

FEDERAL GOVERNMENT OF SUDAN

Ministry of Finance and Economic Planning (MoFEP)

SUDAN FAMILY SUPPORT PROGRAM (FSFP)

(Parent Project and Additional Financing)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

December 2020

1 Introduction/Project Description

Sudan receives significant humanitarian support from United Nations (UN) agencies helping to support IDPs, refugees and conflict-affected segments of the population. The UN, primarily through the World Food Program and UNICEF, provides in-kind and limited cash support to approximately 5.2 million people. Humanitarian actors prioritize assistance to the most vulnerable with acute needs, including internally displaced persons (IDPs), refugees, returnees and vulnerable residents. Humanitarian partners will also invest in readiness to help prevent and mitigate the impact of new shocks including floods, disease outbreaks, severe malnutrition, food insecurity and displacement. There are no immediate plans to transition current humanitarian assistance to refugees, IDPs, or host communities to government- administered systems. UN administration is expected to continue given government capacity constraints in provision of services to remote regions. In parallel, coordination with government programs and transition of humanitarian support to government-led systems will take place over time as conditions become favorable.

The Government of Sudan (GoS) has been operating a large social safety net program known as “Social Initiative Program,” which provides cash transfers of SDG 450 per household per month to 500,000 households in all 18 states. The cash transfer program is run under the “Comprehensive Program for Social Safety – (Shamil)” which was formerly known as the “Social Initiatives Program (SIP).” An increase to SDG 450 was approved in early 2019, but never implemented due to budget shortages. Payments have been irregular since 2018 despite the fact that the SIP piloted digital payments in Khartoum. In the other states, payments are made through Sudapost, Zakat chambers and select rural state-owned bank branches or banking agents.

The Government of Sudan (GoS) is responding to urgent needs to stabilize the economy and begin a long process of clearing arrears to MFIs as part of the Sudan’s larger macroeconomic stabilization and integration. These measures are expected to include exchange rate liberalization/unification and reallocation of public resources away from commodity subsidies, tax exemptions, towards social and development needs. These fiscal adjustments are expected to contribute to furthering an already deteriorating economic situation in Sudan which has impacted vulnerable people’s abilities to cover basic needs. These challenges facing households are compounded by the economic shutdown recently imposed to mitigate the effects of the Corona Virus pandemic (COVID 19) in some regions of Sudan.

The government program is to provide cash transfers of \$5 per person per month to approximately 80 percent of the population, i.e. 32.5 million people for an annual cost of \$1,950 million. The program scale-up is expected to start following a pilot testing period that began in July 2020. The pilot targeting twenty thousand beneficiaries is supported by WFP. Based on expected external resource flows, the program will scale up in phases. The first will build on the lessons from the pilot and support the development of building blocks necessary for establishment of a more effective social SafetyNet system in Sudan. Specific focus during this phase is on transforming the existing institutional and administrative structures to consolidate permanent institutional arrangements in order to design, implement and monitor the social safety net as well as support informed decision making in the context of the national social protection framework.

The first states and subsequent scale up consider issues of; (i) poverty head count; (ii) existing implementation capacity of safety nets programs; (iii) payment infrastructure and (iv) presence or absence of UN agencies in those states and (v) rural/urban consideration or a combination of all these factors. Based on the external resource flows, including the first AF, the design of the second phase will start immediately after the delivery of the first phase.

The project’s development objective (including its additional financing) is to assist the Government of Sudan to effectively provide cash transfers to the targeted population to mitigate the effects of the expected economic stabilization. To this end, the Project includes three components (1) provide cash transfers to selected households; (2) establish delivery systems and institutional capacity; and (3) support project management, monitoring and evaluation and knowledge management. The first component, provision of cash transfers will finance cash transfers to selected households.

Component 1: Provision of Cash Transfers: This component finances cash transfers to selected households during a startup period for the program. The parent program provides cash transfers of \$5 per person per month to 7.2 million people in 1.3 million households for a total cost of \$350 million. The program ramp-up, including the first AF, is expected to reach 80 percent of the population by February 2021. The total household benefit levels is calculated based on the number of household members (\$5 for each member of the household each month).¹ After economic stabilization and fiscal rebalancing measures are undertaken by GoS, financing using domestic revenues would contribute to the longer-term sustainable social safety net from 2022.

Component 1 also finances the service fees to expand the participation of electronic and mobile money, banking fees or other private payment providers. Based on experience in other countries, these fees are estimated to be 3.5 percent of the payment value. As more payment providers enter the market, per transaction fees are expected to decline over the lifespan of the project.

Component 2: Establish Delivery Systems and Build Institutional Capacity. Component 2 establishes the key building blocks of the SFSP delivery system.² Activities under this component strengthen the Government's institutional capacity to manage and implement the program, including the permanent social safety net. The component provides financing for outreach and registration, enrollment, beneficiary verification, payment delivery, grievance redress mechanism, monitoring, and capacity-building. This also establishes operational procedures, an SFSP social registry, beneficiary database, and a Management Information System (MIS).

The project finances the communication and outreach activities including the development of a communications strategy, the strengthening of internal and external communication systems, production of communication materials for key stakeholders and communication on progress and achievements. Communication and community outreach activities are running in parallel with finalizing the communication strategy. The communication outreach strategy is being developed in a way to ensure that information is meaningful, timely, and accessible to all affected stakeholders, including *addressing cultural sensitivities, as well as challenges deriving from illiteracy or disabilities*. Due to the expected country-wide implementation of activities, the *differences of areas and socioeconomic groups will equally be taken into consideration* during rollout of the communication and outreach strategy.

Communications regarding the SFSP is being well coordinated with the rollout of cash transfers. This is based on a communication strategy covering all stages of the delivery chain, stakeholder analysis, branding, tailored messages, and capacity building to support the implementation of the communication campaign at program rollout. The communication strategy will continue evolving to reflect the evolution of SFSP design.

Key elements of the outreach and communication strategy include but not limited to:

- Creating a brand for the SFSP as a national, automated, transparent, temporary, inclusive cash transfer program designed to cover large parts of the population to mitigate the impact of economic reform and contribute to national unity;
- Strengthen information flows and capacity to rationalize the communications roles of stakeholders and unite them on one platform, including SFSP's operational teams at federal, state and local level²;
- Implementing a public information campaign to reach the general public, decision makers and

¹ The World Bank team, Ministry of Finance and Economic Planning, and the Inter-ministerial task force are in discussion on whether a limit is introduced to number of children (under the age of 18) in the household. This follows international practice on determination of generosity of transfers to households taking into consideration (i) economies of scale, (ii) incentive to 'double' count underage dependents.

² The challenge is to understand and strengthen the linkages, capacity and information loops among stakeholders, both horizontally and vertically through strengthening both internal and external communications.

influencers through social and public media. The campaign would address questions such as “What is SFSP and how does it connect with economic reforms?” “Why does the GoS seek to implement SFSP nationally?”, “What are the benefits of SFSP to participants and to the nation?”, “How will it be designed, implemented, and governed?”

- Informing potential and actual beneficiaries on the delivery processes (identification, selection, enrollment, payment, and grievance).
- Engage youth groups and active civil society members. not only in communications but also in monitoring and oversight (e.g., neighborhood service committees); e.g., training and “deputizing” them to monitor cash handouts and report corruption to a nation-wide dashboard via SMS (e.g., using open- source Ushahidi platform), in exchange for minutes or extra cash.

Component 3 supports coordination and project management activities necessary for the smooth functioning of the project, including the establishment of the Project Implementation Unit (PIU). The activities supported include the ‘soft’ establishment costs of the DTA, the day- to-day operational management, institutional setup, and donor coordination by the PIU and DTA. The component also invests in establishing the SFSP beneficiary database, necessary hardware and software, internet connectivity and IT infrastructure at national and local levels.

2 Legislative and Policy Requirements

Article 39(1) of the Sudan Interim Constitution provides that ‘[e]very citizen shall have an unrestricted right to freedom of expression, reception and dissemination of information, publication, and access to the press without prejudice to order, safety or public morals as determined by law’. Further, Article 27(3) of Sudan National Interim Constitution provides that ‘[a]ll rights and freedoms enshrined in international human rights treaties, covenants and instruments ratified by the Republic of the Sudan shall be an integral part of this Bill’³.

The World Bank’s Environment and Social Standard 10 sets out that a Borrower has to engage with stakeholders as an integral part of a Project’s environmental and social assessment and project design and implementation. The nature, scope and frequency of the engagement should be proportional to the nature and scale of the Project. Consultations with stakeholders have to be meaningful and be based on stakeholder identification and analysis, plans on how to engage stakeholders, disclosure of information, actual consultations, as well as responses to stakeholder grievances, and reporting back to stakeholders.⁴

3 Stakeholder identification and analysis

Stakeholder engagement is the interaction with, and influence of project stakeholders to the overall benefit of the project and its advocates. ESS 10 recognizes two broad categories of stakeholders:

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

3.1 Methodology

In order to meet best practice approaches, including in line with COVID-19 restrictions and related parameters the project applies the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference,

³ Sudan National Interim Constitution 2005, art 27(3).

⁴ World Bank, Environmental and Social Framework. Setting Environmental and Social Standards for Investment Project Financing, August 2016.

coercion or intimidation;

- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format that is accessible and understandable, taking into account cultural sensitivities, literacy levels of stakeholders, and special needs of stakeholders with disabilities and stakeholders that are members of other vulnerable groups opportunities are provided for communicating stakeholders' ongoing feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. The project will provide equal access to information to all stakeholders taking into consideration cultural sensitivities and literacy levels. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, people with disabilities, elderly and the cultural sensitivities of diverse ethnic groups.

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

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁶⁵, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.2 *Affected parties*

Affected Parties include local communities, community members and other parties that may be directly affected by or otherwise experience direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Project beneficiaries
- Persons with disabilities, from ethnic/other minorities,
- Women, youth,
- Female headed households
- People with disability
- National and State level Ministries
- Localities
- Local community leaders, including chiefs, headmen and headwomen,

⁵ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, gender orientation, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources

especially for communities as identified for application of ESS7.

3.3 Other interested parties

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

- Traditional media, including newspapers, radio, and television networks
- Participants of social media
- Religious institutions
- Other International NGOs
- The public at large

3.4 Disadvantaged / Vulnerable Individuals and Groups

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

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Elderly
- Illiterate people
- People with disabilities
- Traditionally underserved communities
- Refugees and IDPs
- Female-headed households and
- Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate.

4 STAKEHOLDER ENGAGEMENT PLAN

4.1 Summary of stakeholder engagement done during project preparation

The speed and urgency with which this project has been developed to meet the government's urgent need combined with recently announced government restrictions on gatherings of people due COVID-19 has limited the project's ability to include all operational details in the SEP before this project is approved by the World Bank. This SEP has been developed and disclosed prior to appraisal, followed by iterative cycles to adjust stakeholder engagement to the different project implementation modalities in different geographic and socioeconomic areas. It will be updated periodically as necessary, with more detail provided in the first update planned for two months from project effectiveness. In line with COVID19 parameters, project stakeholder consultation and engagement

activities will be designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. Within the social distancing and other parameters set by the national government, the Project Implementation Unit will make all reasonable efforts to conduct meetings with stakeholders through diversifying means of communication, including based on type and category of stakeholders. This will include online channels, such as zoom, webex, and skype, and where these are not available, to employ TV, radio, newspaper, dedicated phone lines, public announcements, or mail. The channels used to undertake the stakeholder engagement will depend upon the technological and cultural circumstances of the affected stakeholders and will provide them with clear mechanisms to give their feedback and suggestions.

4.2 Purpose and Timing of Stakeholder Engagement Program

The Stakeholder Engagement Plan seeks to define a structured, purposeful and culturally appropriate approach to consultation and disclosure, in accordance with ESS 10, including on the preparation of E&S instruments like the project’s social assessment. The Federal Government of Sudan recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making.

Overall, this SEP serves the following purposes:

- i. stakeholder identification and analysis;
- ii. planning engagement modalities through effective communication, consultations and disclosure;
- iii. enabling platforms for influencing decisions;
- iv. define roles and responsibilities for the implementation of the SEP;
- v. define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.
- vi. defining role and responsibilities of different actors in implementing the Plan; and
- vii. elaborating the role of grievance redress mechanism (GRM).

In consideration of Covid-19 restrictions, the project will continuously innovate ways for consultations to be fit for the situation. This means effective and meaningful consultations to meet project and stakeholder needs and adhere to the restrictions put in place by the government to contain virus spread. Strategies to be employed include smaller meetings, small FGDs to be conducted as appropriate, taking full precautions on staff and community safety. Where meetings are not permitted, traditional technological channels of communications such as radios and public announcements will be implemented. Other strategies will include one-on-one interviews through phones and skype for community representatives, CSOs and other interests’ groups. The project will also make use of a hotline service that will be established during implementation. The project includes resources to implement the above activities and systems. The details are being prepared as part of the Community Outreach and Communication Strategy and consequently this SEP will be updated to outline how the above points will be implemented for the different areas to be funded by the Project.

4.3 Strategy for information disclosure and consultation process

In terms of methodology, it is critical that the various project activities are inclusive and culturally sensitive, thereby ensuring that the vulnerable groups outlined above will have meaningful opportunities to participate in Project design and benefits. An inclusive information disclosure strategy includes household-outreach and focus-group discussions in addition to village consultations, ensuring usage of languages appropriate for the respective affected communities, the use of verbal communication or pictures instead of text where literacy is an issue, etc. Likewise, the project adapts the methods of stakeholder engagement to COVID-19 physical distancing and other national requirements with recognition that the situation is developing rapidly. The project will have to adapt

to different geographic requirements as well with its continued expansion into different states.

Information disclosure to the affected populations and beneficiaries throughout the country will rely on the following key methods: Radio broadcasting, posting information in local notice boards/ and phone communication (SMS). At the national level information will be disclosed on the MoFEP and other implementing agencies website. The SEP and other project information will be disclosed in in a local language in project areas accessible to beneficiaries and the English version on the World Bank external website. Local authorities, such as Locality and County Administrators or community leaders will be requested to inform communities using various channels which fit the situation of COVID 19 as noted above, including disclosure through social media.

4.4 Proposed Strategy for Consultation

Community engagement for the project shall adapt different methods depending on roles and interests of stakeholders and beneficiaries. Furthermore, effective and inclusive engagement will require the consideration of methods of engagement with the vulnerable beneficiary groups including female headed households and people with disability.

The project shall employ interviews, open community meetings respecting social distancing and with restricted number of people in line with the WHO and national guideline, focus group discussions, interviews and workshops as a means of carrying out consultations. These shall be done in the target counties and communities with special consideration to enable easy participation of vulnerable and disadvantaged groups of people.

Key points from the quarterly consultation forums will be summarized and shared with stakeholders and the implementing agencies will be responsible for ensuring the feedbacks and recommendations inform the project design and implementation and incorporate them in project progress reports.

While more detail and comprehensive information will be provided in the updated SEP, the below provides summary of key consultations, target groups and methods to be used.

Table 1: Summary of key consultations and methods to be used

| Project stage | Topic of consultation | Method used | Timetable: Location and dates | Target stakeholders | Responsibilities |
|---|--|---|-------------------------------|---|---|
| Project Preparation and update of instruments | Project design elements | Through distributing check lists and phone calls | Project preparation period | Representatives of Government, Project implementing offices and agencies Development Partners, and NGOs, members of community groups | Project Preparation team in Collaboration with concerned offices |
| | Project design, Environmental and Social Risks, Mitigation Measures, GRM and Stakeholder Engagement Plan | Distributing checklists and phone calls | Project preparation period | Representatives of Government, Project implementing offices and agencies Development Partners, and NGOs, members of community groups | Project Preparation team in Collaboration with concerned offices |
| | Project design, Environmental and Social Risks, Mitigation Measures, GRM and Stakeholder Engagement Plan | Community Meetings focus group discussions and interviews | Project preparation period | Representative Members of Selected Communities, Elders, disabled and Women Group, target beneficiaries, religious leaders and political leaders, and traditional and social organizations | Project preparation team in collaboration with concerned offices |
| Project Implementation | Project implementation Progress Review meetings | Community Meetings, physical information | Quarterly | Representative Members of Selected Communities, Elders, disabled and Women Group, participating beneficiaries, religious and political leaders, traditional and social organizations, formal financial institutions such as banks who is involved in delivering payments to a I beneficiaries | Locality/County level implementing units, PIU, and financial institutions such as banks for payment delivery to all beneficiaries |
| Project phase out | Exit strategy preparation | Community Meetings | Final year of the project | Representative Members of Selected Communities, Elders, disabled and Women Group, beneficiaries, religious leaders, political leaders, | County/locality project implementation units with support of National Project coordination team |

4.5 *Future of the project*

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

5 **Resources and Responsibilities for implementing stakeholder engagement activities**

5.1 *Resources*

The Ministry of Finance and Economic Planning is responsible and oversee the implementation of stakeholder engagement plan and related stakeholder engagement activities. The budget for the SEP is part of the budget, included as *Component 2* Establish Delivery Systems and Build Institutional Capacity.

The project shall allocate an indicative amount of funds to facilitate stakeholder engagement and grievance redress mechanism for the entire project period. The national PIU will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new version distributed. The budget will be revised accordingly. Total roughly estimated cost for SEP implementation is **USD 5M and will be adjusted to take into consideration the needs of expansion into further states.**

Detail break down of the activities and budget will be provided in the updated stakeholder engagement plan.

5.2 *Management functions and responsibilities*

The Digital Economy Agency, reporting to the MoFEP is the institutional home for the SFSP including the beneficiary database. A Ministerial Steering Committee chaired by the Minister of Finance and Economic Planning will provide overall strategic leadership supported by a cross-Ministerial Technical Steering Committee. The SFSP team within the Digital Economy Agency is responsible for the day-to-day implementation of the SFSP. The SFSP team is headed by a program manager and would include, inter alia, specialists in communications, operations, database administration, payments, IT, field operations, M&E, E&S risk management, financial management and procurement.

In general, the institutional capacity is limited, and the GoS lacks experience in implementing cash transfer programs on a nation-wide level. Therefore, the project supports MoFEP in building its E&S risk management capacity (in addition to technical and FM/procurement expertise) to undertake the basic functions of the program. This includes helping in the recruitment of specialized skills in social and environment risk management, SP delivery systems, M&E and communication. The Bank also offers trainings of relevant staff in these areas, in addition to providing implementation support throughout the launch and roll-out of the program.

6 **Grievance Mechanism**

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁶ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.⁷ This Project GRM should facilitate the Project to respond to concerns

⁶ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which is laid out in separate Labour Management Procedures (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’⁷ spells out requirements for a GBV grievance redress mechanisms, which is defined in a separate GBV/SEA and Child Protection Risks Action Plan.

⁷ World Bank, 2018, p. 131.

and grievances of the project-affected parties related to the environmental and social performance of the project. The SFSP will provide mechanisms to receive and facilitate resolutions to such concerns.

This section lays out the grievance redressal mechanisms (GRM) for the SFSP.

Grievance Redress Mechanisms (GRMs) can be used as a tool to stay engaged with communities and share information when other direct measures for stakeholder engagement and consultations are more limited during the COVID19 pandemic. The existence of the grievance mechanism is communicated to all stakeholder groups via the channels used to reach these groups for stakeholder consultations, including advertising it in local newspapers and/or local noticeboards. The Project will provide a summary of the implementation of the grievance mechanism to the public on a regular basis, after removing identifying information on individuals to protect their identities. The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.
- Allow anonymous grievances to be raised and addressed.
- The GRM acknowledges, investigates and reports back to complainants within 7 days. Those who are not satisfied are being guided to state Ministry of Finance and Economic planning, and or the Federal level Ministry of Finance and Economic Planning.

6.1 Description of GRM

A Grievance Redress Mechanism (GRM) has been developed to provide an avenue for complaints and updates regarding registration and enrollment, payments and other operational matters. The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties. The GRM includes mobile-phone based applications, and in-person centers for complaint registration and resolution, and a free hot line linked with a call center. The GRM addresses each area of the feedback value chain:⁹⁸ (i) uptake, (ii) sort and process, (iii) acknowledge and follow up, (iv) verify, investigate, and act, (v) monitor and evaluate, and (vi) provide feedback to the complainant to ensure effectiveness. The stakeholder engagement plan will be updated and include participatory citizen engagement practices to ensure accountability which may include citizen report cards, virtual town halls, and engagement of community development organizations and the NGO sector for reporting.

Project specific GRM suitable to address GBV related issues has been developed to provide an avenue for complaints and updates regarding registration and enrollment, payments, and other operational matters. The GRM includes a toll-free hotline linked to a call center, supported by appropriate CRM software, and in-person centers for complaint registration and resolution.

During the COVID-19 pandemic, the GRM ensures that social distancing measures are in place for

⁹⁸ Each step of the grievance and appeal management process addresses different questions, such as – (i) Uptake; (ii) Sorting and processing; (iii) Acknowledgement and follow up; (iv) Verify, investigate, and act; (v) Monitoring and evaluation(vi) Provide feedback (to the complainants).

meetings of GRM officers, investigation of grievances, monitoring of existing grievances and public information sharing mechanisms, and the GRM's need to direct any health and COVID-19-related queries to the relevant organization.

The GRM has a dedicated manager, and focal points at the state level, preferably women, responsible for managing the grievances coming from project implementation. The process will be supported by a dedicated module in the project's MIS. The GRMs is being promoted as part of a communication campaign and trainings to ensure that beneficiaries of the project are aware of channels through which they can voice their grievances and complaints.

Cases of GBV/SEA can be reported through the general Project GRM. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager. All relevant staff of the PIU and Implementing agencies are receiving training on receiving GBV complains and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GRM officers are being trained to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA referral system. The GRM Officer will ensure appropriate response by 1) providing a safe caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agreed, obtain informed consent and make referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

The GRM is increasingly including key features on prevention of GBV: 1) Establish women quotas as member of grievance management to facilitate women to women reporting, 2) provide multiple channels to receive complaints (channels to be determined after community consultation) 3) Resolving complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels for redress. 4) Communicate GRM services at the community level to create GBV awareness and enable project-affected people to file complaints.

GRM for the SFSP has the following principle features:

- **Decentralization:** It is critical to take steps to ensure that grievances/appeals can also be submitted at offices closer to complainants' residences. This can be done by enhancing the delegation of powers to the local level to act upon certain types of grievances/appeals. To achieve this: three levels of decision- making are being put in place: local, regional, and central. Cases will initially be resolved at the local level (initial point of entry). For unsolved or unsatisfied cases, regional decision making will be used (a regional committee). Cases which are not solved at regional level will be solved at the central level. Further, effective communication around the grievance/appeals process will prevent complainants from traveling long distances. These changes will make the GRM system more beneficiary-friendly.
- **Multiple Channels:** To the extent possible, the activation of multiple channels (e.g., installing complaint boxes in prominent places in all SFSP offices, online GRM portal in SFSP, and free hotline) for submitting grievances/appeals are to ensure that complainants do not need to travel to file a complaint. This is also being facilitated by allowing online submission of grievances and appeals by using social media platforms (whenever possible).
- **Standardized Processes:** The establishment of a standardized process for receiving grievances/appeals that assigns clear responsibilities for grievances/appeals management to existing staff is to be confirmed. This includes the development of a standardized complaint form which could be made widely available.
- **Grievance/Appeal MIS:** A grievance/appeal module has been developed in SFSP MIS to allow for tracking and analysis of all received grievances/appeals. Also, a dedicated person in the inter- ministerial committee must be assigned for analyzing and reporting trends. This will help management to identify problems and undertake mid-course corrections.
- **Process Indicators:** The inter-ministerial committee may consider collecting data to monitor indicators such as resolution rates, average time for resolution, percentage of grievances redressed within stipulated time period, percentage of complainants satisfied with response,

etc.

- **Second Appellate Level:** A second level of appeal for complainants that are dissatisfied with the initial response is considered good practice in grievance management. The inter-ministerial committee will institute a second level of appeal as well.
- **Communication:** Communication material for both offline (e.g., brochures) and online, including social media channels, are being developed. The material shall describe not only grievance and appeals procedures but also the eligibility and selection criteria and documents required for the SFSP.
- **Outreach:** Outreach is to be strengthened by designating a staff at the local level in each to receive, acknowledge, sort, refer, monitor and report on grievances/appeals.
- **Capacity Building:** Training to all social workers, especially those designated to handle grievances/appeals to improve customer service and grievances/appeals management will be designed and provided.
- **Complainant Satisfaction:** A questionnaire to assess the level of satisfaction with the responses received should be administered in line with best practices on grievance management. This can be done by conducting a short survey after each transaction and/or a comprehensive survey annually to assess complainant satisfaction levels

Once all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

7 Monitoring and Reporting

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 is duly reflected in the SEP. Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions is collated by responsible staff and referred to the senior management of the project. The quarterly 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.

Incident reporting. Severe incidents (an incident *that caused significant adverse effect on, the affected communities, project workers e.g. fatality*, GBV is reported by the Implementing agencies - within - to the PIU and the World Bank.

Where grievances are of sexual nature and can be categorized as GBV/SEA, the implementing agency has to handle the case appropriately, and refer the case to the GBV referral system, defined in the GBV/SEA risk assessment report.

Further details regarding consultations on upcoming geographical expansions will be outlined in updated SEPs, to be prepared within 1month from effectiveness of each respective expansion. This will include information describing how, when, and where the results of stakeholder engagement activities is reported back to affected stakeholders and broader stakeholder groups.