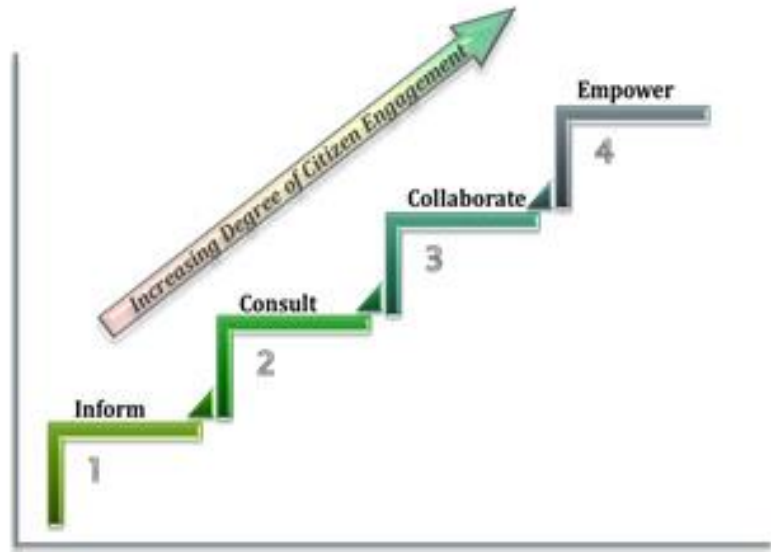**BORNO STATE GOVERNMENT**

Modernizing Financial and Data Management Systems in Borno State (P178727)

STAKEHOLDER ENGAGEMENT PLAN

Draft Version
June 2022

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

LIST OF ACRONYMS AND ABBREVIATIONS

BOACSDHR   Borno State Agency for the Coordination of Sustainable Development and Humanitarian Service

C-ESRS   Concept Environmental and Social Risk Summary

COVID-19   Corona Virus Disease 2019

CSOs   Civil Society Organizations

CT   Complementarity Tracker

DB   Data Base

ES   Executive Summary

ESF   Environmental and Social Framework

ESS   Environmental and Social Standards

FCDO   Foreign and Commonwealth Development Office

FCV   Fragility, Conflict and Violence

FGD   Focus Group Discussions

FPIC   Free, Prior and Informed Consent

GRM   Grievance Redress Mechanism

ICT   Information and Communication Technology

IPF   Investment Project Financing

LFN   Laws of the Federation of Nigeria

LGA   Local Government Area

M&E   Monitoring and Evaluation

MCRP   Multi-Sector Crisis Recovery Project

MDAs   Ministries, Departments and Agencies

MFDMP   Modernising Financial and Data Management Project

NCDC   Nigeria Centre for Disease Control

NEDC   North East Development Commission

NGO   Non-Governmental Organisation

PC   Project Coordinator

PDO   Project Development Objective

PFM   Public Financial Management

PID   Project Identification Document

PIU   Project Implementation Unit

PLO	Public Liaison Officer
SDC	State Data Center
SFMIS	State Financial Management Information System
SFTAS	State Fiscal Transparency, Accountability and Sustainability Program for Results
SSC	State Steering Committee
WBG	World Bank Group

EXECUTIVE SUMMARY

ES1   Background

Borno State is part of the North-East geo-political region of Nigeria and has been the epicentre of the Boko Haram insurgency. The state has suffered extensive infrastructural destruction, loss of life and population displacement. The state government's weak capacity has been exacerbated by the insurgency and continuing insecurity which has left most of the state in a governance vacuum. A significant percentage of the State territory is currently conflict-affected, with Maiduguri, the state capital, currently providing a relative safe-haven.

The process of recovery will require very strong institutional arrangements, particularly in the areas of public financial management and planning. Institutions for public financial management, economic planning and coordination of reconstruction and recovery initiatives have been severely weakened and the state needs support for their restoration. Though Borno State participated in the State Fiscal Transparency, Accountability and Sustainability Program for Results (SFTAS), the majority of government processes anchoring public finance management have remained manual, inefficient and difficult to ensure accountability. This includes core processes related to budgeting (planning, preparation, consolidation, review and approval, execution, and monitoring), funds disbursement, processing of salaries and pensions, cash planning, final accounts and statutory financial reporting. Consequently, automation of these processes and the strengthening of the Public Finance Management (PFM) legal framework to institutionalize same and bring them up to speed with national and international benchmarks are essential. A newly established agency for Sustainable Development, Partnerships and Humanitarian Support, responsible for coordination of all development Partnerships also requires support for building its capacity.

The Modernising Financial and Data Management Project (MFDMP), which will be recipient executed, provides an additional support window to Borno State. While the interventions under the MFDMP will focus mostly on the acquisition of critical Information and Communication Technology (ICT) assets with associated capacity building, these will complement the broader interventions that are currently ongoing under a sister World Bank Executed Trust Fund. The latter includes technical assistance, capacity building and training in various areas of PFM, Monitoring and Evaluation and Donor Coordination. MFDMP will also complement and help scale up ongoing MCRP financed interventions on development financing and coordination.

The Project Development Objectives are to:
  i.   Improve public financial management in Borno State through the implementation of a State Financial Management Information System (SFMIS), and
  ii.   Improve data management in the State through the operationalization of a State Data Dashboard.

The Stakeholder Engagement Plan Addresses Stakeholder engagement needs of MFDMP. The objectives of the Stakeholder Engagement Plan are:

- To establish a systematic approach to stakeholder engagement that will help Borno State Government (BOSG) identify stakeholders and build and maintain a constructive relationship with project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.

- To promote and provide means for effective and inclusive engagement with program-affected parties throughout the program life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide program-affected parties with accessible and inclusive means to raise issues and grievances and allow Ministry of Finance, Budget, and Economic Planning to respond to and manage such grievances.

ES2 Project Description
The project will finance activities under three components which are described below.

Component 1: SFMIS Implementation ($2.5million): This component will support the procurement, installation, and implementation of the technology (hardware and software) to support budget execution, accounting and financial reporting in the State.

Component 2: Operationalization of the State Data Center ($0.65 million): Following the Boko Haram crisis, numerous recovery initiatives from government and development agencies have supported rehabilitation and reconstruction of critical infrastructure and restoration of livelihoods. Coordination and management of these interventions has remained challenging creating gaps in planning with poor accountability to the citizens and donors.

Component 3: Project Implementation Support ($0.35 million): This component will provide support to oversee and administer the implementation of the project. To this end, the project will finance operating costs, goods, consulting and non-consulting services to support the coordination of the administrative, financial management and procurement aspects of the Project.

ES4 Applicable Laws and Polices for SEP

Applicable *National Legal Provisions* and Regulations for Environmental and Social Safeguards and Citizen Engagement include; Constitution of the Federal Republic of Nigeria (1999) as amended, The Freedom of Information Act (2011), Nigerian Environmental Impact Assessment (EIA) Act Cap E12, LFN 2004, The Nigerian Urban and Regional Planning Act, Cap N138, 2004.

- **Constitution of the Federal Republic of Nigeria:** Chapter two of the Nigerian constitution takes socioeconomic rights of Nigerians into account. This chapter includes that no citizen should be denied defined socioeconomic rights.
- **The Freedom of Information Act:** The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information
- **Nigerian Environmental Impact Assessment (EIA) Act:** The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project.

Applicable Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs) 1, 2 and 10.

ES5 Stakeholder Identification and Categorization for SEP
The level of success and sustainability of the MFDMP is crucial and dependent upon proper **Stakeholder Engagement** and its associated activities taking place.

For the purposes of effective and tailored engagement, the stakeholders of MFDMP can be divided into two core categories:

1. Affected Parties (Government PFM Agencies, Humanitarian Agencies, NGOs and INGOs)

2. Interested Parties (Civil Society, Advocacy Groups, Activists, Traditional Local Governance institutions)

ES6   Engagement Methods, Tools and Responsibility

In keeping with the applicable reference framework and the expectations of the stakeholders, the project will undertake regular engagement with the key stakeholder groups identified; through the life of the project utilizing various engagement methods identified for the purpose of this project such as; Focus Group Discussions, Semi-structured and Structured Interviews and Questionnaires, Open Public Meetings, Information Disclosure.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the MFDMP PCU.

ES7   Grievance Redress Mechanism

In compliance with the World Bank's ESS 10, a project-specific mechanism is being set up to handle complaints and issues. This process (referred to as the Grievance Redress Mechanism) would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints, and grievances. The GRM will be accessible and understandable for all stakeholders in the project and for the entire project life.

ES8   Monitoring & Evaluation

Monitoring and evaluation of the stakeholder process is considered vital to ensure the MFDMP can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective.

1.1   Background Information

Borno State is part of the North-East geo-political region of Nigeria and has been the epicentre of the Boko Haram insurgency. The state has suffered extensive infrastructural destruction, loss of life and population displacement. The state government's weak capacity has been exacerbated by the insurgency and continuing insecurity which has left most of the state in a governance vacuum. Most of the State territory is currently conflict-affected, with Maiduguri, the state capital, currently providing a relative safe-haven.

The North-East geo-political zone of the country has remained in conflict started by the Boko Haram insurgency. In support of the Nigerian government's initiatives for restoring peace and livelihood in the region, the World Bank, specifically developed a Multi-Sector Crisis Recovery Project (MCRP), covering Borno, Adamawa and Yobe (BAY) States, in addition to scaling up six existing programs/projects in these States. The MCRP initially focused on strengthening peacebuilding, rebuilding social cohesion, infrastructure rehabilitation and service delivery restoration. The project was scaled up in 2021 to include the transitional stabilization needs of territories in continued or escalated crisis, as well as promoting the sustained recovery of territories that have come out of crisis. MCRP's project activities in Borno, as well as the activities of other partners in the region also gave rise to the need for an enhanced system for coordination of the various interventions by the state government.

For Borno State, the process of recovery will require very strong institutional arrangements, particularly in the areas of public financial management and planning. Institutions for public financial management, economic planning and coordination of reconstruction and recovery initiatives have been severely weakened and the state needs support for their restoration. Though, Borno State participated in the State Fiscal Transparency, Accountability and Sustainability Program for Results (SFTAS), the majority of government processes anchoring public finance management have remained manual, inefficient and difficult to ensure accountability. This includes core processes related to budgeting (planning, preparation, consolidation, review and approval, execution, and monitoring), funds disbursement, processing of salaries and pensions, cash planning, final accounts and statutory financial reporting. Consequently, automation of these processes and the strengthening of the PFM legal framework to institutionalize same and bring them up to speed with national and international benchmarks are essential. A newly established agency for Sustainable Development, Partnerships and Humanitarian Support, responsible for coordination of all development Partnerships also requires support for building its capacity.

The MFDMP, which will be recipient executed, provides an additional support window to Borno State. While the interventions under the MFDMP will focus mostly on the acquisition of critical ICT assets with associated capacity building, these will complement the broader interventions that are currently ongoing under a sister World Bank Executed Trust Fund. The latter includes technical assistance, capacity building and training in various areas of PFM, Monitoring and Evaluation and Donor Coordination. MFDMP will also complement and help scale up ongoing MCRP financed interventions on development financing and coordination.

The Stakeholder Engagement Plan (SEP) describes the methods of engagement with stakeholders throughout the lifecycle of the program. It identifies information and types of interaction to be

conducted in each phase of the program, considers and addresses stakeholders' communication and physical accessibility challenges, and includes any other stakeholder engagement required.

Stakeholder engagement will involve the following steps:
- stakeholder identification and analysis.
- proper documentation of all stakeholders' plans on how the engagement with stakeholders will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances, and
- reporting to stakeholders.

1.2   Purpose of the Project

The higher-level objective of this project is to contribute towards the more efficient use of public resources for public service delivery in the Borno State. Strengthened capacity of the government to manage public financial resources will be the main objective of the proposed project. This will make use of the IFMIS for more efficient monitoring of the status of the budget execution and spending levels.

The Project Development Objectives are to:
iii.   Improve public financial management in Borno State through the implementation of a State Financial Management Information System (SFMIS),
iv.   Improve data management in the State through the operationalization of a State Data Dashboard.

1.3   Objectives of the Stakeholder Engagement Plan

While the Environmental and Social (E&S) Risks of the project are generally low, a SEP will still be required to guide engagements with stakeholders around potential issues. The potential E&S issues are (i) e-Waste (ii) Occupational & Health Issues (iii) Labour (iv) Sexual Exploitation & Abuse and Sexual Harassment; and (v) Exclusion from new PFM practices arising from initiatives financed by the project.

To address this potential risk of exclusion of non-state actors and citizens arising from Public Financial Management (PFM) initiatives to be financed by the project, a system/mechanism to ensure citizen's involvement / engagement and active involvement of these stakeholders in the project will be necessary. The project will also set up a mechanism for presenting government financial information / reports of spending to the public and other stakeholders including Civil Society Organizations. To further promote understanding of social accountability and build trust in government systems, the project will also support the establishment of a grievance redress mechanism which will be incorporated into the Stakeholder Engagement Plan (SEP).

The SEP will include aspects of COVID-19 constraints and the related requirements to comply with the guidelines provided by the World Bank and the Nigeria Centre for Disease Control (NCDC).

The objectives of the Stakeholder Engagement Plan are:

- To establish a systematic approach to stakeholder engagement that will help the Federal Ministry of Finance, Budget and National Planning identify stakeholders and build and maintain a constructive relationship with project-affected parties.
- To assess the level of stakeholder interest and support for the program and to enable stakeholders' views to be considered in project design and environmental and social performance.

- To promote and provide means for effective and inclusive engagement with program-affected parties throughout the program life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow State Ministry of Finance, Budget, and Economic Planning to respond to and manage such grievances.

1.4   Project Description

The project will finance activities under three components which are described below.

Component 1: SFMIS Implementation ($2.5 million): This component will support the procurement, installation, and implementation of the technology (hardware and software) to support budget execution, accounting and financial reporting in the State.

The support shall cover inter alia:

i. The preparation of terms of reference, acceptable to the Bank, and the provision of technical support for the bidding process and the acquisition of the hardware and software for the SFMIS;

ii. The provision of technical assistance for the implementation of the selected Software Application;

iii. The provision of training to civil servants on the Software Application; and

iv. The documentation of the technical information for the implementation process of the New Software Application.

This component will aim to implement a small to medium range system, using technology that is simple, user friendly and with appropriate configuration. The project will encourage the State to adopt a phased approach, with priority being given to the critical core modules like general ledger, accounts receivable, accounts payable and reporting tools. Placing priority on the core modules, it is expected that the State will in the shortest possible time put in place a system that would assure better management, reporting and monitoring of public finance in the State.

The component will also cover the acquisition of ICT equipment for all the stakeholder Ministries, Departments and Agencies (MDAs), following an assessment of their needs. Presently, most government processes anchoring public finance management—such as budgeting (execution, and monitoring), funds disbursement, processing of salaries and pensions, cash planning, final accounts and statutory financial reporting to mention just a few—have remained manual and inefficient. As part of efforts to modernize public financial management practices, Borno State Government is committed to automating some of the processes and key departments responsible for PFM. With the successful implementation and rollout of the State Financial Management Information System (SFMIS) at the office of the State Accountant General, it will become expedient to also automate the basic business processes in some key MDAs that play complementary roles to the central treasury. These include the Ministries responsible for Finance and Budget, Board of Internal Revenue, the Office of the State Auditor General and the Bureau of Public Procurement. It is expected that improving the capacity at these MDAs, including the provision of the required equipment and training on their utilization, will enhance their capacities to contribute to improving service delivery, strengthening transparency and accountability, eliminating discretionary tendencies in expenditure control analogous with manual accounting environment.

Component 2: Operationalization of the State Data Center ($0.65 million): Following the Boko Haram crisis, numerous recovery initiatives from government and development agencies have

supported rehabilitation and reconstruction of critical infrastructure and restoration of livelihoods. Coordination and management of these interventions has remained challenging creating gaps in planning, poor accountability to the citizens and donors.

This component seeks to assist the Borno State Government, particularly the Borno State Agency for the Coordination of Sustainable Development and Humanitarian Service (BOACSDHR), in establishing a State Data Center (SDC) that collects, analyzes, and connect longitudinal data on development initiatives, including government capital investments. Supporting the operationalization of the SDC includes the setup of hardware and software components. With respect to the latter, this component aims to support the creation of a Data Base (DB) and a Complementarity Tracker (CT). The DB will provide a data warehouse while the CT will extract, compile, transform and link data proving useful analysis for decision-making. The DB will acquire, process, store, and disseminate data from various sources across the State, including the financial management information system (IFMIS), geo-spatial distribution satellite mapping, statistical surveys, Monitoring and Evaluation, and the data generated or required by the ongoing Recovery and Reconstruction initiatives.

The CT will provide a collaborative and dynamic approach to decision making within the FCV context through an intelligent system that looks across projects (by government, World Bank, and other development partners in the HDP nexus) and interrelates them for improved effectiveness and efficiency of project selection, prioritization of thematic approaches, and complementarity of initiatives. Information from this system or tool will serve as decision support for humanitarian and developmental activities and will work collaboratively with other available tools (like the NEDC Security predictive tool) to provide incremental value for all stakeholders. The CT will be connected to an interface with different levels of access to information. With the DB and the CT, the BDC aims at supporting and tracking he of implementation of the State's development plan. Furthermore, The SDC will provide data to- collect information from the Borno State Government Delivery Support Unit, supported by the UK's Foreign Commonwealth Development Office (FCDO). Some of the activities envisaged under this component include the establishment of a modern and appropriately equipped digital, state-of-the-art, high-availability, and cloud-capable data processing and data warehousing facility. The facility will acquire, process, store, and disseminate data from various sources across the State, including the financial management information system (IFMIS), geo-spatial distribution satellite mapping, statistical surveys, Monitoring and Evaluation, and the data generated or required by the ongoing Recovery and Reconstruction initiatives.

It is expected that the analysis provided by the SDC will contribute to improved planning of interventions and evidence-based decision making, not only of the Government of Borno, but also of development partners and other actors engaged in supporting the State at this critical time. The CT will take advantage of systems-based approaches and tools to assist implementers and donors design programs that integrate a long-term vision for change into short-term support activities that build resilience across social, economic, and environmental systems. Fundamentally, systemic change will require a significant shift of mindset from phased thinking and "relief to development continuums" to ways of working that recognize the complexity and interconnected nature of risks and adapt quickly to the changes in the context.

Component 3: Project Implementation Support ($0.35million): This component will provide support to oversee and administer the implementation of the project. To this end, the project will finance operating costs, goods, consulting and non-consulting services to support the coordination of the administrative, financial management and procurement aspects of the Project.

1.5   Implementation Arrangements

Responsibility for the implementation of the project in Borno State will be at two broad levels as follows:

State Steering Committee (SSC): The State will establish a SSC as the highest decision making body for the project in the State, chaired by the Governor or his/her representative. The SCC will not be involved in the day-to-day management of the project but will provide a more strategic and policy guidance to the State project team.

Project Management: The Project will be managed by the Project Coordination Unit for the MCRP. Project implementation will be managed, on a day-to-day basis by a full-time focal officer, who will report to the Project Coordinator (PC) for the MCRP, who will have overall responsibility for the implementation of the project.

The main functions of the PCU shall include but are not limited to:

i. Provision of support services on activities such as procurement, contract management, M&E and safeguards, in line with the rules and procedures agreed with the Bank;
ii. Reporting to and act as the secretariat for the SSC;
iii. Preparation of annual work plans, budgets, procurement plans, etc., and present these to the SSC for review and approval
iv. Management of project records and documents necessary for sound project management, transparency and accountability.
v. Monitoring the implementation of the project and prepare progress reports

The Project Coordinator (PC) has overall responsibility for ensuring that the above functions and responsibilities are carried out and will be accountable for the performance of the project.

1.6   Summary of Environmental and Social Risks of the Project

The Concept Environmental and Social Risk Summary (C-ESRS) prepared for the project rates the environmental and social risks of the project as Moderate. Specific details of the E&S aspects of the project will guide the coordinated effort on Stakeholder Engagement required for the implementation of project activities.

1.6.1   Environmental Risk Rating

The proposed project has a low environmental risk rating because there will be no civil works on the ground, no construction and therefore no environmental risks. The scope of work is restricted to the installation of new computers (both hardware and software) in pre-existing Government buildings. The installation will normally take place by IT experts and the extent of this installation may require the installation of wires, cables, and electrical sockets. Most of this can be done by a household electrician. Other minor potential environmental risks and impacts related to occupational health and safety risks from the spread of COVID-19 as equipment is being installed or during face-to-face meetings in the course of the project. This risk could be easily mitigated following standard occupational health and safety measures.

Currently, it is not expected that the new equipment will replace existing computer equipment and no e-waste will be generated. If this should change during the course of project preparation, the risk-rating will be re-evaluated to moderate.   The project will need to prepare an e-waste management plan to ensure that the old waste—particularly mercury, lead, and other dangerous components of a computer—are carefully disposed of or stored to avoid extraction methods for hazardous metals that negatively impact the air and waterways.

1.6.2   Social Risk Rating

The proposed social risk classification is "moderate" given that the anticipated risks and impacts are minimal due to the scope of the project. Though the project objective is to improve public financial management and strengthen capacity of government to effectively use the financial management system in the state, <u>there is the potential risk of inability of citizen, stakeholders and other non-state actors</u>

(including CSOs/CBOs) to adequately monitor government spending. Potential labour and project-induced sexual exploitation and abuse/sexual harassment (SEA/SH) risks are expected to be limited.

1.6.3 Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

The SEA/SH Risk Rating was done using the Bank's Human Development SEA/SH Risk Rating tool. This categorized the intervention as Low Risk for SEA/SH. The risk assigned is due to country context and specific information relevant to the intervention. There are existing WB supported projects such as States Fiscal Transparency and Accountability Systems (SFTAS) and Multi-Sectoral Crisis Recovery Project (MCRP) that are implementing GBV action plans which this project can leverage on in the state. The latter is currently undertaking a GBV Mapping of Service Providers in the participating states. The exercise will provide a database of GBV Service Providers. The MCRP has in place a GRM that will be operationalized under this intervention that will also include a GBV referral pathway for SEA/SH complaints.

1.7 Stakeholder Engagement to date and Key Feedback received during Stakeholder Consultations

Feedback from stakeholders have been instrumental in designing and revising the Project Description, indicators, and program operations manuals and appraisal documents via providing data and details on the existing situation, management status and priorities of government.

Initial consultations held with the government and with a large group of stakeholders over a period led to the formulation of the project. The Project design also benefitted from another round of consultation with Civil Society Organisations (CSOs). The outcomes of those consultations are embedded in this Program and influenced its design.

1.8 Principles for effective stakeholder engagement

The project's Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on "International Best Practice" include the following:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process.
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

The program process flow for stakeholder engagement indicated in Figure 1.2 is represented as a circle because it is continuous where lessons from experience will then shape future planning and engagement. The process is not linear; rather it is an iterative process in which the program learns and improves its ability to perform meaningful stakeholder engagement while developing relationships of mutual respect, in place of one-off consultations.

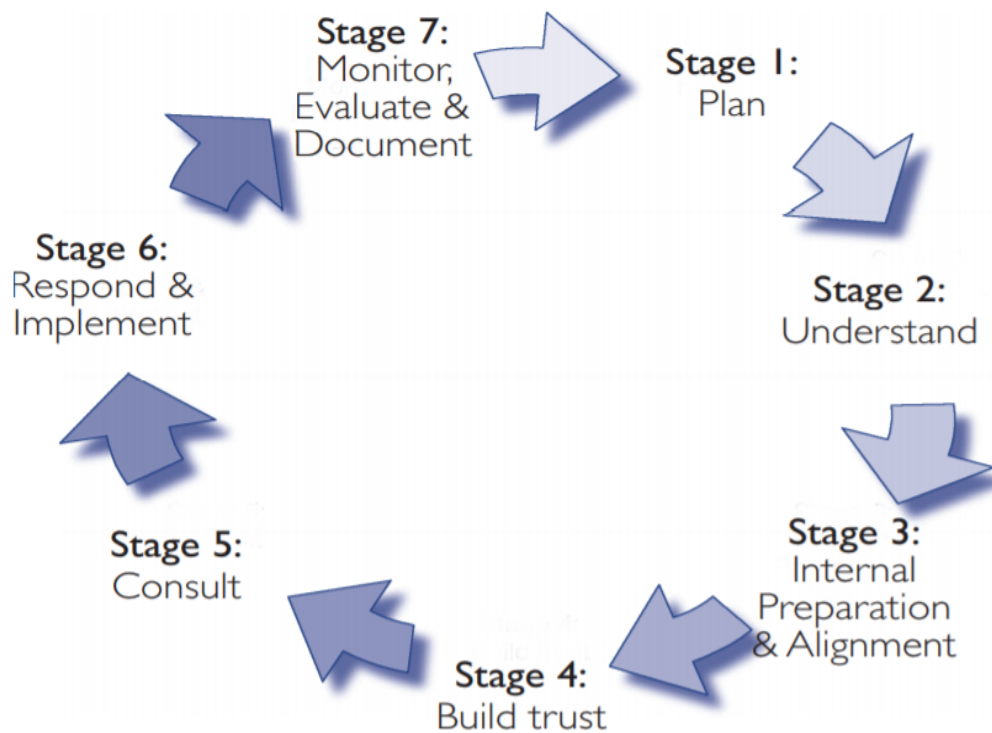Figure 1.1: The Process Flow of Program Stakeholder Engagement

1.8 Structure of Stakeholder Engagement Plan
The structure of the stakeholder engagement plan will be as follows.

- Introduction
- Stakeholder Engagement Regulatory Context
- Stakeholder Identification and analysis
- Stakeholder Engagement Program
- Resources and responsibilities
- Grievance Redress Mechanism
- Monitoring and Reporting

Chapter 2 STAKEHOLDER ENGAGEMENT REGULATORY CONTEXT

This chapter presents a brief overview of the national legal provisions that necessitates citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions.

2.1   Key National Legal Provisions for Environmental and Social Risk Management and Citizen Engagement

2.1.1   The Freedom of Information Act

The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. This Act applies not only to public institutions but also to private organisations providing public services, performing public functions or utilising public funds. According to the Act:

- All stakeholders are entitled to access to any records under the control of the government or public institution
- Any stakeholder denied information can initiate a court proceeding to affect the release of such information
- All public institutions shall make available any records as requested by the stakeholders within a period of 7 days

2.1.2   Constitution of the Federal Republic

Chapter two of the Nigerian constitution takes socioeconomic rights of Nigerians into account. This chapter states that no citizen should be denied the right to environment, the right to secure and adequate means of livelihood, right to suitable and adequate shelter, the right to suitable and adequate food, etc. Section 20 of the constitution also takes into account the use of resources and provides that the environment must be protected and natural resource like water, air, and land, forest and wild life be safeguarded for the benefit of all stakeholders.

2.1.4   Nigerian Environmental Assessment Law

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project.

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and

- frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts;

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will 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 process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank 2017: 98).

- The Borrower will prepare a Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank 2017: 99).

- According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank 2017: 100).

For more details on the WB Environmental and Social Standards, please follow the link below: https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards

2.3   Environment and Social Standards (ESSs) that Apply to Project Activities

2.3.1   ESS1 - Assessment and Management of Environmental and Social Risks and Impacts

The project's potential impacts are mostly positive as the installation of ICT and computers will improve the capacity of the government departments delating with the financial management and will contribute to improving service delivery, strengthen transparency and accountability. The adverse impacts are limited and will include procurement of non-energy-efficient ICT equipment and occupational health and safety risks associated with installation of ICT equipment and electrical cables, and risk of exposure to COVID-19 during installation of the facilities by the workers. E-waste is not envisioned at this stage given that the computers are not replacing pre-existing computers. Should this change, project will need to prepare an e-waste management plan to ensure that the old waste, particularly mercury, lead, and other dangerous components of a computer, are carefully disposed of or stored to avoid extraction methods for hazardous metals that negatively impact the air and waterways.

The management of social risks will be required especially on the proposed Public Financial Management (PFM) reforms, the capacity building activities and support services to oversee and administer the implementation of the project. Potential labour, including child labour and SEA/SH risks are expected to be limited.

2.3.2   ESS2 – Labour and Working Conditions

The project will hire direct workers for the State Project Coordination Unit, primarily supply workers for the procurement of ICT equipment, and contracted workers for the installation of ICT equipment

and training to civil servants on the Software Application. The number of these workers are expected to be few and the potential labour risks are also expected to be limited. ESCP will include a brief on labour management procedures relevant to the project , including grievance mechanism for workers. A simple OHS plan will be prepared to address potential OHS risks associated with the installation of ICT equipment and their routine operation.

2.3.3 ESS10 – Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management and project sustainability. In consultation with the Bank, the client will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts. A draft of the SEP will be prepared and disclosed as early as possible and prior to Appraisal. The client will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. If major changes are made to the SEP, a revised SEP will be publicly disclosed as soon as possible.

Chapter 3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.0 Project Stakeholder identification and Analysis

Project stakeholders are 'people who have a role in the Project, or could be affected by the Project, or who are interested in the Project'. Project stakeholders can further be categorized as primary and secondary stakeholders. Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly, especially those who are directly affected, including those who are disadvantaged or vulnerable. Secondary stakeholders are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them.

Thus, the MFDMP IPF Project stakeholders are defined as individuals, groups or other entities who:

(i)   Have a role in the project implementation (also known as 'implementing agencies');
(ii)   are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
(iii)   May have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

3.1   Project Beneficiary

The main beneficiary of the project is the Borno State government and its selected ministries, departments and agencies, and communities. The project will provide assistance to MDAs that deal with state public finance and coordination of development initiatives. These will include offices and staff of Ministries of Budget and/or Economic Planning, Finance, Due Process/Public Procurement, Board of Internal Revenue, and Borno State Agency for Coordination of Sustainable Development and Humanitarian Response (BOACSDHR), the institution of government responsible for Development partnerships and Humanitarian Support in Borno State.

3.1   Stakeholder Categorization

For the purposes of effective and tailored engagement, the stakeholders of MFDMP can be divided into two core categories:

1. Affected Parties (including Implementing Agencies)
2. Interested Parties

3.1.1 Affected Parties

3.1.1.1   Implementing Agencies

This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the MFDMP program is summarised in the figure below.

- Ministries of Budget and Economic Planning,
- Ministry of Finance
- State Bureau of Public Procurement
- Office of the State Accountant General
- Office of the Auditor General of Borno State
- Borno State Board of Internal Revenue, and

- Borno State Agency for Coordination of Sustainable Development and Humanitarian Response (BOACSDHR)
- Office of the Statistician-General of Borno State
- Borno State Information and Communication Technology Directorate/Bureau
- Project Implementation Unit
- Ministry of Women Affairs
- Ministry of Environment/State Waste Ma Management Agency
- Ministry of Justice
- Public Complaints Commission, Borno State

3.1.1.2 Other Affected Parties

The activities to be financed, under the project, by the implementing agencies will affect various categories of stakeholders with the introduction of new revenue generation options by the government. Stakeholders who will primarily be affected by the newly introduced measures include;

- Citizens and Citizen Groups
- Civil Society Organisations
- Donor Agencies implanting humanitarian services in Borno State

Local NGOs and initiative/advocacy groups as well as traditional institutions, particularly those focusing on governance, public finance and economic rights, represent considerable capacity that the project may tap for disseminating information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established interaction with the local communities, can propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication and possess the facilitation skills that may be utilized as part of the program's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed program to the local communities, including in the remote areas (e.g., by placing information materials about the program in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable [1]status, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program.

3.1.3. Interested Parties

Interested Parties include stakeholders who may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could influence the project and the process of its implementation in some way. Specifically, this category will include the following individuals and groups:

---

[1] Vulnerable status may stem from an individual's or group's ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on other individuals or unique natural resources.

- Local contractors and consultants who can support in the delivery of the Project
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations
- Local Political groups.

Table 3.1 provides an initial profile of the various stakeholders identified within the Result Areas.

Table 3.1: Stakeholder Profiles/ Categorization

Stakeholder Group	Profile of the Stakeholder Group	Relevant Project Component Area
AFFECTED PARTIES		
Revenue Collection Agencies	This are government agencies which are involved in raising the finances for public goods and services in Borno State. They include: 1. Borno State Ministry of Finance, Budget and Economic planning 2. Borno State Internal Revenue Service 3. All revenue generating agencies	This stakeholder group is very important as they contribute to the overall Public Finance Management (PFM) outlook of Borno State.
Public Financial Management Agencies	Financial Management in the Public Sector involves key agencies at state level with their respective mandates. These include; 1. **Ministry of Finance, Budget And Economic Planning:** This is the Ministry responsible for preparing Medium Term Expenditure Frameworks and Annual Budgets. 2. **Office of the Accountant-General:** As part of the PFM arrangements in Borno State, the AG's office manages all accounts, processes payments and does reconciliation of accounts. 3. **Office of the Auditor-General:** The Auditor-General's office is constitutionally empowered to audit all government books and publish audit reports 4. **Borno State Bureau of Public Procurement:**	This stakeholder group will be involved in the implementation of Component 1 activities.
Donor Assistance Data Management Institutions	The project aims to support the strengthening of the capacity of Borno State to manage data from ongoing interventions financed by government and donors. The agencies include: 1. Ministry of Reconstruction, Rehabilitation And Resettlement 2. Borno State Agency for Coordination of Sustainable Development and Humanitarian Response 3. Statistician-General of Borno State 4. Borno State ICT Agency	This stakeholder group will be involved in the implementation of Component 2 activities.

Stakeholder Group	Profile of the Stakeholder Group	Relevant Project Component Area
Civil Society Organisations (CSOs) operating within the program areas	This stakeholder group is comprised of the interested parties made up of civil society industry watchdogs with interest and expertise in the following areas; 1. Public Financial Management 2. Accountability 3. Procurement 4. Good Governance 5. Humanitarian Services 6. Tracking and Monitoring 7. Evaluating 8. Sensitization 9. Advocacy A report from the Borno State Government in June 2020 has it that the government registered 172 organisations, comprising 53 NGOs and INGOs; 109 CSOs and 10 CBOs in Borno[2]. The CSOs in Borno State are organised under the **Network of Civil Society Organisations of Borno State**, which will serve as the entry point to engaging CSOs on MFDMP interventions in Borno State.	Important stakeholder group as influencers of the project in all three components
INTERESTED PARTIES		
Professional Bodies	Professional bodies representing experts in financial management and accounting will also be engaged on the initiative being financed by MFMDMP. Some of the groups to be engaged include; 1. Institute of Chartered Accountants of Nigeria (ICAN) 2. Association of National Accountants of Nigeria (ANAN)	They will be engaged to understand and participate in the processes leading up to the acquisition of FM software, training and operationalisation of the new processes emerging from MFMDMP activities under component 1.
Citizens Groups representing	Some of the groups to be engaged include; 1. National Council of Women Societies	Groups representing the interests of persons who are traditionally excluded from

---

[2] https://www.premiumtimesng.com/regional/nnorth-east/399465-borno-to-monitor-budgets-of-172-registered-ngos-csos-official.html

Stakeholder Group	Profile of the Stakeholder Group	Relevant Project Component Area
traditionally excluded groups	2. National Youth Council of Nigeria 3. *Jamaa Mata Arewa*, Borno State 4. Joint Network of Disabled Persons, Borno State 5. FIDA 6. NBA	development activities would also need to be specially engaged to enhance voice and agency in the context of MFMDMP
Contractor and consultants and other sub-contractors	This stakeholder group comprises of the consultants involved in the provision of goods and services to implementing agencies to deliver activities under the various project components	Important interested parties in the program in Component 1 and 2 activities
Media	This stakeholder group is comprised of the local or state, regional and national press (both print and audio-visual). This stakeholder group can play an extremely important role in the generation of awareness and public opinion towards the Program.	Important interested parties in the program in all project components

Chapter 4 STAKEHOLDER ENGAGEMENT PLAN

4.1   Stakeholder Engagement Plan

The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and meaningful engagement with project-affected parties and other interested parties throughout the project life-cycle on issues that could potentially affect them during implementation of the various activities listed under the Technical Assistant component of the MFDMP.

4.2 Engagement Methods and Tools

The MFDMP will utilize various methods of engagement through the implementing agencies as part of their continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with Government officials may be different from a format of liaising with the local communities (e.g., focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The format of every engagement activity will meet general requirements on accessibility, i.e.. should be held at venues that are easily reachable and do not require a long commute, entrance fee or preliminary access authorization, cultural appropriateness, and inclusivity. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. The vulnerable groups identified by the program in both rural and urban population include, elderly people, persons living with disabilities, women, and disadvantaged youth. Particular attention will be given to the vulnerable groups to ensure that they are not denied program benefits. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at least 30% of participant beneficiaries across the result areas are females.

4.3   General Approach for Preparing Messages

Information that will be communicated in advance of public consultations organised by BOSG as part of MFDMP implementation will primarily include

(i)   an announcement in the public media—local and national
(ii)   the invitation list
(iii)   full details of the forthcoming meeting well in advance, including the agenda.

It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the stakeholders. Furthermore, the messages are targeted according to the stakeholder and issues.

There are three important questions to answer when preparing messages as shown in Figure 4.1 and the checklist to follow as shown in Figure 4.2.

Figure 4.1: Important questions for preparing a message
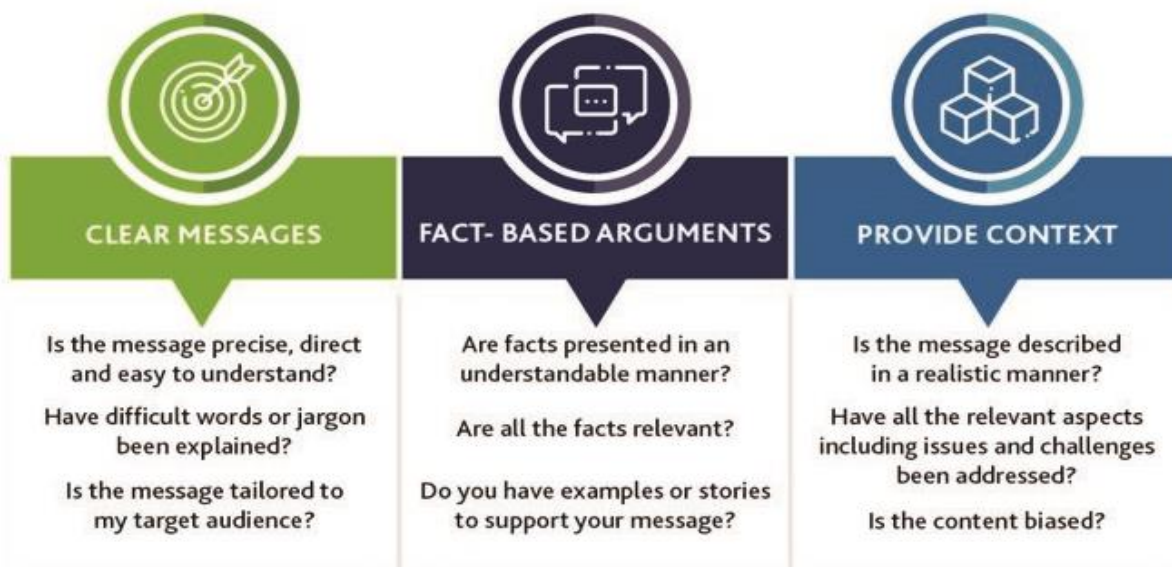
Figure 4.2: Checklist to guide in developing clear messages

The above parameters can be achieved through the following approaches:

1.   Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication. The MFDMP project implementation unit will ensure that information of planned consultation meetings or other engagement activities are made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/advertisements in public places. The project keeps proof of the publication (e.g., a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the implementing agencies and the community-based platforms may be particularly useful for distributing the announcements. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed

by by-passers, or covered by other advertisements. The project's staff will therefore maintain regular checks to ensure that the notifications provided on the public boards remain in place and legible.

2.   Selection of methods of communication that reach the potential audience with lower levels of literacy: Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected stakeholder representatives and institutional leaders to relay up-to-date information on the project and consultation meetings to the various target audiences. Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing should be done in advance, thereby enabling participants to make necessary arrangements for participation. Prior information should include date, time, location/venue and contact persons.

3.   Placement of the project materials in the public domain is also accompanied by making available a register of comments and suggestions that can be used by stakeholders and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a MFDMP staff or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

4.   Drafting an agenda for the consultation meeting is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g., presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the mutual exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate enough time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project becomes an appropriate material for inclusion in the project's regular reporting to the stakeholders.

As a possible option in addition to the Q&A session nearer the close of the public meeting/hearing, evaluation (feedback) forms may be distributed to participants in order to give them an opportunity to express their opinion and suggestions on the project. This is particularly helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in public. Questions provided in the evaluation form may cover the following aspects:

  ➢ Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
  ➢ How did they learn about the Program and the consultation meeting?
  ➢ Are they generally in favour of the Program?
  ➢ What are their main concerns or expectations associated with the Program or the particular activity discussed at the meeting?
  ➢ Do they think the Program is of benefit to them and the stakeholder group they represent?
  ➢ Is there anything in the Program design and implementation that they would like to change or

improve?

➢ Do they think that the consultation meeting has been useful in understanding the specific activities of the Program, as well as associated benefits and outcomes? What aspects of the meeting do they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that completing the form is optional. Program beneficiaries should also be assured that completion of the evaluation form is entirely voluntary and does not affect their status as beneficiaries. Some persons may be willing to express their feedback verbally and in this case Project staff will be allocated to take notes.

5.   **Distribution of targeted invitations to the consultation meeting or a hearing** is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of government ministries and agencies) and as public invitees (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Means of distributing the invitations should be appropriate to the customary methods of communication that prevail for the stakeholder. The various means of distribution that can be used includes direct mail (post); other existing public mailings, utility bills, or circulars from a local authority. All invitations that are sent can be tracked to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

4.3   Description of Engagement Methods

International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To fulfil this requirement, a range of consultation methods are applied.

A summary description of the engagement methods and techniques that will be applied by the Nigeria MFDMP is provided in table 4.1 below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

An attendance list should be made available at the commencement of all engagement activities to record all participants who are present at the meeting. Wherever possible, attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting should be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- Taking written minutes of the meeting by a specially assigned person or a secretary.
- audio recording; and
- Photographing.

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, a video recording may also be undertaken. Combination of these methods ensures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

Table 4.1: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Information Provision					
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Program and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on the MFDMP program. The contents presented are concise, clear and easy to understand for a layperson reader. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	• Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders. • Conduct a workshop to develop standard messages for campaigns and interventions to be used for priority target audiences • Conduct mass media campaigns both at national media and local stations • Conduct social media campaign on (Facebook, Twitter, YouTube, WhatsApp, etc.). • Preparing briefs for policymakers, web pages for the general public, guides for technical staff, reports or videos to local stakeholders (e.g., village committees) and project participants.	▪ Government Ministries, Departments and Agencies at state and Federal levels ▪ All project affected parties ▪ Project interested parties ▪ Other potential stakeholders	At onset of the Program
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Program achievements, announcements of planned activities, changes, and overall progress.	• Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals.	▪ All projected affected parties ▪ All project interested parties ▪ Implementing Agencies and Partners ▪ Government Ministries, Departments and Agencies	Quarterly through the life cycle of the program

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
			• Means of distribution – post, emailing, electronic subscription, delivery in person. • The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project's specified address.		
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Program and its benefits to the stakeholders.	• Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience • Arrange for outdoor advertising	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	At start of specific activities
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Program, Program development update and processes. Advance announcement of the forthcoming public events or commencement of specific Program activities.	▪ Collaboration with media producers that operate in the region and can reach local audiences. ▪ Documentary campaign at national and state stations on impact and success story in local communities ▪ Production of musical sting for to be used in sponsored radio programmes	▪ Government Ministries, Departments and Agencies ▪ Implementing agencies and partners ▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	10 minutes weekly updates

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project activities, processes and timeline. Updates on Project development.	▪ Presentations are widely used as part of the public hearings and other consultation events with various stakeholders. ▪ Video simulation ▪ animations	▪ Participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. ▪ Government Ministries, Departments and Agencies	As needed
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	Regularly
Information Feedback					
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various MFDMP-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	▪ All projected affected parties and other stakeholders	Weekly update
Dedicated telephone line (hotline) (toll free)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make	Any issues that are of interest or concern to the direct project	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings.	▪ Any project stakeholder and interested parties. A	Available all through the project cycle

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations, social and environmental protection.	beneficiaries and other stakeholders.	Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.		
Internet/Digital Media	Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in English	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	A link to the Project web-site should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.	▪ Project stakeholders and other interested parties that have access to the internet resources.	Available all through the project cycle
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to	Description of the proposed Project and related processes.	Soliciting participation in surveys/interviews with specific stakeholder groups.	▪ All project affected parties	

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	complement the statutory process of public hearings.	Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Administering questionnaires as part of the household visits.		
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	▪ Project affected parties, especially vulnerable groups.	
Consultation & Participation					
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	▪ Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. ▪ Targeted invitations are sent out to stakeholders. ▪ Public disclosure of Project materials and associated impact assessment	▪ Project affected parities ▪ Relevant government Ministries Departments and Agencies. ▪ NGOs and civil societies ▪ Other interested parties	On a as needed basis

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
			documentation in advance of the hearing. ▪ Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.		
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, processes that require detailed discussion with affected stakeholders.	Announcements of the Forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	▪ All project affected parties especially vulnerable groups; ▪ Project delivery agencies ▪ MFDMP employees and contractor and consultants ▪ NGOs and civil societies ▪ Implementing Agencies and Partners ▪ Relevant Government Ministries and Agencies	On a as needed basis

4.4. Consultation with Stakeholders

The level of engagement of implementing agencies will be contingent upon their respective roles and authorities in the management of project activities and associated environmental and social risks. The activities which will be implemented by each of the agencies. When consultation takes place, it should be after an extensive period of preparation, as outlined in the previous stages, and should exhibit the following characteristics.

1. **Representative**: it is important that those involved in the consultation process are as representative as practicable of the full range of stakeholders affected by the MFDMP Program actions, to ensure that the Program can build as meaningful relations as possible (see Section 4.5). While it may be easier to engage with the most sympathetic, organised, vocal or powerful stakeholders, consulting with minority organisations or those who are less vocal or powerful, can help to produce more representative, accurate and appropriate conclusions regarding stakeholders' issues and mechanisms to address those issues, thus allowing the Program to respond to stakeholders more effectively and successfully. Winning the support of one or two 'big' stakeholders does not necessarily indicate that meaningful engagement has been achieved; not all community or environmental groups (for example) have the same view of or priority for an issue.

2. **Responsive**: by providing information, analysis and proposals that respond directly to stakeholder expectations and interests already identified through the preparation phases, i.e., be stakeholder driven and focused, rather than responding to internal objectives and activities of the business, or being shaped by your organisation's organisational behaviour

3. **Context focused:** by making available information and analysis that is contextualised so that stakeholders can gain a detailed, holistic and complete picture of the MFDMP Program and organisational motivations, culture and behaviour, and assess the relevance of each of these to the ultimately observed organisation's action with respect to the CARE Program

4. **Complete**: by providing appropriate background information together with the historical or analytical basis to certain decisions, thus allowing stakeholders to draw a 'fair and reasonable' conclusion as to why the organisation responded in a particular way to an issue. An efficient internal knowledge management system will help collate and provide this information.

5. **Realistic**: in the 'negotiation' process with stakeholders there may be an inevitable trade off expectations, needs and objectives, where both parties recognise that they may not ultimately achieve everything they had originally set out to accomplish. Nevertheless, this trade off in itself can be extremely positive to the overall engagement process, allowing trust to be strengthened as each side demonstrates that they can be moderate and realistic, ahead of a significant commitment in time and resources being made. As part of this process, ensure there is accurate representation of the intentions of the MFDMP Program and implementing organisation, providing clarity on expectations of the 'negotiation' i.e. what is on the table for discussion and what is not.

4.5   Disclosure and Participation Plan

Information disclosure is an important activity not just as a form of engagement but for also enabling the other engagement activities to be undertaken in an informed and participatory manner. This section outlines the process to be followed for the disclosure and participation as part of the MFDMP Project implementation.

4.5.1 Disclosure Mechanism

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (EIA requirements, public hearing). While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner.

This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information, but it also allows for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

4.5.2 Process for Disclosure of Information

As a standard practice, this SEP in English will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials (with executive summary in local languages) will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English will be made accessible for the public at the following locations:

- Ministry of Finance, Budget and Economic Planning (MFBEP);
- MFDMP Program Implementation Unit
- The EA Department of the Federal Ministry of Environment; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of each implementing agency. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other interested parties. Translation of the executive summaries in relevant local language and its posting in the designated community centres.

4.6 Timetable for Disclosure

The disclosure and implementation of the SEP will be implemented within the following timeframe:
- Placement of the SEP in public domain – Dates to be confirmed by MFDMP Implementing Agencies
- 21-day disclosure period – Dates to be confirmed by MFDMP Implementing Agencies
- Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the program – Dates to be confirmed by MFDMP Implementing Agencies
- Addressing stakeholder feedback received on the entire disclosure package – Dates to be confirmed by MFDMP Implementing Agencies.

The SEP will remain in the public domain and would be implemented throughout the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their

involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

The outline presented in the table below summarizes the currently identified stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 4.2 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 4.2: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
AFFECTED PARTIES		
Implementing Agencies	• Stakeholder Engagement Plan • Regular updates on Project development • Additional types of Project's information if required for the purposes of implementation and timeline	• Public Notices • Consultation Meetings • Information leaflets and brochures.
Non-governmental Organizations	• Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development	• Public notices. • Electronic publications and press releases on the project web-site. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures.
INTERESTED PARTIES		
Contractors and Consultants engaged under MFDMP	• Stakeholder Engagement Plan • Public Grievance Procedure • Updates on Project development and tender/procurement announcements	• Electronic publications and press releases on the Project web-site. • Information leaflets and brochures. • Procurement notifications.
Citizens Groups and Professional bodies	• Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development	• Public notices. • Electronic publications and press releases on the project web-site. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures.

4.7   Public Consultations and Stakeholder Engagement under COVID-19 and other Public Health Emergencies

When the risks of COVID-19 place constraints on conducting public meetings, stakeholder consultation and engagement activities should be designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. The MFDMP PIU shall:

- Review the country COVID-19 situation in the project and government restrictions put in place by the to contain virus spread.

- Ensure that all prevention measures required by country guidelines are available during engagement events. This will include the use of nose masks, physical distancing between persons, availability of handwashing stations and hand sanitizers.
- Consider the associated potential risks of virus transmission in conducting various engagement activities.
- Be sure that any stakeholder engagement events be preceded with the articulating good hygienic practices.
- Avoid public gatherings including community meetings, and minimize direct interaction between project agencies and potential project beneficiaries and affected people.
- If smaller meetings are permitted, conduct consultations in small-group settings such as focus group meetings. If not permitted, make reasonable efforts to conduct meetings through online channels including WebEx, Zoom and Skype.
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders to do not have access to online channels.
- Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PIU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible.
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. In low ICT capacity situations, audio meetings can be effective tools.
- Disseminate information through digital platform like Facebook, Twitter, WhatsApp groups, websites, and traditional means of communications.
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.
- Where direct engagement with project affected people or beneficiaries is necessary, the PCU will identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, and dedicated phone lines.
- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks.

Chapter 5 RESOURCES AND RESPONSIBILITIES

5.1 Introduction

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function at MFDMP are described. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating state PIU and local sub-contractor and consultants.

The roles and responsibilities of the organizations are presented below in Table 5.1. The Project Implementation Unit (PIU) will be responsible for the preparation and physical implementation of the MFDMP Programme.

Table 5.1: Organizational Roles and Responsibilities

Role	Responsibility / Accountability
Project Coordinator	• Ensure proper implementation and follow up of the SEP. • Ensure that relevant employees of participating agencies implementing MFDMP activities are informed and trained on the SEP. • Ensure the MFDMP Public Engagement and Communications team reports on time and with the expected and agreed points. • Provide resources to ensure that interests of stakeholders are represented and taken into consideration during implementation of activities
Consultants and Suppliers	• Ensure that employees and subcontractor and consultants have in their contracts a stakeholder engagement/community relations management clause and they are aware and trained on the SEP. • Coordinate required SEP support and trainings for staff
Social Manager/ Public Liaison Officer (PLO)	As the primary interface between the Project and stakeholders, the Social Manager/CLO will: • Lead the SEP from the sponsor perspective and coordinate the results and actions to be taken with the MFDMP PIU • Review the SEP viability with the technical leads of all MFDMP activities • Lead day-to-day implementation of the SEP and Grievance Mechanism, including proactively maintaining regular contact with affected parties through regular meetings to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups. • Produce stakeholder engagement monitoring reports and submit to Programme Coordinator. • Supervise/monitor and coordinate activities with the CLO to ensure that staff and all sub-contractor and consultants comply with the SEP. • Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Program.
Contracted employees	• Comply with requirements stated under this document - Non-compliance will be treated as a disciplinary matter. • Provide assistance if needed to ensure compliance with this plan. • Perform assigned tasks towards meeting SEP objectives. • Communicate concerns, questions or views to their supervisor or the CLO compliance or implementation of the SEP. • Provide data related to SEP performance/monitoring as required.

In order to advance the MFDMP Project and ensure availability of resources, the PIU will work collaboratively with relevant departments and units within Implementing agencies such as (i) Purchasing, (ii) Finance, (iii) Customer Services, (iv) Technical Services Department, (v) Tender Committee, and (vi) Public Affairs Department on a needed basis.

5.2   Training

The project will, from time to time assess the adequacy and capacity of the PIU team members in terms of their understanding of the SEP and GRM put in place for the project and the principles governing the same. Provisions for refresher trainings will be put in place.

All parties involved on the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures.

5.3   Budget

The Project Implementation Unit will allocate an adequate standing budget towards the Stakeholder Engagement Program. This is a budget that, when necessary, will be supplemented and/or increased by other budgets related to the activities required for the SEP. Once the project has been finalised, a detailed budget for the implementation of this SEP will be provided and this will be included in the updated SEP. An indicative budget template is annexed to this SEP as Annex 1.

Chapter 6 Grievance Management

In compliance with applicable local and national laws and essentially the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. This process has been specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures as indicated in figure 6.1.

Locked suggestion/complaint boxes will be posted in each implementing agency and participating communities as relevant and they will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing agencies) will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.
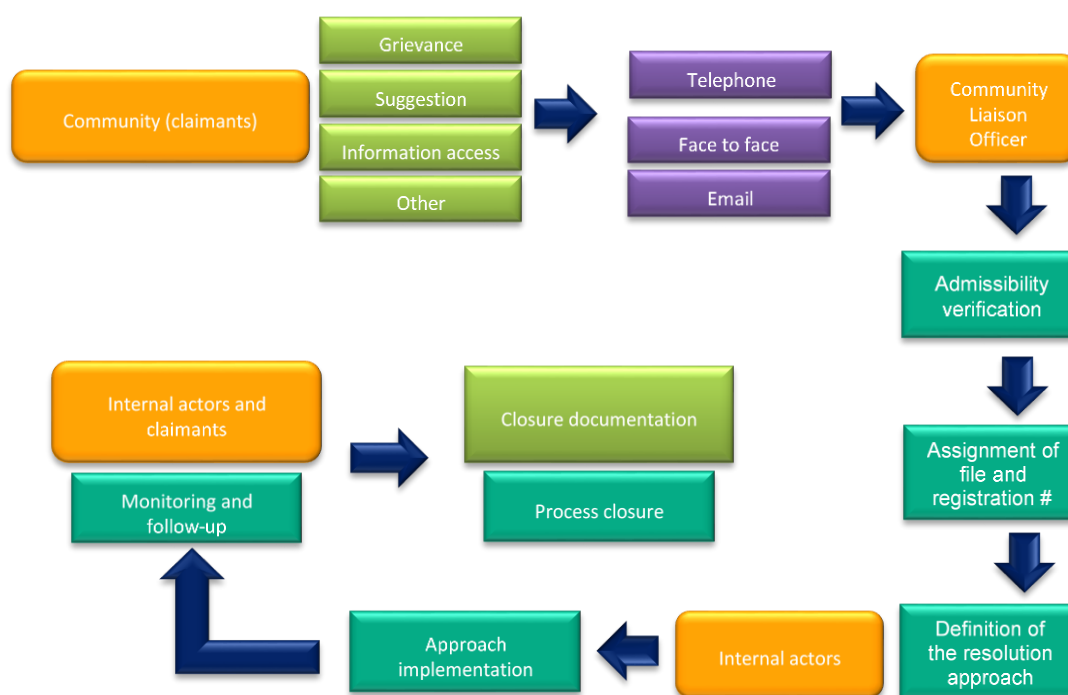

Figure 6.1: Grievance Mechanism flowchart

6.1 Grievance Redress Mechanism (GRM)

Project-affected-people and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to specifics in program components.

- Strengthen accountability to beneficiaries, including project affected people.

The GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the program as it affects them. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The initial effort to resolve grievances to the

complainant's satisfaction will be undertaken by the participating section / unit of each implementing agency. If the unit is not successful in resolving the grievance, the grievance would be escalated to the implementing agency's grievance unit and if unsuccessful at this stage, the grievance will be escalated to the MFDMP PIU at the Federal level. All grievance that cannot be resolved at that level shall be allowed to go the court of law.

6.2 Grievance Resolution Framework

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project implementation unit offices, notice boards available to strategic stakeholders, etc. Information about the GRM will also be posted online at the implementing agencies' websites.

The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievance resolution process.

- *Step 1: Uptake.* Project stakeholders will be able to provide feedback and report complaints through several channels such as filling up grievance forms, reporting grievances to implementing agencies, submitting grievance via email address made available by the implementing units and via the implementing institutions' websites collection boxes stipulated for the grievance uptake.

- *Step 2: Sorting and processing.* Each unit / department of the implementing institutions will conduct a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve and respond to grievances raised.

- *Step 3: Acknowledgement and follow-up.* Within seven (7) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.

- *Step 4: Verification, investigation and action.* This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

Step 5: Monitoring and evaluation. Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency would develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.

Step 6: Providing Feedback. This step involves informing those who have raised complaints, concerns or grievances the resolutions to the issues they have raised. Whenever possible, complainants should be informed of the proposed resolution in person, which gives them the opportunity ask follow-up questions which could be answered on the spot for total resolve. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through a court of competent jurisdiction.

6.3 MFDMP Grievance Escalation Process

GRM Stage One - Specific Implementing Department Level Resolution

This stage represents the grievances collection points by specific units of the implementing agencies. As stated in the six steps framework above, this stage would involve the uptake; collation, sorting and processing; acknowledgement and the resolve as described in stage 4 – verification, investigation and action. All implementing agencies would attempt a full resolve of grievances at this stage as much as practical. A typical example of this stage process is each grievance committee at each unit of the implementing agency activating steps 1 to 4 as stated above to respond to all grievances raised to the institution. The grievance committee at each unit of implementing agencies would deploy all effort as much as practical at this stage to ensure all grievances raised to it has been adequately resolved to the satisfaction of all parties involved. Should the complainant not be satisfied at stage one, the grievances shall be escalated to stage two.

GRM Stage Two – Implementing Agency Level Resolution

The central platform for receiving, sorting and assigning stage two grievance will be in the respective MFDMP Implementing Agency. Once received, sorted and processed at Implementing Agency, grievances related to different implementing agencies will be forwarded to the respective agencies. The stage two is a grievance redress platform led by the main implementing agencies. Every implementing agency would establish a grievance management unit which would deal with all the grievances escalated to it from the different units. These implementing agencies would apply the stage four as mentioned under the framework to address and resolve all grievances promptly and communicate the feedback to the complainants. Any complaints or grievances not resolved at this stage shall be escalated to the MFDMP Ombudsman.

GRM Stage Three – MFDMP Ombudsman Level Resolution

The MFDMP Ombudsman shall be formed of key officers from all the implementing agencies under the coordination of the PCU. The ombudsman shall be responsible for resolving all grievances escalated to it. The ombudsman shall meet quarterly to review the grievance registers maintained by each implementing agency and use the same to update the grievance dashboard which shall be the compendium of all grievances raised across implementing agencies.

6.4 Grievance logs
Each implementing agency shall establish a grievance uptake point.

- Individual reference number

- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)

- Details of the complaint, feedback, or question/her location and details of his / her complaint.

- Date of the complaint.

- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)

- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution.

- Date when proposed resolution was communicated to the complainant (unless anonymous).

- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution.

- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out

- If necessary, details of escalation procedure

- Date when the resolution is implemented (if any).

Grievances will be prioritized according to their severity and complexity level. Table 6.2 shows the priority levels that will be applied:

Table 6.1: Grievance priority classification

Priority Level	Description	Examples
High	Concern, claim or grievance involving stakeholders of high priority, and: • Reports a breach of human rights • Relates to a legal non-compliance • Pose a short term risk to the project continuity,	• Group complaints; • Issues involving third parties (e.g., social, environmental impacts);
Medium	▪ Concern, claim or grievance from stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term.	• Individual complaints; • Issues involving other departments within MFDMP project
Low	• Concern, claim or grievance regarding lack of information or unclear information provided.	Lack of information.

6.5. Monitoring and reporting on grievances

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Program Coordinator. To ensure management oversight of grievance handling, the Federal Implementing Agency (MFDMP) will be responsible for monitoring the overall process, including verification that agreed resolutions are implemented. Anonymised summaries of complaints received, and status of redressal efforts will be reported upon as part of progress reporting procedures. Disclosure of such information will not be done routinely but will follow procedures for public disclosure of other project implementation information.

6.6.   Points of contact

Information on the project and future stakeholder engagement programs will available on the project's website and will be posted on information boards in the respective project implementation Units

The point of contact regarding the stakeholder engagement program are:

Federal Ministry of Finance

Description	*Contact details To be Determined (add the contact details once available)*
Name and position	
Address:	Ministry of Finance, Maiduguri
E-mail:	
Telephone:	To be provided

6.7. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complain directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English.

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org

- By fax: +1.202.614.7313

- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

- Through the World Bank Nigeria Country Office in Abuja: 102 Yakubu Gowon Crescent, Asokoro , Abuja

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s, and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

Chapter 7 MONITORING AND REPORTING

7.1 Introduction

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of Nigeria MFDMP program implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the project context and specific stages of the implementation. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This includes regular refreshers to stakeholders about the grievance mechanism and related processes and regular Project Monitoring reports and reporting to the different stakeholders as appropriate.

7.2 Monitoring

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. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- 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.

7.2. Stakeholder Involvement in Project Monitoring

The Involvement of Project-affected stakeholders in the monitoring process will promote transparency and support in addressing stakeholder concerns. Stakeholder participation in monitoring can also empower communities as it enables them to have a role in addressing Project-related issues that affect their lives. This, in turn, strengthens relationships between the Project and its stakeholders.

Stakeholder involvement in monitoring of this Project will include the following:

- Involvement of affected stakeholders when selecting sampling methods for any social surveys or external impact assessments, and in the analysis of results. Training will be conducted where needed to build capacities.
- Observations of monitoring and audit activities by affected parties.
- Grievance follow-up meetings and calls with affected stakeholders.

7.3. Ongoing Reporting to Stakeholders

MFDMP will produce reports for use by Project stakeholders at stipulated intervals and through specified mechanisms. Reports from various departments will be reviewed and appropriate information presented in synthesized reports to various stakeholders. The modes of reporting shall be as outlined below:

Table 7.1: Outline of Reports to Stakeholders

Report	Content	Stakeholder	Frequency
Technical reports (Financial, M&E, Communications)	Technical Evaluation of the Programme status	Regulatory authorities	At agreed timeline
Progress Update Reports and Annual report	• Project development activities, • challenges and opportunities, • local workers hiring status	State Implementing Agencies World Bank	Quarterly and other agreed timeline
Media release	Main Project milestones	Local media (and national media as appropriate)	At agreed timeline

7.4. Training

MFDMP Implementing agencies will arrange community & stakeholder engagement overview, principles, tools and goals training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the Public Grievance Procedure. Proposed training outline is indicated in annex 2.

Project contractor and consultants and selected representatives will also receive necessary instructions for the Grievance Procedure.

ANNEX 1: PROPOSED BUDGET LINE ITEMS FOR STAKEHOLDER ENGAGEMENT FOR PARTICIPATING AGENCIES

Item	Expected Participants	Frequency	Estimated unit cost	Total (US$)	Total (NGN)
Training of Communication Managers in Implementation Agencies, community members and other interested parties for implementation of SEP and Strategic Communication Priorities		1	5,000	5,000	2,080,000
Support for acquisition of tools for implementing agencies on stakeholder management			Lump Sum	5,000	2,080,000
Town Hall Meetings in three senatorial districts	500	6	Lump sum	3,000	1,248,000
Monthly virtual online meetings/ internet with project stakeholders	1000	12	Lump Sum	1,000	416,000
2-Day Primary Stakeholders retreat	250	2	1,000	2,000	832,000
Stakeholder consultative Forum	250	1	2,000	2,000	832,000
Production of National Jingles for Television and Radio			Lump sum	1,000	416,000
Production of Newsletter				1500	624,000
Programme information kit				500	208,000
Toll free number (2 year subscription and maintenance)		Lump sum		1201.923	500,000
TOTAL				22,202	9,236,000

Community & Stakeholder Engagement Overview
- Setting the scene – change, conflict and community/stakeholder engagement

- The links between change and conflict

- The role of community/stakeholder engagement in managing conflict

- A brief history of community/stakeholder engagement processes on existing project or participating state

- Politics and the roles of community/stakeholder engagement

- Changing emphasis in policy development – Accountability, transparency and involvement of social license to operate

- Increasing stakeholder consultation expectations

Community Engagement Principles
- Levels and principles of community/stakeholder engagement

- The importance of early identification of the purpose and function of community/stakeholder engagement

- Different levels of community/stakeholder engagement – ranging from information to participation to partnership

- Is there a difference between community engagement and stakeholder engagement?

Overview & Introduction
- Current skills inventory for community/stakeholder engagement

- Good and bad experiences of community/stakeholder engagement

- Identification of current community/stakeholder engagement process focus areas

Practical Case Examinations
- At the beginning of the course, participants will put forward examples from their own work situations as possible case studies

- Participants will be able to choose to work on their own consultation plan relevant to their project or participate in group selected most applicable case studies to work through using a practical set of principles and approaches for stakeholder engagement and the tools they have gained through the course

Effective community engagement
- The community engagement approach framework – an overview

- How the framework provides a structure for planning

- The links between different sections of the framework

- How to use the framework in the work situation

- stakeholder engagement strategy

- Create a human rights based model of stakeholder consultation underpinned by community engagement international best practice and regulatory compliance

Engagement Levels, Goals & Communication Levels

- What type of engagement is needed? – the process of making decisions depending on your desired outcomes

- Clarifying what is to be achieved by community/stakeholder engagement – intra-organisational consultation

- Ensuring that the community/stakeholder engagement goals are clearly articulated

- Working up and down within in an organisation to ensure agreement on these goals

Risk Assessments & Conflict Management
- Assessing risks and benefits

- Identifying different risk categories

- Likelihood of conflict in the absence of community/stakeholder engagement

- Possible impact of conflict

- Assessment of likelihood of conflict arising during community/stakeholder engagement

- Use of a Risk Assessment Tool for community/stakeholder engagement

- Managing risks – which risks can be avoided and which must be managed

- Planning the community/stakeholder engagement process to avoid unnecessary conflict

- Where conflict is inevitable, how to ensure it is managed to achieve the most useful outcomes

Stakeholder Management and consultation
- Develop, plan, implement, review and benchmark stakeholder and community engagement programs

- Tailor engagement approaches to respond to diversity and mitigating emerging conflict

- Case study examples will be discussed, based on real life community/stakeholder engagement processes

Resource Allocation & Budgeting
- A standardized budget will be customized for the needs of individual participants and the organisational budgets. It will include all the line items for

  o consideration in a community/ stakeholder engagement process

  o Identifying social investment strategy opportunities which enhance community relationships

  o Influencing organisational stakeholder consultation change

Putting it all Together & Communication Tools
- Communicating clearly – key points

- Communicating via different media – visual, verbal, written

- Using different tools – pamphlets, papers, internet, email, fax, face to face

- What not to do – examples of bad communication and what effect that has on recipients

- Building skills in working with a diversity of people and groups

- When and how to employ professionals/consultants

Review

- Review – identification of key learning points for each individual participant
- What will this mean for your first week back at work?
- What strategies will you use to influence organisational stakeholder consultation change?