementers and beneficiaries ● Reduce the risk of work accidents ● Implement safe work procedures ● Ensure the use of safety equipment ● Increase safety awareness through briefings and training 	<ul style="list-style-type: none"> ● OHS training attended by ≥90% of staff/partners ● Zero fatality (no work-related deaths) ● Number of short briefings conducted ● Labor grievance mechanism available
8	Transparency, Accountability, and Feedback Mechanism	<ul style="list-style-type: none"> ● Ensuring transparency in the implementation of activities ● Ensure accountability to stakeholders ● Provide an easily accessible mechanism/channel for criticism, suggestions and complaints ● Ensure prompt and appropriate response to criticisms, suggestions and complaints ● Ensure documentation and follow-up of complaints 	<ul style="list-style-type: none"> ● Availability of a functional CFM system ● Complaints/Feedback are followed up on time ● Complaints/Feedbacks documentation and follow-up available ● ESMS and CFM public socialization/consultation activities are carried out periodically

No	Penabulu ESMS Principles	Objective	Operational Indicators
9	Continuous Improvement	<ul style="list-style-type: none"> ● Increasing the effectiveness of Penabulu's ESMS implementation ● Encourage organizational learning from field experience ● Strengthen internal and partner capacity ● Conduct periodic evaluation and updates of the ESMS system ● Adapting the system to changing contexts and risks 	<ul style="list-style-type: none"> ● ESMS evaluation is conducted at least annually ● Improvement and follow-up plans ● Regular updates of policies/procedures ● Increased staff capacity related to ESMS

Principle 1. Compliance with Laws and Standards

Ensure that all activities comply with applicable national laws and relevant standards. The program team is required to identify and fulfill all legal requirements from the planning stage, including ensuring the completeness of legal documentation such as environmental permits, cooperation agreements, and other necessary approvals.

In addition, the implementer of activities/programs/implementing partners is obliged to prioritize the principles of environmental and social protection in the entire program management process, including through the implementation of financial management policies that consider conformity with laws and regulations. The initiator is also obliged to uphold the principles of transparency and accountability, as well as carry out periodic supervision and evaluation of the implementation of activities.

Principle 2. Environmental and Social Risk Management & Do No Harm

Requires every activity to identify, assess and manage environmental and social risks. The implementation team/partner must use screening and risk classification instruments as a basis for determining the level of risk and mitigation needs.

Apply the precautionary principle and do no harm by integrating risk management into the entire program cycle. Any identified risks must be followed up through the preparation of a clear, measurable, and accountable mitigation plan.

Ensure that risk management and mitigation plans are monitored and evaluated. The monitoring results are used to adjust mitigation strategies and improve activity design to avoid negative impacts in the future.

Principle 3. Maintaining Environmental Quality and Biodiversity Protection

Ensure that all activities are designed and implemented with environmental protection and biodiversity in mind. The program's implementation team/partner is obliged to identify potential impacts on the ecosystem and take concrete steps to avoid or minimize these impacts.

Encourage good environmental management practices, including the use of local species, responsible waste management, and resource use efficiency. Each activity must avoid the use of invasive species, pollute the environment and ensure that no environmental degradation occurs. In addition, ensure that activities do not cause a disproportionate impact on access and land tenure by the community. Each intervention must consider a balance between program objectives and environmental sustainability.

Principle 4. Respect for Human Rights & Indigenous Peoples

Ensure that all activities are carried out in a manner that respects, protects, and fulfills human rights, including the rights of indigenous peoples to land, territory, and natural resources. Teams and implementing partners are required to systematically identify potential social impacts, especially on affected groups, and ensure that each activity does not cause rights violations, discrimination, or marginalization.

In the event that activities have the potential to cause social conflicts or land disputes, the program team is obliged to prepare and implement conflict prevention and resolution mechanisms that are transparent, fair, and accessible to all parties. Every

conflict resolution process must be documented and part of the organization's accountability and learning system.

Furthermore, the team/implementing partners of the activity must obtain an Approval on the Basis of Prior Information Without Coercion (PADIATAPA) from the Customary Law Community if the activity: (i) has the potential to have a negative impact on customary rights; (ii) cause the transfer or restriction of access to customary lands and customary natural resources; and/or (iii) cause a significant negative impact on the lives of Indigenous Peoples, including on cultural identity, customary practices, rituals, and spiritual values. The approval must be proven through legal, verifiable documentation, and is a prerequisite before the activity is carried out.

Principle 5. Social Inclusion, Gender Equality, and Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH)

Ensure that all activities are designed to ensure inclusive and equal participation. The implementation team/partner must actively involve women and vulnerable groups in all stages of the program. Prevent discrimination and inequality in access to program benefits. Each activity must consider the specific needs of vulnerable groups and ensure a fair distribution of benefits. Implement the PSEAH policy strictly by ensuring that all activities are free from sexual exploitation, abuse, and harassment. Ensuring that the socialization of reporting channels is running, the reporting mechanism is safe, and ensuring that Case Management is carried out fairly and survivor-oriented.

Principle 6. Meaningful Engagement of Key Stakeholders

Ensure that all activities are designed and implemented by actively engaging key stakeholders in an active, inclusive, and meaningful manner at all stages of the program cycle. The implementation team/partner is obliged to systematically identify and map stakeholders, including affected communities, indigenous peoples, vulnerable groups, governments, implementing partners, and other relevant parties, to ensure that all interests and potential impacts can be considered comprehensively.

Conduct a transparent, participatory, and documented consultation process, by ensuring that information is delivered clearly, on time, and in a form that can be understood by all stakeholders. The engagement process must ensure that there is a safe and equal space for all parties to express their views, inputs, and objections without pressure, and ensure that participation is carried out meaningfully, not just a formality.

Ensuring that stakeholder engagement is carried out in a sustainable and adaptive manner, not limited to one stage of activities. Every input received must be documented, analyzed, and followed up in the planning and implementation of the program. Documentation of the engagement process is an integral part of the ESMS accountability system, and is used as a basis for monitoring, evaluation, and continuous improvement.

In the case of activities involving indigenous peoples or vulnerable groups, ensure that the engagement process is carried out with a socially and culturally sensitive approach, including the application of the principles of FPIC that are legitimate, documented and verifiable.

Principle 7. Occupational Health & Safety

Ensure that all activities are carried out with adequate occupational health and safety standards. The implementation team/partner is required to identify potential hazards and implement preventive measures before the activity starts. Implement safe work procedures, including the implementation of safety briefings and the use of safety equipment such as boots, gloves, buoys etc. in accordance with the identified risks. Each activity must ensure that all participants understand the risks and mitigation measures. Require incident recording and reporting as part of the learning system.

Principle 8. Transparency, Accountability, and Feedback Mechanism

Penabulu actively provides a feedback mechanism that is easily accessible to the public and related parties. This mechanism must be responsive, documented, and able to handle various types of complaints, including SEAH.

Every complaint/feedback must be followed up in a timely manner and well documented. Penabulu ensures that the case management is carried out fairly and transparently and is part of the organization's learning system.

Principle 9. Continuous Improvement

Ensure that the implementation of ESMS continues to be improved through evaluation processes and learning from field experience, including through good practice documentation and program learning. The results of the evaluation are used to improve existing policies and procedures.

Penabulu ensures the increase in internal capacity and implementing partners through training and mentoring. This approach aims to ensure that ESMS remain relevant, adaptive and effective in the face of risk dynamics.

III. STAGES OF PENABULU ESMS

Penabulu establishes the ESMS as an integrated framework that integrates environmental and social risk management policies, procedures, and practices into the entire program and operational cycle of the organization. The ESMS Framework is designed to ensure that each activity not only meets compliance aspects, but also actively manages risks and maximizes positive impacts on the environment and society.

The ESMS Framework serves as a risk-based decision-making system that allows Penabulu and implementing partners to identify potential impacts from the planning stage, establish appropriate mitigation measures, and ensure that the implementation of activities is carried out responsibly and measurably, while also improving the quality of program design and implementation.

Furthermore, the ESMS ensures a strong linkage between system components, ranging from risk screening, stakeholder engagement, GEDSI integration, ESMP preparation, to complaint/feedback mechanisms, case management, and evaluation and learning. Each component is designed to complement each other and form a continuous risk management cycle, so that there are no stand-alone or separate stages from the context of program implementation.

In its implementation, the ESMS also emphasizes accountability, transparency, and traceability of the entire risk management process, through systematic and evidence-based documentation. This ensures that all decisions and actions taken are accountable to relevant stakeholders, donors, and regulators.

A. ESMS Implementation Approach

Penabulu establishes that the implementation of the ESMS is carried out based on an integrated approach, ensuring that this system does not run partially, but is inherent in the entire organizational process and program cycle. These key stages are the basis for ensuring the effectiveness, consistency, and sustainability of ESMS implementation, which consists of the following key stages:

First, full integration, where ESMS is applied to all stages of the program cycle, from planning, implementation, to evaluation. Every program decision must consider the results of risk screening, stakeholder analysis, and GEDSI aspects as part of the decision-making process.

Second, cross-functional implementation, where ESMS is not only the responsibility of certain units, but involves all work units, including programs, operations, MEAL, safeguarding, and the management. This ensures that environmental and social risk management is a shared responsibility and integrated across all organizational functions.

Third, a risk-based and evidence-based approach, where the entire ESMS process is based on risk identification results and supported by verifiable data and evidence. Ensure that every mitigation action and decision taken has a solid and accountable basis.

Fourth, accountability and traceability, where the entire ESMS process is systematically documented to ensure that each stage can be traced, audited, and evaluated. Strengthen transparency and support compliance with internal and external standards.

Fifth, inclusivity and meaningful engagement, where the entire ESMS process ensures the active involvement of stakeholders, including vulnerable groups, and integrates GEDSI principles at every stage.

Sixth, adaptive and sustainable, where ESMS is continuously improved based on the results of evaluation, learning, and changes in the context of the program. Penabulu ensures that this system is dynamic and responsive to evolving challenges and needs.

B. Main Stages of ESMS Penabulu (Framework)



ESMS Continuous Risk Management Cycle | Yayasan Penabulu

The ESMS cycle of Penabulu starts from the stage of **screening and risk classification**, which functions as the main *decision gate* in determining the feasibility of an activity. Based on the results of the screening, activities with **low and medium** risk categories can be continued to the next stage, while activities with **high risk categories** cannot be carried out immediately and must go through a design adjustment process (*redesign*) or be declared unsuitable for support.

If the high-risk activity is still possible to be improved, then the design of the activity must be adjusted to lower the risk level to an acceptable category, before returning to the screening process. This mechanism ensures that Penabulu applies the *precautionary principle* and *do no harm* consistently from the planning stage.

After passing the screening stage, the cycle continues with the analysis and plan for stakeholder involvement and GEDSI integration, the preparation of ESMP, implementation and monitoring, as well as the CFM and Case Management. The entire process is then evaluated to produce learnings that are used in continuous improvement, so that ESMS functions as an adaptive and responsive system to evolving risks.

Stages of ESMS	Description	Objective	Main Output	Linkage
1. Screening & Risk Classification	Identification and classification of environmental and social risks	Determining the level of risk and feasibility of activities	Screening results, risk categories	ESMP Policy

Stages of ESMS	Description	Objective	Main Output	Linkage
2. Stakeholder Engagement & GEDSI Integration	Stakeholder analysis and engagement Gender, disability, and social inclusion analysis	Ensuring inclusive participation and preventing conflict Reducing inequality and exclusion	Stakeholder Analysis and engagement plan GEDSI Action Plan (GAP)	Input ESMP
3. ESMP	Preparation of risk mitigation plans	Managing environmental and social impact	ESMP Documents	Implementation
4. Implementation & Monitoring	Implementation of mitigation and monitoring	Ensure mitigation runs effectively	Monitoring reports	Evaluation
5. CFM/GRM	Community Feedback Mechanism/ Grievance Redress Mechanism	Capture issues and risks from stakeholders	Register of complaints	Case management
6. Case Management	Risk-based Case Management	Addressing violations and serious issues	Case reports	Evaluation
7. Evaluation & Learning	ESMS evaluation and learning	Continuous improvement	Evaluation report	System repair

IV. SCREENING AND RISK CLASSIFICATION

A. Initial Risk Screening

Penabulu establishes that the environmental and social risk screening process is the initial stage that must be carried out to identify, assess, and classify the potential risks and/or impacts of each activity. Screening serves as the main instrument in ensuring that all activities have gone through a systematic, documented, and accountable assessment process before being implemented, as well as being the basis for the application of the precautionary principle and do no harm in the entire program cycle.

The screening process must be implemented by Penabulu in all its roles and functions, both as a program implementer (implementer), grant manager (intermediary/fund

manager), and in partnership schemes with other parties. This obligation also applies to all implementing partners and beneficiaries involved in the activity, by ensuring that the environmental and social risk management standards applied are at least equivalent to the ESMS standards of Penabulu.

Through the screening process, Penabulu ensures that each activity actively identifies potential impacts on the environment, communities, and vulnerable groups, and establishes appropriate and proportionate mitigation measures. Screening is used to determine the level of risk of activities, the need for relevant safeguard instruments (including ESMP, FPIC, and other instruments), as well as as a basis for decision-making regarding the feasibility of activities to continue, adjust, or not to be implemented.

Penabulu requires all activities to go through a screening process before implementation. The program team and/or implementing partners are required to carry out screening using the instruments that have been set, ensure that the data and information used are accurate and relevant, and document all screening results completely, including justifications for assessments and supporting evidence. The results of the screening must be submitted for the validation and approval process by the Safeguard/ESMS Expert/Specialist as a prerequisite for the implementation of the activity.

In the event of significant changes to the design, location, scale, or context of the activity, the implementation team is required to conduct a re-screening to ensure that the risk level and mitigation measures set remain relevant. All screening results then become the basis for the preparation of ESMP, the implementation of monitoring, and the evaluation of activities.

When after the screening, certain activities do not meet the eligibility criteria (ineligible), therefore they cannot be carried out/supported or funded within the framework of the ESMS. This provision applies to all roles of Penabulu, both as a program implementer, grant manager, and in partnership schemes.

A.1. Programs and/or activities included in the negative list include, but are not limited to:

1. Activities that involve practices that are contrary to/violate national laws/regulations or international conventions;
2. Activities that have the potential to cause environmental and/or social impacts that are permanent, significant, sensitive, complex, and cannot be adequately mitigated;
3. Activities that cause or contribute to deforestation, forest degradation, or damage to critical ecosystems, including protected areas and critical habitats. or involves trade, hunting, or the use of protected or prohibited wildlife or activities that have the potential to cause the loss of endangered or endangered species that fall under the category of international protection;
4. Activities that violate or potentially violate the rights of indigenous peoples and local communities, including rights to land, territory, and natural resources, as well as activities that do not obtain the consent of the affected communities;
5. Activities that involve forced eviction, relocation, or relocation, either physically or economically, without the lawful consent of the affected community;

6. Activities that involve exploitative labor practices, including child labor under the minimum age, forced labor, or forms of work that are not in accordance with the provisions of laws and regulations;
7. Activities that contribute to significant environmental pollution, including water, soil, and air pollution, as well as non-compliant hazardous waste management.

A.2. The following are the Stages in Conducting Risk Screening/Screening

Stages	Activity Description	Output	Person in Charge
1. Initial Information Gathering	Collect basic data on activities including location, type of activity, scale of activity, beneficiaries, land status, and relevant socio-ecological context, etc	Basic data of documented activities	Program Team/Proposer
2. Identify Risks	Identify potential environmental and social risks based on aspects: environmental, social, gender, tenure/land, OHS, etc.	Initial risk list per activity	Program Team with ESMS Officer/Specialist
3. Risk Analysis	Assess each risk based on severity and likelihood using a risk matrix	Risk score and level (Low/Moderate/High)	ESMS Expert/Specialist
4. Risk Classification	Determine the overall risk category of the activity based on the results of the highest risk analysis	Activity risk category (Low/Moderate/High)	ESMS Expert/Specialist
5. Determination of Safeguard Needs	Determine the required documents and mitigation measures (e.g. ESMP, FPIC, Statement of Environmental Management and Monitoring Commitment-SPPL, etc.) according to the risk category	List of safeguards and mitigation needs	ESMS Expert / Specialist
6.	Review and approval of screening results by the	Approved screening form	Management/ Sector Lead

Stages	Activity Description	Output	Person in Charge
Validation and Approval	authorities before the implementation of activities		
7. Documentation and Archives	Storing all screening results and supporting documents as part of the trail audit system	Documents are stored and searchable	Program Team/ Admin Sector Lead

This stage is carried out in the screening form listed in the [Annex 1. Risk Screening Form - ESMS Penabulu](#)

B. Program/Activity Risk Category

(Risk Identification - Risk Analysis - Risk Classification - Safeguard Needs)

Risk classification in ESMS Penabulu is a process to group activities based on the level of potential environmental and social impacts caused. This classification is the basis for determining the level of prudence, mitigation needs, and types of safeguard documents that must be met before the activity is carried out.

The risk category assessment is carried out based on the results of risk analysis on all major aspects, including environmental, social, GEDSI, tenure/land, customs, OHS, and institutional/governance. In this approach, the principle of prudence should be applied, where the risk category of an activity is determined based on the highest level of risk identified.

In general, the risk category is divided into three levels, namely **Low Risk, Moderate Risk, and High Risk**. Each category has different implications for risk management needs, depth of analysis, and safeguard document obligations.

This classification not only serves as an identification tool, but also as a decision-making instrument to ensure that each activity is designed and implemented responsibly, and does not cause significant negative impacts on the environment and society. The following is a table of risk categories along with examples of safeguard activities and needs:

Category Risk	Definition	Key Characteristics	Examples of Activities	Safeguard Needs
Low Risk	Activities with minimal potential environmental and social impacts, insignificant, and easy to manage	<ul style="list-style-type: none"> • Does not change the physical environment conditions • Does not cause social conflict • Administrative or capacity building 	<ul style="list-style-type: none"> • Workshop • FGD • Training • Coordination meeting 	<ul style="list-style-type: none"> • Screening checklist • Statement of Environmental Management and Monitoring Commitment (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan/SPPL) • Activity documentation
Moderate Risk	Activities with limited impact, are local, and can be mitigated with simple management steps	<ul style="list-style-type: none"> • Impacts are temporary • Limited to the location of the activity • Doesn't cause permanent changes 	<ul style="list-style-type: none"> • Small-scale Forest and Land Rehabilitation (Rehabilitasi Hutan dan Lahan/RHL) • Demonstration plot • Limited land-based activities 	<ul style="list-style-type: none"> • Simple ESMP • Environmental Management Measures (Upaya Pengelolaan Lingkungan/UKL), Environmental Monitoring Measures (Upaya Pemantauan Lingkungan/UPL), or SPPL

				<ul style="list-style-type: none"> • Periodic Monitoring • Mitigation documentation
High Risk	Activities with the potential for significant environmental and/or social impacts, both in scale, intensity, and duration	<ul style="list-style-type: none"> • Potentially causing long-term impacts • Involving sensitive issues (land, indigenous peoples) • High risk of conflict 	<ul style="list-style-type: none"> • Activities in sensitive areas • Activities with tenure issues • Large-scale interventions 	<ul style="list-style-type: none"> • Full ESMP • AMDAL • FPIC • Additional studies • Intensive supervision

C. Screening Output

Penabulu establishes that the environmental and social risk screening process produces outputs that are mandatory and are a prerequisite in the initial stage of submitting proposed activities or programs. This output ensures that all aspects of risk, social, and inclusion have been systematically identified and planned before the activities are implemented.

In particular, there are three main components that must be compiled in an integrated, documented, and verified manner, as an integral part of the screening process within the framework of the Penabulu ESMS, namely:

1. Environmental and Social Risk Screening

It is the result of the identification and classification of environmental and social risks inherent in activities, including the determination of risk categories (low, medium, high) and the necessary mitigation needs. This output is the basis for determining the feasibility of activities and the needs for the preparation of ESMP.

2. Stakeholder Analysis and Engagement Plan

It is the result of mapping relevant stakeholders along with an engagement strategy that is designed proportionally based on the level of influence and importance. This document ensures that all affected parties have been identified and involved in an inclusive and meaningful manner. *Further explanation regarding this component is outlined in the Stakeholder Engagement Chapter.*

3. GEDSI (Gender Equality, Disability, and Social Inclusion) Analysis and Engagement Plan

It is the result of an analysis of aspects of gender equality, disability inclusion, and social inclusion, including the identification of the risks of exclusion and inequality of benefits, as well as an action plan designed to ensure equal participation and access for vulnerable groups. *This component is the basis for the preparation of the GAP and is further explained in the GEDSI Chapter.*

V. ESMP

A. Objectives of the Preparation of ESMP

ESMP is an operational document prepared as a follow-up to the results of the environmental and social risk screening process. Penabulu establishes that each ESMP must be prepared systematically and risk-based, as a follow-up to the results of environmental and social risk screening. ESMPs are required to contain components that ensure that any identified risks can be managed through clear, measurable, and monitorable mitigation measures throughout the program lifecycle.

ESMP functions as an internal control tool to ensure compliance with laws and regulations, donor standards, and ESMS policy of Penabulu. ESMP is also the basis for the monitoring and evaluation process, so that the effectiveness of mitigation measures can be measured and adjusted periodically according to the dynamics of risks that develop in the field.

Penabulu requires that the ESMP not only be an administrative document, but also an implementation guide that is actively used by the program team and implementing partners. All mitigation actions listed in the ESMP must be implemented, monitored, and documented as part of the organization's accountability and learning system.

B. Scope

Penabulu establishes that **ESMP is a mandatory instrument for activities with the MEDIUM and HIGH RISK categories** based on the results of screening. In its preparation, ESMP must refer to the ESMS principles of Penabulu (9 ESMS principles)

C. ESMSP Components

Components	Description	Objective	Expected Output
Activity Name	A brief description of the activities to be carried out	Provide context for the activity	Identify clear activities

Components	Description	Objective	Expected Output
Identify Risks	List of environmental and social risks identified from screening	Determining potential impacts	Clearly defined risks
Triggered ESMS Principles	9 ESMS Principles that are relevant to the risks	Demonstrate the basis of the mitigation policy	Linkage of principles and risks
Category Risk	Risk level (Low/Medium/High)	Determining the level of intervention	Proper risk classification
Potential Impact	Possible environmental and social impacts	Understanding the consequences of risk	Impacts identified
Mitigation Measures	Measures to avoid, reduce, or manage risks	Controlling risk	Operational mitigation
Success Indicators	Parameters for measuring the effectiveness of mitigation	Measure mitigation outcomes	Measurable indicators
Means of Verification (MoV)	Evidence of mitigation implementation (documents, photos, reports)	Supports auditing and verification	Documented evidence
Person in Charge (PIC)	Parties responsible for the implementation of mitigation	Ensure accountability	Clear PIC
Timeline	Mitigation implementation time	Set up the implementation	Defined schedule
Status	Mitigation implementation status	Monitoring progress	Most recent status
Monitoring Notes	Record of monitoring and evaluation results	Learning support	Insight monitoring

The ESMP component table is the main reference for Penabulu and all implementing partners in ensuring that every environmental and social risk is managed systematically, measurably, and accountably. Each component in the table must be filled in completely and based on actual conditions in the field, and supported by relevant data and information. Filling out an ESMP is not purely administrative, but must reflect a realistic mitigation strategy that can be effectively implemented.

Penabulu ensures that ESMP is used as a living document that is updated regularly in accordance with the dynamics of the implementation of activities and the development of risks. The results of ESMP implementation must be monitored, evaluated, and documented as part of the organization's monitoring and learning system.

Here is a table of examples of ESMP filling - referring to Penabulu ESMS format:

No	Activity Name	Risks	ESMS Principles of Triggered Multipliers	Category Risk	Mitigation Measures	Success Indicators	PIC	Timeline	Status	Monitoring Notes	MoV
1	Planting RHL on community land	Land conflicts	4. Respect for Human Rights and Indigenous Peoples; 6. Meaningful Engagement of Key Stakeholders	High	Public consultation and FPIC/PADIATAPA; Land Status Verification	FPIC documents are available; No conflict	Program & Village Team	Pre-Activities	On-going	Consultation has been carried out	FPIC Documents
2	Forest patrol activities	Risk of work accidents	7. Occupational Health & Safety	Medium	Safety briefing; Boot Usage	There are no accidents; All participants wear boots	Field Team	During the activity	Completed	No incidents	Safety briefing and PPE documentation
3	Village community workshop	Exclusion of vulnerable groups	5. Social Inclusion, Gender Equality, and PSEAH; 6. Meaningful Engagement of Key Stakeholder	Low	Inclusive invitations; Facilitation of women's participation	≥30% of participants were female	Program Team	During the activity	Completed	Women's participation 35%	Attendance list, documentation
4	Waste management activities	Environmental pollution	3. Maintaining Environmental Quality and Biodiversity Protection	Medium	Waste management; Buffet Consumption	Controlled waste; No pollution	Logistics Team	During the activity	On-going	Plastic waste is reduced	Waste Management Documentation
5	Socialization of customary village programs	Community rejection	6. Meaningful Engagement of Key Stakeholders; 4. Respect for Human Rights and Indigenous Peoples	High	Repeated consultations; An Approach to Traditional Leaders	Public consent is obtained	Program Team	Pre-activity	On-going	Need additional consultation	FPIC Document, Socialization /Consultation Report
6	Farmer Group Grant Program	Misuse of funds	8. Transparency, Accountability, and Feedback Mechanism	Medium	Monitoring of funds; Periodic Reports	Reports are available and valid	Grant Team	Monthly	On-going	Monitoring runs	

VI. STAKEHOLDER ENGAGEMENT

A. The Principle of Meaningful Engagement

Penabulu's programs apply an inclusive, participatory, and sustainable stakeholder engagement approach as an integral part of the ESMS. Stakeholder involvement is not only positioned as a purely procedural obligation, but also as a key strategy in managing social risks, building trust, and strengthening the legitimacy of programs at the site level.

This approach is designed to ensure that all stakeholders, especially those directly affected, have an equal opportunity to be involved in the planning, implementation, and evaluation process of activities. Thus, stakeholder engagement is an important instrument in improving the quality of program decisions and ensuring long-term sustainability.

This approach is based on the following principles:

1. Inclusivity and equality, by ensuring the active involvement of vulnerable groups such as women, indigenous peoples, youth, and other marginalized groups. Penabulu proactively identifies barriers to participation and provides a safe and equal space for the entire group to communicate its aspirations and interests.
2. Meaningful participation, which is not only informative, but involves stakeholders in the process of two-way dialogue, public consultation, and decision-making. This approach allows stakeholders to contribute significantly to the design and adjustment of the program.
3. Transparency and disclosure of information, by ensuring that information related to program objectives, activities, potential impacts, and risks is conveyed clearly, on time, and can be understood by the community, including through various communication media that are in accordance with the local context.
4. Responsiveness and accountability, through the provision of an easily accessible feedback and complaint mechanism, as well as a commitment to follow up on every input in a systematic, documented and timely manner.

Penabulu strives to build a positive, productive, and balanced relationship between projects and stakeholders, which is not only consultative but also collaborative. This effective and meaningful engagement is a means to: (i) Understand the perceptions, needs, and expectations of the community; (ii) Identify potential social risks early on; (iii) As well as designing more appropriate and contextual mitigation measures.

This stakeholder engagement approach also functions as part of the early warning system against potential social conflicts, as well as a mechanism to strengthen program accountability to the community.

B. Principles of Stakeholder Engagement

Penabulu ensures that stakeholder involvement is carried out based on the following principles:

- **Inclusive.** involving the entire group, including the vulnerable
- **Transparent.** Information is communicated openly
- **Participatory.** Providing a real contribution space
- **Meaningful.** Not just a formality
- **Documented.** The whole process has evidence

C. Scope

In addition to risk screening process, in the initial stage of submitting program proposals, **Penabulu mandates the undertaking of a Stakeholder Analysis and the preparation of a Stakeholder Engagement Plan as integral parts of the ESMS documentation.** These documents may be periodically updated to reflect evolving program dynamics and changes in the social context. This process is intended to ensure that all relevant and potentially affected stakeholders are identified at an early stage, and that appropriate engagement strategies are systematically developed.

The scope of involvement includes, all parties who:

1. Directly or indirectly affected by activities or programs,
2. Have an interest in the results and process of program implementation,
3. As well as having an influence on the success, legitimacy, and sustainability of the program.

ensure that each stakeholder is comprehensively identified and engaged in proportion to their level of influence and importance, to ensure that the engagement process is carried out in an inclusive, transparent, and meaningful manner.

D. Identify and Develop an Engagement Plan

Stakeholder analysis is carried out through systematic, documented, and context-based stages. This procedure aims to ensure that all relevant stakeholders are appropriately identified, as well as an engagement strategy developed according to their level of influence and importance.

Stages of Stakeholder Analysis:

1. Stakeholder Identification

The program team and/or implementing partners are required to identify all relevant stakeholders to the activity, both directly and indirectly affected. This process must consider social, economic, cultural, and potential vulnerability aspects to ensure no group is left behind. Identification includes:

- Local communities and indigenous peoples
- Vulnerable groups (women, elderly, disabled, etc.)
- Village/local government
- Implementing partners and related institutions
- Other parties who have an interest or potential influence on the activities

2. Interest Analysis

Each stakeholder is analyzed based on their level of importance to the activity, used to understand the needs, expectations, and potential social risks of each stakeholder. Includes:

- Degree of dependency on affected resources
- Potential benefits obtained
- Potential negative impacts

3. Influence Analysis

The program team assesses the level of influence of each stakeholder on the success or failure of the activity, it is important to determine which parties need to be intensively involved. Includes:

- Capacity influences decisions
- Formal roles (government authorities, customary figures)
- Social or political forces

4. Stakeholder Classification (Interest vs Influence Matrix)

Based on the results of the interest and influence analysis, stakeholders are classified into four main categories:

Category	Strategy
High influence – high importance	Intensive involvement (consulting, FPIC, co-design)
High influence – low importance	Regular coordination and communication
Low influence – high importance	Empowerment and inclusive engagement
Low influence – low importance	Delivery of information

5. Identification of Social Risks and Sensitivities

The program team is obliged to identify potential social risks related to stakeholders, being the basis for determining appropriate engagement approaches, including:

- Potential social conflicts
- Indigenous peoples' rights issues
- Risk of exclusion of vulnerable groups
- Cultural and social sensitivity

6. Determination of Engagement Strategy

Based on the classification and analysis of risks, the program team devises an engagement strategy that includes:

- Methods of engagement (FGD, public consultation, interview, etc.)
- Frequency of engagement
- Communication media
- Special needs of vulnerable groups

This strategy should ensure meaningful engagement and not be formal.

7. Monitoring & Continuous Improvement

The involvement plan must be monitored and evaluated periodically to; (i) Assessing the quality of participation and effectiveness of consultations, (ii) Identifying gaps in implementation, and (iii) Ensuring continuous improvement.

8. Documentation

Penabulu requires that the entire process of analysis and stakeholder involvement be documented in a systematic, structured manner, and using the ESMS format. The minimum documentation includes a list of stakeholders, the results of interest and influence analysis, and engagement strategies, and must be verified by the Safeguard Focal Point as part of the Screening, ESMP, and Stakeholder Engagement Plan documents.

The entire engagement process must also be documented and digitized to ensure transparency, accountability, and traceability. This documentation serves as evidence of implementation (evidence-based compliance) and must be completed with supporting documents such as attendance lists, minutes, and documentation of activities.

The following is an example of a Stakeholder Engagement Plan form:

Activity Name	Stakeholder	Role	Importance	Influence	Risk Level	Engagement Strategy
Planting RHL on community land	Local communities	Beneficiaries	Land access & program benefits	High	High	Intensive consultation, socialization, FPIC/PADIATAPA
Planting of RHL in customary territories	Indigenous peoples	Owners of customary territories	Protection of customary rights	High	High	FPIC, repeated consultations, involvement of indigenous leaders
Village program	Village government	Local decision-makers	Program success	High	Medium	Formal coordination, regular meetings
Community workshop	Women's groups	Vulnerable groups	Access to participation and benefits	Low	Medium	Inclusive approach, facilitation of participation
Program implementation	Implementing partners	Activity implementers	Program performance	High	Medium	Intensive coordination, capacity building

VII. Preparation of GEDSI Action Plan

Penabulu is committed and determined that the analysis and involvement of GEDSI is an integral part of the ESMS to ensure that all activities are carried out in an inclusive, fair, and responsive manner to the needs of all community groups. The GEDSI approach aims to identify and address inequalities in access, participation, control, and program benefits, particularly for women, persons with disabilities, and other vulnerable groups.

Through GEDSI analysis, Penabulu ensures that potential social risks, including exclusion, discrimination, and inequality, can be identified from the planning stage and managed. This analysis also aims to prevent the emergence of negative impacts on specific groups, as well as ensure that any program intervention does not reinforce existing vulnerabilities or inequalities.

In addition, the involvement of GEDSI aims to ensure that all groups, including women and vulnerable groups, have an equal opportunity to participate meaningfully in every stage of the program. Penabulu ensures that the engagement approach is not only quantitative, but also considers the quality of participation, including access to information, space to express aspirations, and involvement in the decision-making process.

A. GEDSI Action Plan

Penabulu establishes that **in the early stages of Program/Activity planning, it is mandatory to conduct a GEDSI analysis and the preparation of a GAP** as an integral part of the ESMS document. This process aims to ensure that aspects of gender equality and social inclusion are identified early on and integrated into the program design.

The GAP was compiled based on the results of GEDSI's analysis to identify issues, risks, and opportunities related to gender equality, vulnerable group participation, and potential inequality of benefits. Penabulu ensures that GAP becomes an operational instrument [*Gender Equality and Social Inclusion Policy 1 January 2017*] that covers measurable efforts, as well as monitoring mechanisms to ensure the effective implementation of GEDSI.

B. Components of the GEDSI Action Plan

In preparing an action plan, GEDSI must at least include:

- Gender issues identified
- Target groups
- Action actions
- Success indicators
- PIC
- Timeline
- MoV

The following is the format and example of GAP which is used as a reference in the planning and implementation of activities.

The GAP also serves as a monitoring instrument to measure the level of participation, access, and benefits received by women and vulnerable groups, as well as to ensure that social risks, including SEAH, are effectively managed. Each component in the table must be specific, measurable, and verifiable, and be the basis for the monitoring, evaluation, and reporting process of program implementation.

Activities	Gender/ GEDSI Issues	Target Group	Action Actions	Indicator	PIC	Timeline	MoV
Socialization of village programs	Low female participation	Women	Women's invitations; Flexible Time	≥30% of participants were female	Program Team	Pre-activity	Attendance list
Technical training	Limited access for women	Women	Minimum quota for women	≥30% of participants were female	Program Team	During the activity	Documentation
Field activities	SEAH risk	Women & vulnerable groups	Socialization of PSEAH; CFM/GRM available	No case reports	Safeguarding Team	Ongoing	Reports
Village activities	Person with Disability is not involved	Person with Disability	Accessible location	Person with Disability participation	Program Team	During the activity	Photo
Programme Economics	Inequality of benefits	Women	Priority of female beneficiaries	≥40% of female recipients	Program Team	Walk	Recipient data
Public consultation	Male dominance	Women	Women's FGD	Documented women's aspirations	Program Team	Pre-activity	Minutes
Program implementation	Women's double burden	Women	Activity time adjustments	Increased attendance	Program Team	Ongoing	Attendance list

VIII. COMMUNITY FEEDBACK MECHANISM (CFM)

A. Description of Community Feedback Mechanism

Penabulu establishes the *CFM* as the organization's official system to receive, record, analyze, and follow up on feedback and complaints from stakeholders. This mechanism is an important part of the ESMS which aims to ensure accountability, transparency, and protection of the community and related parties throughout the implementation of the program.

CFM serves as the main channel for capturing aspirations, inputs, and complaints, including those related to environmental and social (E&S) risks, social inclusion, safety, as well as sensitive issues such as SEAH and fraud. Through this mechanism, Penabulu ensures that every stakeholder voice is heard, followed up systematically, and becomes the basis for continuous improvement of the program.

B. Complaint/Feedback Channels

Penabulu provides various complaint channels that can be accessed by all implementers, stakeholders involved in activities in an easy, safe, and inclusive manner. These canals are designed to accommodate a wide range of needs and conditions, including for vulnerable groups. This channel is managed by the Safeguarding Focal Point under the Human Resource Unit of Penabulu. The channels include:

- Official hotline or WhatsApp: **0852-1958-6613**
- Official email of the organization: **pengaduan@penabulu.id**
- Complaint form (online): <https://kolega.penabuluoxfam.or.id/>
- Complaint form (offline)
- Focal point in the field (program/safeguarding team)
- Complaint box at the event site (if available)

All channels **must be actively socialized during activities to the community both in the form of providing banners and direct socialization**, and ensuring that they can be accessed, understood, and used without barriers, including by considering local languages and the needs of vulnerable groups.

C. Complaint and Feedback Categories

Penabulu classifies complaints and feedback to ensure appropriate, proportionate, and risk-based management. The categories includes:

- Positive feedback
- Information requests
- Low risk complaints
- Serious complaints (medium risk)
- Sensitive (high risk) cases

Referring to Penabulu's policy on the CFM, for management purposes, complaint/feedback are categorized based on the level of risk:

- **Low Risk Case**
Administrative cases or misunderstandings with limited impact
- **Medium Risk Case**
Cases that require further verification and have the potential to have an operational impact
- **High Risk Case**
Serious cases, including safeguarding, PSEAH, fraud, conflicts of interest, land conflicts, and other environmental and social risks

This classification is the basis for determining the case management mechanism, the need for investigation, and the escalation of cases.

D. Case Management Mechanism

Penabulu ensures that every complaint is handled through a transparent process, and based on the principle of protection. The case management mechanism includes the following stages:

1. **Admission and Recordkeeping.** Complaint/Feedback are received through available channels and recorded in a centralized register.
2. **Screening and Categorization.** Complaints are classified based on type and level of risk.
3. **Risk Assessment and Assignment.** Cases are assessed and assigned to the authorities according to the level of complexity.
4. **Management and Follow-up.** Verification, investigation (if necessary), and settlement actions are carried out.
5. **Response to Reporter.** The reporter was given information related to the status and results of the management.
6. **Documentation and Analysis.** The entire process is recorded as part of organizational learning.

Service Level Agreement Complaint handling follows the following time standard:

Stages	Maximum Time
Early response (acknowledgement)	≤ 2 business days
Verification & categorization	≤ 3 business days
Evaluation & assignment	≤ 5 working days
Investigation (if required)	≤ 14–30 business days
Decision-making	≤ 5 working days after investigation
Case closure & final response	≤ 5 working days

For complex or sensitive (high risk) cases, management refers to the applicable Case Management SOPs and management times can be adjusted by considering the level of risk and protection needs.

E. Principle of Complaint

The implementation of CFM refers to the following principles:

- Accessible and inclusive

- Confidential and secure
- Independent
- Transparent
- Responsive and on time
- Risk-based
- Oriented towards the closure of the feedback cycle

This principle ensures that every complaint/feedback is managed fairly, objectively, and oriented towards the protection of the whistleblower.

F. Role and Responsibilities in CFM

Position	Role
Safeguarding Focal Point	<ol style="list-style-type: none"> 1. Primary person responsible for the CFM; 2. Ensuring the confidentiality, security, and protection of the whistleblower; 3. Overseeing the management of sensitive case and escalation;
Program Team	<ol style="list-style-type: none"> 1. Conveying CFM information to the public; 2. Receive and following up on complaint/feedback; 3. Follow up on complaint/feedback as appropriate;
MEAL Team	<ol style="list-style-type: none"> 1. Analysis of feedback and complaint/feedback data; 2. Supporting learning and program improvement;
Management	<ol style="list-style-type: none"> 1. Ensure policy implementation; 2. Provide resources; 3. Responsible for the effectiveness of the system;

IX. CASE MANAGEMENT MECHANISM

The Case Management mechanism is a structured, risk-based, and documented system to handle every report of alleged violations, irregularities, or problems that arise in the implementation of organizational programs and operations. This mechanism is an important part of the ESMS that ensures that all cases are handled professionally, objectively, and accountably.

The Case Management mechanism functions as a follow-up to the CFM, which acts as an entry point for receiving reports. Furthermore, the management process is carried out systematically through the stages of assessment, risk classification, investigation, to decision-making and follow-up. This approach ensures that each case is handled proportionately according to its level of risk and complexity.

A. Scope of Case Management

This mechanism applies to all parties who have a relationship with Penabulu, including staff, partners, vendors, and other parties involved in activities. Types of cases covered include, but are not limited to:

- Violations of the code of conduct and conduct
- Fraud, corruption, and misuse of assets
- Conflict of interest
- Violations of policies and procedures
- Employment grievances
- Alleged violation of the law

Especially for cases related to safeguarding, including SEAH and child protection, management is carried out in accordance with the safeguarding policies and SOPs that apply at Penabulu.

B. Case Management Principles

Case Management is carried out based on principles that ensure that the entire handling process runs fairly and accountably, including:

- Fairness and impartiality
- Evidence-based
- Confidentiality and data protection
- Whistleblower protection (non-retaliation)
- Do no harm
- Accountability and documentation (trail audit)
- Risk-based approach

C. Risk-Based Case Management Approach

Penabulu applies a risk-based approach throughout the Case Management process, by classifying cases into three categories:

- **Low Risk** → administrative handling
- **Medium Risk** → limited investigation
- **High Risk** → formal investigation and escalation

This classification considers the severity, impact, complexity, sensitivity, and potential for further risks, and is the basis for determining the level of treatment, resource allocation, and investigative needs.

D. Case Management Governance

Penabulu implements a Case Management process with a risk-based approach in accordance with the applicable and latest Case Management Policy of Penabulu. This process covers all stages from receipt of reports to closure and post-case monitoring, ensuring that every step is carried out in a documented, accountable manner.

1. Stages of Case Management

Stages	Description	Output	Service Level Agreement
Report Receipt	Reports are received through official channels, verified for initial completeness, recorded in the system, and given a reference number while maintaining confidentiality.	Case register entry and case reference number	Maximum 1 working day from the time the report is received
Initial Assessment	Reports are reviewed to assess the completeness of the information, relevance, initial validity, urgency, and immediate protection needs.	Preliminary assessment results	Maximum 3 working days
Risk Classification	Cases are classified based on risk level by considering severity, impact, sensitivity, and potential escalation.	Case risk categories	Maximum 2 working days
Establishment of an Incident Management Panel (IMP)	For cases requiring further treatment, especially medium and high risk, the IMP is established or activated to ensure objectivity, independence, and oversight of the process.	IMP setting/activation	Maximum 2 working days after risk classification
Review and Preliminary Decision	The IMP reviews the results of the initial assessment and risk classification to determine the course of action, including the need for formal investigations, administrative actions, or referrals.	Initial treatment results	Maximum 3 working days
Administrative Actions	For cases that do not require formal investigation, administrative steps such as clarification, coaching, warning, or other corrective actions are taken.	Documented administrative actions	Maximum 5 working days
Research	Investigations are conducted internally or externally to gather evidence, clarify facts, and formulate findings objectively.	Investigation report	14–30 business days, depending on the complexity of the case
Decision Making	The decision is determined by the authorities based on the results of the investigation or the results of administrative handling.	Final decisions and recommendations	Maximum 5 working days

Stages	Description	Output	Service Level Agreement
Follow-up Implementation	Sanctions, corrective actions, remedies, or corrective measures are implemented and monitored.	Evidence of follow-up implementation	Maximum 7 working days
Decision Communication	The results of the handling are communicated to the relevant parties according to the authority while maintaining confidentiality.	Official notifications or communications	Maximum 3 working days
Case Closure	The case was declared complete and all documents were systematically archived.	Case closed status and archival	Maximum 2 working days
Post-Case Monitoring	Monitoring is carried out to ensure there is no recurrence, retaliation, or further risk, as well as to support system improvement.	Monitoring and Learning Notes	Maximum 30 days after case closure

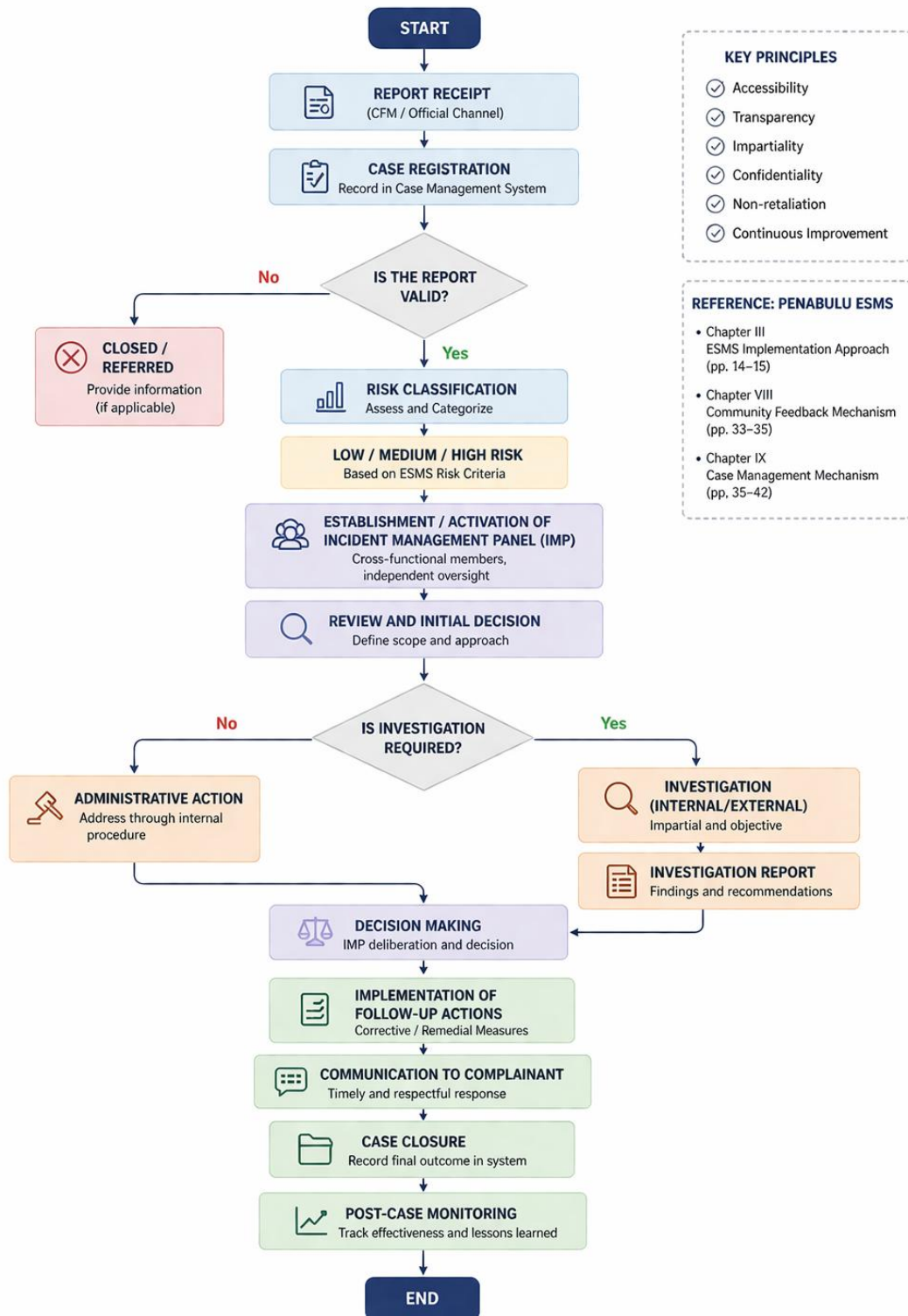
2. Roles and Responsibilities

Position	Role	Responsibilities
Trustees and Supervisory Boards	Strategic oversight and governance	<ul style="list-style-type: none"> ● Provide policy direction related to integrity, ethics, and accountability ● Supervise the effectiveness of the case management system ● Review strategic/high risk/reputational risk cases ● Ensuring the independence of the investigation process
Administrator/ Director	Final decision-makers	<ul style="list-style-type: none"> ● Establish a final decision on the outcome of the investigation ● Agree to disciplinary action, sanctions, or remediation ● Ensure the availability of resources for Case Management ● Maintain system integrity and culture of accountability
Incident Management Panel (IMP)	Case Management manager and director	<ul style="list-style-type: none"> ● Conducting an initial review and risk classification of cases ● Determine if a case needs a formal investigation ● Appointing an investigator (internal/external) ● Oversee the investigation process to meet standards ● Conduct a review of the results of the investigation ● Provide decision recommendations to management

Position	Role	Responsibilities
Safeguarding Focal Point	Recipient of the initial report and guardian of the protection aspect in the early stages of Case Management	<ul style="list-style-type: none"> ● Receive and record reports ● Conducting a preliminary assessment ● Manage case administration and documentation ● Coordinate communication between parties ● Ensure SLAs are met ● Maintain data confidentiality and security ● Close the communication loop with the reporter
Investigator (Internal / External)	Investigation implementer	<ul style="list-style-type: none"> ● Collecting evidence objectively ● Conducting interviews and analysis ● Drafting evidence-based investigative reports ● Maintaining independence and integrity ● Ensure investigation methods do not pose additional risks
HR / Legal / Compliance	Control and support functions	<ul style="list-style-type: none"> ● Provide legal and policy advice ● Ensure regulatory compliance ● Supporting sanctions implementation ● Keeping official case documentation
MEAL	Management of complaint/feedback and learning systems	<ul style="list-style-type: none"> ● Managing the complaint/feedback mechanism (CFM) ● Ensuring accessibility and inclusivity ● Analyze case trends ● Integrate learning into the program

Case Management Flowchart:

Grievance Redress Mechanism (GRM) within ESMS Framework



X. ESMS EVALUATION AND LEARNING FOR CONTINUOUS IMPROVEMENT

In accordance with the principles of ESMS Penabulu Principle 9 on Continuous Improvement. Penabulu believes and is committed that evaluation and learning are key components in ensuring the effectiveness, relevance, and sustainability of Penabulu ESMS.

This process aims to assess the extent to which ESMS implementation is able to effectively identify, manage, and mitigate environmental and social risks, and to ensure that systems continue to be improved based on implementation experience at both the management and field levels.

Evaluations also serve to identify gaps between policies and practices in the field, as well as to ensure that the entire risk management process is implemented in accordance with established standards. In addition, learning from the implementation of ESMS is used as a basis for decision-making, capacity building, and strengthening organizational governance.

Evaluation is carried out on all components of the system, stages of the program cycle and includes activities carried out by Penabulu and implementing partners, including:

- Risk screening and classification process
- Preparation and implementation of ESMP
- Stakeholder engagement
- GEDSI Implementation and GAP
- CFM
- Case Management mechanism
- Compliance with Penabulu ESMS principles and policies

A. Evaluation Mechanism

The ESMS evaluation mechanism of Penabulu is carried out in a sustainable manner through a process that starts from the collection of implementation data, periodic monitoring, and analysis of the effectiveness of environmental and social risk management. The results of the analysis are used to identify gaps, new risks, and areas that need improvement.

Furthermore, an internal review is carried out to determine the need for system improvement. If a discrepancy is found, a corrective plan is prepared and its effectiveness is monitored. The results of the evaluation and learning are then documented and integrated into policies, SOPs, and program practices, ensuring that ESMS continues to evolve adaptively and sustainably.

Stages	Description	Objective	Person in Charge	Output
Data Collection	Collect data from all ESMS components (Screening, ESMP,	Provide an evaluation database	Program Team, Safeguarding Focal	Consolidated ESMS data

Stages	Description	Objective	Person in Charge	Output
	GAP, CFM, Case Management)		Point/Specialist, MEAL	
Periodic Monitoring	Monitoring mitigation, compliance, and stakeholder engagement implementation	Assess implementation in the field	Program Team	Monitoring reports
Data Validation	Verify completeness and accuracy of data	Ensuring data quality	Safeguard Focal Point/Specialist, MEAL	Validated data
Data Analysis & Trends	Analysis of risk patterns, complaints, and mitigation effectiveness	Identify key trends and issues	Safeguard Focal Point/Specialist, MEAL	Analysis report
Gap Identification	Identify system inconsistencies and weaknesses	Determine the improvement area	Safeguard Focal Point/Specialist and Sector Lead	List of findings
Internal Review	Evaluation meeting to discuss findings and recommendations	Evaluation-based decision-making	Management and Sector Lead	Minutes of Meeting review
Preparation of Improvement Plan	Preparation of an action plan based on the results of the evaluation	Following up on findings	Sector Lead	Improvement plan
Implementation of Improvements	Implementation of corrective actions	Improving the effectiveness of ESMS	Program Team	Proof of implementation
Monitoring Improvements	Monitoring the effectiveness of corrective actions	Ensure repairs run	Safeguard Focal Point/Specialist, MEAL	Evaluation report
Documentation & Learning	Documentation of evaluation and learning results	Support continuous improvement	Safeguard Focal Point/Specialist	Learning reports

B. Evaluation Indicators

Evaluation indicators will at least include, as follows:

No	Indicator	Definition	Target / Standard	Data Source (MoV)
1	ESMS Compliance	Percentage of activities that meet ESMS procedures	≥ 90%	Monitoring reports
2	ESMP Implementation	Percentage of mitigation implemented as planned	≥ 85%	ESMP & field reports, etc
3	Stakeholder Participation	The level of stakeholder involvement in the activity	Carried out as planned	Minutes, attendance lists, etc
4	Women's Participation	Percentage of women in activities	≥ 30%	Gender/participant disaggregated data
5	Inclusion of Vulnerable Groups	Vulnerable group involvement	Identified & engaged	List of participants, Documentation of activities, etc
6	Total Complaints	Number of complaints received	Recorded 100%	CFM Register
7	Complaint Resolution	Percentage of complaints resolved	≥ 90%	CFM Report
8	Case Settlement Time	Average case resolution time	SLA Compliant	Case management log
9	Recurring Cases	Number of repeat cases	Decreases every period	Trend analysis
10	Mitigation Effectiveness	Risk mitigation success rate	No significant impact	ESMP Monitoring
11	Program Learning	Number of recommendations implemented	≥ 80% implemented	Evaluation report

No	Indicator	Definition	Target / Standard	Data Source (MoV)
12	Stakeholder Satisfaction	Satisfaction level with the program	≥ 80% satisfied	Survey / feedback

XI. INFORMATION DISCLOSURE

A. General Principles of Information Disclosure

Penabulu is committed to implementing the principles of transparency, accountability, and access to information in all environmental and social risk management. Information disclosure is an integral part of the ESMS to ensure that stakeholders have adequate access to relevant, timely, and understandable information.

Information disclosure is carried out by prioritizing the following principles:

1. Transparency and accountability
2. Accessibility and inclusivity
3. Timeliness
4. Relevance and clarity of information
5. Sensitive data protection and confidentiality

B. Commitment to Applicable Regulations

Penabulu is committed to complying with the provisions of information disclosure as stipulated in relevant national laws and regulations in Indonesia and relevant international standards, including [the GCF Environmental and Social Policy \(Revised\)](#) and [the GCF Information Disclosure Policy](#).

This commitment includes the provision of environmental and social information in a timely, easily accessible, and appropriate social and cultural context of stakeholders, especially affected communities.

C. Types of Information Disclosed

Penabulu ensures that the following information is disclosed to stakeholders in proportion to the level of risk of the activity:

1. General Information of Activities/Programs
2. Purpose, location, and scope of activity
3. Stakeholders involved

4. Potential benefits and risks
5. Environmental and Social Documents
6. Screening results and risk classification
7. Environmental and Social Management Plan (ESMP)
8. Stakeholder engagement plan (SEP)
9. Gender Action Plan (GAP)
10. Risk and Mitigation Information
11. Identified environmental and social impacts
12. Risk mitigation and management measures
13. Significant changes in the design of activities or risks
14. Community Feedback Mechanism (CFM)
15. Complaint channels (online and offline)
16. Procedure for submitting and handling complaints
17. Whistleblower rights and confidentiality guarantee

D. Timing of Information Disclosure

Information disclosure is carried out at the following stages:

1. Pre-implementation
 - Before the activity starts, especially for medium and high risk activities
 - As part of the stakeholder engagement and FPIC process (if relevant)
2. During Implementation
 - Periodically through monitoring, consultation, and public communication activities
3. Changes in Activities
 - When there are significant changes in the design, location, scale, or risk of the activity, the information is updated and relayed to stakeholders

E. Information Disclosure Methods and Media

Information disclosure is carried out through various methods adapted to the local context, including:

1. Official website of the organization
2. Digital platforms (e.g. online complaint system/Kolega)
3. Community meetings, public consultations, and FGDs
4. Print media (leaflets, banners, information boards)
5. Live delivery by the field team

The selection of methods takes into account accessibility, literacy, and the social and cultural conditions of the local community.

F. Information Accessibility and Inclusivity

Penabulu ensures that the information:

1. Delivered in an easy-to-understand language, including local languages if needed
2. Provided in an inclusive and accessible format for vulnerable groups

3. Ensure the participation of women, indigenous peoples, and marginalized groups in the information access process

The ESMS document of Penabulu are publicly available through the organization's official website at the following link: <https://penabulufoundation.org/kebijakan/> or <https://penabulufoundation.org/en/policy/>

G. Person in Charge and Governance

The implementation of information disclosure is under the coordination of:

1. ESMS/Safeguard Expert: ensure the E&S content disclosed is accurate and up to standard
2. Program Team: carry out disclosure at the activity and field level
3. Safeguarding Focal Point: ensures information related to complaint and protection mechanisms is conveyed
4. Communication/MEAL Team (if applicable): support information dissemination and documentation

The entire disclosure process must be documented as part of the ESMS audit and reporting system. The CFM is managed by designated functions, including Safeguarding, that are functionally independent from programme implementation to minimize conflict of interest.

H. Limitations and Confidentiality of Information

Penabulu maintains a balance between transparency and the protection of sensitive information. Certain information may be restricted when:

1. Relating to personal data or the safety of individuals (including victims/survivors)
2. Contains sensitive information related to safeguarding or investigation cases
3. Restricted by legal provisions or agreements with third parties

However, information restrictions do not reduce the commitment to continue to provide relevant and necessary information to stakeholders.

XII. CONCLUSION

The ESMS document of Penabulu is a framework designed to ensure that all organizational activities are carried out in a responsible, accountable, and sustainable manner, taking into account environmental and social aspects thoroughly. ESMS not only serves as an instrument of compliance with national laws and regulations, internal policies, and donor standards, but also as a strategic tool to strengthen program quality and organizational governance.

The formulation of Penabulu ESMS version 2 (V.2) has been adjusted and aligned with the policy directions and priorities in Penabulu–Oxfam Strategic Plan 2025–2030, which emphasizes an integrated approach to environmental issues, climate change, social inclusion, and strengthening community resilience. In this context, ESMS is an important instrument to ensure that all program interventions are not only effective in achieving development goals, but also consistently uphold the principles of environmental and social protection.

Penabulu realizes that the implementation of ESMS is a dynamic process and requires continuous commitment from all elements of the organization, including management, program teams, and implementing partners. Therefore, capacity building, system integration, and consistency in implementation are key in ensuring the effectiveness of ESMS throughout the program cycle.

In addition, Penabulu is committed to continuing to evaluate, learn, and improve ESMS on a regular basis, in line with the development of the program context, stakeholder needs, and applicable standards and best practices. This update is expected to strengthen ESMS's role as an adaptive, responsive, and relevant system in supporting the achievement of inclusive and sustainable impact.

XIII. ATTACHMENT - ESMS PENBULUS ATTACHMENT

Annex 1. Risk Screening Form – Penabulu ESMS

FORM SCREENING RISIKO LINGKUNGAN DAN SOSIAL								
Nama Kegiatan							Penanggung Jawab	
Kode/Subkegiatan							Tanggal Screening	
Lokasi							Jenis Kegiatan	
Unit/Divisi Pengusul							Status Lahan Singkat	
No	Aspek Risiko	Deskripsi Risiko	Severity	Likelihood	Skor	Kategori Skor	Mitigasi Awal / Catatan	
1	Lingkungan							
2	Sosial							
3	Tenurial/Lahan							
4	Adat							
5	GEDSI							
6	K3							
7	Kelembagaan/Tata Kelola							
CHECKLIST HIGH RISK (OVERRIDE)								
No	Kategori	Pertanyaan High Risk	Ya/Tidak	Catatan	Deskripsi			
1	Kepatuhan Hukum	Apakah kegiatan melibatkan praktik, aktivitas, atau transaksi yang melanggar peraturan perundang-undangan nasional atau konvensi/perjanjian	Tidak		Kegiatan yang melibatkan praktik yang bertentangan dengan hujum/melanggar hukum/peraturan perundang-undangan nasional atau konvensi inte			
2	Sosial dan Lingkungan	Apakah kegiatan berpotensi menimbulkan dampak lingkungan dan/atau sosial yang bersifat permanen, signifikan, sensitif, kompleks, dan tidak dapat dimitigasi secara memadai?			Kegiatan yang berpotensi menimbulkan dampak lingkungan dan/atau sosial yang bersifat permanen, signifikan, sensitif, kompleks, dan tidak dapat			
3	Keanekaragaman Hayati & Ekosistem	Apakah kegiatan: a. Menyebabkan deforestasi atau degradasi hutan? b. Berlokasi di atau berdampak pada kawasan lindung/habitat penting? c. Melibatkan perdagangan/perburuan satwa dilindungi? d. Berpotensi menyebabkan hilangnya spesies			Kegiatan yang menyebabkan atau berkontribusi terhadap deforestasi, degradasi hutan, atau kerusakan ekosistem kritis, termasuk kawasan lindung dan habitat penting, ataupun melibatkan perdagangan, perburuan, atau pemanfaatan satwa liar yang dilindungi atau dilarang atau kegiatan yang berpotensi menyebabkan hilangnya spesies langka atau terancam punah yang termasuk dalam kategori perlindungan internasional			
4	Masyarakat adat dan komunitas lokal	Apakah kegiatan: a. Berpotensi melanggar hak masyarakat adat/komunitas lokal? b. Tidak memperoleh persetujuan masyarakat terdampak (FPIC/PADIATAPA)? c. Berpotensi menimbulkan konflik sosial terkait lahan atau sumber daya?			Kegiatan yang melanggar atau berpotensi melanggar hak masyarakat adat dan komunitas lokal, termasuk hak atas tanah, wilayah, dan sumber daya alam, serta kegiatan yang tidak memperoleh persetujuan masyarakat terdampak			
5	Tenurial/Lahan	Apakah kegiatan melibatkan pengurusan, pemindahan, atau relokasi paksa (fisik atau ekonomi) tanpa persetujuan yang sah dari masyarakat terdampak?			Kegiatan yang melibatkan pengurusan, pemindahan, atau relokasi secara paksa, baik secara fisik maupun ekonomi, tanpa persetujuan yang sah dari masyarakat terdampak			
6	Ketenagakerjaan	Apakah kegiatan melibatkan: a. Pekerja anak di bawah usia minimum? b. Kerja paksa atau praktik eksploitatif? c. Kondisi kerja yang tidak sesuai dengan peraturan ketenagakerjaan?			Kegiatan yang melibatkan praktik ketenagakerjaan yang eksploitatif, termasuk pekerja anak di bawah usia minimum, kerja paksa, atau bentuk kerja yang tidak sesuai dengan ketentuan peraturan perundang-undangan			
7	Pencemaran	Apakah kegiatan berpotensi menyebabkan pencemaran signifikan terhadap air, tanah, atau udara, atau melibatkan pengelolaan limbah berbahaya yang tidak			Kegiatan yang berkontribusi terhadap pencemaran lingkungan yang signifikan, termasuk pencemaran air, tanah, dan udara, serta pengelolaan limbah berbahaya yang tidak sesuai standar			
HASIL SCREENING								
Total Skor Tertinggi	0					Kategori Berdasarkan Skor	Rendah	
Jumlah Jawaban 'Ya' High Risk	0					Kategori Final	Rendah	
Instrumen Safeguard Minimum	Checklist screening + dokumentasi dasar							
Keputusan Awal	Dapat dilanjutkan dengan pengendalian rutin							
Disiapkan oleh (Project Manager/Lead Pelaksana)			Ditinjau oleh (Safeguard Officer/Spesialis)			Disetujui oleh (Climate and Energy Sector Lead)		

Annex 4. Penabulu ESMS Monitoring Format

MONITORING IMPLEMENTASI ESMP										
No	Prinsip ESMS Penabulu	Nama Kegiatan	Indikator	Target	Realisasi	% Capaian	Status	Tanggal Update	Daftar MoV ESMS	Link MoV
1	Kepatuhan terhadap Hukum dan Standar (Compliance)	AC.1.1.1								
		AC.1.1.2								
		dst								
2	Penilaian & Pengelolaan Risiko Lingkungan dan Sosial (Risk Management & Do No Harm)	AC.1.1.1								
		AC.1.1.2								
		dst								
3	Menjaga Kualitas Lingkungan Hidup dan Perlindungan Keanekaragaman Hayati (Environmental Protection)	AC.1.1.1								
		AC.1.1.2								
		dst								
4	Penghormatan terhadap Hak Asasi Manusia dan Masyarakat Adat (Human Rights & Indigenous Peoples)	AC.1.1.1								
		AC.1.1.2								
		dst								
5	Inklusi Sosial, Kesenjangan Gender, dan PSEAH (Social Inclusion, Gender Equality & PSEAH)	AC.1.1.1								
		AC.1.1.2								
		dst								
6	Pelibatan Bermakna Pemangku Kepentingan Kunci (Stakeholder Engagement)	AC.1.1.1								
		AC.1.1.2								
		dst								
7	Perlindungan Tenaga Kerja (Occupational Health & Safety)	AC.1.1.1								
		AC.1.1.2								
		dst								
8	Transparansi, Akuntabilitas, dan Mekanisme	AC.1.1.1								
		AC.1.1.2								
		dst								
9	Perbaikan Berkelanjutan (Continuous Improvement)	AC.1.1.1								
		AC.1.1.2								
		dst								

Annex 5. Stakeholder Analysis and Engagement Plan Format

ANALISIS STAKEHOLDER DAN RENCANA PELIBATAN							
No	Kegiatan	Stakeholder yang Terlibat	Peran	Kepentingan	Pengaruh (Tinggi-Rendah)	Tingkat Risiko (Tinggi-Rendah)	Strategi Pelibatan
1							
2							
3							
4							
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Annex 7. PADIATAPA/FPIC Format

A. GENERAL INFORMATION OF ACTIVITIES

Name of Program/Activity	
Activity Location	
Consultation Date	
Organizer	
Implementing Partners	
Funding Sources	

B. IDENTIFICATION OF AFFECTED COMMUNITIES

Community Name	
Representatives Present	
Number of Participants (Male/Female)	
Vulnerable Groups	
Indigenous People Structure	

C. ACTIVITY DESCRIPTION

D. INFORMATION DELIVERED

E. CONSULTATION PROCESS

F. CONSULTATION RESULTS

Agree

Agree to the terms

Decline

Note:

G. STATEMENT

We declare that the information has been provided in full, without coercion, and that the decision was made voluntarily.

H. SIGNATURE

Name	Departments	Signature
Community Representatives		
Traditional Leaders		
Women/Vulnerable Groups		
Village Government		

I. DOCUMENTATION

Attendance list	<input type="checkbox"/>
Photo	<input type="checkbox"/>
Minutes	<input type="checkbox"/>
Location map	<input type="checkbox"/>
Socialization materials	<input type="checkbox"/>