

The Government of Uganda

**Uganda COVID-19 Education Response (GPE)
Project, P174033**

REVISED STAKEHOLDER ENGAGEMENT PLAN

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1.0 INTRODUCTION/PROJECT DESCRIPTION

The COVID-19 pandemic is causing profound socio-economic disruptions to countries across the world. The proposed “physical distancing” required to arrest its spread has brought economies in many regions to a standstill, while health systems are struggling to cope with the dramatic increase in demand. Perhaps less noticeable, yet no less profound, is its impact on education systems. Nearly 200 countries and territories have closed their schools with many for the remainder of the academic year, which has already had profound impacts on education. The damage will become even more severe as the health emergency translates into a deep global recession. Immediate action is required to ensure continuity of learning during the crisis, and to prepare school systems to reopen once the pandemic subsides. This is particularly critical in developing countries.

In response to the danger posed by the pandemic to Uganda learners, the Government on March 18, 2020, announced the closure of all schools and educational institutions from March 20, 2020 for a period of 30 days in a bid to avoid the possible rapid spread of new infections of COVID-19. At first the closure was extended to early May 2020. Now the closure has been extended to July 2020. This measure resulted in the closure of more than 73,200 schools and institutions affecting more than 15,100,000 learners and 548,000 teachers.

Approximately 600,000 children attend schools in refugee settlements. Some of these settlements are in high risk towns bordering countries that have reported confirmed cases of COVID-19, increasing the risks for the entire school system in Uganda. To ensure that the project benefits can be accessed by refugee learners and other vulnerable groups, the Stakeholder Engagement Plan has been designed to ensure that all consultations are inclusive and accessible. In areas with a high presence of refugees, provisions will be made to carry out as early as possible a thorough and meaningful stakeholder engagement to access feedback to influence the project design and also ensure that refugees can access all the project benefits without exacerbating tension between refugee and host communities. Grievance Redress committees will be established to address any project related complaints.

1.2 PROJECT OBJECTIVE

The Project Development Objective is to support students learning (pre-primary, primary and lower secondary) during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student reentry.

The COVID-19 Education Response Project contains three components:

- i) **Component 1: Ensure learning during school closure and prepare for school reopening.** This component will focus on providing access to resources to ensure that students are learning during the school closure as well as preparation for school reopening.
- ii) **Component 2: Enhance the capacity of education stakeholders to respond to the COVID-19 outbreak.** This component will focus on improving the capacity of various stakeholders to respond to the various emerging needs during and after the COVID-19 outbreak.
- iii) **Component 3: Project Management, Monitoring and Evaluation. This component** This component will provide support to the project implementation, supervision, monitoring and evaluation, procurement and financial management and auditing.

The COVID-19 Education response project is being prepared under the World Bank’s Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10. Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and

accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders, in particular members of vulnerable and other disadvantaged groups, including persons with disabilities, women, the poorest of the poor, persons in remote areas, and historically underserved traditional local communities. The SEP includes a mechanism by which people can raise concerns, provide feedback, offer insights about project design and potential project risks, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

2.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- (ii) 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.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way. With community gatherings limited or forbidden under COVID-19, it may mean that the stakeholder identification will be on a much more individual basis, requiring different media to reach affected individuals.

2.1 METHODOLOGY

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement, while tailoring the engagement to comply with government parameters on social distancing and related COVID-19 requirements:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns;

- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders, ensuring consideration of cultural sensitivities, accessibility for persons with disabilities, and literacy levels. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, persons with disabilities, the elderly, illiterate persons, and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet, telephone, postal or other means of communication. (See Section 3.2 below).

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, gender orientation, sexual identity, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

2.2. AFFECTED PARTIES

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- a) Learners/students and Parents, in particular female-headed households and households headed by persons with disabilities and/or households with students with disabilities.
- b) Teachers, School administration, and related school staff
- c) Parents, Students and Teacher Associations (PSTAs)
- d) National and local level educational and technology institutions involved with establishing the educational curriculum and related matters for the project
- e) Local government officials i.e DEOs and District Inspectors of Schools (DISs)

¹ Examples include: elderly people and veterans of war; persons with disabilities and their caretakers; women-headed households or single mothers with underage children; the unemployed; disadvantaged groups that meet the requirements of ESS 7.]

- f) Local administration/government officials
- g) Local religious leaders/local religious organizations
- h) People involved in project-supported activities
- i) Local community leaders, including chiefs, headmen and headwomen, especially those representing Vulnerable and marginalized groups.
- j) Refugees, internally displaced persons and members of vulnerable groups, in particular historically underserved traditional local communities
- k) Labor groups, including those representing the rights and interests of teachers and related school/educational staff, as well as labor groups representing the interests of workers who would be involved in installation or provision of goods, materials, and services to the project
- l) Development partners

2.3. OTHER INTERESTED PARTIES

The projects' stakeholders also include parties other than the directly affected communities, including:

- Electronic and print media
- Politicians
- Local and international nongovernmental organizations/civil society organizations, including children's advocacy, disabilities advocacy, and education advocacy groups
- The general public
- Researchers institutions
- Academia
- Courts of Law and Police, Prisons, Security-Army and Internal Security Officers
- Legal Aid Providers and Psychosocial support teams
- Private Sector (industries/industrialists)

2.4. DISADVANTAGED / VULNERABLE INDIVIDUALS OR GROUPS

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on infectious diseases and medical treatments in particular, be adapted to take into account such groups or individuals' particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, disability, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include, but are not limited to the following: learners from refugee and displaced persons' communities; learners with disabilities; those living in remote or inaccessible areas; learners from particularly low income families without access to the new means of study (lack of access to Internet, Television, Radio or Newspapers); Girl children who are prone to early marriage and/or early pregnancy due to economic hardships resulting from the epidemic; all learners prone to child labor abuse exacerbated by the effect of the epidemic on livelihoods, Parents who cannot afford to keep their children in school; redundant teachers made vulnerable due to the result of the project's introduction of alternative

learning means.² Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated and culturally sensitive means, taking into account accessibility needs, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

ESS7 (where applicable)

Where the SEP and VGMP are used to address Vulnerable and marginalized Groups (VMGs/IPs), the SEP will be prepared in a manner consistent with the ESS7 to enable targeted meaningful consultation, including identification and involvement of IP communities and their representative bodies and organizations; culturally appropriate engagement processes; providing sufficient time for the VMGs s decision making processes; and allowing their effective participation in the design of project activities or mitigation measures that could affect them either positively or negatively. The GRM will be culturally appropriate and accessible for IPs, taking into account their customary dispute settlement mechanism.

3.0 STAKEHOLDER ENGAGEMENT PROGRAM

3.1. SUMMARY OF STAKEHOLDER ENGAGEMENT DONE DURING PROJECT PREPARATION

The speed and urgency with which this project has been developed to meet the growing threat of COVID-19 in the country, combined with recently-announced government restrictions on gatherings of people, has limited the project's ability to develop a complete SEP before this project is approved by the World Bank. No comprehensive consultations have been conducted yet. This initial SEP was developed to be disclosed prior to project appraisal, as the starting point of an iterative process to develop a more comprehensive stakeholder engagement strategy and plan. The project SEP will be updated periodically as necessary, with more details provided in the first update planned after project approval.

In line with government COVID-19 parameters, project stakeholder consultation and engagement activities during the preparation phase will not be deferred but rather will be designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. As identified under the (Uganda Secondary Education Expansion Project(USEEP),the presence of some students and their families who are members of VMGS as prescribed under (ESS7) this project , merits a fit for purpose, tailored approach to ensure meaningful consultations. Such an approach will use best efforts to ensure that these and other stakeholders have opportunities to provide inputs on project design and identify possible unknown project risks. Within the social distancing and other parameters set by the national government, the Project Implementation Unit will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, including based on type and category of stakeholders, as indicated in section 2.1.

² printing and distribution of self-learning materials to students, and broadcast of lessons via radio and TV, use of braille for pupils/students with special needs and use of the Internet and mobile messaging where practical and necessary.

3.2. SUMMARY OF PROJECT STAKEHOLDER NEEDS AND METHODS, TOOLS AND TECHNIQUES FOR STAKEHOLDER ENGAGEMENT

The Project will take a precautionary approach for the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation that the Ministry will observe:

- Avoiding public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If and when the government permits smaller meetings, conducting consultations in small-group sessions taking into account cultural and accessibility sensitivities, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversifying means of communication and relying more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employing traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identifying channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement will clearly specify how feedback and suggestions can be provided by stakeholders.

In line with the above precautionary approach, the Project will propose and employ different engagement methods to cover different needs of the stakeholders.

3.3. STAKEHOLDER ENGAGEMENT PLAN

The Project will carry out stakeholder engagement for (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including their concerns, suggestions and other feedback, and complaints, (ii) awareness-raising activities to sensitize communities about risks of COVID-19.

3.3. (i) Stakeholder consultations related to COVID 19

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Project Inception	Introduction of the project and intended benefits,	Emails, official letters, consultation	MoES and Local Government Administration	MoES and World Bank

	<p>grievance redress management (GRM) tools for filing complaints and providing feedback</p> <p>General information of the project as stipulated in the PAD; fiduciary considerations; schedules of planned activities, associated risks and mitigation measures.</p>	<p>meetings (if and when permitted in line with government social distancing requirements), phone calls, SMS, Social media. Emails, official letters and virtual meetings and virtual round table discussions with relevant organizations</p>	<p>Head teachers and school administration</p> <p>Government officials; media, private sector; civil society groups and NGOs;</p>	
Project Implementation	<ul style="list-style-type: none"> ▪ Project status ▪ Project progress in outreach ▪ Risks and mitigation measures <p>Communication campaign: Press releases in the local media (both print and electronic), written information will be disclosed including brochures, flyers, posters, etc. MoES website, to be updated regularly</p> <p>Information about Project development updates, health and safety,</p>	<p>Information leaflets, posters and brochures; audio-visual materials, social media, direct communication channels such as mobile/ telephone calls, SMS, etc; Public notices; Electronic publications and press releases on the MoES websites; Press releases in the local media (both print and electronic)</p> <p>Official letters, emails, phone calls and individual</p>	<p>Head teachers and school administration, General population, including Vulnerable and marginalized households Government agencies, media, private sector etc.</p> <p>Official letters, emails, phone calls and individual meetings (if needed)</p> <p>All stakeholders</p>	MoES

	employment environmental and social aspects, Project-related materials.	meetings (if needed)		
Supervision & Monitoring	Project's outcomes, overall progress and major achievements	Press releases in the local media; Consultation meetings (virtual); Round table discussions	Government officials; Civil society groups and NGOs;	MoES

3.4. PROPOSED STRATEGY TO INCORPORATE THE VIEW OF VULNERABLE GROUPS

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information. The details of strategies that will be adopted to effectively engage and communicate with members of vulnerable groups will be considered during project implementation. Vulnerable groups may include (i) women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design engagement; consider provisions for childcare, transport, and safety for any in-person community engagement activities; (ii) Elderly and people with existing medical conditions; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members, health care providers and caregivers; (iii) People with disabilities: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology; (iv) Children: design information and communication materials in a child-friendly manner & provide parents with skills to handle their own anxieties and help manage those in their children (v) vulnerable and marginalized groups in the context of ESS7.

3.5. PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

The project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups outlined above will have meaningful opportunities to participate in and benefit from project activities.

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Project Inception	<ul style="list-style-type: none"> ▪ MoES and MDAs; ▪ National & International NGOs; ▪ Beneficiary schools and the general public 	<ul style="list-style-type: none"> ▪ SEP ▪ ICWMP ▪ GBV/SEA/SH assessment ▪ ESCP ▪ Social Assessment Other information as required 	<ul style="list-style-type: none"> ▪ Press releases in the local media; Virtual meetings, public/relevant agency libraries, MoES website

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Project Implementation	<ul style="list-style-type: none"> ▪ Project affected persons; and ▪ Other interested Parties 	<ul style="list-style-type: none"> ▪ Various awareness messages on benefits of Education ▪ Awareness on social distancing strategy; ▪ Availability of resources to report cases of Gender Based Violence (GBV)/Violence Against Children(VAC), and to access psychosocial support services ▪ Availability of psycho social support for teachers and school administration ▪ Grievance Redress Procedures; ▪ Update on project implementation and progress; ▪ Relevant E&S documents; ▪ Update on school opening agenda 	<p>Information leaflets, posters and brochures; audio-visual materials, social media and other direct communication channels such as mobile/ telephone calls, SMS, etc; Public notices; Electronic publications and press releases on the MoES websites; Press releases in the local media (both print and electronic); Consultation with vulnerable and marginalized groups using mobile/ telephone calls, SMS, etc. in a culturally appropriate manner; training and meetings; help desk mechanism; virtual meetings; virtual roundtable discussions</p>
Supervision & Monitoring	<ul style="list-style-type: none"> ▪ Project affected person; and ▪ Other interested Parties 	<p>Project’s outcomes, overall progress and major achievements</p>	<p>Virtual roundtable discussions; Press releases; Press conferences; Public meetings; Reports; MoES website;</p>
Project Close Out	<ul style="list-style-type: none"> ▪ MoES and ministries, departments and agencies (MDAs); ▪ Project affected persons; and 	<ul style="list-style-type: none"> ▪ Project exit strategy; and ▪ Dissemination of final project reports. ▪ Decommissioning plans and schedules 	<p>Consultation meetings; information leaflets, posters and brochures; audio-visual materials, social media; Electronic publications and press releases on the MoES websites; Press releases in local media (both print and electronic); media; roundtable discussions, stakeholders dissemination conference,</p>

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
	<ul style="list-style-type: none"> ▪ Other interested Parties 		and Implementation Completion Report (ICP).

3.6. REPORTING BACK TO STAKEHOLDERS

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism through some of the channels already outlined in the foregoing sections..

4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENTACTIVITIES

4.1. RESOURCES

MoES will be responsible for and take charge of stakeholder engagement activities, including by providing adequate human and technical resources for undertaking stakeholder engagement in particular in relation to accesibility, cultural sensitivity and technical considerations of members of vulnerable groups. The Project has allocated an adequate budget for implementing the SEP, in the amount of **USD 211,785**.

4.2. MANAGEMENT FUNCTIONS AND RESPONSIBILITIES

The project implementation arrangements are as follows: The MoES Environmental and Social Specialists within the PCU will provide support and coordinate the management of the environmental, social, and health and safety risks and impacts posed by the project at central level. At District level, the District Environment officers will provide support on the Environmental/Health and Safety, while the Community Development Officers, Probation Officers, and Labor Officers of the participating ? districts will provide similar support for the management of social risks. Environmental and Social staff will oversee implementation of the SEP while working closely with other relevant MDAs and District Education Officers. All stakeholder engagement activities will be documented through preparation of quarterly progress reports by the PCU to be shared with the World Bank.

5.0 GRIEVANCE MECHANISM

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

5.1. DESCRIPTION OF GM

The GRM proposed for this project is a 4 tier/level grievance handling procedure. Grievances at the project level will be handled by committees set up at the 4 different levels that include:-

(i) Grievances handling at National Level: Grievances will be handled at the project's level by MoES project implementation unit (PIU) that will setup the national level committee and be working through Grievance Committees (GCs) at the other levels.. The PIU will inform stakeholders about the grievance procedure and will keep a log of complaints received, like all the other levels.

(ii) Grievance handling at District level: These will handle grievances that have come from the schools and the community GR committees, that are related to project and are unresolved at the level. The committee will solve grievances at the level, in case they need referral those grievances will be sent to the National level.

(iii) Grievance Handling at Community level: These will handle grievances reported by the community members relating to project. These grievances will be solved following the existing government structures to solve grievances at the level. Where they fail is when they forward the grievances to the District level handling the project issues.

(iv) Grievance handling at schools level: These will handle grievances that occur at school level or reported to the school but related to the project. The GR Committee at this level should be able to handle grievances at that level, where they fail, that's when they forward grievances to the District level Committee.

The GMs will be accessible to all stakeholders, including learners, parents, teachers, community members, civil society, media, and any interested parties. Stakeholders will use the GMs to submit complaints related to the overall management and implementation of the project. In addition, the various GCs will be required to submit monthly reports to the District and the MoES/PCU.

Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance: By completing a written grievance registration form that will be available at the GMC level offices including the LC1, LC3, headteacher and district Education offices as well as at the Ministry/PCU. Complainants may also be submitted orally and the details of the complaint entered in the GM log. When complainants make their submissions verbally, they should take consideration of social distancing norms and lockdown restrictions as much as possible.

The complainant will attach all copies of documents that support their complaints. Staff at MoES and GCs will ensure that the form is filled accurately. The complainant will receive a receipt or a confirmation email of acknowledgment with a reference number to track their complaint(s). The GMC shall discuss the grievance in less than 5 days from the date of reporting. On conclusion of mediation, the GMC will ensure that the grievance is resolved. The action shall be implemented within 5 days of the implementation decision. If the grievance action has been well implemented and concluded, there will be a grievance closure form that the parties shall sign and the date of the completed action will be recorded in the grievance log.

Grievance feedback shall be communicated with complainants, among others, by telephone, fax, email, or in

writing and authorised meetings where necessary.

The GM will provide an appeal process if the complainant is not satisfied with the proposed resolutions of the complaints at different levels of the GRMS, including the right to legal recourse.

The grievance submission channels allow for anonymous grievances which can also be raised and addressed. Several uptake channels under consideration by the project include:

- Toll-free telephone hotline;
- E-mail;
- Letter to Grievance focal points at schools/local health facilities;
- Complaint form to be lodged via any of the above channels;
- Walk-ins may register a complaint on a grievance logbook at schools/healthcare facility or suggestion box at schools/clinic/hospitals;
- Child protection Committees that already established for. e.g children outside school;
- Verbal communications-talking to the affected parties directly, that may involve negotiations, mediation and arbitrations;
- Tracking of grievances;
- Referrals and appeals, depending on the nature of the grievances; and
- Grievance data management at various levels .

[The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH.]

All received complaints will be recorded in the complaints logbook or grievance excel-sheet/grievance database.

6.0 MONITORING AND REPORTING

The Project will provide opportunity to stakeholders, especially Project Affected Parties to monitor certain aspects of project performance and provide feedback. GRM will allow stakeholders to submit grievances and other types of feedback. Due to the high risk of contamination, frequent and regular meetings and interactions with stakeholders will be suspended until decided otherwise by MoES.

In the meantime, the Ministry is using a number of consultative methods that include on line meetings, radio announcements, radio programme on various media (mainly radios), printing and distribution of study material, issuance and circulation of the standard operating procedures (SOPs) for institutions during the COVID-19 Pandemic developed by the ministry of Health. In addition, during the course of implementation of the project, the other alternative methods such as TV, newspaper, radio, dedicated phone-lines, and mail and social media and online channels, dedicated online platforms and chatgroups will be maintained and used as the case may be.

6.1. REPORTING BACK TO STAKEHOLDER GROUPS

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with

the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project’s interaction with the stakeholders.

A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

- Frequency of public engagement activities;
- Number of grievances received and resolved within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; and
- Number of press materials published/broadcasted in the local, and national media.

PROPOSED STAKEHOLDER ENGAGEMENT BUDGET

Stakeholder Engagement Activities	Q-ty/per years	Unit Cost, USD	No of years/ Months	Total cost (USD)
GRM, MIS case management process, data base (including running of hotline, record keeping etc.)				15,000
Travel expenses of staff on Stakeholder Engagements)				31,700
Communication materials (leaflets, posters,)				35,000
Project press conferences (twice per year)				30,000
Trainings (Social issues, outreach, GRM, etc.) for PIU, Districts				70,000
Project hotline to receive complaint and grievance related to the project (TA and Airtime)				20,000
Subtotal				
Contingency				10,085
Total				211,785

