



Social impact assessment

Guideline to preparing a social impact management plan

September 2010



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Guideline to preparing a social impact management plan

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Introduction

In 2008, the Queensland Government released the *Sustainable Resource Communities Policy* in response to the need to manage growth in the resource development areas of the Surat Basin, Bowen Basin and north-west Queensland minerals province. The policy was developed as a result of government's strong interest in securing the best outcomes for those communities directly and indirectly affected by the development of large resource development projects.

The *Sustainable Resource Communities Policy* and the subsequent 2010 *Surat Basin Future Directions Statement*, outlined that only through a range of policies, programs and services, will Government, industry and the community be able to maximise the economic benefits and minimise any unintended consequences associated with rapid growth. The actions include developing a Land Access Policy, an Economic Strategy, a Coal Seam Gas Water Management Policy, Strategic Cropping Policy, Workforce Development Plan, and a Regional Transport plan.

Under the *Sustainable Resource Communities Policy* and the *Surat Basin Future Directions Statement*, proponents of new or expanded major resource development projects, will need to develop a social impact management plan in consultation with government and key stakeholders. The *Sustainable Resource Communities Policy* also expresses government's desire to work in partnership with industry and local government, and its commitment to the principles of leadership, collaboration, corporate responsibility, sustainability, communication and community engagement.

In order to implement this policy, the Department of Infrastructure and Planning has conducted consultation with government, community and industry stakeholders to identify and agree preferred methods for assessing and mitigating social impacts.

This guideline is the result of that consultation and has been developed by the Department of Infrastructure and Planning in close collaboration with members of the Sustainable Resource Communities Partnership Group including the Department of Employment, Economic Development and Innovation, the Queensland Resources Council and the Local Government Association of Queensland.

The guideline aims to help proponents develop a social impact management plan, in collaboration with stakeholders, after having conducted a social impact assessment. The plan must be prepared in accordance with the Queensland Government's *Sustainable Resource Communities Policy*, current environmental impact assessment and resource development legislation, policies and procedures.

Stronger social impact assessment and the development of social impact management plans as envisaged by the *Sustainable Resource Communities Policy*, will not be a cure-all for social ills or a solution for community conflict.



This decade has seen the assessment and management of community health, safety and social wellbeing impacts increasingly considered as part of the risk management and social responsibility of resource development proponents. In Australian jurisdictions, there is strong industry support for the role of a ‘social licence to operate’ as a complement to the regulatory licence issued by government.¹

From an industry perspective, a ‘social licence to operate’ is about operating in a manner that aligns with community expectations and acknowledges that businesses have a shared responsibility with government and more broadly society, to help facilitate the development of strong and sustainable communities.

In accordance with this guideline, proponents will be primarily responsible for developing social impact management plans. However in practice, their development will be a co-operative activity between local governments, state government departments and community stakeholders.

Importantly, the guideline acknowledges the need for proponents to develop inclusive stakeholder engagement mechanisms throughout the project life cycle. They should ensure that these engagement processes are integrated into project implementation at site level, and at local, regional and state levels. The improved information sharing and collaboration by all parties facilitated by these engagement mechanisms will play a central role in identifying innovative local responses to social impact issues and to advancing successful mitigation outcomes. Meaningful engagement between the parties will also improve monitoring and evaluation of objectives and outcomes, and assist in building public confidence and trust in social impact management processes.

Purpose

A social impact management plan establishes the roles and responsibilities of proponents, government, stakeholders and communities throughout the life of a project, in mitigating and managing social impacts and opportunities during construction, operation and the decommissioning of major resource development projects.

¹ This represents world best practice. The International Council on Mining and Metals (ICMM) and its members seek to strengthen the contribution of mining, minerals and metals to the sustainable development of the communities in which they operate. A total of 19 mining and metal companies (including many companies operating in Australia) are members, and through such tools as the ICMM’s *Good Practice Guidance on Health Impact Assessment* (HIA), companies are managing the community health, safety and wellbeing in a socially responsible manner. *Enduring Value*, the Australian Minerals Industry Framework for Sustainable Development, aligns with global industry initiatives and in particular, provides critical guidance on the ICMM Sustainable Development Framework Principles and their application at the operational level.



Following a social impact assessment, a thorough and well-researched social impact management plan should be prepared by the proponent.

The plan should:

- reflect the findings and recommendations of the project's social impact assessment, including consideration of the results of engagement with stakeholders
- present only a concise summary of the findings of the social impact assessment including an analysis of the existing social and cultural area and potential positive and negative impacts (mitigation measures should be described in detail in the project's social impact assessment)
- be a plain-English stand-alone document
- provide a summary for all stakeholders regarding the potential positive and negative impacts of the project, proposed mitigation and management strategies and implementation actions
- be developed for the life of the project
- promote an active and ongoing role for communities, local authorities and all levels of government through construction, operation and decommissioning.

A social impact management plan only covers the period from project approval onwards. It does not cover the management of social impacts that may occur during the feasibility and exploration stages of a project.

A social impact management plan does not fundamentally alter the role that governments or the community have in regions across Queensland. However, the priorities in social infrastructure facilities and services for the community can often change over time and all stakeholders need to be able to recognise the changing needs of the community.

When social impact management plans are required

A social impact management plan is required for either:

- new or expanded major resource development projects which require an environmental impact statement (EIS) to be prepared under either the *Queensland Environment Protection Act 1994* or the *Queensland State Development and Public Works Organisation Act 1971*
- a project for which the Department of Environment and Resource Management has approved that a proponent voluntarily prepare an EIS.

Ideally, proponents should submit a draft social impact management plan following the completion of the social impact assessment and submit the plan to government with the EIS, prior to the public consultation period. A final plan reflecting the outcomes of consultation with government should then be submitted with the final EIS.

Given the range of stakeholders involved in projects and the complexity of some social issues, it is not always possible to reach full agreement, consensus or a clear way forward on all mitigation strategies at the time a final



plan is submitted with the EIS. Where there are unresolved matters, actions to resolve these matters should be articulated and included in the mitigation table of the final plan.

In such cases, a working copy of the plan should be submitted with the final EIS and should contain the actions needed to resolve issues and to develop mitigation strategies. If these actions are considered reasonable by the Department of Infrastructure and Planning, this approach will be sufficient for assessing the social impact component of the project. The actions nominated to resolve issues should be accompanied by progress measures and timeframes in the monitoring plan, and be reported on as project implementation proceeds.

Responsibility for preparing a social impact management plan

The proponent is responsible for preparing a social impact management plan. In preparing the plan, the proponent must collaborate with stakeholders, particularly:

- local government
- Queensland Government departments and agencies
- relevant Commonwealth government departments and agencies
- service providers.

The plan should also reflect any broader community engagement undertaken as part of the social impact assessment.

The role of the Queensland Government

The Department of Infrastructure and Planning will coordinate the Queensland Government's involvement during the development of social impact management plans. The department's role includes working closely with the Department of Environment and Resource Management to support their coordination and assessment of EISs required under the *Queensland Environment Protection Act 1994*.

To ensure effective coordination and communication on all EIS related matters, the following arrangements apply to the social impact management plan components of the EIS process:

- where the EIS is being conducted under the *State Development and Public Works Organisation Act 1971*, proponents should direct all initial inquiries regarding the social impact assessment and social impact management plan to the EIS project manager at the Department of Infrastructure and Planning
- where the EIS is being conducted under the *Queensland Environment Protection Act 1994*, proponents should direct all initial inquiries regarding the social impact management plan to the EIS assessment manager at the Department of Environment and Resource Management. Project and assessment managers will then contact the Department of Infrastructure



and Planning's Social Impact Assessment Unit to establish communication protocols for the social impact components of the project EIS.

In addition to providing support and advice with regard to the social impact assessment and the social impact management plan, the Social Impact Assessment Unit will facilitate relevant whole-of-government coordination. The Queensland Government's involvement in the development of social impact management plans will be supported by the:

- Department of Infrastructure and Planning
- Department of Environment and Resource Management
- Department of Employment, Economic Development and Innovation.

These departments will assist proponents to develop social impact management plans by:

- providing and facilitating input, advice and access to state agency information for proponents regarding potential local, regional and cumulative project impacts
- facilitating proponent access to departmental and agency planning processes, strategies and actions—for example, statutory regional plans, local government community plans, regional development plans and other relevant state and Commonwealth policies and programs
- providing accurate information to assist in the development of a social impact management plan such as:
 - relevant studies conducted for the Sustainable Resource Communities partnership group and local leadership group
 - whole-of-government information coordinated by Queensland Government departments
 - advice through the Department of Treasury's Office of Economic and Social Research on data to ensure consistency, relevancy and reliability of social impact assessment findings
- assessing the adequacy of social impact management plans
- utilising social impact assessment findings and social impact management plans to improve planning for social infrastructure and services in resource communities, and ensuring that the planning of infrastructure and services considers anticipated socio-economic changes
- use regular progress reports and review processes including analysis of key performance indicators and associated project activities, to monitor and review the progress of social impact management plans – noting that key stakeholders (including industry, local governments and the community) will be involved in this process as part of the stakeholder engagement strategies contained in social impact management plans and through Department of Infrastructure and Planning monitoring of projects.

What a social impact management plan should contain

At a minimum, social impact management plans should include: an overall summary; identified impacts; an impact analysis, including mitigation and management strategies; monitoring, reporting and review mechanisms; engagement strategies; and dispute resolution mechanisms.



Each of these components is discussed in detail below and included in the sample templates set out in Appendix A.

Section A: Summary

The summary section should provide both a concise summary of the project, as well information drawn from the social impact assessment. It should also briefly summarise key aspects of the social impact management plan including key mitigation strategies and initiatives. The following should be considered:

- the name and location of the project
- a brief summary of the project, including a statement of the project's objectives and expected outcomes
- a description of the project's social and cultural area of influence
- the potential contribution of the project to regional development
- key social and cultural issues in the project's area of influence that were identified in baseline studies of the social impact assessment
- an overview of the stakeholder engagement strategy from the social impact assessment, including key stakeholders and key stakeholder and community issues, concerns, views, attitudes and aspirations
- key mitigation and initiatives of the social impact management plan that may include positive and negative impacts
- processes for monitoring the social impact management plan
- an overview of the proposed workforce profile including workforce accommodation and/or travel to work proposals.

A list of any existing activities and commitments by the proponent in the project's social and cultural area of influence can be included in this section.

The potential contribution and links of the project to regional development should be determined in the social impact assessment through:

- consulting with the Department of Employment, Economic Development and Innovation
- aligning mitigation and management strategies with local government community plans and state government regional planning strategies and initiatives.

More detailed information can be provided in an appendix as deemed appropriate by the proponent.

Section B: Impact mitigation and management

Impacts may be both positive and negative. A list of impacts identified in the social impact assessment, should be included in the social impact assessment plan in order to ensure that it is effective and comprehensive. In preparing the social impact assessment, impacts should be identified in consultation with key stakeholders including state government agencies, local governments, community reference groups and the broader community. Visit



the Department of Infrastructure and Planning's website at <http://www.dip.qld.gov.au/projects> and refer to the Queensland Curtis LNG project for examples of positive and negative impacts.

Where possible, the impacts should be ranked by whether they are of high, medium or low probability, and their probable consequence. The inclusion of contextual information can be included to evidence this ranking. An assessment of the probability and consequence of impacts is encouraged as part of the social impact assessment. Further guidance will be developed and issued in 2011. The inclusion of these assessments in a social impact management plan is discretionary until that guidance is issued.

Identified impacts should be listed in priority order and should address the following, noting that this will reflect the ranking (high, medium or low) of the impact:

- the phase of the project at which the impact is likely to occur
- the stakeholders involved
- the type of impact (positive or negative)
- probability (high, medium or low)
- consequence (high, medium or low)
- proposed mitigation and/or management strategies
- responsible parties
- proposed timeframe
- key performance indicators.

Impacts from a number of existing or proposed resource development projects which are publicly known or communicated by government may result in cumulative impacts to a particular area or community. This may occur, for example, where another project's development overlaps with the construction period of the project being assessed. Such impacts should be considered in both the study and plan.

The Department of Infrastructure and Planning recognises that cumulative impacts represent a challenging issue. While obvious cumulative impacts on the population, workforce, accommodation, housing, and social infrastructure can be identified in social impact assessments, government's need to identify the exact nature of cumulative impacts at a local and regional level. It is important to further develop an understanding of cumulative impacts in order to enable government, local governments, industry and the community to better plan for the negative impacts as well as maximise likely project benefits.

Factors which will provide for a correct identification and better understanding of the effects of cumulative impacts are:

- information obtained from other social impact assessments (the Office of Economic and Social Research will assist in providing such information)
- government, industry and community initiatives in resource development regions e.g. the Surat and Bowen Basins and north-west Queensland minerals province



- social infrastructure planning undertaken by the Department of Infrastructure and Planning
- national and international best practice and research
- Department of Employment, Economic Development and Innovation 'Cumulative Growth Management Framework'
- engagement with local and regional councils through regional and local planning processes.

Social impact management plans will progressively reflect best practice in managing cumulative impacts as greater understanding is gained by government, industry and communities.

Mitigation and management strategies

For impacts identified, the social impact management plan should include the ranking of associated risks (low, medium, high) and mitigation and/or management strategies for the risks over the life of the project. This enables government to ensure that mitigation and management strategies are aligned with those impacts upon communities and regions which are most likely to occur and recognises that ranking of risks may change over time. The strategies should:

- be developed in collaboration with relevant parties, enabling improved interaction between key stakeholders in resource communities
- utilise short, medium or long term responses appropriate to the type, probability and consequence of impacts
- support, strengthen or link to existing local, regional and state government plans, strategies and programs, especially at the local and regional level, in order to ensure greater certainty of outcomes and to increase the level of awareness and collaboration between all parties wherever possible
- reflect or link to strategies and initiatives that are already being implemented by the proponent.

The mitigation and management strategies should also address the cumulative impacts identified during the social impact assessment where appropriate and as necessary.

The social impacts of decommissioning or closure of a resource development project begins when the intent to close down is announced and the community or region begins to adapt. A social impact management plan should include how and when (during operations) a proponent intends to commence closure planning in collaboration with key stakeholders. The plan would be updated at this stage of operations to include mitigation and/or management strategies to address impacts of the closure phase.

Stakeholders

The social impact management plan must list the key affected stakeholders including:

- project proponent
- relevant local government authorities



- relevant state government agencies
- directly affected landholders
- industry or community parties who may be represented on a stakeholder/community reference group.

Responsible parties

While the proponent is responsible for identifying the impacts in the social impact management plan, in many instances, the development of mitigation and management strategies will be completed in close consultation and collaboration with key stakeholders including state government agencies.

The plan may identify that the responsibility for a particular action needs to be shared or may identify that other stakeholders have direct responsibility, such as government agencies or service providers. The Social Impact Assessment Unit will work with the proponent and/or consultants to facilitate whole-of-government coordination where necessary.

As an outcome of consultation, government agencies may agree to undertake or lead strategies set out in the social impact management plan. This may be formalised through an exchange of letters between the proponent and the Director-Generals of relevant government agencies. Such exchanges of documents will represent government's commitment to actions identified in the social impact management plan. The letters may detail the strategies, performance indicators, timeframes and reporting requirements that the agency agrees to deliver, including the governance arrangements adopted by the proponent to implement and monitor the progress of the social impact management plan. A copy of any such letters should be supplied with the final social impact management plan.

In some cases, a stakeholder may play a role in implementing the strategy but may not be fully identified or have a formal commitment to specific actions. Regardless of this, all affected stakeholders should be listed in the correspondence. The stakeholder engagement strategy (refer to 'Stakeholder engagement strategy' section) should include actions which involve stakeholders in the development of mitigation and management strategies from an early stage.

As they mature in future years, the following initiatives will be of increasing relevance to social impact management plans and will provide valuable data and guidance for stakeholder identification, impact analysis and community engagement:

- community plans developed by local governments
- regional plans
- local and/or regional economic development plans developed by development boards
- work plans developed by the Local Leadership Group
- relevant Commonwealth Government agency initiatives



Mitigation and management timeframes

For short or medium term impacts (1–3 or 3–5 years) that are of high or medium probability and consequence, specific timeframes should be identified for the completion of actions to address or mitigate the impacts.

Impacts that may occur in the longer term (5–10 years) should, if possible, nominate a key project milestone or year for the planning and implementation of mitigation or management strategies.

Section C: Monitoring, reporting and review

A social impact management plan should include:

- a monitoring plan for mitigation and management strategies designed to address high and medium probability and consequence impacts
- procedures for periodically reporting progress and results to company management, the Queensland Government and affected stakeholders
- any requirements for coordination or joint action among various parties.

Proponents may consider meeting the review requirements for a social impact management plan as part of a broader review, audit and assurance program.

Monitoring

While monitoring is the primary responsibility of the proponent, responsibility for mitigation actions may be shared or may be the direct responsibility of other stakeholders including government agencies. This effectively means that responsible parties will need to report on the progress of the strategy to the proponent as part of agreed reporting requirements. Monitoring enables the tracking and evaluation of the plan's objectives and expected outcomes and can assist to:

- track progress on implementation of mitigation and management strategies
- assess the return which a proponent is receiving from community investments
- capture information with which to advise communities and government on progress and achievements
- facilitate engagement with stakeholders.

Stakeholder participation can assist in many aspects of monitoring, such as collecting local data and participating in the development of monitoring strategies. Meaningful participation can help to build public confidence and trust.

Monitoring plans

The key components of a monitoring plan are:

- a list of identified impacts and issues—for example, increased demand on emergency services
- targets and outcomes sought



- a monitoring strategy—how management of the impact will be monitored, for example, regular communication with the relevant government agency and other service providers
- responsibility—documenting of the party responsible for the implementation of each monitoring strategy, for example, community relations manager
- timing and frequency—document how often monitoring of the impact should take place, for example, monthly
- key performance indicators—informative, relevant, measurable, useful, widely recognised, simple to report and easily understood.

Reporting

The frequency of reporting may depend on the type of mitigation and management strategies contained in the social impact management plan.

During the construction phase, proponents should submit an annual report on progress against the social impact management plan. As the size and complexity of projects vary considerably, the reporting regime for the operational phase will be as agreed with the state government during the approval process.

Review

The Department of Infrastructure and Planning's compliance plan identifies external review as a fundamental aspect of an effective compliance program. The timing of external reviews of a social impact management plan will be determined at the project approval stage between the proponent and the Queensland Government but are likely to be:

- two years after commencement, then every three years, or
- two years after commencement then at key project milestones, for example, with a coalmine, a review may be conducted at the time of planned/unplanned increases/decreases in production levels, or
- every three years.

Following each external review, a report will be provided to the Department of Infrastructure and Planning. This report will include:

- an overview of the effectiveness of implementation
- an assessment of progress against nominated performance indicators
- an explanation of why any actions were not undertaken as planned and if required
- recommendations to improve future performance.

The proponent may also elect to conduct additional internal reviews. The Coordinator-General may, as a condition of approval or a condition imposed in a Coordinator-General's report, set out the intervals at which the independent external review will be conducted. The Department of Environment and Resource Management may, as a condition of approval, set out in an EIS the intervals at which an independent external review will be conducted. These



intervals will, in each case, reflect the outcomes negotiated during the project approval stage.

The Coordinator-General may, as a condition of approval or a condition imposed in a Coordinator-General's report, require proponents to have their activities audited by an independent and suitably qualified person² to determine whether activities are in compliance with the conditions imposed. This may be a requirement at either or both the construction and the operational stages of the project, depending on the nature of activities.

The Compliance Unit of the Department of Infrastructure and Planning may consider the review reports and make recommendations to the Coordinator-General if any further action is considered necessary. The unit may also undertake further monitoring or auditing of a project's activities as a result of the findings of a report or as part of a random or targeted audit program. Such audits may include analysis of the level of compliance with conditions or an assessment of the accuracy of the audit report submitted to the Coordinator-General³.

Amendment and termination

Amendments and updates to a social impact management plan should be made if the strategies and actions no longer meet the desired outcomes, or to improve their effectiveness. Consideration of any actions requiring amendment should occur during the regular review process and may also need to occur at key project milestones or events, to ensure a social impact management plan remains relevant.

A social impact management plan may be altered, re-structured, re-scoped or terminated through agreement by both government and the proponent, following consultation with key stakeholders. Amendments to a plan may be necessary under certain circumstances, such as changes in government policy, significant changes to company operations and site structure, or significant national or international changes to the proponent's management approaches and frameworks.

Any proposal to amend a social impact management plan will involve negotiation between the proponent and the Department of Infrastructure and Planning. A process to facilitate any amendments should be identified. If necessary, the stakeholder engagement strategy should be updated to describe how stakeholders will be engaged in any change process at the time.

Section D: Stakeholder engagement strategy

A social impact management plan must include a stakeholder engagement strategy for the plan which covers:

² The Department of Infrastructure and Planning will work with industry and key stakeholders to develop and implement an appropriate audit regime for the use of independent and suitably qualified persons.

³ The administrative arrangements for review of social impact management plans for projects assessed under the *Queensland Environmental Protection Act 1994* by the Department of Environment and Resource Management, will be determined in the context of the development of legislative amendments to effect the requirement for social impact management plans. To allay any concerns, it is proposed that the one compliance regime should apply to all social impact management plans.



- a list of key stakeholders—individuals, non-government organisations, community groups, community representatives, Indigenous organisations, local authorities, state and Commonwealth government departments and agencies—and a description of their interest in the project
- strategies and/or approaches that are sensitive and inclusive of the needs of people who are vulnerable in the community and who may not engage through mainstream consultation processes
- actions to promote an active and ongoing role for stakeholders throughout the project life cycle
- management strategies to ensure that stakeholder and community engagement processes are integrated into project implementation at site level, and at local, regional and state levels
- mechanisms to support a regular review of the effectiveness of the stakeholder engagement strategy.

Section E: Social impact management plan dispute resolution

The dispute resolution mechanism for the social impact management plan should support an active response to community and stakeholder concerns about social impact issues. In most instances, proponents have well established policies, procedures and mechanisms to respond to disputes, grievances and complaints. The social impact management plan dispute resolution may be aligned to these existing organisational processes. A checklist can be found at Appendix A.

Conclusion

This guideline has been developed to assist those preparing a social impact management plan. It should be used alongside the sample templates provided at Appendix A.

Visit the Department of Infrastructure and Planning's website at www.dip.qld.gov.au for further information on the environmental impact statement and social impact assessment processes.

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Appendix A

Sample social impact management plan template

(Project title)

Social impact management plan (SIMP)

Section A: Summary

This section should provide a concise summary of the project, information drawn from the social impact assessment, and briefly summarise key aspects of the SIMP including key mitigation strategies and initiatives

The following should be considered:

- name and location of the project
- brief project summary including the project's objectives and expected outcomes
- a description of the project's social and cultural area of influence
- the potential contribution of the project to regional development
- key social and cultural issues identified in the SIA baseline study
- an overview of the SIA stakeholder engagement strategy including key stakeholders and key stakeholder and community issues, concerns, views, attitudes and aspirations
- key mitigation measures and benefit strategies proposed in the SIMP including positive and negative impacts
- SIMP monitoring processes
- proposed workforce profile including workforce accommodation and/or travel to work proposals



Section B: Impact mitigation and management

Impact headings are provided as a guide, headings will be determined by project social impact assessment requirements. Contextual information can be included to evidence the 'type' and 'probability' of impact. Obvious cumulative impacts are to be identified.

B	Impact	Phase	Stakeholders	Type of impact (positive vs. negative)	Probability (high, medium or low)	Consequence (high, medium or low)	Management and/or mitigation strategies	Responsible parties	Timeframe	Key performance indicators
B1	Housing and accommodation									
B2	Workforce									
B3	Social infrastructure									
B4	Cultural									
B5	Economic/business development									
B6	Cumulative impacts									



Section C: Monitoring plan

	Impact	Monitoring strategy	Target and outcomes	Responsibility	Timing and frequency	Key performance indicators
C1						
C2						
C3						
C4						



Section D: Stakeholder engagement strategy					
	List of key stakeholders— including community and Indigenous stakeholders	Stakeholders' interests—in the project	Engagement actions— promoting an active and ongoing role for stakeholders and community throughout the project life cycle	Management strategies— integrating stakeholder and community engagement into project implementation at site level, and at local regional and state levels	Review mechanisms— supporting a regular review of effectiveness
D1					
D2					
D3					
D4					
D5					
D6					
D7					



Section E: Social impact management plan dispute resolution - checklist

E1 | Pathway and process for handling grievances

E2 | Procedural elements—a documented procedure outlining steps to be taken to prevent and handle community grievances

E3 | Records—complaints and grievances logs and data, evidence of information and communication about process and outcomes

E4 | Dedicated resources—human and financial resources, formally defined responsibilities for grievance handling

E5 | Evidence of dialogue with aggrieved parties and/or use of alternative dispute resolution techniques

E6 | Substantive outcomes—improved organisational practice and relationships, conflict resolution validated by aggrieved parties

