

THE REPUBLIC OF RWANDA



MINISTRY OF EDUCATION

UPDATED STAKEHOLDER ENGAGEMENT PLAN (SEP)

**PROJECT:
RWANDA COVID-19 EDUCATION RESPONSE (GPE) (P174046)
(ADDITIONAL FINANCING TO QUALITY BASIC EDUCATION FOR HUMAN
CAPITAL DEVELOPMENT IN RWANDA- P168551)**

APRIL 2020

ACRONYMS

AP: Aggrieved Party

BEQAD: Basic Education Quality Assurance Department

CoK: City of Kigali

CBC: Competency Based Curriculum

CPD: Continuous Professional Development

ESIA: Environmental and Social Impact Assessment

ESMP: Environmental and Social Management Plan

GRCs: Grievance Redress Committees

GRM: Grievance Redress Mechanism

HGS: Home-Grown Solutions

IFC: International Finance Corporation

IPF: Investment Project Financing

M&E: Monitoring and Evaluation

MINEDUC: Ministry of Education

MININFRA: Ministry of Infrastructure

MoE: Ministry of Environment

MoH: Ministry of Health

NGOs: Non-Governmental Organizations

NSC: National Steering Committee

OSC: One Stop Centre

PAP: Project Affected People

PCP: Project Contact Person

PDO: Project Development Objective

PM: Project Management

SPIU: Project Management Unit

PSE: Project Site Engineer

QBEP: Quality Basic Education Project

RDB: Rwanda Development Board

REB: Rwanda Education Board

REG: Rwanda Energy Group
REMA: Rwanda Environment Management Authority
RHA: Rwanda Housing Authority
RLMA: Rwanda Land Management and Use Authority
RNP: Rwanda National Police
RTDA: Rwanda Transport Development Agency
SCDE: School Construction District Engineer
SEP: Stakeholder Engagement Plan
SES: Sector Executive Secretary
SPIU: Single Project Implementation Unit
TBA: To Be Announced
TTCs: Teacher Training Colleges
UR-CE: University of Rwanda – College of Education
WASAC: Water and Sanitation Corporation

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Introduction

The proposed Additional Financing (AF) in the amount of US\$9.7 million from the Global Partnership for Education (GPE) is being prepared to support the country's COVID-19 Education Response. The funding will be provided as AF to the Rwanda Quality Basic Education for Human Capital Development Project (QBEP) (P168551). QBEP is funded by an IDA credit of US\$200 million equivalent and was approved by the Board of Executive Directors on July 30, 2019, signed by the Government of Rwanda on August 1, 2019 and became effective on November 20, 2019. The project development objective of the parent project is to improve teacher competency and student retention and learning in basic education. The proposed AF is well aligned with the objectives of QBEP and will not require any change in the PDO. The focus on improving teacher competency, student retention and learning will be maintained, and the proposed AF will complement the *Education Sector COVID 19 Response Plan* as well as other ongoing partner-led efforts to support the optimization of remote learning and use of mass broadcasting tools for continued education and socio-emotional wellbeing of students. The parent project encompasses three main components and each component embodies sub-components while the additional financing brings the fourth component which also embodies sub-components.

A. The three original components of QBEP are the following: **Component 1: Enhancing teacher effectiveness for improved student learning**

The Project will focus on enhancing teacher's effectiveness for improved student learning. This will include supporting the development of strong English language proficiency and digital literacy skills of all government teachers in the country, strengthening of math and science content knowledge and pedagogy skills for teachers in basic education, enhancing the preparation of new teachers through strengthening of the 16 Teacher Training Colleges and developing schools in order to disseminate innovative teaching and learning practices throughout the country. This component will be composed of

Sub-Component 1.1: Improve teacher's English proficiency and digital skills

This sub-component will aim at improving English proficiency of teachers to enable them to teach effectively, given that the language of instruction from Primary 4 onwards is English. Equally, teachers will be equipped with digital skills as required for the increasing demand for ICT to improve teaching practices in Rwanda. In a nutshell, this subcomponent objective is to improve teachers' English language proficiency and digital literacy through development of a facilitated online course and assessment system.

Sub-component 1.2: Support professional development of Math and Science teachers

The main intent of this sub-component is to strengthen the content knowledge and pedagogical practices of Mathematics and Science teachers in Rwanda. This subcomponent will focus on modernizing instructional tools and enhancing teacher content knowledge and pedagogical practice for teachers of Mathematics and Science in upper primary through lower secondary (P4-S3).

Subcomponent 1.3. Strengthen preparation of new teachers

Given the need for strengthening the preparation of new teachers in Rwanda; this sub-component aims to bolster the preservice training provided in all 16 TTCs through enhanced mentoring, instruction and assessment approaches and an enhanced learning environment so that future pre-primary and primary school teachers will be fully equipped to teach effectively. Correspondingly, it will support TTC leaders and tutors to effectively manage, coach, support and assess TTC students through a variety of activities.

Subcomponent 1.4. Develop model schools to support innovative instructional practices

Under this component, the Project will create a dynamic network of 17 “model schools” to support TTC students’ practice training and develop new knowledge about teaching and instructional leadership. Sixteen comprehensive schools near 16 TTCs and 1 school where UR-CE is located will be developed as model schools. This will not only be limited to undertaking activities around mentoring and coaching future teachers from TTCs but also putting in place needed infrastructure to enable the effective teaching and learning process and not only TTCs students will benefit from model schools but also in-service teachers around the model schools.

Component 2: Improving the school environment to support student learning

The project will substantially address the critical issues of overcrowding and long distances to schools and this will be done through the construction of additional classrooms and primary level schools. The learning environment for the youngest students will be enhanced through development and launch of an educational entertainment learning program for children in pre-primary through the early primary grades and provision of teaching and learning kit to all public pre-primary classrooms in the country.

Sub-Component 2.1: Reduce overcrowding and distance to schools

In order to reduce overcrowding, the Project will finance the construction of approximately 8000 additional furnished primary classrooms in existing public schools. The construction of an additional 12,000 latrines will also be financed on the same sites according to the national standard of 1.5 latrine per classroom. The project will also target the construction of new schools to address the issue of long distances that children make from home to schools. Around 3000 classrooms will be constructed for the latter case and approximately 4,500 latrines.

Subcomponent 2.2. Enrich early learning environments

With this sub-component, the Project will enhance the learning environments of the youngest children in Rwanda through development and provision of locally produced, high quality, age appropriate teaching and learning materials targeting pre-primary and early primary grades. This will contribute in addressing the issue related to the fact that in most preprimary and early grade classrooms (especially in rural areas) in

Rwanda, teachers must create their own teaching and learning materials while in others, teachers share materials across many classrooms. Amongst others, an engaging educational program focusing on helping Rwandan children develop core literacy and numeracy skills outlined in the Rwandan curriculum for pre-primary through primary 3 students. The content will also include social literacy competencies

Subcomponent 2.3 Supporting gender sensitive learning environment for students

This sub-component's objective is to address critical gender-based issues currently facing schools in Rwanda (including high numbers of girls dropping out in secondary school, high frequency of teen pregnancy and frequent cases of gender-based violence (GBV) towards both boys and girls in school settings). This will be implemented through two main activities: (i) Development of a school wide gender sensitive teaching and learning environment, and (iii) supporting behavior change communication around key education related gendered issues across the country.

Component 3: Development of institutional capacity to strengthen teaching and learning

The Project will support the development of institutional capacity to strengthen teaching and learning in Rwanda. This will include strengthening of the current quality assurance system and national learning assessments. It will also upgrade the skills and knowledge of key staff in all the single project implementation units (SPIUs) to manage and implement the Project.

Subcomponent 3.1. Support quality assurance systems

One of the project aims is to strengthen key systems and policies that underpin achievement of the PDO and are integral to quality assurance in basic education including: teacher recruitment and deployment, school inspection and learning assessments at national and regional level.

Subcomponent 3.2. Strengthen project management and implementation capacity (US\$ 6 million)

This sub-component targets financing and supporting project management and building implementation capacity in the Single Project Management Units (SPIUs) at the Ministry of Education (MINEDUC) and the Rwanda Education Board (REB) to ensure effective execution of the project. In order to do so, the Project will (i) finance key staff in SPIUs at MINEDUC and REB in key functions, including coordination and management, financial management (FM), procurement, environmental and social safeguards, and operations and planning throughout the project implementation period, (ii) support the purchase of equipment and furniture required to make SPIUs fully functional at both MINEDUC and REB including IT equipment and accessories (laptops, printers, projectors, and tablets) and office furniture (chairs, desks, filing cabinets, and tables), and (iii) support operating cost for MINEDUC SPIU and REB SPIU, including maintenance, office stationery, motor vehicles, and motorcycles for field visits.

B.The additional component on COVID-19 response:

The proposed Additional Financing (AF) will add a fourth component to QBEP. It will finance select activities from MINEDUC's *Education Sector COVID-19 Response Plan*, to support continuation of quality learning while protecting the health and well-being of approximately 2 million (50 percent female) students and an estimated 40,000 teachers targeted under the parent project in the short, medium, and long term. The proposed activities are organized and sequenced to provide seamless support for the sector to resume its activities and emerge stronger and more resilient to face future shocks. The package of preparedness and response activities proposed under this AF are to achieve the following sub-objectives:

- a. Continuing learning and tracking student progress;
- b. Ensuring safe re-opening of schools and return of all students;
- c. Ensuring health and safety of students and teachers on return to schools;
- d. Protecting vulnerable groups of students (including girls, children with disabilities and those from low-income households) from compounded negative impacts of the crisis;
- e. Generating resilience to prepare for potential recurrence of COVID19 or for other emergencies.

Component 4: Supporting the national COVID-19 response for continued learning, recovery, and resilience in education sector (US\$9.7 million equivalent). The proposed project activities are organized into two sub-components identified for the modality of service delivery, such as remote support for continued learning and wellbeing of students and teachers, and school-based capitation grants to ensure safe reopening and return of all students. The following table maps the proposed strategic responses by objective and expected implementation timeline which is conditional to the evolving situation of disease spread and control in the country. These activities are grouped into two main subcomponents as elaborated below:

Sub-component 4.1: Optimizing and implementing remote approaches for continued learning, wellbeing and resilience.

One of the most common global responses to COVID19 crisis in the education sector has been the use of remote or distance learning solutions by using e-learning strategies. In contexts where digital solutions (like online learning) are less accessible, countries have considered low-tech mass broadcasting tools (like radio and television).

Mass broadcasting is relevant for (a) engaging learners in some form of daily learning activity relevant to their age and grade; (b) educating children and their families on disease prevention and control at home and outside; (c) alleviating fears and trauma associated with the emergency; (d) motivating students to return upon school re-opening; and (e) strengthening prevention measures against Gender Based Violence (GBV) and teenage pregnancies by delivering gender-sensitive messaging to raise community consciousness. Maintaining equitable access to learning resources is important to reduce expected learning gaps associated with income, gender, and disability profile of students, and the consequent digital divide. In the short term, a combination of technologies needs to be utilized; and in the medium- and long-term, further resources will need to be devoted to accelerating digital development in the country. The rapid expansion in Rwandan household access to technology, especially radio, mobile phones, internet, and TV make these viable options for distance and

interactive learning modalities in the long run.

In order to ensure the continuation of student learning while also generating systemic resilience to future disruptions, the combination of modalities will be applied as follows:

- Expand remote learning opportunities for students and teachers during school closure through radio broadcasting of lessons aligned to the competency-based curriculum.
- Promote the development and use of alternative audio-visual materials on national television and the REB youtube channel (zero-rated).
- Strengthen the use of Rwanda Education Board's (REB) e-learning platform for students and teachers to access different subject textbooks, lessons and assessments. The e-learning platform will support continuous professional development of teachers by allowing them to access training modules.
- Adopt mobile phone technology (free SMS) to enable communication between REB and teachers, and with parents, for regular communication of messages around the use of the available remote learning options

Sub - component 4.2: Supplementing school grants to support safe re-opening, student re-entry and sustained progression in schools.

Under this subcomponent, MINEDUC will reassess the composition of eligible capitation grants expenditures and supplement it with additional financing in order to prioritize the following needs. All students will be targeted from pre-primary through lower-secondary grades.

- a. Enhanced provision of soaps and hand-washing facilities adaptive to persons with disabilities to schools;
- b. Provision of scholastic materials to schools (for children) in order to offset the cost of schooling for poor households;
- c. Provision of targeted nutrition support for at least 3 months (achievable without requiring construction of kitchens) in collaboration with development partners and districts;
- d. Organization of parent and community mobilization activities through Local Government and School General Assembly Committees to ensure that students' return to school;
- e. Establishment of remedial (catch-up) programs for students at risk of repetition and dropping out (drawing additional resources from other ongoing learning support projects).

Considering all project sub-components, it is clear that **the sub-component 2.1 aiming at reducing overcrowding and distance to schools through construction of additional classrooms and new schools** and the component 4 for additional financing are likely to attract the attention of much more stakeholders.

The sub-component 2.1 will support Rwanda's continuous school construction program to provide improved learning environment to primary learners, with a new focus on early grades. Approximately 11,000 furnished classrooms and approximately 16,000 latrines will be financed throughout the project. The school construction program will

support the ongoing government's program to reduce class overcrowding, which is currently the highest priority. Additionally, the project includes also the construction of new schools to reduce current long distances to primary school.

In the past 9 years, more than 18,000 classrooms and about 33,500 latrines have been built. The standard drawings for school construction are of good quality and include para-seismic and handicap-friendly features. Implementation follows a hybrid arrangement by which factory materials are procured centrally, while the local materials and specialized labor are procured by the local governments (Districts). This ensures management and supervision of the works at the central and local levels. In the case of the latter, local involvement helps in identification of skilled labour and unskilled labour. This system has been working successfully, and includes the following characteristics:

- Delivering on time. There have been yearly deliveries of a large number of classrooms (average 2,000 per year), latrines, and school furniture. All yearly construction programs start on July 1st and end the following December.
- Being highly cost-effective. It is about half the cost compared to classic procurement of works through centralized procurement of works. The Government found possible ways to effectively lower cost on each segment of the construction chain.
- Providing rapid delivery. Each annual construction program has been delivered in six months (July to December).
- Improving on quality construction. Good quality construction has gradually been implemented in recent years, according to World Bank field visits.
- Mobilizing community support. The category of workers anticipated includes skilled labour and unskilled labour. Both categories will have work contracts specifying the amount payable per day and required work hours per day. No voluntary labour will be involved.

However, the community work of the last week of the month shall participate in schools' construction at the sites in the context of the community obligation.

The sub-component will support the Government's successful implementation strategy to build school facilities in rural areas, introducing the minimum of changes or improvements that are required by the use of World Bank funding through investment project financing (IPF), in terms of procurement, financial management, as well as social and environmental safeguards, including transparency and grievance systems, monitoring and evaluation (M&E).

The bulk comprehensive insurance will be provided for all sites and the open competitive tender will be used to get the service provider. As regards possession of protective materials, it will be a precondition that the workers to be contracted must mandatorily possess the helmets, vests and health insurance and this applies to both skilled labour and unskilled labour. This mandatory requirement will be clearly stated in the work contract.

The component 4 of additional financing will finance select activities from MINEDUC's *Education Sector COVID-19 Response Plan*, to support continuation of quality learning while protecting the health and well-being of approximately 2 million (50 percent female) students and an estimated 40,000 teachers targeted under the parent project in the short, medium, and long term. The proposed activities are organized and sequenced to provide seamless support for the sector to resume its activities and emerge stronger and more resilient to face future shocks.

Concerning Grievance Redress Mechanism, provisions in law N° 66/2018 of 30/08/2018 regulating labour in Rwanda will be applied for grievance cases from workers and the same law will be applied for prohibition of Child Labour at all construction sites. The Grievance Redress Mechanism in place will also be applied for component 4 for grievances resulting from its implementation.

Continuous Monitoring and reporting on Environmental and Social issues including Occupational Health and Safety on sites will be handled by 15 Environmental and Social Safeguards Officers based at District level (1staff/2 Districts) who will work closely with Environmental Safeguards Specialist and Social Safeguards Specialist responsible for following up the environmental and social issues at central level.

The above staff will work closely with construction field officers who will also be based at the District level and this one will be responsible for regular follow up and reporting of construction activities within the District of jurisdiction and will work closely with the District School Construction Engineer.

Since 2009, the Government of Rwanda has been implementing a Rwanda-specific school construction strategy based on one of the several Home-Grown Solutions (HGS) developed after the genocide. This strategy is implemented through a hybrid arrangement of centralized, decentralized and community-based activities, named *Uburyo Budasanzwe* (unconventional approach) in Kinyarwanda. The basic concept behind *Uburyo Budasanzwe* is to make cost savings wherever possible, without compromising neither quality nor speed of the works. The implementation arrangement involves three main actors in a coordinated manner.

- MINEDUC, centrally procures nonlocal materials in bulk (cement, iron bars and iron sheets) through national competitive bidding of factories in order to get factory-prices that are 30 percent lower than market-dealer prices. By contract, factories deliver the materials to the 30 District warehouses. The construction unit supervises the progress of the overall program and reports to the Basic Education Quality Assurance Department (BEQAD) within the Ministry of Education.
- Districts do the following: (a) procure local materials (stones, gravel, sand, bricks or cement blocks) on the local markets through the local shopping procurement method; (b) competitively procure specialized labor (foreman, masons, carpenters, iron-men; (c) ensure site management, supervision and control of the works by SCDE; (d) procure the unskilled labour to provide support to the skilled labour. Depending on the need, the community will be mobilized to

actively participate to monthly community works for the activities to be carried out on the sites but this will only apply under the citizen responsibility that every citizen owes the country. Tools and equipment to be used during the community work will be communicated on time.

- Communities provide free labour contribution through *Umuganda*, which can be translated as 'coming together in common purpose to achieve an outcome'. *Umuganda* is a citizen responsibility and a practice of mutual help and cooperation rooted in Rwandan culture by which members of a community complete together a difficult task. This half day community work undertaken on the last Saturday of the month, was reimaged by the Government in 2007, as one of Rwanda's HGS, to address societal challenges. In addition to collective work, *Umuganda* contributes to sharing information, fostering social cohesion, and building peace and it is performed through the free consent of citizens.
- For the component 4, as activities that involves public gathering have been prohibited due to COVID -19 situation in the country, for proper implementation e-learning will be adopted via REB website, The use of national and private TVs and Radios, online newspapers and dedicated phone lines will help beneficiaries to access online courses.
- Also the project will explore the use of social media, television, mobile phones and radio, to embed messages on healthy conflict resolution, healthy parenting, stress and anger management in community and other awareness campaigns during COVID - 19 situation. Technology and mass communication will be used to diffuse information and reach communities with empathy messages to apply within the home and with others.

The success of this project requires a good understanding and active participation of each and every stakeholder such that the adequate involvement of every concerned stakeholder is needed throughout the project life cycle. Detailed hereunder, is the Stakeholder Engagement Plan (SEP).

1. Stakeholder Engagement Plan (SEP)

1.1. Stakeholder Engagement Plan (SEP)

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided with sufficient opportunity to voice their opinions and concerns that may influence Project decisions even in times of crisis as this of COVID 19 situation. The SEP is a useful tool for managing communications between project developer (MINEDUC) and its stakeholders.

The Key Objectives of the SEP can be summarised as follows:

- Understand the stakeholder engagement requirements of Rwandan legislation;
- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice;

- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Develops a stakeholder’s engagement process that provides stakeholders with an opportunity to influence project planning and design; the initial stakeholders’ consultation has taken place as indicated under point 2.3
- Establish formal grievance/resolution mechanisms;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT

2.1. What is Stakeholder Engagement?

Stakeholder engagement is the practice of interacting with, and influencing project stakeholders to the overall benefit of the project and its advocates. The successful completion of a project usually depends on how the stakeholders view it.

Their requirements, expectations, perceptions, personal agendas and concerns will influence the project, shape what success looks like, and impact the outcomes that can be achieved. Successful stakeholder engagement is therefore a vital requirement for professional project management.

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It will involve interactions between identified groups of people and provide stakeholders with an opportunity to raise their concerns and opinions (e.g. by way of meetings, surveys, interviews and/or focus groups), and ensure that this information is taken into consideration when making project decisions.

Effective stakeholder engagement develops a “social licence” to operate and depends on mutual trust, respect and transparent communication between the project developer (MINEDUC in this case) and its stakeholders. It thereby improves its decision-making and performance by:

- **Managing costs:** Effective engagement can help project developer avoid costs, in terms of money and reputation;
- **Managing risk:** Engagement helps project developer and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- **Enhancing reputation:** By publicly recognising human rights and committing to environmental protection, project developer and financial institutions (World Bank) involved in financing the project can boost their credibility and minimise risks;

- **Avoiding conflict:** Understanding current and potential issues such as land rights and proposed project activities;
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in project corporate practices and policies;
- **Identifying, monitoring and reporting on impacts:** Understanding a project's impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for the project proponent to become aware of and manage stakeholder attitudes and expectations.

Stakeholder Engagement Considerations

The following considerations will be made when planning for stakeholder engagement:

- Avoid public gatherings following GOR guidance.
 - Where direct engagement must happen, conduct consultations in small groups (not more than 5 people maintaining social distancing). If not allowed, make all reasonable efforts to conduct meetings through online channels, including Microsoft teams, skype and whatsapp groups;
 - Based on type of stakeholder, use social media and online channels more extensively.
 - Use of traditional channels of communications (mainly radio, to a small scale use TV,) when stakeholders do not have access to online channels or do not use them frequently
 - Each of the proposed channels of engagement will use sms, chat groups and dedicated help lines to allow stakeholders to provide their feedback clearly specify how feedback and suggestions can be provided by stakeholders;
 - Where none of the above means can work, the developer will then decide after consultation whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible.
- **It takes time and resources:** Some stakeholders will need to be educated about the concept of engagement itself, as well as on the complex issues requiring specialized and technical knowledge. These demands can increase the cost of consultation required to meet external expectations, and often this occurs at a time when a project lacks the internal capacity and resources to implement a broad engagement strategy.
 - **It raises expectations:** Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such project proponents from the

outset must be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities.

- **Securing stakeholder participation:** Cultural norms and values can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This might be avoided by employing local created GRCs committee. The GRCs committee includes local authorities in capacity of Secretary Executives of cells. The last will play a key role as they are sensitive to local power dynamics.

- **Consultation fatigue:** Moreover, there is evidence to suggest that stakeholders can easily get tired of consultation processes especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives are not improving as a result of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This might be avoided by coordinating stakeholder engagement during an ESIA and RAP implementation process, and by ensuring practitioners do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the client and other project specialists.

2.2. Principles for Effective Stakeholder Engagement

Stakeholder engagement is usually informed by a set of principles defining core values underpinning interactions with stakeholders. Common principles based on International Best Practice include the following:

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

2.3. Stakeholder Identification

In compliance with National regulations and international standards, Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social

impacts. Similarly, in order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project.

It is also important to understand how each stakeholder may be affected – or perceives the project so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

During the development of Resettlement Policy Framework, the consultation was held with key stakeholders involved in project implementation and land management, acquisition and compensation process as well as some of the potential affected people near identified schools. However, a comprehensive community engagement and consultation will be required when final project design is available and sites for construction of new schools are known and potential project Persons identified.

The combination of both structured and unstructured interviews was used to collect information from different actors and stakeholders. Consulted people and institutions include Rwanda Environment Management Authority (REMA), the Ministry of Environment (MoE), Rwanda Development Board (RDB), Ministry of Infrastructure, Ministry of Education, Rwanda Education Board, Rwanda Land Use and Management Authority. At district level the consultation was held with school construction engineer, Director of education/in charge of education and in charge of land administration and use in one stop centre and head teachers in visited schools.

Stakeholders will continue to be identified on a continuing basis and these will include:

- Various stakeholder categories that may be affected by, or be interested in the Project; and
- Specific individuals, groups, and organizations within each of these categories taking into account:
- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected; The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

In general, engagement is directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the

intensity of the engagement method used. All engagements should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

2.4. Stakeholder identification and consultation methods

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group should be considered. The techniques mostly used are:

Table 1: SEP Techniques

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails, Text, instant messaging)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions
Online meetings via social media means such webex, Microsoft team 365	Present the project information to a group of stakeholders by respecting national regulations (Ministry of Health and Prime Minister guidelines) and international regulations (World Health Organisation guideline) in regards to the fight against COVID – 19 spread.
Public meetings	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.

Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses
Project on website/Information Centre/information Boards	Establish Information Board in each project area Present project information and progress updates Disclose ESIA, ESMP and other relevant project documentation
Direct communication with affected crops/asset/goods/land owners	Share information on timing of project activities Agree on options for removing crops and relocation of properties.
Radio/TV emissions	Arrange for broadcast Radio/TV emissions to bring the project to large public awareness and allow question/answer session
Project information on site	Share information on project activities Provide information on construction materials that will be needed to incite potential suppliers
Project leaflet	Brief project information to provide regular update Site specific project information.
Workshops	Present project information to a group of stakeholders Allow stakeholders to provide opinions and views. Use participatory exercises to facilitate discussions, brainstorm issues, analyse information and develop recommendations and strategies
Focus group meetings	Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions Build relationship with neighbouring communities Use a focus group interview guideline to facilitate discussions Response recording
Surveys	Gather opinions and views from individual stakeholders Gather baseline data Record data Develop a baseline database for monitoring impacts

2.5. IDENTIFIED STAKEHOLDERS

A stakeholder is defined as a person or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. (IFC's Handbook on Stakeholder Engagement, 2007)

According to the nature and extent of this MINEDUC project of **QUALITY BASIC EDUCATION FOR HUMAN CAPITAL DEVELOPMENT IN RWANDA** and its **Additional financing to support continuation of quality learning while protecting the health and well-being of approximately 2 million (50 percent female) students and an estimated 40,000 teachers targeted under the parent project in the short, medium, and long term**, which is to be implemented in all 30 Districts of the country, a number of stakeholders can be readily identified and grouped as follows:

- Affected communities
- Local administration
- Government officials
- Non-Governmental Organizations
- Government Institutions
- Religious Organisations
- Students (specifically including those learners with disabilities, lower primary children)
- Teachers
- Parents
- Development partners

Key stakeholders identified for consultation during preparation/design and implementation of the project include but not limited to the following:

At national level:

- Ministry of Local Government (MINALOC)
- Ministry of Environment(MoE);
- Rwanda Environment Management Authority (REMA)
- Rwanda Development Board (RDB).
- Rwanda Land Use and Management Authority
- Ministry of Infrastructure (MININFRA)
- Ministry of Finance and Economic Planning (MINECOFIN)
- Ministry of Gender and Promotion (MIGEPROF)
- Ministry of ICT and Innovation (MINICT)
- Ministry of Health (MOH)
- Rwanda Housing Authority (RHA)
- Rwanda Education Board (REB)
- Rwanda Energy Group (REG)
- Water and Sanitation Corporation (WASAC)
- Rwanda National Police (RNP)
- Rwanda Defence Force (RDF)
- Rwanda Polytechnic (RP)
- Workforce Development Authority (WDA)
- University of Rwanda (UR)
- National Council of Persons with Disabilities (NCPD)
- National Early childhood Development Programme (NECDP)
- Private telecommunication companies

- National and private broadcasting agencies (Radios and TVs)
- Private online journals
- Construction materials manufacturers/ suppliers

At local level:

- Districts officials (including District Education Officials);
- Sector officials (including District Education Officials);
- Cell leaders
- Village leaders
- School General Assembly Committee members
- School head teachers;
- Teachers; and
- Potential Project Affected People(PAPs)/parents of pupils.

Agencies and NGOs:

- UNICEF DFID (BLF)USAID (Soma Umenye, Mureke Dusome)
- Rwanda Huguka Dukore (HD)
- World Food Program (WFP)
- UNESCO
- Save the Children

The list of stakeholders is likely to expand/change in composition as the project moves to implementation.

Table 2: Key stakeholders

Affected communities	All people in villages and cells where constructions will occur and those likely to have their children benefit from the project	All people who will be positively or negatively affected by project activities . People whose children will benefit from the schools' education . Farmers whose produce will be sold to the schools . People who may initiate businesses with schools as potential buyers (restaurants, boutiques, stationeries, bookshops, hair cutters, etc.) . People likely to get jobs during construction and operation (technical and casual) . People who may be able to supply construction materials (Stones, sand,
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		etc.) . People who may lose land for crops
Local administration	Villages, Cells, Sectors and District authorities especially those in charge of education	All 30 Districts . People and their leaders to be involved in the construction of the schools through community works (Umuganda)
Government officials	Individual officials	Village and Cell leaders, Sector executive secretary,
Government Institutions	Institutions to be involved in capacity building, permitting, law enforcement, safety and security, and compliance monitoring and supervision	RDB, REMA, RHA, CoK, Districts, REB, MININFRA, RTDA, REG, WASAC, MoH, RNP, RDF
NGOs	NGOs will be consulted to share the know their areas of intervention so as to avoid duplication of implementing similar interventions	UNICEF USAID Rwanda Huguka Dukore World Food Program (WFP) UNESCO Save the Children
Religious Organizations	Some churches may be holding some schools which will benefit from the project in a way or another. As per the existing practice in relation to the nature of the government aided schools, church owners provide government with land for school infrastructure construction free of charge.	For Government aided schools
Vulnerable people		Orphans, widows, disabled, disadvantaged

Feedback from initial stakeholder engagement, as reported in the Resettlement Policy Framework (RPF)

Initial one to one Consultation were held with government institutions, District officials, school head teachers and few members of local communities. This initial consultation carried out during the development of RPF in the period from March 01st, 2019 to April 04th, 2019 revealed that the project is well perceived as portrayed by stakeholders' views:

The following table summarizes key feedback from initial consultation.

Table 3: Key feedback from initial consultation

No	Stakeholder	Issues raised	Response provided
1	Rwanda Environment management Authority	Has the Ministry of education budgeted for Resettlement Impacts	Once the project design are completed and Required land known, the ministry will request the compensation from Ministry of Finance
		What are mechanism put in place to ensure that People are compensated on time	The ministry has agreed with WB that construction works will start after compensation of affected People.
2	Rwanda Land Management and Land Use Authority	How the ministry is planning to work with district especially land Bureau?	The district is fully involved in project implementation and the district will be in charge of Resettlement process.
4	District Land Bureaus	We are requested to comply with WB standard and yet we have never received any training on these policies.	Before project Implementation, all people involved in the project will be trained on WB environmental and Social Framework.
		We are informed about land requirement at last minute and sometimes the districts does not have budget for that.	Ministry of Education will make an effort to involve the district officers at all stages of project.
5	District Education officers	District are not fully involved in selection of schools to be covered under the project and this may left out schools that are priority to district	The project it's at preparation phase and district will be consulted in confirming schools to be supported under the Project
		It seems that the Project is focusing on government schools while Government aided schools have more problems and more students	Though the Priority was given to government school, the project will support also Government aided Schools
		Some schools are in critical conditions or are located in areas where there are few people and	The initial identification was done so as to have information of different schools in the

		it would be good to relocated these schools rather than providing additional classrooms.	country and to have an idea on needs. The Ministry will work with district to confirm schools that can resolve existing problems and achieve the project objectives
		All project components will be implemented in the same schools.	Project components will target different schools based on needs and available resources. The government will find other source of fund to cover schools that are not support under this projects
6	Head teachers	There are other school need that are not covered under the project such as the construction of kitchen, Girls Room	The Ministry has prepared reference school plan but during the implementation the school may make slight modification to accommodate other urgent need. Further, the project is not replacing other ongoing initiatives aiming at improving quality of education
		Local communities have encroached to the school lands and some of them managed to get land titles and may claim compensation	Before the construction, a detailed resettlement plan will be prepared and eligibility criteria have been established. The Ministry will work with district land bureau the check the land ownership and eligible affected people will be compensated.
		Schools have free land far from the school boundaries and this would cause management issues if additional classrooms are to be constructed on this land	The school can explore if there any possibility of land exchange between the school and local community or any other means of acquiring land near the school.
		Decision are made at Ministry level and district and School management are not fully involved in project preparation and implementation.	Consultation will be an integral part of the projects and school management will be involved in project implementation including resettlement process and Grievance Redress

			Mechanism.
		Schools has rented land to local community and it's likely that the project implementation may start before people harvest their crops.	If crops are found on the designated land for construction, the owner of crops will be compensated.
7	Local Community	We have heard even experienced some project that don not compensate affected assets or delays in providing compensation.	The ministry will work with district and ensure that all compensations are made before using the land.
		Schools do not have playing grounds and students play in our garden and we have received any compensation from the school or district.	The Government is working with different partners to improve learning environment and this include recreation facilities. However, before this happens in all schools whoever is affected by school activities can submit his complaints to local authorities and Compensation will be affected

2.6. STAKEHOLDER ENGAGEMENT OBJECTIVES AND PRINCIPLES

The SEP has three corporate objectives, a number of project-specific operational objectives, and key principles. The stakeholder engagement programme will aim to achieve the objectives and comply with the principles.

2.6.1. Communal objectives

The corporate objectives of stakeholder engagement are

- A co-ordinated approach to all engagement actions;
- Consistency of messaging;
- Management of stakeholder expectations; and
- Reduction in the potential for delays in future project-related decision-making for issue of project approvals and permits or the need for costly redesign of operations/facilities.

2.6.2. Operational objectives

The operational objectives of stakeholder engagement are:

- Acquisition of information from certain stakeholders to assist preparation of the ESIA report;
- Provision of information on Quality Basic Education Project (QBEP) and the Additional financing project and the ESIA to stakeholders;

- Ensuring that stakeholders have an understanding of how they might be affected and their potential role in QBEP implementation and impact management;
- Provision of opportunities for stakeholders to express their opinions and concerns in relation to QBEP design and implementation, and for these opinions and concerns to be taken into account in the QBEP -related management decisions; and
- Ensuring that stakeholders understand MINEDUC's corporate and operational aims and requirements, with respects to QBEP, and have confidence in MINEDUC's ability to manage environmental/social risks in a responsible and transparent manner

2.6.3. Key principles

The SEP will ensure that the following key principles are applied to all engagement activities:

- Consider the country COVID-19 spread situation in the project area, and observe the restrictions put in place by the government to contain virus spread
- Timing and number of engagement events designed to maximise stakeholder involvement and to avoid disruption to the 'daily businesses' of local stakeholders and also stakeholder 'fatigue';
- A senior MINEDUC staff member to be present and participate actively at all engagement events;
- Engagement events to occur in line with the SEP schedule so that there is clear linkage between engagement activities and the key stages in the ESIA assessment process;
- Ensure that engagement is managed so that it is culturally appropriate, adequate and timely information and opportunities are provided to all stakeholders to be involved/contribute; and
- Ensure that engagement is free from coercion, undertaken prior to key decisions and informed by provision of objective and meaningful information, and that feedback is provided to stakeholders after engagement has concluded.

2.7. Culturally appropriate engagement

It is critical that engagement is culturally appropriate, especially, but not exclusively, in terms of impacted communities. Most stakeholder engagement will be with rural village inhabitants and it is known from previous engagement activities with such communities that traditional social and cultural norms are respected by almost all inhabitants. It is the intention that the ESIA local consultant will manage and, as appropriate, lead engagement events. Also, it is expected that most rural community engagements will be held in Kinyarwanda.

Prior to any engagement events occurred during the consultations which have already taken place and similar events to be conducted with stakeholders in time to come, the following actions occurred/ will occur:

- Preparation of standard 'question and answer' sheets tailored for specific stakeholder types (based on 'lessons learnt' analysis and common issues raised in previous engagement);

- Planning/design of engagement action(s) with Project Manager (PM), consultants and then key 'traditional' and 'formal' authorities;
- Selection of individual stakeholders with whom engagement occurred/will occur;
- Selection of methods for disclosure of information (including such topics as format, language, and timing);
- Selection of location and timing for engagement event(s) (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring);
- Agreeing mechanisms for ensuring stakeholder attendance at engagement event(s) (if required);
- Identification and implementation of feedback mechanisms to be employed.

2.8. Regulations and requirements

Hereinafter are the national and World Bank requirements pertaining to stakeholder engagement applicable to the project. Mentioned below tackle resettlement specifically as some of the sub-projects may require land acquisition.

Rwandan Regulations and requirements

The Law no 32/2015 of 11/06/2015 related to expropriation in the public interest, especially in its article 6 stipulates that:

- The initiator of an act aimed at the implementation of land use and development master plans shall first negotiate with owners of assets that are affected by the project.
- In case negotiations fail, formalities related to expropriation in the public interest shall be followed upon request of the expropriator and the initiator of the project, taking into account the interests of the person to be expropriated.

Ministerial Order N° 003/2008 of 15/08/2008 relating to the requirements and procedure for environmental impact assessment

Article 9: Public Participation

The stakeholders may comment on the environmental impact report and express views on the impact of the proposed development.

The Authority shall cover all costs of the public hearing process.

In the framework of public hearing, the Authority shall notify the public of:

- (a) The day, time and venue where the public hearing shall take place by using at least any of the three of the following means:
 - (i) Publishing a notice twice in any local newspapers;
 - (ii) Running four (4) radio announcements;
 - (iii) Putting up posters at the site of the proposed development.

(b) The developer's details include name and address.

Law N° 66/2018 of 30/08/2018 regulating labour in Rwanda

Ministerial order N°2 of 17/05/2012 determining conditions for occupational and health safety

EIA General guideline of 2006, part 3, point 6 gives the procedure for conducting public hearings

World Bank requirement

The World Bank Involuntary resettlement OP. 4.2 mentions that displaced persons and their communities and any host communities receiving them should be provided with timely and relevant information consulted on resettlement options and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanisms should be established for these groups.

3. ESIA IMPLEMENTATION

The MINEDUC is the Implementing Agency. The MINEDUC is responsible for the management of all activities, including procurement, financial management, and reporting.

During ESIA implementation, EIA law requires adequate public consultation. This requirement is incorporated into the stakeholder engagement programme for this stage. The main purpose for consultations at this stage is to provide feedback to stakeholder as to ESIA progress and preliminary results (which may include early identification of key risks/impact issues and mitigation measures). This is also a stage when it may be clear that certain risk/impact issues are more, or less, important than first thought and, indeed, that new risk/impact issues are identified that need investigation.

4. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE

This SEP needs to be updated and refined throughout the lifecycle of the Project. During this process the focus and scope of the SEP will be updated to ensure that the PMU addresses external changes and adheres to its strategy.

The key life-cycle phases to be considered when implementing stakeholder engagement are briefly discussed below.

Design/Plan: the process of ensuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements;

Implementation: the process and activities are implemented as planned

Stakeholder engagement within the project preparation and implementation process is critical for supporting the project's risk management process, specifically the early identification and avoidance/management of potential impacts (negative and positive) and cost effective project design.

Stakeholder engagement is an on-going process throughout the life of the project:

- Planning/design (including disclosure);
- Construction
- Commissioning
- Decommissioning

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

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

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

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

Targeted stakeholders may comment on the ESIA within the time indicated.

There are various avenues that will be employed in the stakeholder engagement process:

- a) **Community Forums:** To facilitate effective consultation with the communities during implementation of the project, the Project Manager (PM), establishes community forums through local community established leadership to disseminate project information to community members.
- b) **Local Government:** Government representatives (Government Representatives on respective District/Town Officers, Sector, Cell, etc.) as a channel to disseminate information on the project.
- c) **Information Boards:** Notice boards are effective mechanisms to inform the communities and wider audiences about the project. These can be installed on specific areas of impact (communities).
- d) **Media:** Newspapers commonly read in the project area will be used to notify the general public.

Table 4: Summary of SEP implementation

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibility
Design	<ul style="list-style-type: none"> . Need of the project; . Ongoing and planned activities; . Presentation of the project . ESMF . Grievance redress mechanism (GRM) 	<ul style="list-style-type: none"> .One-on-one meetings . Formal meetings .Focus group meetings . Workshops . Field visit . Radio/TV . Online channels, including webex, Microsoft teams, chat groups and skype meetings 	<ul style="list-style-type: none"> - Done before March, 2019 - Ongoing -Before commencing key project activities <p>At MINEDUC, at Institution HQs, on sites</p> <p>For additional financing April 2020.</p>	<ul style="list-style-type: none"> . Government Officials; .Government Institutions: MINALOC, MOE, REB, REMA, RDB, RLMA, District, Sector, Cell . Public: School Head Teachers, Teachers, pupils project beneficiaries, PAPs 	<p>Environmental and Social Safeguard Specialists</p> <p>Project Engineer</p> <p>Project Manager</p> <p>MINEDUC/ SPIU</p> <p>REB/SPIU</p>
Construction	<ul style="list-style-type: none"> . Need of the project . Ongoing activities . GRM 	<ul style="list-style-type: none"> . Meetings . Presentations . Information boards . Disclose ESIA 	<ul style="list-style-type: none"> - Done before March, 2019 -Along the project implementation period through monthly community works on construction sites 	<ul style="list-style-type: none"> . Public: project beneficiaries, PAPs . Contractors . Government officials .Government Institutions: REMA, District, Sector, Cell 	<p>Environmental and Social Safeguard Specialists and Officers</p> <p>Project site engineer</p>

Operation	. Use of the facilities . OHS .Maintenance of the classrooms	. Public meetings . Physical visits . ESIA disclose	TBA, on sites	. Public . Pupils and teachers . Agencies: UNESCO, USAID,	Environmental and Social safeguard Specialists and Officers
Decommissioning	EHS	. Meetings	After design life time	Local government REMA	Environmental and Social safeguard Specialists and Officers

Table 5: Estimated budget to implement SEP

Engagement Technique	Cost Estimate (in USD)
Correspondences (Phone, e-mail, etc)	3,000
Meetings	30,000
Workshops	30,000
Field visits	50,000
Information Boards	10,000
Radio & TV Announcement	7,000
GRM Implementation	20,000
Total	150,000

5. SEP Resources and Responsibilities

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within MINEDUC /SPIU and its local sub-contractors. The roles and responsibilities of the organizations are presented below.

Environmental and Social Safeguards Specialists who will be at the Central Level (MINEDUC) will supervise 15 Environmental and Social Safeguards Field Officers at District level, the ones to consolidate reports to be submitted to the World Bank

5.1. MINEDUC

MINEDUC has a social performance team under the management of the PM. The key tasks are *inter alia* to:

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

6. GRIEVANCE MECHANISM

6.1. Definitions and Grievance Procedure

A grievance mechanism has been developed for potential use by external stakeholders. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. The grievance mechanism described in this section is distinct from the grievance mechanism to be used by the Project's workforce.

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

Key definitions are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by a project activity, which has affected an individual or group. Adversely, the interests of an individual or group and the individual or group wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance; and
- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to MINEDUC operations (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

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

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

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

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

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

As per the RPF developed for the project, the Grievance Redress Mechanism will be administered, as far as possible, at the District level by the Resettlement and Compensation Committee to facilitate access by PAPs. This Committee will act as District Project Coordination office and be the main project contact for all PAPs. All grievances concerning non conformity with the RPF, levels of compensation, or displacement of assets without compensation and any other complaints that cannot be resolved through community traditional and cultural redress mechanisms, will be addressed to the District Project Coordination office and resolved in coordination with the District Land Office and project Coordination.

6.2. Grievance Redress Process

A grievance redress mechanism (GRM) is presented below to uphold the project's social and environmental safeguards performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs). The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

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

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

6.3. Community Level Grievance Redress Mechanism

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes between individuals/ family members but which might result from the project implementation in the area, may be resolved using these mechanisms, without the involvement of the Government representatives at local and national level. This is primarily concerned with the extended family members.

However, regarding disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the Project, the mechanism will involve the District Land Officer, landowner(s) concerned, and if required, the representative from the Ministry of Environment.

It is expected that any land dispute issues pertaining to the Project would be resolved at this level given the nature of land ownership and the significant authority vested under the Minister of Environment.

Where issues caused by the project are raised and resolved through these existing community level grievance redress mechanisms, it is important that a mechanism for reporting them to the MINEDUC is established. Hence, the MINEDUC records all complaints/outcomes.

The option of using existing community mechanisms for resolving and reporting project related grievance is recommended.

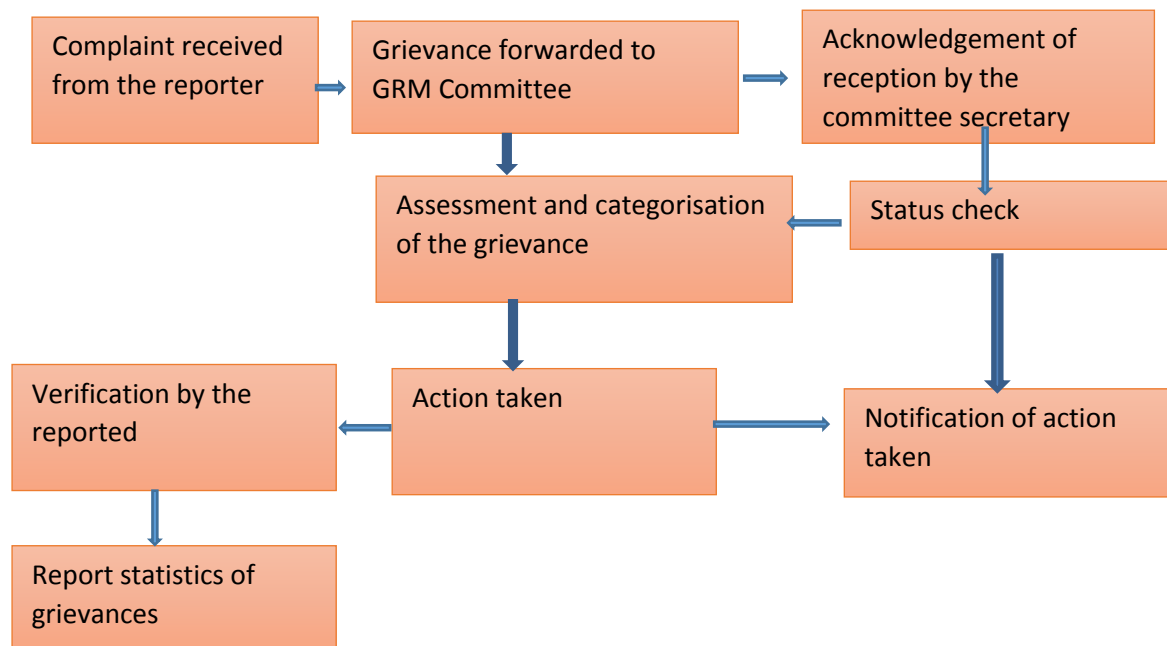
6.4. Project Level Grievance Redress Mechanism

The MINEDUC project SPIU is expected to establish grievance redress mechanism (GRM) to address complaints arising during the project implementation. Provisions in law N° 66/2018 of 30/08/2018 regulating labor in Rwanda will be applied for Grievance Redress Mechanism for workers. Grievances are issues that may be raised by stakeholders in general and local people in particular. Grievances may include dissatisfaction in land expropriation issues and compensation arrangement, land owners whose land will be affected by different forms of erosion including rills and gullies caused by uncollected roof water, stinking emission from toilettes and kitchen and noises from construction sites, uncompensated injuries and accidents from the construction sites, payment arrears etc. In addition, grievances may arise from other schools that will not be selected for the project implementation.

Therefore, a system that permits the affected stakeholders to lodge complaints will be established. Stakeholders will be informed of the intention to implement the grievance redressal mechanisms. A grievance redress mechanism committee (GRMC) will be established at district level. This committee will comprise the District Director of Education (DDE) as the chairman, the Environmental Officer (Vice-chairman), the School Construction Engineer (Secretary), The Director of One Stop Centre (member) and the property valuers (member), the Sector land officers and education officers, Head teachers of concerned schools, and elected community representatives from sectors where the activities will be taking place. A complaints registry will be established at each district for people to lodge complaints. After receiving complaints, the GRMC chairman will convene the committee and shall make sure that all complaints

are responded. In case the response to the complaints is not satisfactory, the complainer will lodge his complaints to the higher level (Project Implementation Unit at Ministerial Level). The decision outcome of grievance redress mechanisms by GRMC will be communicated and approved by the District Mayor who will also report to the Ministry of Education to ensure accountability and transparency.

Figure 1: Grievance redress mechanism process



6.5. Judiciary Level Grievance Redress Mechanism

The project level process will not impede affected persons' access to the legal system. At any time, the complainant may not be satisfied with the resolution at the District and Ministry level, he/she may take the matter to the appropriate legal or judicial authority as per the Rwandan laws.

7. MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder process is considered vital to ensure Project Developer (MINEDUC) is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;

- Sense of trust in MINEDUC shown by all stakeholders;
- Clearly defined approaches; and
- Transparency in all activities.

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

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

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

7.1 Key performance indicators

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

