

THE REPUBLIC OF LIBERIA



MINISTRY OF EDUCATION

STAKEHOLDER ENGAGEMENT PLAN (SEP)

For the proposed
LIBERIA LEARNING FOUNDATION PROJECT
Project ID No: P172705

Funded by
GLOBAL PARTNERSHIP FOR EDUCATION (GPE)
MAXIMUM COUNTRY ALLOCATION ADDITIONAL FINANCING

May 2020

ACRONYMS

ADR	Alternative Dispute Resolution
AF	Additional Financing
AE	Accelerated Education
AP	Aggrieved Party
ALP	Alternative Learning Program
AGs	Advocacy Groups
AW&B	Annual Work plan and Budget
BTE	Bureau of Teacher Education
CBOs	Community Based Organizations
CSA	Civil Service Agency
CSOs	Civil Service Organizations
CSSO	Civil Society Standing Order
CDC	County Development Committee
DEOs	District Education Officers
DLIs	Disbursement-Linked Indicators
DPs	Development Partners
DPE	Division of Physical Environment
DWA	Descent Work Act
ECE	Early Childhood Education
EPA	Environmental Protection Agency
ESDC	Education Sector Development Committee
ESMF	Environmental and Social Management Framework
ESIA	Environmental and Social Impact Assessment
EU	European Union
FLY	Federation of Liberian Youth
FM	Financial Management
GoL	Government of Liberia
Gas	Government Agencies
GPE	Global Partnership for Education
G2B	Getting to Best in Education
G2B-ESP	Getting to Best in Education Sector Plan
GPE-G2B	Global Partnership for Education-Getting to Best in Education
GRCs	Grievance Redress Committees
GRM	Grievance Redress Mechanism
HGS	Home Grown Solution
HRGs	Human Rights Groups
IDA	International Development Association
IRISE	Improving Results in Secondary Education
IRIs	Intermediate Results Indicators
IPF	Investment Project Financing
JESR	Joint Education Sector Review
LGAs	Local Government Authorities
LEG	Local Education Group
MCA	Maximum Country Allocation
LINSU	Liberia National Student Union
LLA	Liberia Land Authority
LLFP	Liberia Learning Foundation Project

M&E	Monitoring and Evaluation
MFDP	Ministry of Finance and Development Planning
MoE	Ministry of Education
MoJ	Ministry of Justice
MoGSP	Ministry of Gender & Social Protection
MoL	Ministry of Labour
MoYS	Ministry of Youth and Sports
MPW	Ministry of Public Works
NGOs	Non-Governmental Organizations
NSAS	National School Accountability System
NSQS	National School Quality Standard
OSIWA	Open Society Initiative for West Africa
PAP	Project Affected People
PC	Project Coordinator
PCP	Project Contract Person
PDO	Project Development Objective
PDT	Project Delivery Team
PIM	Project Implementation Manual
PM	Project Management
PPSD	Project Procurement Strategy for Development
PS	Procurement Specialist
PSE	Project Site Engineer
PSS	Project Site Supervisor
PTAs	Parent Teacher Associations
RBF	Results-Based Financing
RF	Results Framework
RL	Republic of Liberia
RTTIs	Rural Teacher Training Institutes
RPF	Resettlement Policy Framework
SCR	Student Classroom Ratio
SEP	Stakeholders Engagement Plan
SMT	Senior Management Team
SQA	School Quality Assessment
TA	Technical Assistance
TBA	To Be Arranged
TDCs	Targeted Disadvantaged Counties
TLs	Traditional Leaders
TTLs	Task-Team Leaders
TWT	Technical Working Team
WASH	Water Sanitation and Hygiene
WB	World Bank

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1. Project Overview and Description

On June 27, 2018, the Global Partnership for Education (GPE) informed the Government of Liberia through the Ministry of Education (MoE) of an increase in the Maximum Country Allocation (MCA) of US\$5.61 million which the Government intends to use to embark on the Liberia Learning Foundation Project (LLFP). The LLFP is expected to complement the existing Global Partnership for Education Getting to Best in Education (GPE-G2B) Project in line with the priorities in the Getting to Best in Education Sector Plan (G2B-ESP). Specifically, the LLFP will allow the MoE to revise and/or scale-up its result-based financing (RBF) targets in the existing GPE-G2B project, and in consultation with the Local Education Group (LEG) developed new activities for implementation with the aim of increasing the development impact of GPE interventions in Liberia. The LLF has three components as described below.

Component 1: Improving the quality of and access to Early Childhood Education (ECE) in targeted counties

This component aims to strengthen ECE foundations in targeted disadvantaged counties, in alignment with the ESP ECE objectives. To meet the component objective, three sub-components will be financed: (i) construction of ECE classrooms, latrines and water systems; (ii) accelerated education for overage students; and (iii) provision of ECE teaching and learning materials (TLMs).

Sub-component 1.1: Construction of ECE classrooms, latrines and water systems (US\$1.699 million)

This sub-component will address a priority need identified in the ESP for additional ECE classrooms and Water, Sanitation and Hygiene (WASH) facilities in schools with overcrowding or which lack ECE infrastructure. The sub-component aims to reduce ECE overcrowding and improve infrastructure quality at 18 school sites each of which will receive a package of three ECE classrooms (one per ECE grade), furnishings and basic equipment, one latrine (consisting of four age-appropriate toilets) and one water system. The 18 schools are also benefiting from the placement of qualified ECE teachers under the G2B Project. The Government recognizes that construction of additional classrooms and WASH facilities are required to address inequities in ECE provision and reduce overcrowding as well as complementing the COVID-19 longer term recovery phase.

Sub-component 1.2: Provision of ECE teaching and learning materials (US\$0.48 million)

The objective of sub-component 1.2 is to increase access to ECE teaching and learning materials (TLMs) in the six targeted counties. This sub-component address the widespread lack of curriculum materials for play-based learning and further enhance the impact of the ECE grants, construction and teacher training TLMs, including curriculum and teachers' guides, supplementary ECE reading books, and assorted classroom learning aid materials for pretend play, sensory play, blocks play, reading and counting, will be distributed across the same schools receiving school grants under the G2B Project. The lack of materials has been highlighted by the JESR and G2B-ESP and is particularly acute in rural schools.

Sub-component 1.3: Accelerated education for overage students (US\$0.90 million)

This sub-component will support the MoE's plans to expand its accelerated learning program (ALP) for overage ECE students and also complements the MoE's COVID-19 response plan. The G2B-ESP identifies overage enrollment as a persistent challenge to improving access, efficiency and quality in the education sector. The phenomenon begins in ECE and impacts every grade, driven by low levels of at-age enrolment, poverty and high rates of grade repetition. The disadvantaged counties targeted by the project, suffer from some of the worst overage enrollment patterns. One hundred (100) public schools in 5 districts in 3 counties will be expected to run Level 1 ALP classes for 5,600 overage ECE students during the academic year. The MOE will coordinate with the school feeding program to ensure targeted schools receive school feeding support, if necessary, given that many children are not receiving meals at home and food insecurity is a major concern.

Component 2: Achieving learning outcomes through increased equity, efficiency and accountability (US\$1.77 million)

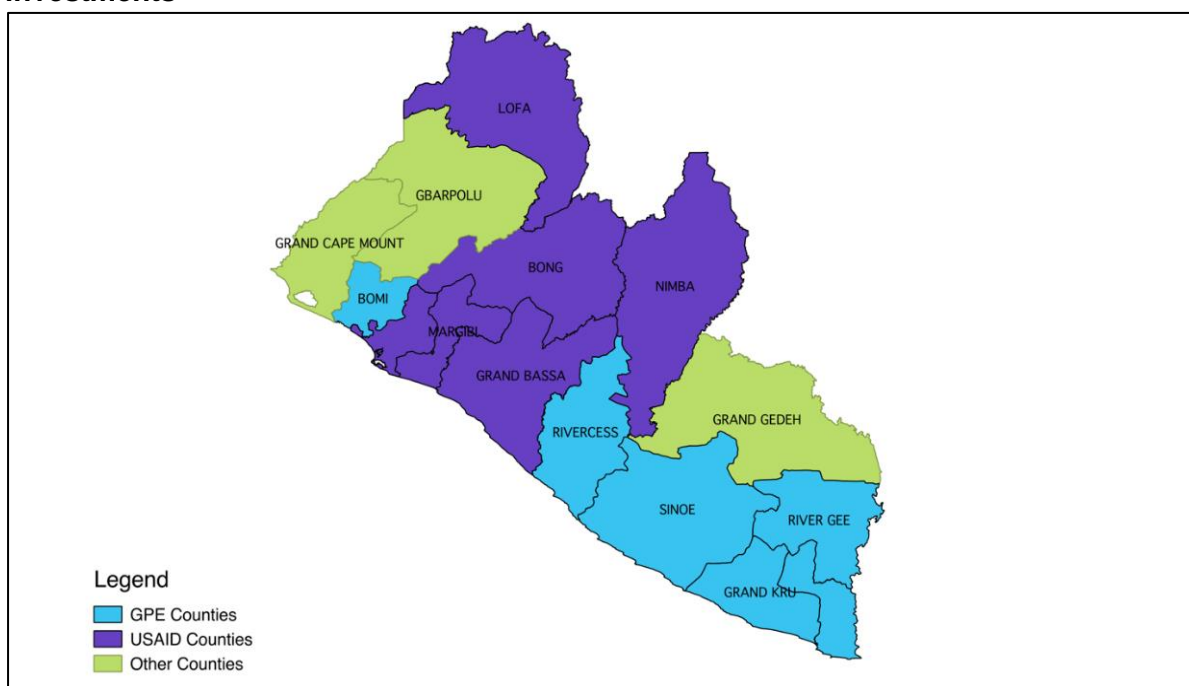
This component focuses on consolidating education system accountability to increase equity, efficiency and learning outcomes in the education system by furthering targets for DLIs under the G2B Project. This component provides financing through three DLIs. DLI 1 (equity) aims to increase the proportion of qualified ECE and primary teachers in the targeted counties by incentivizing the deployment of additional qualified teachers, teacher certification and replacement of unqualified or absent teachers. DLI 2 (efficiency) aims to improve the system of teacher payroll management by teachers linking teacher certification to teachers' biometric National ID. DLI 3 (learning outcomes) aims to support the establishment of a national primary student learning assessment for Grade 3 and 6.

Component 3: Strengthening project management and sector support and coordination (US\$0.7 million)

This component will provide financing to support the implementation of activities under Components 1 and 2 and help to ensure the activities are sustainable beyond the life of the Project, including M&E, training and management. The component will fund M&E activities conducted by the MoE, county and district levels, as well as operational costs. A school infrastructure audit will be conducted to identify vulnerabilities to environmental risks, in line with the World Bank's safeguards procedures. Allocations will be made for Technical Assistance (TA), communications, an Independent Verification Agent (IVA), two Joint Education Sector Review (JESR) and additional activities to ensure the project is effectively implemented aligned to World Bank and GPE requirements.

The LLF has no change in project development objective (PDO) and location from its parent G2B Project. The six targeted disadvantaged counties remain the same for this scale up intervention, and include Bomi, Grand Kru, Maryland, Rivercess, River Gee and Sinoe. See the map of Liberia below for counties targeted by GPE-G2B and MCA AF interventions.

Figure 1 Map of counties targeted by GPE G2B project and USAID education investments



MoE has selected 18 school locations in the 18 most disadvantaged districts of the targeted counties based on high SCR and lack of permanent school infrastructure. These schools are also receiving qualified ECE teachers under the parent project and have been assessed as having adequate land and topography, no land tenure issues, and there is sufficient population density to justify additional classrooms. Each location will receive a package of three ECE classrooms (one per ECE grade), one latrine (consisting of four age-appropriate toilets) and one water system. See table 1 below for district allocation of classrooms construction.

Table 1: District allocation of new ECE classroom constructions

County	Allocation	Districts	Number of classrooms
Grand Kru	3 sites	Wedebo, Jloh & Sass Town	9
Rivercess	3 sites	Monweh, Central Rivercess 1&2	9
Maryland	3 sites	Sodoken, Barrobo 1 & Barrobo 2	9
River Gee	3 sites	Tiempo, Webbo & Sarbo	9
Bomi	3 sites	Senjeh, Suehn-Mecca & Dewoin	9
Sinoe	3 sites	Sankwen, Central Kpanyan & Lower Kpanyan	9
Total	18 sites	18 districts	54

Project Beneficiaries

The primary beneficiaries are ECE students targeted by the accelerated learning program (5,600 students) and ECE classroom construction (approximately 2,538 students. Additional beneficiaries include the 300 accelerated learning program teachers and principals trained under the project. Purpose of the Stakeholder Engagement Plan

The LLFP) is being prepared as IPF and the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10 on "Stakeholder Engagement and Information Disclosure", the MoE should provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the beneficiary population is essential to the success of the LLFP. It will ensure smooth collaboration between LLFP's staff and beneficiary communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project affected parties and other stakeholders in a timely manner, and that these groups are provided with enough opportunity to voice their opinions and concerns that may influence project decisions. The MoE will use the SEP as tool for managing communications between itself as project implementing agency and the project stakeholders.

2. Stakeholder Identification and Analysis

Project stakeholders are defined as individuals, groups or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the LLFP (also known as 'affected parties'); and
- (ii) may have an interest in the LLFP ('interested parties'). They include individuals or groups whose interests may be affected by the LLFP and who have the potential to influence the LLFP outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the LLFP development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the LLFP. Community representatives may provide helpful insight into the

local settings and act as main conduits for dissemination of the LLFP-related information and as a primary communication/liaison link between the LLFP and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Depending on the different needs of the identified stakeholders, the legitimacy of the community representatives can be verified by checking with a random sample of community members using techniques that would be appropriate and effective considering the need to also prevent coronavirus transmission.

2.1 Methodology

In order to meet best practice approaches, the projects will apply the following principles for stakeholder engagement in an appropriate manner considering social distancing requirements:

- *Openness and life-cycle approach*: public consultations for the NCPRP will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity*: stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the NCPRP is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention should be given to vulnerable groups, in particular disabled, women, youth, elderly and the cultural sensitivities of diverse ethnic groups.

Given the nature of activities involved under components and sub-components of the proposed Liberia Learning Foundation Project, a number of potential stakeholders have been identified and grouped as follows:

- **Project affected parties**: persons, groups and other entities within the LLFP Area of Influence (PAI) that are directly influenced (actually or potentially) by the LLFP and/or have been identified as most susceptible to change associated with the LLFP, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other interested parties**: individuals/groups/entities that may not experience direct impacts from the LLFP but who consider or perceive their interests as being affected by the LLFP and/or who could affect the LLFP and the process of its implementation in some way; and
- **Disadvantaged /vulnerable individuals or groups**: persons who may be disproportionately impacted or further disadvantaged by the LLFP as compared with any other groups due to their vulnerable status; and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the LLFP.

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2.2 Project affected parties

Generally, the project will directly and indirectly affect the inhabitants of the project area. All people resident in the 18 school communities of the 18 districts where classrooms, latrine and water facilities constructions will be taking place including students, teachers, school administrators, parents, local business owners, farmers, land owners, properties owners and labour force would be directly or indirectly affected by the project activities either positively or negatively. Population of schools and communities that will benefit from the age-appropriate alternative education and distribution of teaching learning materials will as well be affected by the project. Table 3 section A provided list of affected parties.

2.3 Other interested parties

Key stakeholders identified for consultation and disclosure as potential other interested parties during preparation/design and implementation of the project have been grouped at three levels: the national level (i.e. relevant government ministries and agencies as well as CSOs), the local level (i.e. country, district, township and school administrators as well as community-based organizations (CBOs), local civil society organizations (CSOs) and religious leaders, and development partners as well as Non-Governmental Organizations (NGOs) including World Bank, European (EU), United States Agency for International Development (USAID), UNICEF, World Food Programme (WFP), Open Society Initiative for West Africa (OSIWA), Save the Children, LEG, ESDC, etc.). Table 3 section B provided list of interested parties.

2.4 Disadvantaged /vulnerable individuals or groups

These are individuals and groups who need or are interested in special and inclusive education for all pupils, and comprises of school age children with disabilities in communities where the project activities will be implemented as well as national and local associations of persons with disabilities. It also includes female workers at construction sites and people with HIV/AIDS working on the Project. Table 3 section C provided list of disadvantaged/vulnerable individuals or groups.

Table 3: List of project stakeholders, potential roles and needs/interests

Stakeholder group	Potential roles in the Project	Needs/interest of stakeholder group
A. Project affected parties	Potential roles in the Project	Needs/interest of stakeholder group

Stakeholder group	Potential roles in the Project	Needs/interest of stakeholder group
<ul style="list-style-type: none"> • Inhabitants of project communities • ECE students in project areas • ECE/primary Teachers • Local business owners • Local labor force 	<ul style="list-style-type: none"> • Cooperate during project implementation. • Avail themselves as beneficiaries of project activities. • Express interest in procurement and supply chain activities. • Be hired for project works 	<ul style="list-style-type: none"> • Desires to directly benefit from project activities • Need protections from exploitations, human rights abuses and negative impacts of project
B. Other interested parties		
B.1. National level interested parties	Potential roles in the Project	Needs/interest of stakeholder group
<ul style="list-style-type: none"> • MFDP • MPW • EPA • LLA • MIA • MoH • MoL • MoJ • MoG&SP • LNP • CSA • RTTIs • NTAL • NPA • NPTA • Construction materials, manufacturers/suppliers • LINSU • FLY 	<p>Overall, ensure that the Project:</p> <ul style="list-style-type: none"> • promotes the national development agenda particularly pillar 1 of the PAPD and SDGs Goal 4 • is in compliance with Liberian legislations (including labor laws and environmental and social protection laws and policies) during its design and implementation • conforms to regulations on land tenure • makes impacts on its targeted beneficiaries 	<ul style="list-style-type: none"> • Interested in the general socio-economic impacts of the project, both adverse and beneficial • Compliance with national laws and regulations • Data on project implementation
B.2. Local level interested parties	Potential roles in the Project	Needs/interest of stakeholder group
<ul style="list-style-type: none"> • County officials • District officials • Township officials • School administrators • Local CSOs • CBOs • Local religious leaders • Local media 	<ul style="list-style-type: none"> • Protect the rights of inhabitants in the project area • Represent the local communities/PAPs; • Receive and address any feedback and grievances from PAPs • Ensure the environmental and social performance of the Project is protecting the environment and affected people and complies with international E&S standards. • Inform residents in the project area and the wider public about 	<ul style="list-style-type: none"> • Interested in the general socio-economic impacts of the project, both adverse and beneficial • Involvement in project decision-making process • Involvement in project monitoring & evaluation • Interested in project implementation performance report

Stakeholder group	Potential roles in the Project	Needs/interest of stakeholder group
	the Project implementation and planned activities.	
B.3. Development Partners & NGOs interested in the Project		
<ul style="list-style-type: none"> World Bank USAID GPE UNICEF WFP Save the Children OSIWA LEG ESDC 	Overall, ensure that the Project <ul style="list-style-type: none"> Aligns with the G2B-ESP priorities Is implemented as designed/planned Is implemented without compromising the rights of host communities including the most vulnerable groups and individuals Avoids duplications of already existing interventions 	<ul style="list-style-type: none"> Interested in regular Project implementation status report Interested in the general socio-economic impacts of the project, both adverse and beneficial Interested in lessons learned from project implementation
C. Disadvantaged/vulnerable individuals or groups		
	Potential roles in the Project	Needs of stakeholder group
<ul style="list-style-type: none"> School age children and working age adults with disabilities in project communities HIV/AIDS individuals in project communities Inclusive education advocacy groups Vulnerable women and girls in project communities 	Advocacy for inclusion and protection of rights	s inclusion as project beneficiaries sion of their special needs ction from all forms of mination ction against sexual and er-based violence including al harassment and exploitation.

The list of stakeholders is likely to expand/change in composition as the project moves to implementation. As implementation progresses, the list will be updated as new beneficiaries who may be negatively impacted by the project are identified as implementation progresses and updated when the project team will find.

2.5 Summary of stakeholders' interest in and influence over the project

A summary of stakeholders' interest in and influence over the project is provided in Table 4 below. The needs and interests of stakeholders are different, and the project will engage with identified stakeholders based on their needs, roles, and influence.

Table 4: Summary of key stakeholders' interest in and influence over the project

Stakeholder	Potential Role of Stakeholder	Influence	Interest
MoE	Project implementing institution	High	High
MFDP	Ensuring project aligns with the PAPD, approval of project, and Disbursement of fund	High	Medium
County, district, township and school officials	Identification of Project beneficiaries	Medium	Medium

EPA	Clearance for EIA reports and issuance EIA permits; monitoring	Medium	Low
DPs, NGOs	Ensure that implementation of the Project supports the ESP	Medium	High
Multilateral and Bilateral Donors	Provide funding for similar areas (need to coordinate to avoid duplication to maximise impact)	High	Medium
Civil Society groups	Observe implementation, and advocate for adherence to international best practice and human rights laws.	Low	Medium
MoL	Monitor adherence to the relevant national Labour laws and regulations	Medium	Low
Students and teachers	Direct beneficiaries	High	High

The analysis above should assist in prioritizing stakeholders by assessing the significance of the project to each stakeholder group from their perspective, and vice versa. Table 5 below present this analysis.

Table 5: Summary analysis and prioritization of key stakeholders based on interest in and influence over the project

	High ability or likelihood to influence or impact the project	Medium ability or likelihood to influence or impact the project	Low ability or likelihood to influence or impact the project
High level of interest in the project	<ul style="list-style-type: none"> • MoE • World Bank 	<ul style="list-style-type: none"> • ESDC • Inhabitants of project communities • ECE students in project areas • ECE/primary Teachers • County Administrators • School Administrators 	
Medium level of interest in the project	MFDP USAID LEG	<ul style="list-style-type: none"> • Local CSOs • Local media • District Administrators • Township Administrators 	<ul style="list-style-type: none"> • Local CBOs • Local businesses
Low level of interest in the project		<ul style="list-style-type: none"> • EPA • MoL • LLA 	

3. Planned Stakeholder Engagement Program

This initial Stakeholder Engagement Plan (SEP) would be disclosed prior to LLFP appraisal. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. It will be updated periodically as necessary and will be linked and implemented in coordination with the LLFP's ESMF, RPF, RAP(s) consultations and with subprojects identification exercises in the 18 likely impact locations.

As the SEP becomes more fully developed, it will describe the ways in which the LLFP team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about any activity related to the project. The SEP will support LLFP's activities related to communication, mobilization, and community engagement campaigns to raise public awareness and knowledge in advancing the Ministry's plan on prevention and control of COVID-19 in the targeted 18 ECE communities and contribute to strengthening the capacities of the 18 community structures in promoting coronavirus prevention messages.

The success of this project depends on a good understanding and active participation of each and every stakeholder in the decision-making process such that every concerned stakeholder is adequately informed about and satisfied with the relevant decisions of interest on project activities. The SEP will engage in meaningful consultations on policies, procedures, processes and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable and accessible information. Detailed, hereunder, are various avenues envisaged going forward to be employed in the stakeholder engagement process under the Project.

Sector-level coordination forums/meeting: The Project Coordinator (PC) will provide regular updates on project activities to SMT, ESDC and LEG members both through regular meetings and emails, and would be opened to entertain critical opinions on the design and implementation of the project activities as well as resolutions/consensus reached on the issues raised during these meetings, and make the necessary adjustments in the project activities where necessary.

Community forums/public meetings: To facilitate effective consultation with the communities during planning and implementation of the project, the Project Coordinator (PC) will establish community forums through local community established leaderships to disseminate project information to community members.

Local authorities: Government representatives (Government Representatives on respective District/Town Officers etc.) as a channel to disseminate information on the project.

Information boards/desks: Notice boards will be used as effective mechanisms to inform the communities and wider audiences about the project. These can be installed on specific areas of impact (communities).

Media: Talk show and jingo on national and community radio stations in the project area will be used to notify the general public.

Orientation workshops: to educate project affected parties will be conducted at different phases of the project.

As stakeholder engagement within the project preparation and implementation process is critical for supporting the project's risk management process, particularly the early identification and avoidance/management of potential impacts (negative and positive) and cost effective project design, stakeholder engagement would be an on-going process

throughout the life of the proposed project from planning/design (including disclosure) to construction and dedication/turning over.

Disclosing and consulting on the draft results of the ESIA process would be an integral part of the engagement process. Within the overarching ESIA engagement objectives, the specific objectives for the ESIA phase are to:

- Provide feedback to the stakeholders on the draft impact assessment and associated management/mitigation measures
- Gather stakeholder input on the impact assessment and outlined mitigation and enhancement measures

The disclosure and consultation activities will be designed along with some guiding principles:

- Consultations will be widely publicised particularly among the project affected stakeholders/communities, preferably 2 weeks minimum prior to any meeting engagements.
- Non-technical information summary would be accessible prior to any event to ensure that people are informed of the assessment and conclusions before scheduled meetings.
- Location and timing of meetings would be designed to maximise stakeholder participation and availability.
- Information presented will be clear, and non-technical, and presented in both local language and mannerism.
- Would be facilitated in a way that allow stakeholders to raise their views and concerns.
- Issues raised will be answered, at the meeting or at a later time.
- Targeted stakeholders may comment on the ESIA within the time indicated.

3.1 Previous Stakeholder Engagement Activities

The Project application is prepared by the Technical Working Team (TWT) from the Ministry of Education with closed guidance from the World Bank TTLs. Key education stakeholders including the Senior Management Team of MOE (SMT), Education Sector Development Committee (ESDC), Local Education Group (LEG), Education Officers and MoE's Central Office staff were consulted at every stage of the project application preparation process. The program areas of the project have already been discussed with and endorsed by the SMT, ESDC and LEG as major stakeholders in the Sector. The expansion of subcomponents, new activities and revised targets under the Liberia Learning Foundation Project were developed as AF in consultation with the LEG to increase the development impact of the parent project. Prior to its endorsement by the SMT, ESDC and LEG, education officers and other education stakeholders across the country were briefed about the Project through the Joint Education Sector Review (JESR) 2018 and updated through the JESR 2019. Below is summary of consultation meetings held with stakeholders.

Table 2: Summary of previous stakeholder discussions

Stakeholders	Main issues discussed	Date and Venue
Senior Management Team of the MoE(SMT)	Proposing of program areas for the fixed part of the AF	22/10/2018 Minister's Conference Room
ESDC Meeting	Discussion of ESP priorities selected by SMT as possible intervention areas of the AF	26/10/2018 Conference Room MoE
Local Education Group	Discussion and endorsement of proposed program areas for the fixed part of the AF.	07/11/2018 Alvino Hotel, Gompa City
General Central Office Staff Meeting	Briefing meeting on the endorsed fixed part components of the AF.	16/11/2018 MoE Conference Room
Meeting with EOs of GPE counties	Briefing discussion on the proposed project.	08/02/2019 MoE Conference Room
SMT	Discussion and endorsement of variable part DLIs for the AF.	13/02/2019 Minister's Conference Room
ESDC	Discussion and endorsement of proposed variable part DLIs for the AF.	22/02/2019 MoE Conference Room
LEG	Discussion and endorsement of proposed variable part DLIs for the AF.	12/03/2019 LSA Building, Mamba Point
Education officers	Briefing on the entire project components (fixed and variable part) endorsed.	24/05/2019 MoE Conference Room
SMT	Revision of fixed part components of AF	05/12/2019 Minister's Conference Room
LEG	Presentation and endorsement of revised project components	27/12/2019 Minister's Conference Room
SMT	Discussion and approval of draft DFM	20/01/2020
MFDP	Review and approval of draft DFM	21/01/2020
SMT	Presentation of application package for endorsement	14/02/2020
LEG	Presentation of application package for endorsement	Pending

3.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

Strong citizen and community engagement are preconditions for the effectiveness of the LLFP. Stakeholder engagement under the LLFP will be carried out on two fronts: (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including their concerns, feedback and complaints about the project and any activities related to the project; and to improve the design and implementation of the project, (ii) awareness-raising activities to sensitize the 18 district communities on risks of COVID-19.

In terms of consultations with stakeholders on the subprojects' design, activities and implementation arrangements, etc., the revised SEP is expected to be updated within 30 days after the project effectiveness date, and continuously updated throughout the LLFP implementation period when required. The SEP will clearly lay out:

- Type of Stakeholder to be consulted
- Anticipated Issues and Interests
- Stages of Involvement
- Methods of Involvement
- Proposed Communications Methods
- Information Disclosure
- Responsible authority/institution

With the evolving COVID 19 situations, as the Liberian Government has taken measures to impose strict restrictions on public gatherings, meetings and people's movement, the general public has also become increasingly concerned about the risks of transmission, particularly through social interactions. Hence alternative ways will be adopted to manage consultations and stakeholder engagement in accordance with the local laws, policies and new social norms in effect to mitigate prevention of the virus transmission in the 18 targeted districts.

These alternate approaches that will be practiced for stakeholder engagement will include: having consultations in small groups if smaller meetings are permitted, or else making robust efforts to conduct meetings through online channels (e.g. webex, zoom, skype, etc.); diversifying means of communication and relying more on social media, chat groups, dedicated online platforms & mobile Apps (e.g. Facebook, Twitter, WhatsApp groups, project weblinks/websites etc.); and employing traditional channels of communications such TV, radio, dedicated phone-lines, sms broadcasting, public announcements when stakeholders do not have access to online channels or do not use them frequently.

Under the prevailing COVID 19 circumstance, WB's ESS10 and the relevant national policy or strategy for health communication & WHO's "COVID-19 Strategic Preparedness and Response Plan -- Operational Planning Guidelines to Support Country Preparedness and Response" (2020) will be the basis for the project's stakeholder engagement and for the ESMF, RPF, RAP and subprojects consultations; also with particular attention to Pillar 2 of WHO requirement, on Risk Communication and Community Engagement outlines as stated below:

"It is critical to communicate to the public what is known about COVID-19, what is unknown, what is being done, and actions to be taken on a regular basis. Preparedness and response activities should be conducted in a participatory, community-based way that are informed and continually optimized according to community feedback to detect and respond to concerns, rumours and misinformation. Changes in preparedness and response interventions should be announced and explained ahead of time and be developed based on community perspectives. Responsive, empathic, transparent and consistent messaging in local languages through trusted channels of communication, using community-based networks and key influencers and building capacity of local entities, is essential to establish authority and trust."

3.3 Stakeholder Engagement Plan

The LLFP stakeholder engagement plan will be carried out for: (i) consultations with stakeholders throughout the entire LLFP cycle to inform them about its plan and activities, including capturing their concerns, feedback and complaints and, (ii) awareness-raising activities to sensitize the ECE schools targeted in districts or communities on risks of COVID-19. Table 6 below summarizes the information and consultation techniques to be employed during the proposed project life for SEP implementation.

Table 6: Summary of proposed stakeholder engagement techniques by project activities/phase

Project phase	Targeted stakeholder group	Issue(s) of engagement	Engagement method(s)	Location/frequency	Person(s) responsible
Design and application	Project affected parties: Inhabitants of project communities including ECE students, ECE/primary Teachers, Local business owners, Local labour force etc.	Project intervention areas/planned activities, targeted beneficiaries and rationale; Grievance redress mechanism/process	<ul style="list-style-type: none"> • Public meetings • Trainings/ workshops • Focus group meetings specifically for women and vulnerable • Mass Media Communication – radio Newspapers • Survey of PAPs in affected communities; 	County/district/ townships and local communities of project affected areas; regular monthly meetings; Communication through mass/social media (as needed);	Maximum Country AllocationS/ Technical Working Team (MCA TWT)
	Other interested parties (Internal): MoE including SMT, directors of divisions, PDT and general staff	Project information - scope and rationale Status update	<ul style="list-style-type: none"> • Formal meetings 	SMT weekly meeting room; Ministry conference room	MCA TWT DMP
	Other interested parties (National level): other Government ministries and agencies from which permissions/ clearances are required like MFDP, MoL, EPA, LLA; academic and civil society institutions	Project information – scope and rationale, alignment with PAPD and ESP priorities; Coordination activities; Framework for compliance with national laws on environmental and social protection, labour and land rights; mechanisms for	<ul style="list-style-type: none"> • Formal face-to-face meetings • Information sharing through invitation to public/community meetings, presentation of project documents 	As needed	MCA TWT DMP

		protection of human rights; grievance redress process			
	Other interested parties (Local level): County, district, township and school administrators; local media and CSOs	Project information – scope and rationale, alignment with PAPD and ESP priorities; Coordination activities; Framework for compliance with national and local laws on environmental and social protection, labour and land rights; mechanisms for protection of human rights; grievance redress process	<ul style="list-style-type: none"> • Mass townhall meetings; • Face-to-face consultative meetings with local authorities 	As needed	TWT Bank TTLs
	Other interested parties (DPs & NGOs): World Bank, GPE, USAID, UNICEF, WFP Save the Children, OSIWA, LEG, ESDC	Project information – scope and rationale, alignment with PAPD and ESP priorities; Coordination activities; Framework for compliance with international laws on	<ul style="list-style-type: none"> • Correspondences (emails, text messages, phone calls etc.) • Formal sector coordination forums (JESR, ESDC, LEG etc.) • Field visit 	As needed	MCA TWT

		environmental and social protection, labour and land rights issues; mechanisms for protection of human rights; grievance redress process			
	Vulnerable individuals and groups: School age children and working age adults with disabilities in project communities, HIV/AIDS individuals in project communities, Inclusive education advocacy groups, Vulnerable women and girls in project communities	Concerns of inclusion of facilities for people with special needs; Discrimination issues; Grievance mechanism process; Health and safety concerns; Employment opportunities; Environmental concerns; SGBV concerns	<ul style="list-style-type: none"> • Presentation of project information through public meetings; • Focused group discussions 	In project affected communities during project appraisal and as needed	MCW TWT

Implementation	<p>Project affected parties: Inhabitants of project communities including ECE students, ECE/primary Teachers, Local business owners, Local labour force etc.</p>	<ul style="list-style-type: none"> • Selection criteria for targeted beneficiaries; • Employment opportunities; • Procurement opportunities; • Grievance redress mechanism; • Occupational health and safety issues; • Contract management issues; • Involvement of community volunteers; • Implementation status reports 	<ul style="list-style-type: none"> • Project lunch meeting; • trainings/workshops; • Information desks with brochures/posters; • Regular update meetings; • Public consultation meetings; • Individual outreach to PAPs; • Mass/Social Media Communication 	<ul style="list-style-type: none"> • Designated conference hall in one of project counties (at most a month after project effectiveness); • In project affected communities (continuous); • At designated locations in project affected communities; • At county or district HQs of project affected communities (quarterly and/or as needed) • In project communities as needed • Continuous 	PDT
	<p>Other interested parties (Internal): MoE including SMT, directors of divisions, PDT and general staff</p>	<ul style="list-style-type: none"> • Implementation status; • Oversight/monitoring /supervision issues; • Line of authority issues; • Bureaus/divisions involvement issues • Compensation of MoE internal staff 	<ul style="list-style-type: none"> • Correspondence (emails, phone calls, text messages, memos, etc.) • One-on-one meetings • Formal meetings • Trainings/workshops • Field visits 	<ul style="list-style-type: none"> • Among staff (as needed) • MoE offices (as needed) • Ministry conference room • Designated halls as needed • To project sites as needed 	<ul style="list-style-type: none"> • PDT • Director of DPE • Director of ALP

		involve in project implementation			
	<p>Other interested parties (National level): other Government ministries and agencies from which permissions/ clearances are required like MFDP, MoL, EPA, LLA; academic and civil society institutions</p>	<ul style="list-style-type: none"> • Implementation status; • Coordination issues; • Compliance with established frameworks for adherence to national and international laws on environmental and social protection, labour and land rights, protection of human rights and grievance redress process 	<ul style="list-style-type: none"> • Correspondence Formal meetings • Workshops 	<ul style="list-style-type: none"> • Emails as needed • MoE conference room (quarterly) • In designated locations as needed 	<p>PDT</p> <p>DMP</p>
Implementation	<p>Other interested parties (Local level): County, district, township and school administrators</p>	<ul style="list-style-type: none"> • Coordination issues; • Compliance with national and local laws on environmental and social protection, labour and land rights, protection of human rights and grievance redress process 	<ul style="list-style-type: none"> • Public meetings • One-on-one meetings • Workshops • Information desks with brochures/posters • local media talk shows/news daily 	<ul style="list-style-type: none"> • Local communities of project areas (quarterly and/or as needed) • Offices of local authorities (as needed) • Designated halls in project area (as needed) • At project sites • In project communities as needed 	<ul style="list-style-type: none"> • PDT • Directors of relevant divisions • Project contractors

Implementation	<p>Other interested parties (DPs & NGOs): World Bank, GPE, USAID, UNICEF, WFP</p> <p>Save the Children, OSIWA, LEG, ESDC</p>	<ul style="list-style-type: none"> • Implementation status • Coordination issues • Compliance issues 	<ul style="list-style-type: none"> • Correspondences (emails, text messages, phone calls etc.); • Formal sector coordination forums (JESR, ESDC, LEG etc.) • Field visit • Implementation status/performance reports 	<ul style="list-style-type: none"> • Emails, whatsapp, phone calls as needed • At designated venues (Monthly/annually) • To project areas as needed • Distributed quarterly reports 	<ul style="list-style-type: none"> • PDT • DMP • Donor Coordinator
	<p>Vulnerable individuals and groups: School age children and working age adults with disabilities in project communities, HIV/AIDS individuals in project communities, Inclusive education advocacy groups, Vulnerable women and girls in project communities</p>	<ul style="list-style-type: none"> • Concerns of inclusion of facilities for people with special needs; • Discrimination issues; • Grievance mechanism process; • Health and safety concerns; • Employment opportunities; • Environmental concerns; • SGBV concerns 	<ul style="list-style-type: none"> • Public meetings • Separate meetings specifically for women and vulnerable individuals and groups; 	In project communities (as needed)	PDT
Post-Project Implementation	<p>Project affected parties: Inhabitants of project communities including ECE students, ECE/primary Teachers, Local business owners,</p>	<ul style="list-style-type: none"> • Project impact concerns 	<ul style="list-style-type: none"> • Impact evaluation survey • Feedback report on project impact 	Project communities once after completion of project	<ul style="list-style-type: none"> • PDT • DMP • Divisional directors • (DPE, ALP,

	Local labour force etc.				ECE, M&E)
	Other interested parties (Internal): MoE including SMT, directors of divisions, PDT and general staff	Project performance	<ul style="list-style-type: none"> Formal meetings Correspondence 	<ul style="list-style-type: none"> MoE conference room (once) Emails as needed 	<ul style="list-style-type: none"> PDT DMP
	Other interested parties (National level): other Government ministries and agencies from which permissions/ clearances are required like MFDP, MoL, EPA, LLA; academic and civil society institutions	Project report	<ul style="list-style-type: none"> Formal end of project meeting Project report on website 	At designated venue (end of project)	<ul style="list-style-type: none"> PDT DMP
	Other interested parties (Local level): County, district, township and school administrators	Project impact	Dissemination of project impact evaluation report	County/district of project area (once at end of project)	<ul style="list-style-type: none"> PDT M&E Specialist
	Other interested parties (DPs & NGOs): World Bank, GPE, USAID, UNICEF, WFP Save the Children, OSIWA, LEG, ESDC	<ul style="list-style-type: none"> Project performance report Lessons report 	<ul style="list-style-type: none"> Formal meetings Emails 	End of project	<ul style="list-style-type: none"> PDT DMP
	Vulnerable individuals and groups: School age children and working age adults with disabilities in project	Project impact on special needs	Disclosure of End of project report	Local media in project area	PDT

	communities, HIV/AIDS individuals in project communities, Inclusive education advocacy groups, Vulnerable women and girls in project communities				
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This Stakeholder Engagement Plan, the Environmental and Social Management Framework (ESMF), the Environmental and Social Management Plans (ESMPs), the Resettlement Action Plan(s) (RAPs) and subprojects identifications that will be prepared under the project will also be consulted and disclosed. The Project shall be required to include adequate resources to implement the above-mentioned activities and actions. The details of this will be prepared during the update of this SEP, expected to be updated within 30 days after the project effectiveness date, and continuously updated throughout the project implementation period when required.

3.4. Proposed strategy for information disclosure

The SEP will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups under the project will have the chance to participate and benefit from LLFP activities. This will include among others, household-outreach through SMS, telephone calls, etc., depending on the social distancing requirements, in the major Liberian local languages (X, X, and X), the use of verbal communication, audiovisuals or pictures instead of text, etc.

Stakeholders will be kept informed as the LLFP develops, including reporting on LLFP's environmental and social performance and implementation of the Stakeholder Engagement Plan and the grievance mechanism..

3.5. Proposed strategy to incorporate the views of vulnerable groups

The LLFP will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, schools, classrooms, latrines, WASH facilities and services and other challenges they face at the targeted schools.

4. Resources and Responsibilities for Implementing SEP

54.1 Responsibilities and resources for implementing SEP

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members of the MoE within the DPE, PDT and the local contractors. The roles and responsibilities of each group are presented below.

The M&E Specialists of the PDT will work along with the Director of Physical Environment of the MoE to monitor construction works through 18 project site supervisors, and consolidate reports to be submitted to the World Bank.

MoE will also have a social performance team under the management of the PC. The key tasks are inter alia to:

- Approve the content of the draft SEP (and any further revisions);
- Approve prior to release, all materials used to provide information associated with the Project ESIA (such as introductory letters, question and answer sheets, PowerPoint materials, posters, leaflets and brochures explaining the Project and ESIA process);
- Approve and facilitate all stakeholder engagement events and disclosure of material to support stakeholder engagement events;
- Participate either themselves, or identify a suitable MoE representative, during all face-to-face stakeholder meetings;
- Review and sign-off minutes of all engagement events; and
- Maintain the stakeholder database.

See proposed budget below.

Table 7: Estimated budget to implement SEP

<i>Engagement Technique</i>	<i>Unit Cost Estimate (in USD)</i>	<i>Frequency/Quantity</i>	<i>Amount (in USD)</i>
Correspondences (Phone, e-mail, etc)	2,600	Lumpsum	2,600
Meetings	100	50 meetings	5,000
Workshops	4,000	5 workshops	20,000
Field visits	3,500	3 visits	10,500
Information Boards	160	18 boards	2,880
Radio Announcement	3,020	Lumpsum	3,020
GRM Implementation	6,000	Lumpsum	6,000
Total	19,380		50,000

5 Grievance Mechanism

The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. The grievance mechanism described in this section is distinct from the grievance mechanism to be used by the Project's workforce.

This grievance mechanism will ensure that complaints and grievances are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. It does not deal with 'concerns' which are defined as questions, requests for information, or perceptions not necessarily related to a specific impact or incident caused by a project activity. If not addressed to the satisfaction of the person or group raising the concern, then a concern may become a complaint. Concerns are not registered as a grievance but will be managed via the MoE external communications plan.

5.1 Definitions and grievance procedure

Key definitions are as follows:

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

Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to MoE operations (through

stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

The grievance mechanism described in this section includes both complaints and grievances (hereinafter referred to only as 'grievances').

Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The grievance mechanism should be appropriate to the scale of impacts and risks presented by the project and beneficial for both a proponent/operator and external stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

This grievance mechanism in this SEP sets out the following steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities/stakeholders, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and
- Unacceptable behaviour by staff or employees.

It is critical that stakeholders understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism.

As per the RPF developed for the project, the Grievance Redress Mechanism will be administered, as far as possible, at the community, district and national levels as follows:

Community level

The Chief, Youth Leader, Women's Leader, Chairman of the PTA (where applicable), Community Leader and an NGO known in the community will constitute the committee.

District level

The Planning Officer, District Education officer (DEO) Civil Society representative, District Security official will constitute the committee. Overall responsibility is on the CEO

National level

The Ministry of Education, Environmental Protection Agency (EPA), Liberia Land Authority, Ministry of Internal Affairs.

Once constituted, each committee shall appoint/designate a registrar to handle the processing of complaints as detailed below. The Project Delivery Team will have overall responsibility for coordination.

5.2 Grievance redress process

A grievance redress mechanism (GRM) is presented below to uphold the project's social and environmental safeguards performance. The purpose of the GRM is to record and address

any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected parties (PAPs). The GRM is expected to work within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the project level.

The key objectives of the GRM are:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise project level and the judiciary level redress mechanisms. The details of each of those components are described as follows.

Resolution of grievances at the project level would embody the steps below.

5.2.1 Community-level redress: Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes between individuals/family members but which might result from the project implementation in the area, may be resolved using these mechanisms. Grievances may be submitted to any member of the community level representatives which will be recorded/filed and discussed at an agreed date for possible resolution within 7 days upon receipt of such complaints. The community representatives will meet at the community level- to discuss and address issues and complainant informed of outcome of resolution.

5.2.2 District-level redress: If complaint is not resolved at the community level, then it is elevated to the level of the district. The DEO receives and convenes a meeting with all representatives to address complaint or resolve the issue in consultation with the CEO. At this level, it is recommended that a representative of an NGO/CBO working in the community and in good standing should be invited as an independent witness. Maximum time for resolution should not exceed 14 days.

5.2.3 National/Ministry level redress: If issue is not resolved at the district level, then DEO informs CEO who will inform the MoE. The MoE will convene the national committee for a final resolution which could take any time between 1-3 months.

The grievance redress process will follow the following steps:

Step one: Aggrieved party files complain to the grievance officer

Step two: Grievance officer forwards complain to the Grievance Committee

Step three: Grievance Committee acknowledges the complaint through its secretary

Step four: Grievance Committee assesses complain and categorize it

Step four: Grievance Committee takes action based on category of complaint

Step five: Grievance Committee notifies the parties concern about the outcome of the complaint filed via the secretary

Step six: The Complainant response to the outcome of the redress

Step seven: Grievance officer provides report to stakeholders on statistics of complaints received and outcomes.

Figure 2: Grievance redress mechanism process



5.2.4 Judiciary level grievance redress: The project level process will not impede affected persons' access to the legal system. At any time, the complainant may not be satisfied with the resolution at the Community, District and National/Ministry level, the aggrieved party may take the matter to the appropriate legal or judicial authority as per the Liberian laws.

Notwithstanding the aforesaid, the option of using existing community mechanisms for resolving and reporting project related grievance would be highly explored as viable grievance redress approach. Where issues caused by the project are raised and resolved through these existing community level grievance redress mechanisms, a mechanism for reporting them to the MoE would be established. Hence, the MoE will records all complaints/outcomes.

6. Monitoring and Reporting

Monitoring and evaluation of the stakeholder engagement process is considered vital to ensure that MoE and its Project Delivery Team are able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following proposed characteristics/commitments/activities will help in achieving successful engagement:

- Sufficient resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in MINEDUC shown by all stakeholders;
- Clearly defined approaches; and

- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken.

Two distinct but related monitoring activities in terms of timing will be implemented.

- **During the engagement activities:** short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- **Following completion of all engagement activities:** review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

9.1 Key performance indicators

- Updates/redesign on project components and activities
- Level of understanding of the project by different stakeholders
- Number of grievance files
- Attendance to the consultation sessions