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REPUBLIC OF THE GAMBIA



Ministry of Finance and Economic Affairs (MoFEA)

Draft Report

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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FOR

The Gambia Resilience Inclusion Skills Equity (RISE) Project (P179233)

July 2023

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ABBREVIATIONS AND ACRONYMS

CRR	Central River Region
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
EMIS	Education Management Information Systems
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
GamSR	Gambia Social Registry
GBA	Greater Banjul Area
GCCI	Gambia Chamber of Commerce Industry
GIEPA	Gambia Investment & Export Promotion Agency
GoTG	The Government of The Gambia
GPE	Global Partnership for Education
LED	Local Education Directorate
LMP	Labor Management Procedures
LRR	Lower River Region
MERP	The Gambia Education Reform Project
MIA	Ministry of Internal Affairs
MoBSE	Ministry of Basic and Secondary Education
MoFEA	Ministry of Finance and Economic Affairs
MoHERST	Ministry of Higher Education, Research, Science & Technology
MOTIE	Ministry of Trade, Industry, Regional Integration and Employment
NAQAA	National Authority for Quality Assurance and Accreditation
NaNA	National Nutrition Agency
NBR	North Bank Region
NEA	National Environmental Agency
NEDI	National Enterprise Development Initiative
PCU	Projects Coordination Unit
PDO	Project Development Objectives
PEI	Productive Economic Inclusion
POM	Project Operations Manual

PP	Procurement Plan
PTAs	Parent Teacher Associations
RCT	Randomized Controlled Trial
SBCC	Social and Behavioral Change Communication
SEP	Stakeholder Engagement Plan
SMCs	School Management Committees
SP	Social Protection
SSC	Sector Skills Council
ToR	Terms of Reference
TVET	Technical and Vocational Education and Training
UNDP	The United Nations Development Programme
UNICEF	The United Nations International Children's Emergency Fund
URR	Upper River Region
USET	University of Science, Engineering and Technology
WB	World Bank
WCR	West Coast Region

GLOSSARY OF KEY TERMS

Affected Communities - Refers to groups of people living in close proximity to a project that could potentially be impacted by a project (“Stakeholders,” in contrast, refers to the broader group of people and organizations with an interest in the project).

Consultation - The process of providing stakeholders with opportunities to express their views on project opportunities, risks, impacts and mitigation measures by gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

Disadvantaged and Vulnerable Stakeholders - Individuals or groups who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/ group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and may require specific measures and/or assistance to participate. Such measures take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

Disclosure – The provision of information as a basis for consultation with project stakeholders. Involves prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders.

Engagement - A continuous two-way process in which an implementing agency, company or organization builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader stakeholder engagement strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.

Environmental and Social Assessment - An assessment comprising various social and environmental studies which aim to identify project risks and impacts and design appropriate mitigation measures to manage these and to enhance positive impacts and outcomes.

Grievance Redress Mechanism - A process for receiving, evaluating, and facilitating resolution of concerns and grievances from project-affected parties related to environmental and social performance of the project as well as other project-related concerns from citizens and other interested stakeholders. This may utilize existing formal and information mechanisms supplemented as needed with project-specific arrangements but does not prevent access to judicial remedies.

Non-Governmental Organizations - Private organizations, often not-for-profit, that facilitate community development, local capacity building, civil society advocacy, and environmental protection.

Partnership - In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

Stakeholders - Project-affected and other interested parties. These are individuals or groups who are affected or likely to be affected by the project, and those who may have an interest in the project and/or the

ability to influence its outcome, either positively or negatively. This may include beneficiary business enterprises, partner organizations, workers and their organizations, local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

Stakeholder Engagement Plan - A plan which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.

1. INTRODUCTION

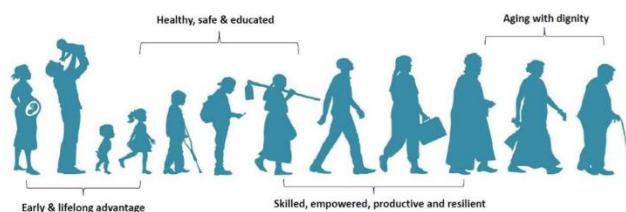
1.1. Background and Project Description

1.1.1 Background

The Gambia's Country Partnership Framework emphasizes the importance of enhancing human capital to develop a productive workforce.¹ The country's Human Capital Index score is 0.4, ranking 137th out of 174 countries.² This score, which is on par with the average for Sub-Saharan Africa, implies that under current investments in human capital, the future earnings potential of children born today will be 40 percent of what they could be with complete education and adequate health services. Strategic Priority 4 of the country's National Development Plan 2018-21 (NDP), which was been extended to December 2022, also prioritizes human capital strengthening through "improved education and health services, and building a caring society."³ Since the government, the WB, and global partners are doing a lot in the field of health, the Government of The Gambia (GoTG) and the WB agreed to focus this proposed operation specifically on education and social protection with an emphasis on the employability of youth and women.

This proposed project is designed to build on the success of the GoTG and WB's ongoing work in education and social protection. Scheduled to close in June of 2023, the Education Sector Support Program (ESSP) (P162890) is increasing access to early childhood development and basic education while improving the quality of teaching and learning. In higher education, The Gambia also participates in the regional Africa Higher Education Centers of Excellence (ACE) for Development Impact (P169064) to improve the quality, quantity, and development impact of postgraduate education in selected universities through regional specialization and collaboration. The Gambia Social Safety Net Project (P167260), scheduled to close in March of 2024, is improving the coordination of social assistance activities, providing temporary social assistance support to rural households in the wake of COVID-19, and increasing inclusion of the extreme poor in the Nafa⁴ cash transfer program. To achieve a common understanding and vision across a cross-sectoral delegation, the GoTG and WB applied a lifecycle approach (see Figure 1.1) to determine how education and social protection can build, protect, and utilize human capital, with a specific emphasis on enhancing skills development, employability, and productivity for the youth.

Figure 1.1 The Lifecycle Approach to Human Development



¹ Gambia - Country Partnership Framework for the Period FY22-26 (English) <https://elibrary.worldbank.org/doi/epdf/10.1596/33810>

² World Bank's Human Capital Project, 2020

³ <https://gambia.un.org/en/98394-national-development-plan-2018-2021>

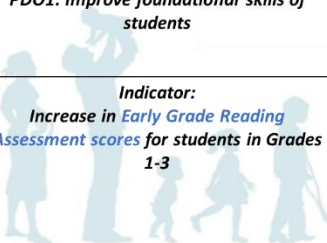
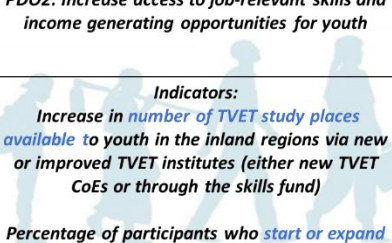
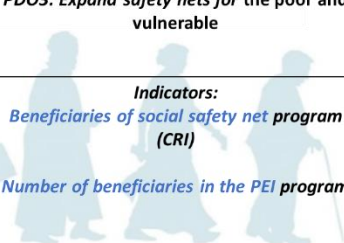
⁴ Nafa is a local word for a leather pouch that hangs around the neck and serves as a purse.

1.1.2 Project Description

Project Development Objective

To improve foundational literacy of students, increase access to job-relevant training and income generating opportunities for youth, and expand safety nets to the poor and vulnerable in The Gambia.

PDO Level Indicators

PDO: To improve foundational skills of students, increase access to job-relevant training and income-generating opportunities for youth, and expand safety nets to the poor and vulnerable in The Gambia.		
<i>PDO1: Improve foundational skills of students</i>	<i>PDO2: Increase access to job-relevant skills and income generating opportunities for youth</i>	<i>PDO3: Expand safety nets for the poor and vulnerable</i>
 <p>Indicator: Increase in Early Grade Reading Assessment scores for students in Grades 1-3</p>	 <p>Indicators: Increase in number of TVET study places available to youth in the inland regions via new or improved TVET institutes (either new TVET CoEs or through the skills fund) Percentage of participants who start or expand microenterprise 1 year after Productive Economic Inclusion training and start up support</p>	 <p>Indicators: Beneficiaries of social safety net program (CRI) Number of beneficiaries in the PEI program</p>
Basic Education	TVET System & PEI	Nafa Cash Transfers

Project Components

Given the multi-sectoral approach and substantial needs of The Gambia, the proposed project must be highly selective in what it finances. That said, The Gambia's experience with ongoing WB-financed projects and its small size allows a relatively small amount of funding to cover a substantial set of activities. Aside from the WB's normal criteria (e.g., comparative advantage, alignment with government strategies, etc.), this operation deployed a unique set of selectivity criteria to help prioritize activities: (i) scale-up activities that are already underway with positive impact, especially those disbursing well; (ii) support activities that strengthen systems that will benefit a variety of initiatives in the future (e.g., data systems, inter-operability); (iii) only invest in new activities if they have a strong research base and evaluation results; and (iv) demonstrate a proof-of-concept that additional financing can later help scale up. This selectivity approach should also ensure the GoTG has the implementation capacity needed to deliver strongly on all components and activities. To clarify roles and responsibilities in implementation, the components have been structured according to implementing ministries or agencies; however, many of the activities overlap in their focus. For example, the project's overall focus on skills and employability for youth are addressed in both the TVET activities under Component 1 as well as the PEI activity under Component 2.

Component 1: Improve foundational learning outcomes in literacy and numeracy

Sub-component 1.1 Extend structured pedagogy approach to improve classroom-level teaching and learning

The sub-component expands existing efforts underway to boost foundational literacy and numeracy. Leveraging lessons from the Effective Intervention RCT, this work will build on a cohesive and integrated pedagogical approach, which reflects recent efforts on the curriculum redesign, teaching at the right level, and adjusting the language of instruction policies, for improved learning outcomes. The planned program will focus on: (i) well-designed student books and materials at a one book per child ratio, (ii) teachers' guides that provide daily lesson plans for teachers; (iii) teacher training to reinforce specific skills in teaching the lesson plans; (iv) on-going support to teachers to implement the structured pedagogy program, including coaching and/or communities of practice; and (v) assessment results for monitoring and adapting program implementation.

Sub-component 1.2 Scale-up programs to expand access to formal education system

This sub-component focuses on providing avenues to enter or reenter into formal schooling for the most vulnerable populations. The approach would be modeled on the ongoing ESSP's pilot program in Region 5, which transferred funding to mothers' clubs at the community level and empowered them to decide how best to spend the funds to support families (uniforms, school feeding, etc.) with the goal of improving enrollment of out-of-school children. Leveraging data from the GamSR, this scale-up would target districts with the lowest enrollments. Capitalizing on the ongoing Early Childhood Development (ECD) work under MoBSE (e.g., play-based curriculum, training of facilitators, etc.), the sub-component would also continue ECD enrollment efforts for ages 3-6 and possibly pilot a childcare intervention. Given the improved parenting interventions under the Nafa Cash Transfers, this could facilitate a more integrated, cross-sectoral approach to early childhood development.

Sub-component 1.3 Scale-up efforts to strengthen systems for basic education system, including the TVET pipeline

The sub-component will continue system-level improvements to: (i) the education management information system to integrate better with human resource and social registry data; improve and conduct learning outcome assessment data; enhance the distribution and utilization of education data at decentralized levels, including school communities; and update strategies for improved, data-driven teacher deployment; (ii) the teachers training institute to build leadership capacity; develop, improve, reorganize courses on offer, address student intake/output strategy, and rehabilitate its campus and classrooms; and (iii) the acquisition of equipment and supplies to foster a pipeline of students interested in, exposed to, and equipped with TVET-related skills.

Component 2: Increase access to labor-market relevant TVET programs

Sub-component 2.1 Scale-up competitive skills fund for rapid response and innovation in the TVET sector.

To rapidly address the stock of unemployed youth, the project will finance a competitive grant mechanism to improve the quality and quantity of youth training programs that meet existing job needs, or, in the case of self-employment, successfully meet market opportunities. The training fund will incorporate lessons learned from the ongoing 'Skills for Youth Employment' (SkYE) Fund and from the WB's extensive experience in supporting training funds. Depending on how the fund is designed, it may finance both formal and non-formal training and target specific sectors, regions, or beneficiaries. Given the current context in The Gambia, the training fund might particularly focus on spurring innovative training approaches, including by private training providers and private sector actors, with a strong focus on graduate employability, targeting priority economic sectors, and/or women vulnerable population groups. For illustrative purposes, the ongoing SKYE fund supported a competitive tender process to help eight TVET institutions to offer programs in Solar Installation,

CCTV Installation, and Vehicle Diagnostic Techniques and Repairs. Prospective students could then apply to enroll and receive financial support. The competitive skills fund will be designed to boost participation of women in non-traditional, male-dominated, and higher paying sectors in recipient TVET institutions through, inter alia, targeted scholarships, and information campaigns.

Sub-component 2.2 Establish Two TVET Centers of Excellence focused on priority economic sectors/trades.

To address the flow of youth, this sub-component serves the dual purpose of promoting equitable access to and improving the quality and relevance of TVET by operationalizing two TVET Centers of Excellence (CoE) focused on priority economic sectors (e.g., agri-business and mechanization) and trades in two of The Gambia's underserved regions. The CoEs will be established on the location of an existing TVET center/education institution as no land acquisition or construction is envisaged.

To initiate the planning process for the CoE, this sub-component will fund a feasibility study to inform the location, the demands of the labor-market, an employer-engagement approach, the priority programs/trades, the student in-take capacity, a staffing/teacher assessment, and a model for financial sustainability, among others. Additional centers could be added if the model is successful, and timing and funding allow.

Sub-component 2.3 Strengthen TVET systems through data, governance, and management for results.

Activities financed under this sub-component will strengthen those system elements that are most essential to facilitate the performance and sustainability of the TVET sector, with a particular priority for activities necessary to support the proposed CoE. The selection of activities will be guided by the implementation plans for the national TVET Policy and is expected to include: supporting evidence-based decision making through promoting the timely availability and use of credible, relevant data; improving the effectiveness of stakeholder collaboration, including through sector skills councils related to the CoE; enhancing quality assurance mechanisms, including through strengthening NAQAA on quality assurance in the trades and qualification levels of the CoE; and evaluating the TVET funding model, including analyzing approaches to increase funding and to improve efficiency and effectiveness of expenditures.

Component 3: Expand and enhance social safety nets to improve the incomes and productivity of the poor and vulnerable

Sub-component 3.1 Establish a productive economic inclusion (PEI) program to skill target poor populations

Productive economic inclusion measures are proven to stimulate productive recovery of households, particularly after being affected by shocks. They also improve employment prospects for underserved segments of the labor force and contribute to women's economic empowerment. PEI measures are intended to enable households to develop sustainable income-generating activities as an exit strategy from reliance on cash transfers. This proposed sub-component will focus on areas that develop human capital and promote sustainable and resilient livelihoods by leveraging social protection and skills development. It focuses on the most vulnerable populations by providing avenues to improve productivity and develop livelihoods. The sub-component will pilot and subsequently scale-up a productive economic inclusion approach in a few selected rural and urban districts, with a focus on youth employment. PEI activities will also have a keen focus on supporting persons with disabilities and women. The package would likely include several activities, such as access to skills through basic business training, coaching to build confidence and motivation, promote participation in savings associations, and access to start-up capital through a business grant. The modalities and package will be defined in the context of The Gambia and will draw upon regional experiences of productive

inclusion programs (e.g., Niger and Ghana) and productive inclusion programs focused on youth and urban areas (e.g., Senegal, Togo, Liberia, and Benin).

Sub-component 3.2 Support Nafa Cash Transfers Program

The poverty-targeted social assistance program started with a pilot of 2,770 households in three of the poorest districts in September 2021. In July 2022, the Nafa Program was scaled up to reach 11,736 households in an additional 17 poor districts with cash transfers and SBCC interventions. The objective of this component would be to continue (and complete) delivery of the Nafa program to the 17 districts, as well as expand the Nafa program to reach new eligible beneficiaries across the country, especially in urban areas. The Nafa program will continue to target beneficiaries by using data from the GamSR. In addition to delivery of the cash transfers, the program will continue to provide SBCC trainings to promote behavioral change and strengthen human capital development through parenting and Early Childhood Development interventions, and good use of the funds through financial capability and inclusion support, including use of e-payments and promoting savings. Further, this component will support shock-responsive cash transfers, as needed, to increase household resilience to shocks and prevent negative coping mechanisms.

Sub-component 3.3 Scale-up SP data and improve interoperability among Social Services

This sub-component will support the completion of data collection for the GamSR, including to the remaining two districts to create a nationwide social registry across all 43 districts in the Gambia. The component will also support operationalizing a robust data sharing plan to ensure that data is available for use in all social sectors, including national and community level sensitization, communications and stakeholder engagements, to fulfill its role as the single entry-point for social interventions. In addition to completion of the GamSR, this component will support interoperability between the GamSR and other data systems, such as the EMIS, the national civil registry and vital statistics (CRVS) system, and the health insurance system. This sub-component will also support building update mechanisms to the GamSR to ensure the registry remains relevant. To continue to strengthen the SP system, the sub-component will also provide continued support to social protection monitoring and evaluation and initiate a national strategy for a shock-responsive and shock-resilient SP system, given The Gambia's vulnerability to climate change and fragility.

Component 4: Support project management, communications, and capacity-building

This component will provide financing towards: (i) institutional arrangements for the project; (ii) project management and operational costs; and (iii) The component will also support communication campaigns and research studies that will improve programming.

Component 5: Contingent Emergency Response Component

A zero-dollar Contingency Emergency Response Component (CERC) will only be activated and funded in accordance with IPF WB Policy Paragraph 12 and 13 for situations of urgent need of assistance. It will allow for the rapid reallocation of project proceeds in the event of a natural or manmade disaster or crisis that has caused, or is likely to imminently cause, a major adverse economic or social impact. The Government of The Gambia will need to declare an emergency or provide a statement of fact justifying the request for the activation of the use of emergency funding to trigger the CERC.

1.2. Purpose and Objective of the Stakeholder Engagement Plan

ESS10 of World Bank's Environmental and Social Framework (ESF) requires the Gambia Rise Project to prepare

and implement a Stakeholder Engagement Plan (SEP). The purpose of the Stakeholder Engagement Plan (SEP) is to ensure appropriate stakeholder consultation and information disclosure in the context of Gambia. The goal of the SEP is to help decision-making and the project implementation by involving beneficiaries and other stakeholders in a way that gives these groups the opportunity to provide feedback and express their views on intended project outcomes, benefits and potential adverse consequences. The SEP is a useful tool to manage communication between the project and its stakeholders.

The main objectives of the SEP are the following:

- To understand the stakeholder engagement requirements of the Gambian legislation
- To identify key stakeholders that are affected, and/or able to influence the Project and its activities
- To develop a stakeholder's engagement process that gives stakeholders the opportunity to participate and influence project design and implementation
- To define the information disclosure provisions under the project
- To establish a formal Grievance Mechanism under the project
- To define roles and responsibilities for the implementation of the SEP
- To define the monitoring arrangements to ensure that the SEP remains an effective and up-to-date tool for stakeholder engagement.

Communicating early, often and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays. 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.

1.3. Stakeholder Engagement Principles

This project prioritizes citizen engagement to ensure that its design and implementation are effective, responsive, and sustainable. The engagement with citizens will be consistent throughout the project cycle, fostering inclusivity, active participation, transparency, and accountability.

Feedback Mechanisms: Multiple rounds of the Fund for Skills, Innovation, and Entrepreneurship will be deployed. After each round, beneficiaries will be interviewed to gather their feedback, which will then be incorporated into subsequent rounds. This iterative feedback process will help the project continually refine and improve its methods and outcomes. Additionally, student satisfaction surveys will be conducted at the new TVET CoEs at the end of training programs. These surveys will collect valuable data on students' experiences, helping identify areas of success and areas that need improvement. Furthermore, the grievance redress mechanism will allow beneficiaries to provide feedback, express concerns, and file complaints about the project's activities, ensuring all grievances are responded to in a timely manner.

Community Sensitization and Engagement: Regular sensitization and engagement activities will be organized at both national and community levels. These activities will aim to inform and educate, raising awareness about the project's goals, activities, and expected outcomes. For instance, community sensitization activities will be used to help youth understand the opportunities available in TVET and the PEI program. By clearly communicating the potential benefits and opportunities of these programs, the project aims to encourage greater youth participation and engagement.

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: public consultations for the project will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project 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. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, internally displaced persons (IDPs), returnees, persons with disabilities, youth, elderly and those living in remote or inaccessible areas.
- Cultural appropriateness. The activities, format, timing, and venue will respect local customs and norms.
- Conflict sensitivity. This is considering the complex country context and referring to the humanitarian principles of neutrality and impartiality.
- Gender sensitivity. Consultations will be organized to ensure that both females and males have equal access to them. As necessary, the implementing agencies will organize separate meetings and focus group discussions for males and females, engage facilitators of the same gender as the participants, and provide additional support to facilitate access of facilitators.

1.4. Scope and Structure of the SEP

The SEP shall be applicable to all activities planned under the Project. The engagements will be planned as an integral part of the project's environmental and social performance and project design and implementation.

The document comprises of 8 chapters.

- The first chapter serves as an Introduction.
- Chapter 2 presents the World Bank ESS10, Gambian Environmental & Social regulation and analysis of the gaps between World Bank and Gambian Stakeholder Engagement Legislation.
- A summary of stakeholder engagement held so far is presented in Chapter 3.
- Stakeholder Identification, Mapping and Analysis is described in chapter 4.
- The Stakeholder Engagement Program is presented in Chapter 5.
- Resources and responsibilities for implementing stakeholder engagement activities is discussed in Chapter 6.
- Description of the Project's Grievance Mechanism (GM) follows in Chapter 7.
- Monitoring, documentation and reporting is presented in Chapter 8.

2. REGULATORY CONTEXT

2.1. World Bank Requirements

The World Bank has a long history of multi-stakeholder engagement and strategies to promote effective project preparation, project implementation and monitoring, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key enablers to achieving results.

In August 2016, the World Bank's Board of Executive Directors approved the Environmental and Social Framework (ESF), which went into effect in 2018 and progressively replaced the Bank's Safeguards Policies. The ESF protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. Within the ESF, ten Environmental and Social Standards highlighted responsibilities for Borrowers. The Standards are designed to help Borrowers manage project risks and impacts as well as improve environmental and social performance, consistent with good international practice and national and international obligations.

The Environmental and Social Standard (ESS) 10 is on "Stakeholder Engagement and Information Disclosure". The provisions of the Standards are to be read in conjunction with other applicable ESSs. The specific requirements set out by ESS10 are highlighted below:

Borrowers will commence with stakeholder engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design and shall maintain such engagement throughout the Project cycle. 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: (i) stakeholder identification and analysis; (ii) planning on ways to engage; (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 a stakeholder engagement log as 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 considered, or the reasons why it was not."

As early as possible in the Project, before appraisal, the Borrower will develop and disclose a Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks. The SEP is a living document, potential changes are driven by any changes in the Project. Should the project incur significant changes, such updates will be reflected in the SEP and the document will be re-disclosed. 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.

3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The main stakeholder engagement activities were conducted by the Project Implementing Agency (MoFEA) with the World Bank team support. The following information provides a list of all the stakeholders consulted during the project identification and formulation stage. The consultations were used to identify the needs and concerns of the stakeholder. These needs and concerns were utilized to inform the project activities.

3.1. Consultations Prior to this SEP

Given the Project's multisectoral design, the main stakeholder engagement activities were conducted under the leadership of the three Implementing Entities (IEs): Ministry of Basic and Secondary Education (MoBSE); Ministry of Higher Education, Research, Science and Technology (MoHERST); and National Nutrition Agency (NaNA) and World Bank team. The following Table 1 provides a list of all the stakeholders consulted during the project identification and formulation stage. The consultations were conducted from 16th May 2023 to 26th May 2023 and used to identify the needs and concerns of the stakeholder. These needs and concerns were utilized to inform the project activities. The detailed list of stakeholders consulted is included in Annex 5.

Table 3-1 List of Stakeholders consulted during the project identification and formulation

Main Project Component	Stakeholders consulted	Needs Identified	Relevant Project Activities which address these Needs
1	Regional Office Authorities (Directors, PEOs and Senior Education Officers) Teachers, Effective Intervention Tutors, Second Chance Education Tutors, Special Needs (Itinerant) Teachers	<ul style="list-style-type: none">• Lack of proper monitoring of implementation activities at the regions.• Capacity gap for teachers for the various interventions (Only few teachers are trained especially on the National language)• Limited time for training received for the different interventions.• Limited teaching and learning materials	<ul style="list-style-type: none">- Need to conduct monitoring at the regional level.- Regional directors and officers need to be involved during project implementation, specifically during trainings as they know what needs are best applicable for the region and the strategies, which is best for developing teacher's modules in respective areas.- The period of training needs to be increased so that people will have more knowledge on the subject matter.

Main Project Component	Stakeholders consulted	Needs Identified	Relevant Project Activities which address these Needs
	and ECD Facilitators		<ul style="list-style-type: none"> - Adequate materials/resources need to be available for the different activities, especially for the National language which is not familiar to people.
2	Regional Governors, Lecturers, youths, Mechanical workshop Manager, Agribusiness owners.	<ul style="list-style-type: none"> • Limited collaboration between the implementers and the local authorities. • Limited dissemination of project information to the public specifically to youths who are out of school. • Concerns on Favoritism during award of start-up grants after having the relevant training. 	<ul style="list-style-type: none"> - More synergies are needed to cement the relationship between the stakeholders. - Relevant Project Information needs to be disseminated on time and to the right people.
3	Regional Governors, youths, Affected individuals Women, persons with disabilities.	<ul style="list-style-type: none"> • Inadequate social inclusion • Favoritism during award of grants (PEI) for vulnerable people • Issues of sustainability • Strategy gap in the selection criteria 	<ul style="list-style-type: none"> - Vulnerable people should be catered for adequately for all activities which they are involved in so as to have effective implementation of their activities. - These include having trainings in environments which are disable friendly, as well as providing safe means of transport for the beneficiaries. - They can also be provided with government officers trained in dealing with people with special needs during activities such as business registration, procurement of material /merchandise/equipment etc. - People who benefit from the PEI program should be made to understand that the opportunities are not for free. After a particular period, the startup funds given to individuals should be recovered and given to others so these opportunities can continue for others to benefit from. This way, the program can expand. - Relevant stakeholders need to be included from the planning stage so that all project-affected peoples' rights are considered during project implementation.

Main Project Component	Stakeholders consulted	Needs Identified	Relevant Project Activities which address these Needs
		<ul style="list-style-type: none"> • Communication Gap 	<ul style="list-style-type: none"> - More strategies need to be put in place to foster social inclusion. - Project GRM officer (s) should be devoted to collecting grievances on the ground by following up on uptake channels in place to see whether they are working efficiently and if not, provide alternative means which ensure that they receive most grievances of beneficiaries. - Continuous sensitization of beneficiaries on the use of the cash received is required as distribution at home might not be even and this can lead to a misunderstanding at family level.

3.2. Consultations during The Gambia RISE Project (GRP) preparation

Consultation took place on 26th May 2023 focusing on The Gambia RISE Project (GRP) presentation with the following attendance:

- **Participants** included representatives from The Ministry of Basic and Secondary Education, Ministry of Higher Education, Research, Science & Technology, National Nutrition Agency, Effective Intervention and National Enterprise Development Initiative.

Table 3-2 : Concerns and Suggestions about the project

Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
Ministry of Basic and Secondary Education (MoBSE), Effective Intervention	<ul style="list-style-type: none"> • The new curriculum is centered on realistic learning situation with opportunities to apply knowledge learnt. It has implications on pedagogy and assessment (giving a chance to pupils to display their skills). It is going to be piloted for a year to see how it can be taught and the impact it will make to learners. • There is a concern on the impact of different dialects of individual tribes when using the national language to teach as this can bring confusion to the early grade pupils as they have their own languages with different dialects at home. • For EMIS, many data have been collected but the challenge, which the Ministry and partners encounter, is the adequate and effective use of the data to inform policies and decision-making. • Capacity to do financial recording of expenditure of funds given to Mothers' Clubs is a challenge. 	<ul style="list-style-type: none"> • It will be good if partners can have access to the new curriculum to integrate them into their curriculum so they can zoom on what they are trying to achieve in schools. • There will be a standardization of ethnic dialects when using the national language. A policy is currently being developed by MoBSE on how the national language should be used to teach in schools and by the time, it is completed; English will be taught only as a subject (second language) from ECD to Grade 3. • Development of a curriculum for using national language as a medium of instruction for early years is ongoing. • Data needs to be accessible as there are still gaps. Partners can always request additional data from the MoBSE Planning Unit. • Going forward, the mothers' clubs should select an educated community member who will join the club and do the financial record keeping of transactions. • Mothers' Club has to work with the individual School Management and so adequate sensitization of both parties is required to boost the relationship and their efficiency. • Rolling out of the boosting program needs to be inclusive especially schools located in

Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
	<ul style="list-style-type: none"> Schools selected for the boosting program does not include madrassas and Majalis. 	<p>border communities in CRR, madrassas and Majalis as well.</p>
Ministry of Higher Education, Research, Science and Technology (MoHERST), NEDI	<ul style="list-style-type: none"> Most youths have the skills but are not employed and they are not doing anything meaningful. It is important to have a system which will consider all those in the local Mechanical workshop. Integrate youths trained on entrepreneurship with a focus on the informal sector into the formal system. There is a need align the MoBSE prevocational learning with the programs at TVET Centers. Entry requirements into skills centers need to be flexible and backed by the gazette article showing different routes of entry. There is need to know of safeguards issues which might arise during the construction of the Sapu Agribusiness. 	<ul style="list-style-type: none"> It is good for the youths to have employability skills so that they can be self-employed. Most private institutions are not subvention; and the institutional improvement window will enhance them The USET model can be used in industry and the idea is to replicate it in all TVET regions. Due to scope of budget, it will be annexed to what is possible. Currently, there is a mapping of all kinds of skills Centers (formal and informal) in the country going on so that intervention will span across all sectors. This is justified by the need to have a whole value chain of the TVET sector from production to commercialization. Piloting is underway with NEDI to sponsor students for training on entrepreneurship with a focus on the informal sector. The sector wants to harmonize all programs (looking at curriculum and entry requirements) across TVET Centers as currently, Graduates from different Centers have different level of skills for the same program. The Ministry will work with the SSC to ensure they have the right quality of program and equipment for the training.
National Nutrition Agency (NaNA)	<ul style="list-style-type: none"> The possibility of expanding the Nafa program from 20 to the 30 districts initially proposed needs clarification. How does NaNA follow up on the effectiveness of the GM in order to avoid conflicts. 	<ul style="list-style-type: none"> Under the GRP, the Nafa program will maintain the 20 districts and be completed for the 3 years initially planned and not expand to the 30 districts initially proposed. The satisfaction of recipients concerning the grant is always monitored and linked to the GM. Panel analysis is also conducted by an independent body.

Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
	<ul style="list-style-type: none"> • The resilience and sustainability of the Nafa program is a concern as the project will end after 3 years. If the funding ceases, the implications need to be reviewed. • Are Governors involved in the implementation of the Nafa Program? How does implementation of this program work at NaNA in the regions? • In terms of data systems, Key Government Agencies (Immigration, Health etc.) do give identification numbers which are always different for each institution and individual and this can affect project implementation. 	<ul style="list-style-type: none"> • This is what justifies the PEI Program which is seen as a means to wean people off the Nafa Program to progress to income-generating activities. • Governors are members of the Project Steering Committee, while at regional level NaNA use regional structures and partners. • There is a need to generate a unique identification number for everybody in the country. A taskforce spanning across all sectors need to come together to review the idea.

4. 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 (known as “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.

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

4.1. Stakeholders’ identification through Project’s Components

The table below summarizes the stakeholders involved in each project component and sub-component forease of reference:

Table 4-1: Stakeholders Involved in Each Component

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
Component 1: Improve foundational learning outcomes in literacy and numeracy			
Sub-component 1.1 Extend structured pedagogy approach to improve classroom-level teaching and learning	<ul style="list-style-type: none"> Pupils/Students Teachers Cluster Monitors Regional Education Directorates MoBSE Curriculum Research, Evaluation & Development Directorate MoBSE M & E Directorate MoBSE INSET Unit Effective Intervention 	<ul style="list-style-type: none"> well-designed student books and materials at a one book per child ratio, teachers’ guides that provide daily lesson plans for teachers; teacher training to reinforce specific skills in teaching the lesson plans; on-going support to teachers to implement the structured pedagogy program, assessment results for monitoring and adapting program implementation. 	<ul style="list-style-type: none"> Consultants Direct workers Local public authorities NGOs Sectoral donors World Bank
Sub-component 1.2 Scale-up programs to expand access to formal education system	<ul style="list-style-type: none"> MoBSE PCU MoBSE Curriculum Research, Evaluation & 	<ul style="list-style-type: none"> providing avenues to enter or reenter into formal schooling for the most vulnerable populations 	<ul style="list-style-type: none"> ESSP’s pilot program in the region The Ministry of Basic and Secondary Education (MoBSE)

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
	<ul style="list-style-type: none"> Development Directorate Schools Most vulnerable populations Mothers' clubs Pupils' families Facilitators School dropouts 		<ul style="list-style-type: none"> Nafa Cash Transfers Community Targeted districts The Gambia Social Registry (GamSR)
Sub-component 1.3 Scale-up efforts to strengthen systems for basic education system, including the TVET pipeline	<ul style="list-style-type: none"> MoBSE Planning Directorate School communities Schools Gambia College Students Regional Education Directorate 	<ul style="list-style-type: none"> The Education management information system Gambia College The acquisition of equipment and supplies 	<ul style="list-style-type: none"> The Ministry of Trade, Industry, Regional Integration and Employment (MoTIE) Ministry of Finance and Economic Affairs (MoFEA)
Component 2: Increase access to labor-market relevant TVET programs			
Sub-component 2.1 Scale-up competitive skills fund for rapid response and innovation in the TVET sector.	<ul style="list-style-type: none"> MoHERST Directorate of Science, Technology and Innovation MoHERST Directorate of Tertiary and Higher Education GCCI GIEPA NEDI NAQAA USET Unemployed youth Vulnerable population groups TVET institutions Students 	<ul style="list-style-type: none"> Finance a competitive grant mechanism to improve the quality and quantity of youth training programs that meet existing job needs, or, in the case of self-employment, successfully meet market opportunities 	<ul style="list-style-type: none"> Private training providers Private sector actors The Ministry of Trade, Industry, Regional Integration and Employment (MoTIE) Ministry of Finance and Economic Affairs (MoFEA)
Sub-component 2.2 Establish Two TVET Centers of Excellence focused on priority	<ul style="list-style-type: none"> MoHERST MRC Holland Foundation 	<ul style="list-style-type: none"> promoting equitable access to and improving the quality and relevance of TVET 	<ul style="list-style-type: none"> The Ministry of Trade, Industry, Regional Integration and Employment (MoTIE)

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
economic sectors/trades.	<ul style="list-style-type: none"> • NAQAA • USET • Youths • TVET institutions • Centers of Excellence (CoEs) • Consultants • Lecturers • Governors (WCR and CRR) 		<ul style="list-style-type: none"> • Ministry of Finance and Economic Affairs (MoFEA)
Sub-component 2.3 Strengthen TVET systems through data, governance, and management for results.	<ul style="list-style-type: none"> • MoHERST Planning Directorate • CoEs • TVET Institutions • NAQAA 	<ul style="list-style-type: none"> • supporting evidence-based decision making; • improving the effectiveness of stakeholder collaboration. • Enhancing quality assurance mechanisms • Evaluating the TVET funding model. 	<ul style="list-style-type: none"> • The Ministry of Trade, Industry, Regional Integration and Employment (MoTIE) • Ministry of Finance and Economic Affairs (MoFEA)
Component 3: Expand and enhance social safety nets to improve the income and productivity of the poor and vulnerable			
Sub-component 3.1 Establish a productive economic inclusion (PEI) program to skill target poor populations	<ul style="list-style-type: none"> • National Nutrition Agency • Department of Community development • National Social Protection Secretariat • Poor Households • Youths • Women • Persons with disabilities 	areas that develop human capital and promote sustainable and resilient livelihoods by leveraging social protection and skills development pilot and subsequently scale-up a productive economic inclusion approach	<ul style="list-style-type: none"> • Selected rural and urban districts
Sub-component 3.2 Support Nafa Cash Transfer Program	<ul style="list-style-type: none"> • National Nutrition Agency • Department of Social Welfare • Nafa Cash Transfers Program • Department of Community development 	<ul style="list-style-type: none"> • delivery of the Nafa program to the 17 districts, as well as expand the Nafa program to reach new eligible beneficiaries across the country • support shock-responsive cash transfers 	<ul style="list-style-type: none"> • 17 districts of Nafa Cash Transfers Program

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
	<ul style="list-style-type: none"> Eligible beneficiaries in rural areas. 		
Sub-component 3.3 Scale-up SP data and improve interoperability among Social Services	<ul style="list-style-type: none"> National Social Protection Secretariat Districts 	<ul style="list-style-type: none"> the completion of data collection operationalizing a robust data sharing plan building update mechanisms to the GamSR continued support to social protection monitoring and evaluation and initiate a national strategy for a shock-responsive 	<ul style="list-style-type: none"> National Nutrition Agency
Component 4: Support Project Management, Communications and Capacity-Building			
Component 4 Support project management, communications, and capacity-building	<ul style="list-style-type: none"> Direct worker Contractor Primary supplier workers 	<ul style="list-style-type: none"> Institutional arrangements for the project. project management and operational costs; and support communication campaigns and research studies that will improve programming. 	<ul style="list-style-type: none"> MoF Sectoral donors NGOs Local Public Authorities World Bank Consultant
Component 5: Contingent Emergency Response Component			
Component 5 Contingent Emergency Response Component	<ul style="list-style-type: none"> The Government of The Gambia 	<ul style="list-style-type: none"> Support the country's future response if a natural or manmade disaster or emergency arises 	<ul style="list-style-type: none"> World Bank Project Coordination Unit, Ministry of Finance and Economic Affairs (MoFEA)

4.2. Key Stakeholders

4.2.1 Affected Parties

This section identifies individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively. The project's core beneficiaries will be out-of-school youth aged 18-35, both with and without secondary education, with an emphasis on those in the inland regions.

Government

- The Government of Gambia

Ministries/Agencies

- Ministry of Basic and Secondary Education (MoBSE)
- Ministry of Higher Education, Research, Science & Technology (MoHERST)
- Ministry of Finance and Economic Affairs (MoFEA)
- National Nutrition Agency (NaNA)

National Agencies, Institutions and local Affected Parties

- Mothers' clubs
- School communities
- Gambia College
- Effective Intervention
- Nafa Cash Transfers Program

Individuals

- Centre of Excellence (CoE)
- Facilitators
- Schools
- Households,
- Vulnerable groups
- PEI Program Training Staff
- Communities
- Students
- Persons with disabilities
- Teachers
- Lecturers
- TVET institutions
- Youths

4.2.2 Other Interested Parties

This section identifies individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively.

Ministries

- Ministry of Environment Climate Change and Natural resources
 - National Environmental Agency (NEA)
 - National Disaster Management Agency
- Ministry of Justice
 - Registrar of Businesses
- Ministry of Agriculture
 - Department of Planning
- Ministry of Fisheries and Water Resources
 - Department of Fisheries

- Department of Water Resources
- Ministry of Tourism
 - Gambia Tourism Board
- Ministry of Information
- Ministry of Communication and Digital Economy –
- Ministry of Trade, Industry, Regional Integration and Employment (MOTIE)
 - Department of Labour
- Ministry of Health
 - Planning Unit
 - Directorate of Health Promotion
- Ministry of Gender, Children and Social Welfare
 - Child Welfare Unit
 - Women's Bureau
 - Department of Social Welfare

National Agencies and institutions

- Gambia Federation of the Disabled
- National Authority for Quality Assurance and Accreditation (NAQAA)

Local authorities

- Administrative Area Councils
 1. Banjul City Council
 2. Kanifing Municipal Council
 3. Brikama Area Council
 4. Mansakonko Area Council
 5. Kerewan Area Council
 6. Jangjangbureh Area Council
 7. Kuntaur Area Council
 8. Basse Area Council

Civil society & Local institutions

- The Association of Non-Governmental Organizations of the Gambia (TANGO the umbrella of all NGO in the Gambia)
- Network Against Gender Based Violence
- Parent Teacher Associations (PTAs)
- School Management Committees (SMCs)
- Mothers' Clubs
- Village Development Committees (VDCs)
- Sector-specific Civil Society Organizations.
- National Education Bantabas
- Schools award of small grant-supported projects
- Targeted TVET CoEs
- Women Associations
- Youth Associations
- Regional Mothers' Club Associations

Private sectors

- Contractors for Construction Works
- Private sector providers of ECD services.
- Primary suppliers

Individuals

- Parents
- Head teachers
- Students with disabilities
- Teachers/caregivers
- Direct project workers
- Contractor workers
- Primary supplier workers
- Trainers
- Pupils
- Individual Recipients/beneficiaries of the project.

4.2.3 Vulnerable People

Disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. The vulnerable groups may include and are not limited to the following:

- Persons with special needs (hearing, sight, physical, intellectual)
- Low-income families/extreme poor and especially female headed households.
- Youths (uneducated, unemployed, or untrained)
- Biological and social orphans.
- Children with severe physical and sensory disabilities;
- Children caring for parents who have physical and sensory disabilities.
- Households with more than four children.
- Women that have limited access to education services
- Teachers with disabilities
- Families from ethnic minorities
- Illiterate parents

4.3. Summary of Stakeholder Interest and Influence over the Project

The table below summarizes the potential role, interests and influence for each of the above-mentioned stakeholders.

Table 4-2 : Role, Interest and Influence of key Stakeholders

Stakeholder	Potential Role of Stakeholder	Interest	Influence
The Government of Gambia	- Borrower / Recipient of the current project. It shall ensure that the Project is carried out in accordance with the ESSs and the ESCP.	High	High

Stakeholder	Potential Role of Stakeholder	Interest	Influence
Ministry of Finance and Economic Affairs (MoFEA)	<ul style="list-style-type: none"> - Lead in implementation. - Efficient use of the construction investments. Interested in efficient implementation of external funding 	High	High
Ministry of Basic and Secondary Education (MoBSE)	<ul style="list-style-type: none"> - Technical responsibility for all foundational learning activities under component one - facilitate communication and coordination with MoFEA's PCU, especially on fiduciary and safeguard matters, and among other stakeholders, monitor progress, and provide technical support as needed to ensure successful implementation of the component. 	High	High
Ministry of Higher Education, Research, Science & Technology (MoHERST)	<ul style="list-style-type: none"> - will manage TVET-related technical activities under component two - facilitate communication and coordination with MoFEA's PCU, especially on fiduciary and safeguard matters, and among other stakeholders, monitor progress, and provide technical support as needed to ensure successful implementation of the component. 	High	High
National Nutrition Agency (NaNA)	<ul style="list-style-type: none"> - NaNA will lead social protection activities in close collaboration with NSPS, DCD, and DSW under component 3 - facilitate communication and coordination with MoFEA's PCU, especially on fiduciary and safeguard matters, and among other stakeholders, monitor progress, and provide technical support as needed to ensure successful implementation of the component. 	High	High
PAPs and local government Authorities	<ul style="list-style-type: none"> - The main beneficiaries and implementers of the project activities; the success of the implementation depends on their active involvement and engagement 	High	Medium

Stakeholder	Potential Role of Stakeholder	Interest	Influence
Contractors	- Renovation and construction of Centers of Excellence	High	Medium
National Accreditation and Quality Assurance Authority	- developing criteria and standards for the establishment, registration and accreditation of institutions - Provide the quality assessment framework and methodology	High	Medium
<ul style="list-style-type: none"> Ministry of Information Ministry of Communication and Digital Economy 	- Promote research and development of information technology in education	Medium	Medium
Tertiary and Higher Education Directorate, MoHERST	- An executive staff that manage education at district level - Provide additional policy advice and input	Medium	Medium
Development partners (DPs)	- Budgetary support and technical assistance	Medium	High
Multilateral and Bilateral donors	- Provide investments in similar areas and need to coordinate to avoid overlap and maximize impact	High	Medium
High School and University Students, including TVET	- Benefit from improved education which may affect their life-long earning potential.	High	Moderate
Vulnerable Groups	<ul style="list-style-type: none"> poor and vulnerable women and youths will benefit from productive economic inclusion activities detailed in subcomponent 3.1, which will provide them with the tools to improve productivity and develop sustainable livelihoods. vulnerable people who wish to enter or reenter formal schooling will benefit from activities in subcomponent 1.2. 	High	Low
Media	- Dissemination of information in local and national news	High	Medium
Parents	- Interested in ensuring an improved general education for their children	High	Low

4.4. Summary of Project Stakeholder Needs

The following specific needs were identified based on the prior experience of the implementing agencies:

Table 4-3: Project Stakeholder Needs (Summary)

Stakeholder Group	Consultation Methods	Specific Needs (accessibility, large print, childcare, daytime meetings)
Basic Education Authorities at Regional and Ministry Level	<ul style="list-style-type: none"> • Official letters • Emails • Nontechnical summary documents • Progress reports • in person meetings 	<ul style="list-style-type: none"> • Official correspondence and nontechnical documents or progress reports to be shared in English (official language) • Daytime meetings
Local Authorities at Regional and Ministry level who are engaged in the education process or access approval	<ul style="list-style-type: none"> • Official letters • Emails • Nontechnical summary documents • Progress reports • In person meetings 	<ul style="list-style-type: none"> • Official correspondence and nontechnical documents or progress reports to be shared in English (official language) • Daytime meetings
Teachers in target areas	<ul style="list-style-type: none"> • Official letters • Emails • In-person meetings • Nontechnical summary documents • Flyers • Posters • WhatsApp Group Messages • Phone call 	<ul style="list-style-type: none"> • Communication to go through Ministry of Basic and Secondary Education reporting lines • Materials to be shared in English. • Proximity to schools / homes • Time bound meetings to enable teachers to meet family commitments
Headteachers in target areas	<ul style="list-style-type: none"> • Official letters • Emails • In-person meetings • Nontechnical summary documents • Flyers • WhatsApp Group Messages • Phone call 	<ul style="list-style-type: none"> • Communication to go through Ministry of Basic and Secondary Education reporting lines • Materials to be shared in English • Proximity to schools / homes • Time bound meetings to enable Headteachers to meet family commitments
Other education personnel in target areas	<ul style="list-style-type: none"> • In-person meetings • Banners • Posters • Flyers • Phone call 	<ul style="list-style-type: none"> • All materials to be shared in English • Printed material to be in large font • Proximity to schools / homes • Time bound meetings to enable stakeholders to meet family commitments
Children (in and out of school)	<ul style="list-style-type: none"> • In-person meetings • Banners • Posters • Flyers 	<ul style="list-style-type: none"> • All materials to be shared in English • Printed material to be in large font • Presence of caregiver • Communication should be in language which they are familiar with.

Stakeholder Group	Consultation Methods	Specific Needs (accessibility, large print, childcare, daytime meetings)
Parents and caregivers of children living in the targeted areas	<ul style="list-style-type: none"> • Parent Teacher Association (PTA) In-person meetings • Posters • Radios (during COVID-19) 	<ul style="list-style-type: none"> • Communication should be in language which they are familiar with. • Printed material to be illustrative. • Timings for in-person meetings should not interfere with childcare responsibilities or professional commitments
Basic Education actors working in the targeted areas	<ul style="list-style-type: none"> • Cluster working group in-person meetings • Email • Phone • Flyers 	<ul style="list-style-type: none"> • All materials to be shared in English • Printed material to be in large font • Daytime meetings
Vulnerable Groups (in and out of school) living in the targeted areas, including children with disabilities	<ul style="list-style-type: none"> • In-person meetings • Posters • Flyers 	<ul style="list-style-type: none"> • Communication should be in language which they are familiar with. • Printed material to be illustrative. • Presence of caregiver • Ensure facilities for in-person meetings are physically accessible (for CWD) • Materials in Accessible Format (for CWD)
Humanitarian and Development Actors, including NGOs and CSOs	<ul style="list-style-type: none"> • Cluster working group in-person meetings • Email • Phone • Flyers 	<ul style="list-style-type: none"> • All materials to be shared in both English • Printed material to be in large font • Daytime meetings

5. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. The table below presents key stakeholder engagement activities to take place during the project preparation stage through to implementation and closure of the Project.

5.1. Engagement Methods to be Used

The suggested methods below will be used to communicate and consult with the stakeholders:

- **Online Platform** - A dedicated webpage/Platform will be created for the project to enable users to find all the information about the project. The goal of the platform is to provide core information about the project and to ensure accessible online feedback from stakeholders and to support several citizen engagement activities. The platform will also be used to publish all ESF documents, including ESCP, ESMF, LMP, SEP, site specific ESIA, RPF, ESMP and other relevant information related to project implementation. The platform will be used to support face-to-face consultations through digital feedback surveys at regular intervals and will provide a dedicated portal for the identified sub-projects to inform the population and engage them in providing feedback and support monitoring through the implementation cycle. All public consultations events will be advertised through this platform. The platform's outreach will be guaranteed by ensuring that links with various websites of relevant implementing unit entities, partners and outreach will be done on social media to make sure citizens can easily find and access the platform.
- **Public Consultations / Virtual and in-person consultations** - Consultations have been and will continue to be organized during the project design stage and the project implementation. Public consultations will be organized by MoFEA's Social Specialist and Environmental Specialist for ESMF documents, as well as site specific ESIA/ESMP and other ESF documents. Moreover, public consultations will be held on an ongoing basis as part of the citizen engagement process during the project cycle.
- **Workshops** - Workshops with experts will be held to consult on the implementation status and progress of the project and the revision and development of new policies and normative documents. Also, several workshops with citizen/ stakeholders will be carried out with a focus on raising stakeholder awareness on project benefits, establishing project implementation procedure, timing for project implementation, and GM. Other topics relevant for these workshops will be identified during project implementation.
- **In-depth Interviews with Relevant Experts** - Experts' views and recommendations on various project issues and challenges are valuable and have been conducted as part of the gender assessment. They will continue to be used as part of specific project activities.
- **Leaflets/ Informative Notes** - Leaflets with information that might present more interest for affected parties, such as the benefits of proposed investments will be developed and distributed during meetings/ public consultations/ public institutions (schools, etc.).
- **Information Boards** - Establish Information Boards in each sub-project area, communities that will benefit by investments and also in localities with investments for Education facilities. These information boards will contain information related to the Project and relevant for every phase of Project implementation.
- **Letters** - Letters will be an instrument used in order to facilitate the Project implementation process through good collaboration between the implementing entities and other stakeholders.
- **Reports** - The reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project.

- **E-mails.** Emails will be used to facilitate communication between implementing entities.
- **GM** – Grievance Mechanism (GM) will be established in line with the World Bank’s ESS-10 requirements. A dedicated grievance mechanism will be set up for the Project. The stakeholders will be able to raise grievances anonymously using the uptake channels provided.
- **Grievance Log** - where grievances, including those delivered through the online platform, are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

5.2. Purpose and Timing of Stakeholder Engagement Program

5.2.1 Purpose of Stakeholder Engagement Program

Stakeholder Engagement activities will be ongoing throughout the whole life cycle of the Project. The stakeholders will be engaged as early as possible and throughout the planning and implementation phase of the project. The nature and frequency of follow-up consultations will be different depending on the preparation or the implementation phase of project activities.

Prior to implementation of the GRP, all affected parties will be informed about the Project’s scope and contact information which they can use to access further Project information. They will also be informed about the availability of publicly available information on the MoFEA website.

Key communication principles are to:

- Keep the community and key stakeholders informed in advance of project progress.
- Encourage stakeholder’s participation.
- Ensure ‘no surprises’ to key stakeholders and the community.
- Listen to feedback, investigate suggestions and adopt them where possible.
- Transparency.

The GRP PCU will be responsible for overall GRP implementation, including the implementation of this SEP. The Social Development Specialist, Environmental Specialists and the GBV/SEA/SH specialist shall be the responsible people for implementation of the SEP document during the entire Project cycle, and in charge of communicating with the communities. All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP.

5.2.2 Timetable for information disclosure

During Project implementation, MOBS, MOHERST, MOFEA, NANA. will continue disclosing information on the content of the project as well as related processes to targeted stakeholder audiences as described in the Table below.

Key dates for information disclosure are at the start of the project, at mid-term as well as at the end of the lifespan of the project; in addition, each year there will be joint mid-year and annual reviews organized between MOBS, MOHERST, MOFEA, NANA. and the relevant project stakeholders, including implementing partners / service provider. Such a review will serve to take stock, discuss opportunities and challenges, and to take corrective actions where needed. In areas where physical access is limited, alternative channels of information disclosure will be applied, with the possibility to engage a third- party to support the information disclosure process.

Formats of information disclosure are a combination of face-to-face meetings where applicable, accompanied by information shared via radio, television, newspapers, posters, brochures, and leaflets as well as via websites and social media. Information disclosure formats will be determined in discussion between MOBS, MOHERST, MOFEA, NANA. and the relevant stakeholders following Project effectiveness.

Table 5-1 Provisional strategy and timetable for the information disclosure

Phase and process	Information dissemination activities	Indicative calendar	Targeted stakeholders	Responsibility
PROJECT PREPARATION PHASE				
Preparation Project Document	Dissemination of the SEP on the project website Dissemination of the SEP on the website of MoBSE, MoHERST, MoFEA, NaNA and the World Bank. Document matching and sharing	Following the adoption of the document by MoBSE, MoHERST, MoFEA, NaNA. and the Board of Directors of the World Bank	MoBSE, MoHERST, MoFEA & NaNA. World Bank; Project affected parties Other identified stakeholders	GRP Unit under MoBSE, MoHERST, MoFEA & NaNA. World Bank
Preparation of the SEP including the GM	Official correspondence Dissemination of the SEP document on the Project and World Bank website Publication of SEP summaries in newspapers, brochures and leaflets	No more than one month after validation of the report	Project affected parties, interested parties and vulnerable people Other identified stakeholders Implementing partners	GRP Unit under MoBSE, MoHERST, MoFEA & NaNA. SEP Consultant
Preparation of the Environmental and Social Commitment Plan (ESCP)	Official correspondence Availability of the ESCP document on MoBSE, MoHERST, MoFEA, NaNA and World Bank website	No more than one month after validation of the report	MoBSE, MoHERST, MoFEA & NaNA. Project affected parties List of identified stakeholders Implementing partners	GRP Unit under MoBSE, MoHERST, MoFEA & NaNA. World Bank E&S Consultant
EXECUTION PHASE AND SUPERVISION OF THE PROJECT				

Phase and process		Information dissemination activities	Indicative calendar	Targeted stakeholders	Responsibility
EXECUTION	Project Start/Project Introduction	Project Information/ Presentation of Project Activities The launch workshop is accompanied by the distribution of physical documents on the Project (brochure, leaflet, etc.)	At the time of Project effectiveness	All GRP stakeholders, including affected parties, interested parties, vulnerable persons and implementing partners	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators
	Project Execution	Environmental and social documents (ESCP, ESMF, RPF, PMP, SEP etc.) maintained and available on the web of the Bank Project Supervision Report	Throughout the planning and implementation phase of the project until after closure	Affected parties and beneficiaries Interested parties Vulnerable persons Implementing partners Other identified stakeholders	MoBSE, MoHERST, MoFEA & NaNA Team
	Establishment of the GM bodies and effective functioning	Dissemination of meetings for the establishment of GM bodies/appointment of people Minutes of meetings Attendance list	Right after project approval and throughout the planning and implementation phase.	Affected parties and beneficiaries Interested parties Vulnerable persons Implementing partners Other identified stakeholders	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist SEP Consultant
	Implementation of the SEP	Availability of the updated SEP report on MoBSE, MoHERST, MoFEA, NaNA and World Bank website Publication of summaries of the updated SEP if major changes are made.	Each time the SEP is updated	Affected parties and beneficiaries Interested parties Vulnerable persons Implementing partners Other identified stakeholders	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist
	Notification of incidents and accidents.	A detailed report on specific information, including causes, consequences, actions taken, preventive measures taken to avoid similar situation in future etc.	Incidents and accidents will be reported to the Bank in writing no later than 48 hours after becoming aware of them; 24 hours if there is a fatality.	MoBSE, MoHERST, MoFEA & NaNA. World Bank	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators.
CLOSING PHASE					
	Final evaluation of the project	Publication of the final evaluation report of the project Summary of Project Successes/Achievements and Lessons Learnt	Six months before the closure of the GRP	MoBSE, MoHERST, MoFEA & NaNA. World Bank; Project affected parties, interested parties and vulnerable people Other identified stakeholders	MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators. World Bank GRP Final Evaluation Consultant

Phase and process	Information dissemination activities	Indicative calendar	Targeted stakeholders	Responsibility
Evaluation of the SEP and the GM	GRP Final Social Report	Six months before the closure of the GRP	MoBSE, MoHERST, MoFEA & NaNA. Project affected parties, interested parties and vulnerable persons Other identified stakeholders	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators. SEP Final Evaluation Consultant World Bank Assigned Environmental and Social Specialists

5.2.3 Timetable for Stakeholder Engagement

Table 5-2 Provisional Plan and timetable for Consultation

Phase and process		Information dissemination activities	Indicative calendar	Targeted stakeholders	Responsibility
PROJECT PREPARATION PHASE					
Preparation of the Project Document		Formal meetings with national entities; Public consultations; Field visits; Interviews	Throughout the development of the document	MoBSE, MoHERST, MoFEA & NaNA. List of identified stakeholders.	GRP Unit under MoBSE, MoHERST, MoFEA & NaNA.
Preparation of the PMPP including the GRM		PMPP Validation Workshops	During the preparation of documents and before their publication	Project affected parties, interested parties and vulnerable people.	GRP Unit under MoBSE, MoHERST, MoFEA & NaNA. SEP Consultant
Preparation of the SEP		Consultation workshops	During the preparation of documents and before their publication	MoBSE, MoHERST, MoFEA & NaNA. Project affected parties, interested parties and vulnerable persons List of identified stakeholders.	MoBSE, MoHERST, MoFEA & NaNA.
EXECUTION PHASE AND SUPERVISION OF THE PROJECT					
EXECUTION	Project Commencement	Updating the list of stakeholders Stakeholder consultation on project planning Presentation of objectives, principles and program for stakeholder engagement.	At the actual start of the Project	All GRP stakeholders including Project affected parties, interested parties and vulnerable people. Implementing Partners	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators
	Establishment of GM bodies and effective functioning	Meetings for the establishment of the bodies of the GM/appointment of people Minutes of meetings Attendance list	From the beginning of project approval, throughout the planning and implementation phase,	MoBSE, MoHERST, MoFEA & NaNA Project affected parties, interested parties and vulnerable people. Other identified stakeholders	Environmental specialist, Social development specialist Gender and GBV/SEA/SH specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators
	Implementation of the SEP	Continued implementation of the SEP GRP Implementation Report Updating the list of stakeholders Stakeholder consultation on project planning Presentation of objectives, principles and program for stakeholder engagement.	Each time the SEP is updated	MoBSE, MoHERST, MoFEA & NaNA. Project affected parties, interested parties and vulnerable persons Other identified stakeholders	Project Environmental Specialist Project Social Development Specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators

Phase and process		Information dissemination activities	Indicative calendar	Targeted stakeholders	Responsibility
SUPERVISION	Evaluation of the performance of SES (SEP and GRM)	Stakeholder consultation on SES: Social risk assessment, state of implementation and performance of environmental and social (SEP including the GRM)	Every six months.	MoBSE, MoHERST, MoFEA & NaNA Project affected parties, interested parties and vulnerable people. Other identified stakeholders	GRP Monitoring and Evaluation Specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators.
	GRP mid-term evaluation	Stakeholder consultation for the preparation of the mid-term report: successes/achievements and lessons learnt from the project	Mid-term of the Project	MoBSE, MoHERST, MoFEA & NaNA World Bank; Identified stakeholders	GRP Monitoring and Evaluation Specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators.
CLOSING PHASE					
Final evaluation of the project		Stakeholder consultation for the final project evaluation report: project successes/achievements and lessons learned	Six months before the closure of the GRP	MoBSE, MoHERST, MoFEA & NaNA World Bank; Project affected parties, interested parties and vulnerable people. Other identified stakeholders	MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators. GRP Final Evaluation Consultant
Evaluation of the SEP and the GM		Stakeholder consultation for the GRP's final social report	Six months before the closure of the GRP		Project Environmental Specialist Project Social Development Specialist Community Health and Safety (CHS) specialist MoBSE, MoHERST, MoFEA & NaNA Technical Coordinators. SEP Final Evaluation Consultant World Bank Assigned Environmental and Social Specialists

5.3. Proposed Strategy for Inclusion and Communication with Vulnerable Groups

The project will make a concerted effort to target all the vulnerable groups identified in the SEP. As part of its visibility/communication strategy, the Project will promote and highlight social benefits for disadvantaged groups and individuals in the society such as the poor, disabled and socially excluded. GRP will continue to consult with and engage all relevant stakeholders and interested parties in different stages of planning and implementing this project.

GRP will organize different techniques to include vulnerable groups. Part of the techniques will include, but not limited to, focus groups with parents of vulnerable pupils/students, school report collection days, online presentations/info sessions/consultations etc. This risk will be addressed through a two-tier approach: (i) through the ESIA/ESMP and C-ESMP preparation for each sub-project that will assess the risk and propose adequate mitigation measures, which will, consequently, be integrated in project designs and (ii) through the stakeholder engagement processes. The second tier are activities within a school, especially for schools with more children coming from vulnerable groups: the project will be proactive in soliciting views from the vulnerable group parents and children especially in the preparation of the school improvement plans.

Table 5-3 : Strategy for Inclusion and Communication with Vulnerable Groups

Target groups	Strategy
<ul style="list-style-type: none"> • People with special needs (hearing, sight, physical, intellectual) • Vulnerable groups (Poor families) • Youths (uneducated, unemployed, or untrained) • Potential migrants, and returnees; • Business owners (including local stalls, trading markets, small businesses/shops, landlords/tenants of businesses/buildings, including elderly, youth and women business owners) • Orphans; • Children with severe physical and sensory disabilities; • Children whose parents have physical and sensory disabilities; • Households with more than four children; • Women that have limited access to education services • Teachers with disabilities • Parents and children from ethnic minorities • Illiterate parents • Low-income families/extreme poor and especially female headed households 	<ul style="list-style-type: none"> • The PCU will arrange separate consultation sessions (e.g., meetings and focus group discussion). • The PCU will use various communication measures including women associations to reach out to female groups but also materials and training on responding to needs of disabled children, information in relevant languages for minorities, visual information tailored to child needs, messages on safe schools and prevention for reporting of VAC. • The PCU will use various communication measures including all relevant NGOs to reach out to different vulnerable groups. • The project will use various measures including counseling and support services to address gender issues in education such as workshops on gender issues, advocacy and media campaigns. • Having in mind COVID-19 pandemic, different online activities can be provided such as presentations and/or information for project activities, consultations, surveys, meetings etc.

5.4. Timeline for Provision of Feedback

Throughout implementation, stakeholder feedback and comments will be collected. The MoFEA PCU will provide appropriate background and relevant technical information to stakeholders' whose feedback is sought on various project issues with sufficient advance notice (5-10 business days) so that the stakeholders can have enough time to prepare to provide meaningful feedback. The PCU will collect, review and report back to stakeholders on how the comments were incorporated or the rationale for not incorporating them within 10 to 30 working days from the stakeholder engagement event.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1. Implementation Arrangement

The overall coordination role in the implementation of the SEP will be carried out by the MoFEA. The MoFEA has experience with the implementation of projects financed by international development organizations, including the World Bank .

A PCU will be within the MoFEA for the management of the implementation of this Project. This PCU has a good track record of project implementation and ensures compliance with the applicable World Bank procedures. Its staff are hired as part-time individual consultants, financed through the mentioned Project. Given the nature of the proposed package of interventions to be funded by the Project and the new Environmental and Social Framework applicable to the Project, the PCU will include one Environmental and one Social Specialist who will ensure compliance with the World Bank's ESF performance standards and implementation of this SEP.

The Project Coordinator will be the liaison officer between the MoFEA and the World Bank and will be held accountable for compliance with ESF guidelines agreed upon under the project. He or she should report to the Project Director (MoFEA's staff). MoFEA will play an important role in the implementation of the proposed Project including those responsible for (i) higher education, (ii) NQF and (iii) information, communication and technologies.

The PCU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PCU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Project Management component and may be increased should there be a need.

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

6.2. Roles and Responsibilities

The roles and responsibilities of the various units are presented below in Table 6-1. The Projects Coordination Unit (PCU) will be responsible for the preparation and implementation of the SEP.

Table 6-1 : Organizational Roles and Responsibilities

Role	Responsibility / Accountability
MoFEA Projects Coordination Unit (PCU)	<ul style="list-style-type: none"> • Ensure proper implementation and follow up of the SEP. • Ensure that contractors and MoFEA employees are informed and trained on the SEP. • Ensure that the MoFEA E & S team report 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 Program.
MoBSE, MoHERST, and NaNA Technical Teams	<ul style="list-style-type: none"> • Ensure that employees and subcontractors have in their contracts a stakeholder engagement/community relations management clause and are aware of and trained on the SEP. • Coordinate required SEP support and trainings for staff in coordination with E & S team and Human Resources Manager.
Project Environmental Specialist, Social Specialist and GBV/SEA/SH Specialist	<p>Neutral individuals ideally recruited locally, who speak dominant local languages and should be proven not to have a personal interest in a particular outcome.</p> <p>As the primary interface between the Project and stakeholders, including the local community, the Environmental and Social Specialist will:</p> <ul style="list-style-type: none"> • Lead the SEP Plan design and implementation and coordinate the results and actions to be taken with the Environmental Specialist and later with the Subcontractor's Team. • Review the SEP viability with the Environmental Specialist. • Lead day-to-day implementation of the SEP and Community Grievance Mechanism, including proactively maintaining regular contact with affected communities through regular community visits to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups. • Produce stakeholder engagement monitoring reports and submit to Project Implementation Team. • Supervise/monitor and coordinate activities with the Project management Team to ensure that staff and all sub-contractors comply with the SEP. • Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Program. • Review the SEP ensuring compliance in terms of Environmental, Occupational Health and Safety requirements and provide feedback to Social Development Specialist. • Maintain the project Grievance Mechanism and ensuring that it functions throughout the project cycle.
Subcontracted employees	<ul style="list-style-type: none"> • Comply with requirements stated in this document as 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 MoFEA Social Development and Environmental Specialist. • Provide data related to SEP performance/monitoring as required.

6.3. Training and awareness

All parties involved in the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures. The project will assess the adequacy and capacity of the PCU team members in terms of their understanding of the SEP and GM put in place for the project and the principles governing the same. Provisions for refresher trainings will be put in place at the commencement of project effectiveness and annually thereafter.

Information leaflets will be developed and disseminated among beneficiaries during various events (see the leaflet below). In addition, all communication materials, including banners commonly used during project implementation, will include information on access points for feedback and complaints.

Information about the Grievance Mechanism will be available at the MoFEA's website (GRP's section) and will be included in communications with stakeholders and in events organized under the project. MoFEA will also inform via email all the Local Education Departments, and beneficiary schools of all project activities, including instructions that the information be publicly displayed. The information about the GM will also be included as part of the communication campaign about the project.

The Gambia Rise Project (GRP) will include information provided on the scope of the GM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to complainants, as well as the principle of confidentiality and the right to make anonymous complaints.

6.4. Review of comments

Establishing a communication mechanism with the public is an integral part of the Stakeholder Involvement. The PCU will respond to public request for information and concerns/complaints as soon as possible in accordance with the procedures below:

Table 6-2 : Procedure to respond to public request for information and concerns

Stage	Descriptions
Reception	The PCU will ensure the reception of communications sent by the public from accessible means made available to them (WhatsApp, email address, complaints box, toll-free number, Phone call, etc.)
Registration	The PCU must ensure the registration and update of all external communication
Analyze	The PCU must analyse the issues raised and determine how they will be handled and answered
Feedback	The PCU must ensure that all questions/concerns/complains raised are responded to within an acceptable time frame
Adjustment	The PCU should consider the possibility of adjusting the management process, if necessary. It should be taken from the perspective of improvement.
Publication	The PCU should periodically report on the project and social issues.

6.5. Estimated Budget

The Project will have a dedicated budget for engagement and communications activities to ensure the implementation of this SEP and outreach activities envisaged. The below table presents an estimated budget for the implementation of the SEP. It should be noted that Contractors' budgets should include the costs of

SEP implementation, in view of activity specific stakeholder consultations and information dissemination for educational facilities/schools' rehabilitation/construction. The budget presented here concerns the Project level implementation of the SEP through the PCU. The source of funding is the Project budget.

Table 6-3 : The Project estimative costs for SEP activities (USD)

Item	Quantity	Unit cost	Total cost (USD)
Periodic stakeholder consultations	20	500	10, 000
Capacity building for citizen engagement and delivery and support to public awareness campaign (trainings, workshops for local focal points and Citizen)	1	240, 000	240, 000
Project information (preparation of webinars/video and GM materials)	12	1, 000	12, 000
Project website creation and maintenance (online platform)	1	20, 000	20, 000
Technical support (WEBEX, Zoom) for conducting online public consultations & interested parties	5	1, 200	6, 000
Information materials development (brochures, leaflets, posters and other items)	6	2, 000	12, 000
Connectivity cost	6	600	3, 600
Project press conferences (twice per year)	18	500	9, 000
Trainings for PCU staff on stakeholder engagement and GM including GBV Risk Mitigation	3	10, 000	30, 000
•			
Subtotal			402, 600
Contingency 5%			20,130
Total			422,730

6.6. Financial Resources

The project will ensure that the budget formulated for the purpose of the stakeholder engagement process and grievance resolution is sufficient to meet the expenses of both activities. In the case of grievances requiring monetary compensation, the amount will be provided through the dedicated escrow account set up for the project.

7. GRIEVANCE MECHANISM

It should be expected that the implementation of the Project will cause grievances to individuals and communities such that a system needs to be in place to effectively attend to, and resolve, these complaints, hence the need of a GM, the details of which are proposed in this section.

Transparency and accountability are core elements of the Gambia Rise Project (GRP). For this purpose, the project will include a Grievance Mechanism (GM) which is already being used in a different project funded by the World Bank. The goal of the GM is to strengthen accountability to beneficiaries and provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The GM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

7.1. Definition of GM

For the purpose of this SEP, a Grievance Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms ‘grievance’ and ‘complaint’ are used interchangeably.

7.2. GM Principles

- The project-level GM would be designed in a culturally appropriate way so as to effectively respond to the needs and concerns of all affected parties.
- The GM would be well-publicized and known to all affected population. The implementing agency will ensure that the GM is widely publicized and also conduct awareness campaigns in this regard among the affected communities. Implementing agencies will brief target stakeholders about the scope of the mechanisms, the safety of the complainant, time of response, the referral and appeal processes.
- Accessibility - The GM will be clear, accessible to all segments of affected communities, living within the vicinity of the project and subprojects sites or location.
- The Mechanism would allow for multiple avenues of uptake of grievances.
- The system would be sensitive to women, men, boys and girls, as well as vulnerable populations such as persons with disabilities, elderly, displaced persons and other marginalized groups.
- Confidentiality and prevention against retaliation.
- The GM would be designed to protect beneficiaries and stakeholder's rights to comment and complain, and even raise their complaints to higher management if they are not satisfied with services or receive insufficient solutions. The mechanism would facilitate their sharing of concerns

freely with understanding that no retribution will be exacted for their participation. To create a safe space, anonymous complaints will also be allowed.

- The GM shall provide for relaying regular information and feedback regarding the redressal of the grievance to the aggrieved.
- The Mechanism shall be responsive in redressal of grievances by facilitating resolution with the concerned actor in the implementing chain.
- The GM would be based on transparency and accountability. All complainants will be heard, taken seriously and treated fairly. The community and stakeholders will be aware of the expectations from the project; the GM procedures; understand its purpose and have sufficient information on how to access it.
- The GM will have provisions to appeal if the grievances are not resolved satisfactorily.
- The GM will not prevent access to judicial and administrative remedies.

The mechanism will provide for prompt time-bound resolution of grievances.

7.3. Objectives and Grievances Categories

The Grievance Mechanism (GM) is an essential tool that enables stakeholders to convey their grievances to the project and allows project to properly address them in a timely manner. For the purpose of this document, “grievances” refers to any formal concerns, complaints, suggestions or any other equivalent terms. It is anticipated that project related activities may induce grievances.

Categories of grievances include:

- Conflicts related to the diversion or suspicion of diversion of the workers benefits, Incidents due to lack of communication.
- Conflicts of interest;
- Conflicts between employers and employees related to late (or non-payment) of wages or bonuses;
- Disputes related to the removal or reduction of financial or non-financial benefits; Disputes related to the degrading treatment of certain executives;
- Disputes related to an administrative task.

7.4. Institutional Framework and Operational Procedures of the GM

Institutional Framework of the GM Implementation

The GM institutional framework is intended to provide a description of the various committees that will be set up by the Project Steering Committee (PSC) to achieve the objectives assigned by the project. It involves all stakeholders in the Project implementation process.

This GM consists of two (02) levels:

- **Level 1:** The Project Implementation Unit which will be based at the Implementing Agency, the Directorate of Public Private Partnership (DPPP) of the Ministry of Finance. It will be chaired by the Director of DPPP.
- **Level 2:** The Project Steering Committee which will be composed of high-level officers representing all project stakeholders. It will be chaired by the Permanent Secretary of MoFEA.

The Grievance Mechanism (GM) Operational Procedures

During the GM disclosure process, employees and stakeholders will receive a brochure of the GM procedures. Alternatively, the content of this document will be read to illiterate workers who will confirm their understanding by signing a form.

Communities and individual workers who believe they are adversely affected by the Gambia Fiscal Management Development project may submit their claims to the existing process, the description of which is as follows:

Step 1: Grievance Receipt, Registration and Uptake Channels

The receipt and registration of grievances consists in allowing any worker or eligible person to convey their grievance to the various GM Management Committees in the 3 implementing entities. In complex and/or sensitive situations, these grievances are made anonymously through the various channels (email, letter/note, in person through a representative, etc.) to protect the plaintiff and to allow for an investigation. Each member of the committee constitutes an uptake channel where a complaint can be filed.

Grievances can be submitted by:

Table 7-1 : Various channels to make a complain.

Uptake Channel	
a) Regional Social Welfare Officers	
b) Phone call (toll free number);	
c) Sending an SMS (short message service);	
d) In person (staff who receive grievances verbally must put them in writing);	
e) E-mail;	
f) Complaint boxes;	
g) WhatsApp	
h) Regional Project Focal Points	

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints. GRP's Project Manager must be informed of all complaints received.

Confidentiality and Conflict of Interest: Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to submit complaints will be established and conflicts of interest will be avoided.

Step 2: Assessment, Acknowledgement and Response

Acknowledgment of receipt

The PCU GM Operator receiving the grievance must inform the plaintiff (using the plaintiff's preferred

acknowledgement of receipt/way of notification) that the grievance has been received, that it will be registered, given a reference number and assessed. When the plaintiff files the grievance in person, the acknowledgment of receipt is **immediately or at most 24 hours** given to him/ her and the notification to the GM Operator must be made within **three days**. When the grievance is filed in other forms, the acknowledgment of receipt is sent within **a maximum of three days**.

Assessment of complaint

- i. Did the plaintiff indicate whether a person, body/service or project activities or processes have had a negative impact, economic or social harm on the plaintiff or could have such impact or harm?
- ii. Does the grievance specify the type of existing or potential impact or harm, and how the person, service or structure has or may have caused such impact?
- iii. Does the grievance indicate whether the plaintiff is the one who is impacted or at risk? Or it indicates that the plaintiff represents affected or potentially affected stakeholders?
- iv. Does the grievance not concern cases that have already been settled?
- v. Is the grievance documented? Any relevant details about the date, place, date of appointment, department/unit, copies of any letters or other documents to support the grievance?

The Grievance assessment is made within **5 days** of receiving the grievance. If a grievance is deemed ineligible, the reasons for this decision must be provided to the plaintiff.

Assignment of Responsibility

The claims are referred to the competent agency/entity based on the plaintiff issue. Given that various partners will intervene in project activities, it is important that the PCU coordinates the GM implementation and the response to the plaintiffs.

Plaintiffs are sent a response to their grievance through their chosen route. In total, grievance acknowledgement of receipt and its eligibility assessment are made within 5 days of the grievance reception.

Step 3: Investigation and Response Proposals

The concerned Grievance Management Committee will review the details and grounds for the grievance with the assistance of a resource person, if necessary. Additional support or information may be gathered from other fitting source to describe the cause and effects of the grievance more clearly, its urgency or seriousness and its link to the project. Surveys may include an in-depth assessment (field visits, collection of evidence, technical expertise) to determine: the scale and impact of the grievance and what options there may be for appropriate responses or resolutions.

This GM provides for two types of response proposals/decisions:

- direct action to solve the problem (awareness, training, compensation, conciliation or mediation);
- further assessment and engagement with the plaintiff and other stakeholders to jointly determine the best solution and its implementation.

The time for the response proposal must not exceed 20 days from the date of receipt of the grievance by the GMCs.

Step 4: Communication of the Response to the plaintiff and seeking an agreement

Upon reaching a decision, the concerned GM Management Committee will inform the PCU GM Operator who is responsible for communicating the proposed response, in writing or by any other means, in a language understandable to the plaintiff. Where appropriate, plaintiffs may be invited to meetings to review and revise the initial approach. The response should include a clear explanation of the proposed decision, the nature of the response and the options available to the plaintiff in light of the response. If the plaintiff does not agree with the resolution proposed, he or she can refer the matter to the Permanent Secretary, MoFEA and then the Project Steering Committee level; If an agreement is not reached at this level, the PSC members must ensure that the plaintiff understands what other official remedies (i.e., Labor Commissioner, courts, Ombudsman Office etc.) are available through the administrative or judicial system.

The answer must include a clear explanation of why the response is proposed. Options may be a proposed draft agreement, a referral to a higher authority, further dialogue on the proposed action or participation in the proposed evaluation and engagement procedure. In addition, the response must indicate all other organizational, judicial, non-judicial but official remedies that the plaintiff may consider (i.e., Labor Commissioner, courts, Ombudsman Office etc.)

Although it varies in practice, the proposed response must be communicated within 15 days of receipt of the grievance. This period may be extended by 7 days depending on the nature or complexity of the dispute. Where a grievance claims serious damage or risk and/or serious rights violations, the operational procedures of the GM shall provide for an expedited response, either by the GM or by referral to another instance with immediate notification to the plaintiff of this referral.

The plaintiff may or may not accept the proposed response. If the worker or plaintiff disagrees with the decision of inadmissibility, rejects the proposed direct action or refuses to participate in a more thorough assessment and engagement process with the stakeholders, the settlement authority must clarify the reasons for the refusal, provide additional information and if possible, revise the proposed response.

If an agreement is still not reached, the GM Management Committee that ruled on the complaint must ensure that the worker or plaintiff understands what other remedies may be available, through the administrative or judicial system via the MoFEA PCU GM Operator. The GM Management Committee must document the outcome of discussions with the plaintiff and clearly indicate the options that were offered and the reasons for the rejection.

Step 5: Implementation of the Proposed Response

The proposed response must be implemented when agreement has been reached between the worker or plaintiff and the GM Management Committee to proceed with the proposed action or stakeholder engagement process.

Where the initial proposed response is to start a process of evaluation and engagement of all stakeholders, this procedure may be carried out by the staff required by the GM Management Committee to do so or by other entities considered as impartial and effective by the specific GM Management Committee, the worker or plaintiff and other stakeholders.

Where a cooperative approach is possible, the GM Management Committee must be responsible for its oversight. The committee can directly facilitate the work of stakeholders, contract with a mediator or use traditional conflict resolution and consultation procedures (i.e., Labor Commissioner, courts, Ombudsman Office etc.).

Step 6: Re-assessment of the Proposed Response in Case of Failure

Several cases can lead to this:

- Failing to reach an agreement with the worker or the plaintiff on the proposed response;
- Multi-stakeholders' conflict where the evaluation procedure concluded that a cooperative approach is not feasible.

In these cases, the GM Management Committee should review the situation with the plaintiff and see if a change on the response can satisfy the plaintiff and other stakeholders. If this is not the case, the GM Management Committee must inform the complainant of other potential alternatives, including judicial or administrative review mechanisms. Regardless of the choice of the worker who filed the grievance or any other plaintiffs, it is important that the GM committee that rendered the decisions, render and document the entire process.

Step 7: Referral of Grievance

If the plaintiff is satisfied with the proposed response, this should be documented by the PCU GM Operator in charge of the process. In cases of serious risks and impacts and/or negative publicity, it may be appropriate to include documentation written by the plaintiff indicating his satisfaction after the response. In other cases, it will be sufficient for the relevant bodies to note the action and satisfaction of the plaintiff and other stakeholders. It may be useful to include lessons learned when the situation has been particularly complex or unusual.

If the grievance has not been resolved, the PCU GM Operator must document the steps followed, the communication with the plaintiff, and with other stakeholders if significant efforts have been made to initiate or finalize a procedure involving different stakeholders and decisions made by the company and the plaintiff regarding referral or use of other alternatives, including the judicial process.

In all instances, the GM documents must maintain the confidentiality of details and provide disaggregated public statistics on the number and type of complaints received, the actions taken and the results obtained.

Accurate documentation using an electronic database is essential for public accountability, organizational learning and resource planning for the operationalization of the GM.

7.5. Recommended Grievance Resolution Time Frame

As much as possible, the GRP uses electronic data collection and recording tools to reduce the costs of reporting, expand the capacity to monitor, and improve communication flow from the community level to the national level. The PCU thus allows data to be captured electronically and for smooth compilation of reports. The table below generally presents the recommended time frames for addressing grievances or disputes received related to GRP.

Table 7-2: Proposed GM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 48 hours
3	Assess grievance	Within 3 Days
4	Assign responsibility	Within 3 Days
5	Development of response (investigation, consultation)	within 24 Days
6	Implementation of response if agreement is reached	within 24 Days
7	Close grievance	within 35 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 35 Days
9	Implement review recommendation and close grievance	within 45 Days
10	Grievance taken to court by complainant	As applicable

7.6. Roles and Responsibilities for the GM

The Responsibilities for the Management of the GM system include the following and may be updated from time to time in consultation with the ministerial management team and the World Bank task teams:

- Overall management of the GM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints
- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise requested by complainants due to privacy or other concerns.
- Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GM results

7.7. GBV GM

7.8.1 Making Complaints: GBV and VAC Allegation Procedures

All staff, volunteers, consultants and subcontractors are encouraged to report suspected or actual GBV or VAC cases. Managers are required to report suspected or actual GBV and/or VAC cases as they have responsibilities to uphold company commitments and held by their direct reports accountable for complying with the Individual Code of Conduct.

The project will provide information to employees and the community on how to report cases of GBV and VAC Code of Conduct breaches through the Grievance Mechanism (GM). The GCCT will follow up on cases of GBV, VAC and Code of Conduct breaches reported through the GM.

7.8.2 Process for addressing GBV or VAC Complaints

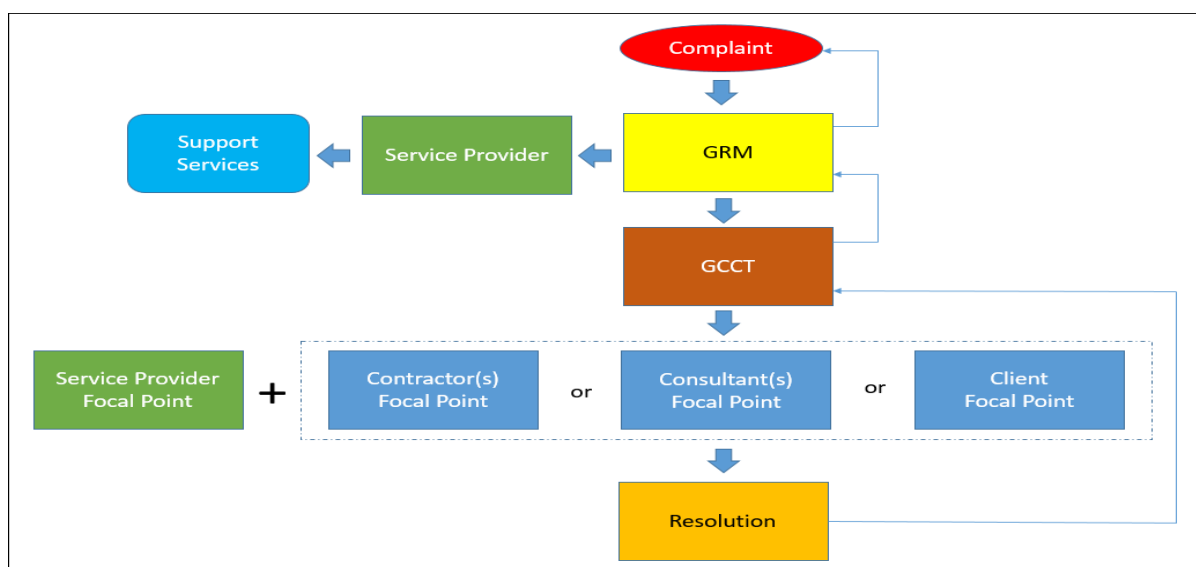
The figure below shows the process for addressing complaints.

The project operates a Grievance Mechanism (GM). Reports of GBV or VAC, other complaints, or other concerns may be submitted online, via telephone or mail, or in person.

The MoFEA PCU GM operator will refer complaints related to GBV or VAC to the GCCT to resolve them. In accordance with the Action Plan, the GCCT through the Service Providers and Focal Point(s) will investigate the complaint and ultimately provide the GM operator with a resolution to the complaint, or the police if necessary. The GM operator will, upon resolution, advise the complainant of the outcome, unless it was made anonymously. Complaints made to managers or the Service Provider will be referred by them to the GM for processing.

If the complaint to the GM is made by a survivor or on behalf of a survivor, the complainant will be directly referred to the service providers to receive support services while the GCCT investigates the complaint in parallel.

Figure 7.1 Process For Addressing GBV/VAC Complaints



8. MONITORING AND REPORTING OF THE SEP

8.1. 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. Policies, procedures and regular updates on the GM, the complaints made and resolved, will be available on the MoFEA's web page, GRP's section.

Periodic 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 the designated GM Operator (Social Development Specialist), and referred to the senior management of the project. The 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.

Further details on the SEP will be outlined in the updated SEP, to be prepared and disclosed within 30 days after the project Effectiveness Date.

Reports on stakeholder engagement activities will be prepared by the MoFEA PCU Social Development Specialist and will be shared through email and/or physical versions to specific groups.

Monthly summaries and internal reports on public complaints, inquiries and incidents, together with the status of implementation of the correction/prevention associated with the actions will be compiled by the responsible staff of the implementing entities and sent to the PCU. Monthly summaries will show the number and nature of complaints and requests for information, as well as the project's ability to address them in a timely and effective manner. The quarterly report on stakeholder engagement will be prepared by the Social Development Specialist and submitted to the World Bank. In addition, these quarterly reports will be transmitted to stakeholders in two possible ways:

- Publication of an annual report on the project's interaction with stakeholders;
- Regularly monitoring of some key Project GM performance indicators as follows:

Table 8-1: Key Project GM Performance Indicators

#	INDICATOR	RESPONSIBILITY
1	Percentage of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline. Sex- disaggregated data should be provided.	<ul style="list-style-type: none"> • Environmental specialist, • Social development specialist • Gender and GBV/SEA/SH specialist
2	Number of channels and frequency of information provided to stakeholders	
3	Number of community awareness and training on the functioning of the GM;	
4	Number of press releases published or broadcasted in local, regional and national media;	
5	Number of training programs on GM management for key project stakeholders;	
6	Number of complaints handled within the prescribed time;	
7	Number of complaints received regarding GBV/SEA/SH.	

8.2. Regular Internal Monitoring and Reporting

The Project Manager will assess quarterly, the functioning of the GM in order to:

- Provide a monthly/quarterly snapshot of GM results, including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.
- In the case of MoBSE, MoHERST, and NaNA, as part of their regular implementation reports to MoFEA/GRP, they will inform the Project Coordinator about the complaints received and their status.

During quarterly GRP meetings, the project team shall discuss and review the effectiveness and use of the GM and gather suggestions on how to improve it.

8.3. Submission of Bi-annual and Annual Progress Reports to the World Bank

In the bi-annual and annual GRP implementation reports submitted to the World Bank, the PCU shall include a GM section, which provides updated information on the following:

- Status of establishment of the GM (procedures, staffing, awareness building, etc.);
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
- Qualitative data on the type of complaints and answers provided including issues that are unresolved;
- Time taken to resolve complaints;

- Number of grievances resolved at the lowest level, raised to higher levels;
- Any particular issues faced with the procedures/staffing or use;
- Factors that may be affecting the use of the GM/beneficiary feedback system;
- Any corrective measures adopted.

8.4. Submission of Bi-annual and Annual Progress Reports on Stakeholder Engagement and Consultations to the World Bank

In the bi-annual and annual GRP implementation reports submitted to the World Bank, the PCU shall include a stakeholder engagement section, which provides updated information on the following:

1. **Report on issues and topics identified during consultations and responses provided: provide a summary of substantive issues raised by proponents and stakeholders at each event.** This should be understandable to laypersons and demonstrate that a meaningful two-way feedback response process has occurred describing the results of the engagement (i.e., what issues, ideas, concerns were raised by whom and how the project responded). Describe any communications resulting from use of social and conventional media and at consultation events.
2. **Describe engagement with the range of stakeholders identified in the SEP including beneficiaries and vulnerable groups:** demonstrating that stakeholders who are benefiting or will be affected are included in discussions, their concerns identified and addressed.
3. **The report should address the contents of the engagement strategy and action plans described in the SEP to demonstrate progress on SEP implementation** indicating deadlines, delays and revised timeframes.

ANNEXES

Annex 1: Grievance/inquiry record

GRIEVANCE/INQUIRY RECORD (Form A)				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:			Name of Staff Completing Form:	
Grievance Received (check <input checked="" type="checkbox"/>): <input type="checkbox"/> National <input type="checkbox"/> Oblast <input type="checkbox"/> Rayon <input type="checkbox"/> Village				
Mode of Filing Inquiry or Grievance (check <input checked="" type="checkbox"/>): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
	Category 1	Social Safeguards		
	Category 2	Environmental Safeguards		
	Category 3	Grievances regarding violations of policies, guidelines and procedures		
	Category 4	Grievances regarding contract violations		
	Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns		
	Category 6	Grievances regarding abuse of power/intervention by project or government officials		
	Category 7	Grievances regarding MERP staff performance		
	Category 8	Reports of force majeure		
	Category 9	Grievance about project interventions		
	Category 10	Other		
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g., answered, being resolved, settled):				

Annex 2: Stakeholder Engagement Meeting Minutes

Date: 26th May 2023

Venue: MoBSE Conference Hall

Time: 10 am

AGENDA

- 1 Discussions on the Project Components
- 2 Updates and clarifications on some concerns from PAPs
- 3 Concerns of Stakeholders
- 4 Recommendations and Way Forward

Concerns and Comments from Stakeholders

MoBSE

- It will be good if partners can have access to the new curriculum to integrate them into their curriculum so they can zoom on what they are trying to achieve in schools.
- The new curriculum is centered on realistic learning situation with opportunities to apply knowledge learnt. It has implications on pedagogy and assessment (giving chance to pupils to display their skills). It is going to be piloted for a year to see how it can be taught and the impact it will make to learners.
- The use of national languages to enhance reading in schools. EI is focusing on jolly phonics to enhance reading and comprehension in the lower levels including EGRA and EGMA. The national language is used as a medium of instruction for literacy and numeracy. A policy is currently being developed on how the national language is being taught in schools and by the time, it is completed; English will be taught only as a subject. English will be taught as a second language. Development of a curriculum for using national language as a medium of instruction for early years is ongoing. There will be a standardization of ethnic dialects when using the national language.
- For EMIS, a lot of data has been collected but the challenge which the Ministry and partners encounter is the adequate and effective use of the data to inform policies and decision making. Data needs to be accessible as there are still gaps and partners can always request additional data from the MoBSE Planning Unit.
- Gaps in capacity to do financial recording of expenditure given to Mothers' Clubs is a challenge. Going forward, the mothers' clubs should select an educated community member who will do the financial record keeping of transactions. Mothers' Club has to be working with the individual School Management and so adequate sensitization of both parties is required to boost the relationship and their efficiency. Rolling out of the boosting program needs to be inclusive especially with regards to borders schools to CRR, madrassas and Majalis as well.
- Learning should be based on approach and not brands such as Jolly Phonics and SEGRA. At the level of the schools, this brought about a competition in schools and between teachers and the need to synchronize literacy. It is more ideal to use the name Synchronized literacy strategy despite the use of brands (Jolly phonics and SEGRA).

- Second chance was a pilot to get dropouts re-integrated into the School System with a possibility to continue to college. Focus was on core subjects. A comprehensive Tracer study on the impact of the program is highly needed.

MoHERST

- It is good for the youths to have an employability skill so that they can be self-employed.
- Most private institutions are not sub vented and the institutional improvement window will enhance them
- The USET model can be used in industry and the idea is to replicate it in all TVET regions. Due to scope of budget, it will be annexed to possible.
- Entry requirements into skills centers need to be flexible and back by the gazette article showing different routes of entry.
- There is need to know safeguards issues which might arise during the construction of the Sapu Agribusiness.
- There is a current mapping of all kinds of skills Center (formal and informal) in the country going on now so that intervention will span across all sectors. There is a need to have a whole value chain of the TVET sector from production to commercialization.
- There is a need align the MoBSE prevocational learning with the programs at TVET Centers.
- The sector wants to harmonize all programs across TVET Centers as Graduates from different Centers have different level of skills for the same program. The Ministry will work with the SSC to ensure they have the right quality of program and equipment for the training.
- Piloting is underway with NEDI to sponsor students for training on entrepreneurship with a focus on the informal sector.

NaNA

- The Nafa program will maintain the 20 districts and completed for the 3 years initially planned and not expanded to the 30 districts initially proposed.
- The satisfaction of recipients concerning the grant is always monitored and linked to the GM. Panel analysis is also conducted by an independent body.
- Resilience and sustainability of the Nafa program is a concern as the project will end after 3 years. If the funding ceases, the implications need to be reviewed.
- Governors are members of the Project Steering Committee, while at regional level NaNA use regional structures and partners.
- There is need to generate a unique identification number for everybody in the country. A taskforce spanning across all sectors need to come together to review the idea.

Annex 3: List of Participants at Key Stakeholder Consultation

GAMBIA RISE STAKEHOLDERS' CONSULTATION MEETING

FRIDAY 26TH MAY, 2023

ATTENDANCE REGISTER

Nn.	Name	Designation	Institution/Unit	Telephone	Email	Signature
1.	Senier. B. Sagnia	National Consultant	Effective Intervention	3657581	jsagnia@gmail.com	
2.	Faten Bin Tobe	CEO	Effective Intervention	3994067	faten@effint.net	
3.	Abhishek Thakur	HR Officer	Effective Intervention	2549782	a-thakur@effint.net	
4.	Pierre M. Conner	ED O	NED1	9906299	pconner@ned1.org	
5.	Babucarr N. Jof	Planning Director	NaNA	3194018	bjofofenna@gmail.com	
6.	Solun Foun-chine	Director	PMES	3917977	Schunachun@delugambian.org	
7.	Moumou Jeng	Director	CICED	9732874	jengmoumou@gmail.com	
8.	Anthony G. Mendi	DIHE	MOHES	3745466	mendi.tongel@mo.gov.gm	
9.	Alhaji Lamin	IC	PMES	3305448	lamin@pmes.org	
10.	Samba Sow	D, STI	MOHES	316994	batsow86@gmail.com	
11.	Mamuna A.M. Sall	SSS	MOHES (PM)	3039766	m.sall@mo.gov.gm	
12.	Hannah LM Njie	ESS	MOHES (PM)	2942882	hannah@mo.gov.gm	
13.	Abdoulaye Sow	PM	PM	996687	pm@pmes.org	

Annex 4: Record of Public Consultations

Stakeholder Consultations with Project Affected People

Component 1

Summary of concerns from Regional Authorities and Teachers

- A concerned participant stress on the need to revise the curriculum for the National language as it has different dialects and sometimes children are confused in reading the words.
- Teachers find it very difficult to teach the language because they do not have enough training. The training only takes 3 days and that is not sufficient to get what one requires indicated by most teachers.
- The period for training needs to be increased so that people will have more knowledge on the subject matter.
- In addition, teachers need to be trained adequately on the Multigrade Curriculum so as to avoid a lack of teachers in such schools.
- I am a grade 5 teacher, but to me jolly phonic reflect more on the children literacy reading than the literacy lessons than the National language.
- Monitoring is very crucial for both the National language and the Second Chance Education because it will help to identify the impact it has in the system
- Effective intervention is very good as you can gauge the difference between pupils who got the opportunity and those who did not enroll in it.
 - However, the only problem is the space, for example if the pupil is attending the intervention class in another venue in the morning, because of lack of space in the school, most pupils might not attend the formal class in the afternoon for that particular day. This is a concern from most people consulted in relation to the Effective Intervention during the consultation Visit.
- Limited involvement of regional directors and officers during project implementation, specifically during trainings because they know what needs are most applicable for the region and the strategies needed for developing teachers' modules in respective areas. The above statement was alluded to by almost all PAPs consulted.
- There is a need to re-strategize the teaching process of literacy and numeracy.
- Inadequate materials/resources including textbooks need to be available for the different activities, especially for the National language which is not familiar to people.
- Data flexibility through synchronization is really required across all stakeholders
- The second chance Program implementation should be reviewed entirely to improve efficiency.
- Ready-made or Skeletal scheme and lesson plans should be re-introduced into the school system to ensure consistency in the material delivered to the pupils.

- Overloading of teachers in schools, which do double shifts (Morning and afternoon) in Basic Cycle Schools. By the time it is afternoon, the teacher's energy will not be the same; so, the students will not get the same content as those taught in the morning.
- Inability to achieve proposed contact hours by the Ministry.
- Insufficient subvention to some schools because of enrollment figures not updated at the MoBSE Planning Unit.
- For the enrolment boosting program in Region 5, transportation cost of groceries not included in the funds allocated.
- Lack of curriculum guide in the Present curriculum makes monitoring of teaching difficult.

Component 2 & 3

Concerns from Regional Authorities and Center Managers/Lecturers

- It is difficult for the Authorities from the office to do their own analysis and get the correct data without involving the local authorities, according to a regional governor.
- Involvement of youths in the project activities is very important, as it will help them to engage in something meaningful in their life.
- If such intervention is coming to our district, I think it is crucial for us to know about it so that we can collaborate with the Chief and the Alkalos to select the target beneficiaries indicated by a chairperson in one of the communities.
- If we want our projects to benefit the local communities and they are sustainable, we must follow protocols and due process. Involvement of the local authorities from the planning state will help implementers to work effectively during the life span of the project.
- Some stakeholders were not trained on the project during the preparation phase.
- Regional Governors have little knowledge of what the project is all about, so this makes it difficult for the local authorities to be part of the implementation of the project.
- There is a tendency of having social issues at the communities surrounding the Agribusiness center as people from different villages will converge at the center to study and there is a risk of interfering with community culture and bad influence on the youths like GBV, sexual violence, smoking marijuana, drinking alcohol etc.
- Most students in rural skills centers cannot afford to pay for course fees due to poverty and as such, the center is struggling with operational costs including sustaining of trainers.
- There is a worry on how free and fair the awarding of grants will be as it will be competitive.

- Participants indicated that about 85% of youths, especially in the rural areas, have the mentality that government should be responsible to sponsor their education about acquiring skills.
 - There is a general concern as to how students will be selected for the start-up window because if few students benefit from that window, the rest will still go back jobless in the streets.
- Some youths expressed concerns related to lack of access to learning skills they are interested in. These skills (hairdressing, catering (hospitality) etc.) are not available in Basse unless they travel to the urban areas where they do not know anybody who can host them for the duration of their studies.
- Challenges concerning transportation costs to attend the Julangel skills center which is far from the northern end of the region where they live.
- Most people with disability (youths) want to undergo training at the Julangel skills center but due to lack of accessible accommodation facilities in the area, they are discouraged to enroll.

Summary of concerns from Youths and Women

The youth and women groups consulted identified the following important issues:

- The community members and the stakeholders emphasized their full support for this project's realization.
- They all said, we are eagerly waiting for it and want to stand with them to support it.
- We have some who started to benefit from it but the way selections are done is not fair, who can see families who are extremely poor, yet still they do not benefit. At the same time some well off families are benefiting from the Nafa project and this is what doubted me, according to a woman from a surrounding community.
- A woman (widow) stated that she is very poor, but she is not benefiting and most of the extremely poor household are not benefiting, she concluded.
- Some regional authorities indicated that they are not included, I think in order to get what we want from projects, we need to change strategies raised by a concerned participant.
 - The involvement of VDC members, relevant authorities, and village Alkalos would help in the selection. I think these people will work with the chief to select the correct beneficiaries, he concluded.
- My husband is visually impaired, and we are very poor, but we are not included, this is why I came from another village to attend the meeting when I was called by the chief. Our chief is very helpful, sometimes he give us money from other people who normally give to our charity through him.
 - Therefore, the chief and the mothers' club members need to be involved because they know the people who need the money most.
- Engaging our children in skills training is good, but the problem is most of our young people are without job. I think the government need to consider and create jobs for young people indicated by a woman who attended the meeting.

- Family conflict resulting from decisions as to how the Nafa cash transfer should be used, especially in polygamous households where the husband has passed away during project implementation.
- Potential conflict between some community leadership and recipients of the cash transfer due to lack of familiarization between the Alkalo and officers making visitation to distribute the monies.
- There is a tendency of favoritism being evident in the selection of people for the start-up grant due to experience with similar projects.
- There might be challenges for vulnerable people to attend trainings or register for local businesses at local council office as mobility might be an issue for people with disability due to lack of access to certain buildings or even wheelchair.
 - In addition, some government officers might not have the patience to accommodate their needs during activities.
- Tendency to not receive some grievances.
- Some women might be slow to catch up during the training as not everybody is on the same level of understanding.
- Lack of dedication from the part of the beneficiaries of the PEI program.
- Lack of childcare might be a challenge faced by women and youths who need to attend training under the PEI Program.
- There is fear of insufficient sensitization or advertisement of the PEI program to the population in the rural areas as most of the women are always busy with house chores and are not even aware of what is happening in their regions.
- Lack of adequate start-up funds for the PEI program might lead to sustainability challenges.
- There are concerns on how poor households are selected as there are districts which have extremely poor households than ones selected for the current program especially in URR.
- There is concern of the women being asked to return the start-up grant or even with interest based on experiences.
- Previously, a project was launched in the region proposing help for youths in acquiring skills and setting up businesses.
 - They later came back asking for refund of the grants used to set up the businesses for those who were awarded grants. This led to a police incident where it was agreed that they should be left alone as refund of the capital invested was not part of the initial agreement.

Annex 5: List of Participants at the Public Consultations

Date	Project Component	Region	District	Community/venue	Stakeholders consulted	
25 th May 2023	1	Greater Banjul	Kanifing	Bakau Newtown LBS, Bakau	Headteacher, Deputy Headteachers and Senior Teachers	
				Latrikunda Yirinyanya LBS	Deputy Headteachers and Senior Teachers	
				Regional Education Office, Kanifing	Regional Director and Regional Education Officers	
24 th May,2023	1	WCR	Kombo North	Regional Education Office 2, Brikama	Director and Regional Education Officers, Itinerants teachers, Lower and Junior school teachers and few students. Second chance Education Coordinators	
			Kombo East	Gidda Sukuta	Head Teacher and Teachers	
			Kombo	Old Yundum	Head Teacher and Teachers	
	2		Foni Brefet	Ndemban Skills Center	Few community members consulted	
	3		Kombo North	Governor’s office	Governor	
23 rd May 2023	1	NBR	Lower Baddibu	Regional Education Office 3, Kerewan	PEO and Regional Education Officers, Coordinator of Second chance Education	
			Upper Nuimi	Albreda Lower Basic	Head Teacher, Teachers and Effective Intervention Facilitator	
				Nuimi Lamin LBS	Head Teacher and teachers.	
			Jokadou	Karantaba Lower Basic School	Head Teachers and teachers	
				Kerr Omar Saine	Deputy head and teachers	
			Illiasa	Farafenni Upper Basic School	Principal and deputy and Science Teachers	
				Kerr Ndongo	Head Teachers and teachers	
			2	Chamen Agricultural Centre	Matron and trainees.	
	23 rd May 2023				Upper Nuimi	Sami Tenda
	23 rd May 2023				Lower Baddibu	Governor’s Office, Kerewan

20 th May 2023	3		Sabach Sanjal	Ngayen Sanjal and surrounding communities.	More than 50 participants representing different sections of the community including men women, youth and PAPs	
16 th May 2023	1	LRR	Jarra West	Regional Education Office, Mansakonko	PEOs and Regional Education Officers	
				Pakalinding UBS	Principal and Teachers including Second chance Tutors	
				Soma LBS	Headteacher, Deputy Headteacher and Senior Teachers	
			Jarra Central	Jappineh UBS & SSS	Principal, Vice Principal and Senior Teachers including Second chance Tutors	
			Kiang East	Kaiaf LBS	Headteacher, Deputy Headteacher and Senior Teachers	
17 th May 2023	2		Jarra West	USET Rural Skills Training Center, Mansakonko Annex	Center Manager and Lecturers	
				Girls Guide Skills Training Center, Soma	Center Manager	
				Soma Scouts Skills Training Center, Soma	Center Manager	
				Governor’s Office, Mansakonko	Governor	
	3					
18 th May 2023	2 & 3				Jarra West Chief’s residence, Soma	More than 100 participants representing different sections of the community including women and youths
19 th May 2023	1			Lower Fulladu West	Brikamaba LBS	Headteacher and Senior Teachers
					Sare Abdou LBS	Headteacher and Senior Teachers
				Janjangbureh	Armitage SSS	Second Chance Coordinator
				Upper Fulladu West	Bansang LBS	Headteacher, Deputy Headteacher and Senior Teachers
20 th May 2023	2			Lower Fulladu West	Sinchu Bamba	VDC and Community members
					Kerewan	Alkalo
	2 & 3			Janjangbureh	Governor’s office, Janjangbureh	Governor, Deputy Governor and NAFA Focal Point for the region
						Governor’s office, Janjangbureh

21 st May 2023	3	CRR	Janjangbureh and Lower Fulladu West	Pacharr, Fulabantang & Janjangbureh	21 participants (women) representing different communities.
20 th May 2023	1		Niani	Regional Education Office 5 north, Wassu	PEO and Regional Education Officers.
19 th May 2023			Janjangbureh	Regional Education Office 5 south, Janjangbureh	PEO and Regional Education Officers.
16 th May 2023			Upper Saloum	Jareng Kerr Mamut LBS	Head Teachers and Teachers
				Kerr Auldi BCS	Head teacher and teachers
19 th May 2023			Sami	Kibiri LBS	Head Teacher, Deputy Head, Senior teachers and religious leaders
				Demba kally	Head Teacher, Deputy Head, Senior teachers
16 th May 2023	2		Nianija	Kayai village	few youths (men) consulted to discuss on pertinent issues in relation to TVET programs
			Niani	Mechanical Workshop, Wassu	Mechanical Workshop owners and apprentice to discuss on pertinent issues in relation to TVET programs
20 th May 2023	2 & 3		Sami	Njallal	More than 100 participants representing different sections of the community including women, youth and PAPs.
18 th May 2023	1	URR	Sandu	Diabugu LBS	Head Teacher, Deputy Head and Senior teachers
			Wuli East	Briff Fula Kunda	Deputy Head, Senior teacher.
			Sami	Bush Town	Senior Teachers, Special Needs Parents
			Sandu	Sare Batch Jawo	Head Teachers and Teachers
22 nd May 2023			Jimara	Tabajang LBS	Headteacher, Deputy Headteacher, Senior Teachers and Teachers
			Fulladu East	Koba Kunda UBS & SSS	Vice Principal, Senior Teachers and Teachers
			Kantora	Garawol BCS	Deputy Headteacher and Teachers
			Fulladu East	Regional Education Office, Basse	Regional Director, PEO and Regional Education Officers
23 rd May 2023	2		Jimara	Julangel Skills Training Center, USET Annex, Julangel	Lecturers

	2 & 3			Rural Support Organization for the Disabled	About 10 participants consisting of men and women with disabilities
24 th May 2023			Fulladu East	Youth Center, Basse	About 20 youth participants representing communities from different districts.
	3			Governor's office, Basse	Governor
				Regional Education Office, Basse	More than 100 participants representing different women groups in the region

Annex 6: Gambia Legal and Policy Framework related to Stakeholder Engagement

The Table below indicates the relevant national policies and laws that encourage stakeholder engagement in the Gambia.

National Policy and Law	General Considerations
National Policy for the Advancement of Gambian Women and Girls (1999-2009)	Policy provides a legitimate point of reference for addressing gender inequalities at all levels of government and all stakeholders; Consultation of affected stakeholders is relevant for this Project since it must benefit both men and women equitably.
The Gambia National Gender and Women Empowerment Policy (2010–2020)	To mainstream gender in national and sectoral planning and programming to ensure equity and equality. Women will be consulted widely and will be involved in the local monitoring and evaluation process during project implementation
National Youth Policy (2019–2028)	Policy aims to empower the Gambian youth for employability and enterprise for optimal contribution to national growth and development. Successful project implementation will encourage youth engagement in skills to reduce youth underemployment where applicable.
Environmental Impact Assessment Regulations, 2014	The EIA Regulations elaborate on the requirements for EIA procedure, environmental impact statements, approval, environmental monitoring, etc. The Regulations provide more details for the stakeholder engagement during EIA process and implementation of its ESMP.
Sexual Offences Act, 2013	Updates the law and procedures regarding the trial of rape, sexual offences, and related matters. This Act is relevant to the Project due to the need for engagement and protection of vulnerable persons within the Project sites against sexual offences, which is defined in the Act.

REFERENCES

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