REVISED STAKEHOLDER ENGAGEMENT PLAN

FOR THE

Adolescent Girls' Initiative for Learning and Empowerment (AGILE) Project

P179281

Additional Financing

DRAFT FINAL REPORT

JUNE 2023

Contents

LIST OF FIGURES

LIST OF TABLES

LIST OF ACRONYMS AND ABBREVIATIONS

AGILE	Adolescent Girls Initiative Learning and Empowerment
AF	Additional Financing
AoI	Area of Influence
BESDA	Better Education Service Delivery for All
CDA	Community Development Association
CCT	Conditional Cash Transfers
CCTV	Closed Circuit Television
CSOs	Civil Society Organizations
CLO	Community Liaison Officer
EFA	Education for All
EMIS	Education Information Management System
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
ESST	Environmental and Social Safeguards Team
ESP	Education Sector Plan
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
FGN	Federal Government of Nigeria
FM	Financial Management
FMFBNP	Federal Ministry of Finance Budget and National Planning
FPIC	Free Prior Informed Consent
GRM	Grievance Redressal Mechanism
GER	Gross Enrolment Ratio
GO	Grievance Officer
HILWA	High Level Women Association
IDP	Internally Displaced Person
ITF	Industrial Training Fund
JSS	Junior Secondary School
KGIS	Keeping Girls in School
LALRP	Land Acquisition and Livelihoods Restoration Plan
LGA	Local Government Area
LRP	Livelihood Restoration Plan
MDAs	Ministries, Departments and Agencies
MoMs	Minutes of Meetings
MPA	Multi-phase Programmatic Approach
MoWA	Ministry of Women Affairs
NECO	Nigeria Examination Council
NECA	Nigeria Employer's Consultative Association

NGO	Non-Governmental Organization
PAF	Project Affected Families
PAP	Project Affected Person
PDO	Project Development Objective
PID	Project Identification Document
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SAEA	Schools Agriculture Enterprise Agency
SBMC	School Based Management Committee
SEB	Secondary Education Board
SEP	Stakeholder Engagement Plan
SESP	State Education Sector Project
SGBV	Sexual and other Forms of Gender-Based Violence
SoME	State Ministry of Education
SPEB	State Primary Education Board
SRGBV	School Related Gender Based Violence
SSCE	Senior Secondary Certification Examination
SSS	Senior Secondary School
SSO	Social Safeguards Officer
SUBEB	State Universal Basic Education Board
WAEC	West African Examinations Council
WBG	World Bank Group
WDR	World Development Report
WOFAN	Women Farmers Advancement Network

EXECUTIVE SUMMARY

The World Bank is supporting the Federal Government of Nigeria (FGN) to implement the Adolescent Girls Initiative for Learning and Empowerment (AGILE) Project to reduce gender gap in secondary education completion rate, improve secondary education opportunities among girls and labor market transition among adolescent girls in seven (7) participating states; Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau. The project aims to support the FGN through a holistic and multi-sectorial approach to unlock binding demand- and supply-side constraints to girls' empowerment, especially in northern Nigeria. The project is using secondary schools as a platform to empower girls through education, life skills, health education (e.g., nutrition, reproductive health), GBV awareness and prevention, negotiations skills, self-agency and digital literacy skills. Due to the success of Project in the 7 participating states, the FGN is now requesting for additional support from the World Bank to scale up the number of states benefitting from the AGILE Project to the following states; Adamawa, Bauchi, Gombe, Kogi, Kwara, Niger, Sokoto, Jigawa, Nasarawa, Yobe and Zamfara. The AF will also support interventions in one hundred and twelve (112) Federal Unity Colleges within the country.

Similar to the Parent Project, the proposed Project Development Objective (PDO) for the Additional Financing is to Improve secondary education opportunities among girls in targeted areas in participating states. Currently, the parent project only targets girls that are in school, with multiple interventions to empower them and prevent their dropouts. However, this leaves out a large group of adolescent girls that are not attending schools. Therefore, the AF project will:

- expand the target group to include skills for girls that are in and out of school, especially adolescent married girls, and other vulnerable groups (girls with disabilities).
- promote policies that allow married girls to continue their education and eradicate prohibitions for married girls to attend school.
- ensure that different ministries enhance their coordination: at the National level, the Ministry of Women Affairs will be added as one of the entities to implement component 3, given the recent commitment to the girls' agenda demonstrated by the Ministry.

The Parent Project Stakeholder Engagement Plan (SEP) was disclosed on World Bank and Government platforms on June 30, 2020. The SEP is now updated as a requirement prior to World Bank Board approval of the Additional Financing, taking cognizance of new group of stakeholder and requisite engagement methods using the school, family, and community platforms to empower the adolescent girls. The updated SEP will be disclosed in-country and on the World Bank website.

Specific objective of this SEP is to establish a systematic approach to stakeholder engagement at the project level that will identify stakeholders that includes the new stakeholder groups (out of school girls, adolescent married girls, and other vulnerable groups (girls with

disabilities) and new approach to address these group by using the school, family and community platforms to empower the adolescent girls and build/ maintain a constructive relationship with them to enable all stakeholders' views to be considered in project design and environmental and social performance.

Applicable *National Legal Provisions* and Regulations for Environmental and Social and Citizen Engagement include: Constitution of the Federal Republic of Nigeria (1999) as amended; The Freedom of Information Act (2011), Nigeria Child Rights Acts, 2003 Nigerian Environmental Impact Assessment (EIA) Act Cap E12, LFN 2004, and the Nigerian Urban and Regional Planning Act, Cap N138, 2004.

Applicable *World Bank Policies include:* World Bank Environmental and Social Framework, The World Bank Environmental and Social Policy for Investment Project Financing, and Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure.

The level of success and sustainability of the AGILE project is crucial and dependent upon proper Stakeholder Engagement and its associated activities taking place. The AGILE project seeks to improve secondary education opportunities among girls by constructing new schools and refurbishing existing dilapidated learning facilities. It further seeks to provide cash-based scholarships to improve girls transition to, and attendance of, secondary school, provide life-skills, livelihood skills and digital training, as well as engage in behavioural campaigns that seek to address social norms that have enabled negative attitudes and behaviours towards girl's education and empowerment.

Given the above objectives, the stakeholder engagement process will be important in:

- ascertaining key project risks as the communities see them;
- developing preventive and mitigation measures to address risks;
- ensuring concerns of communities are acknowledged and addressed;
- informing targeting mechanisms for the identification of schools as well as for recipients of financial packages (special care will be given to ensuring that vulnerable groups are included in the dialogue – notably students with disabilities and their parents/gurdians, displaced girls, among others);
- helping to identify the best monitoring mechanisms for activities;
- seeking inputs from stakeholders on how to develop an adaptive behavioral campaign that addresses differentiated concerns in communities, and the likely varied adoption rates of social norms that support girls education and their empowerment (notably, norms associated with child marriage, exclusionary education, school related gender based violence (SRGBV) and school-based violence (e.g., corporal punishment); and
- strengthening the projects 'safe school' approach.

The Stakeholder Engagement Cycle includes: Identification of Stakeholders (Who?); Creation and analysis of stakeholder profiles (Why? What?); (Re)definition of the Stakeholder Engagement Strategy (How?); Planning of Engagements (When?); Engagement with Stakeholders (The Doing); and Measurement of Effectiveness (The Results).

For the purposes of effective and tailored engagement, the stakeholders of the AGILE Project can be divided into three core categories:
- Implementing Agencies (e.g., Ministries, Departments and Agencies (MDAs))
- Affected Parties (Beneficiaries, project affected persons (PAPs, etc.)
- Interested Parties (local population who can benefit indirectly)

In keeping with the applicable reference framework and the expectations of the stakeholders, the project will undertake regular engagement with the key stakeholder groups identified through the life of the project. The engagement methods identified for the purpose of this project includes focus group discussions; semi-structured and structured interviews and questionnaires; open public meetings; and information disclosure.

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (Environmental Impact Assessment (EIA) requirements, public hearing). As a standard practice, this SEP in English will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Free printed copies of the SEP in English will be made accessible for the public.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating state Project Implementation Unit (PIU) and Implementing Partners. The specific roles and responsibilities of the organizations/stakeholders are presented in section 6.1 and table 6.1. In compliance with applicable local and national laws and essentially the World Bank's ESS 10, a project-specific mechanism is being set up to handle complaints and issues. This process (referred to as the Grievance Redress Mechanism (GRM) would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints, and grievances. The Parent Project is operationalizing a Project level GRM at three levels: site level (school/community), state level and national level. A GRM Manual is already developed which will be utilized for the new states. Similar to the Parent Project, the GRM will be accessible and understandable for all stakeholders in the project and for the entire project life. The process to be followed for the redressal of grievances can be summarized as follows: Publicizing and Disclosure of the GRM; Receiving and Recording Grievances; Maintaining a Grievance Register; Acknowledgement of Grievance; Resolution and Closure; Update of Records. The GRM will be expanded to include a GBV-GRM which are linked to identified GBV Service Providers at the communities through established referral pathway in a survivor-

centric approach. A summary of the nature of the grievance and the personnel to be involved in the grievance resolution is presented in Table 7.4.

Monitoring and evaluation of the stakeholder process is considered vital to ensure the AGILE can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. A series of key performance indicators for each stakeholder engagement stage have been developed and outlined in Table 8.1. All stakeholder engagement activities as mentioned in the previous sections will be documented, in a standard engagement activities format, as can be seen in Table 8.2. The performance of the SEP-GRM will be reviewed on a bi-annual basis during the initial years of SEP implementation. For the purpose of review, quarterly reports will be considered for analysis and discussion.

CHAPTER ONE: INTRODUCTION

1.1   Background Information

The World Bank is supporting the Federal Government of Nigeria (FGN) to implement the Adolescent Girls Initiative for Learning and Empowerment (AGILE) Project to reduce the gender gap in secondary education completion rate, improve secondary education opportunities among girls and labor market transition among adolescent girls in seven (7) participating states: Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau.

The project aims to support the FGN through a holistic and multi-sectorial approach to unlock binding demand- and supply-side constraints to girls' empowerment, especially in northern Nigeria. The project will use secondary schools as a platform to empower girls through education, life skills, health education (e.g., nutrition, reproductive health), GBV awareness and prevention, negotiations skills, self-agency and digital literacy skills.

The AGILE Program was developed by the Federal Ministry of Education (FMoE) in collaboration with the World Bank as part of the FGN's long-term education reform agenda, to adequately address the identified constraints of accessing and completing secondary education facing adolescent girls in Nigeria. The project is in line with the FGN's commitment to promote gender equality and girls' empowerment by introducing a number of initiatives including putting forward a set of prioritized policy and programmatic actions on doubling girls' secondary education enrolment and completion rates.

With the successes of the AGILE Project (referred to as Parent Project), the FGN is requesting Additional Financing (AF) to scale up the number of participating states under the project to include Adamawa, Bauchi, Gombe, Kogi, Kwara, Niger, Sokoto, Jigawa, Nasarawa, Yobe and Zamfara. The AF will also support interventions in one hundred and twelve (112) Federal Unity Colleges within the country. Similar to the Parent Project, the AF project development objective is to increase girls' access to and completion of quality secondary education in participating states. The proposed project aims to achieve its objective by addressing the critical binding constraints adolescent girls face as described in the sectoral context. The AF project will use a comprehensive approach to address these constrains by using the school, family, and community platforms to empower adolescent girls. The approach will consist of interventions aimed at keeping girls in school and provide opportunities for them to acquire critical life skills and market relevant skills not currently offered in schools.

1.2   Proposed New Activity - Additional Beneficiary Group

Currently, the parent project only targets girls that are in school, with multiple interventions to empower them and prevent their dropouts. However, this leaves out a large group of adolescent girls that are not attending schools. Therefore, the AF project will:

- Expand the target group to include skills for girls that are in and out of school, especially adolescent married girls, and other vulnerable groups (girls with disabilities),

- Promote policies that allow married girls to continue their education and eradicate prohibitions for married girls to attend school, and

- Ensure that different Ministries enhance their coordination: at the National level, the Ministry of Women Affairs will be added as one of the entities to implement component 3, given the recent commitment to the girls' agenda demonstrated by the Ministry.

1.3 Project Components[1]

Within this framework, the project is structured around three components:

Component 1: Creating safe and accessible learning spaces - this component aims to increase adolescent girls' access to secondary education by addressing supply-side constraints to girls' education.

Sub-Components 1.1: Creating new safe learning spaces in secondary schools

Sub-Components 1.2: Improving existing infrastructure in secondary schools.

Component 2: Fostering an enabling environment for girls – this component aims to galvanize support for girls' education and empowerment among families, communities, and schools by addressing demand-side constraints to girls' participation in education.

Subcomponent 2.1: Promoting social and behavior change through communications campaign, engagement with traditional rulers and advocacy.

Subcomponent 2.2: Empowering girls with critical life skills and livelihood skills and knowledge for navigating adulthood and digital literacy

Sub-component 2.3: Providing financial incentives to the poorest households

Component 3: Project management and system strengthening – this component aims to support institutional strengthening at the Federal, State, and local levels to manage, implement and provide oversight for the AGILE Project.

Subcomponent 3.1. System strengthening for sustainability and Technical Assistance - This subcomponent will support efforts to strengthen the institutional capacity of Federal and State governments to support girls' education and empowerment.

Subcomponent 3.2. Project management, monitoring, and evaluation (M&E) - The main objectives of this subcomponent are to support both Federal and participating State governments for effective project coordination, procurement, financial management (FM), E&S, M&E, and project communications.

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[1] These components reflect the project components engaged on with stakeholders at the time. Slight modifications have since been made to components.

1.3.1 Project Implementation Management and Coordination

The AF will use most of the same implementation arrangements as the parent project[2], with a few modifications at the federal, state, local and community-levels as described below.

Implementation arrangements at the federal level

The Federal Ministry of Finance, Budget and National Planning (FMFBNP) will be the representative of the Borrower as it relates to the financial and legal obligations of the Government. The Federal Ministry of Education through a National Project Coordinating Unit (NPCU) provides oversight and a coordinating and monitoring role in the project and will be responsible for the implementation of specific activities (e.g., communications activities under Subcomponent 2.1 and Component 3). The Federal Ministry of Women Affairs will also provide support in coordinating specific activities.

Implementation arrangements at the state-level

The State Ministry of Education (SMoE) in each participating state will be the agency responsible for the implementation of the project in close coordination with the relevant ministries and parastatals (e.g., Ministry of Women Affairs, Ministry of Health, State Universal Basic Education Board (SUBEB), Local Government Education Authority (LGEAs), and other agencies. Similar to the arrangements under the parent project, the State Project Implementing Unit (SPIU) will be established within the SME and will have the same representation.

Implementation arrangements at the Local Government Area - level

The LGEA, with oversight mainly from the SPIU and in collaboration with SUBEBs will be responsible for assisting with the monitoring of and support to the implementation of all relevant project activities in the targeted LGEAs, but specifically at the school-level. The LGEA will be responsible for coordinating capacity building for the School Based Management Committees (SBMCs), conducting school inspection visits and monitoring of school activities. They will also assist SMoEs/SPIU in project coordination.

Implementation arrangements at the community and school levels

A large majority of communities have an established SBMC (or similar), with representatives from school management, parents, CSOs and community members. The SBMC will be responsible for construction of Junior Secondary Schools (JSSs) using a community-based approach and will work closely with the SPIU which manages the overall construction process. 3 The SBMCs will monitor project activities - construction and rehabilitation, supervise project work and ensure the achievement of agreed milestones with support from the SPIUs and parent teachers associations (PTAs). As envisaged under the parent project,

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2 Detailed implementation arrangements under the parent project can be found in Annex 1 of the PAD. Any adjustments to the existing implementation arrangements are described in this section.

3 SPIU to manage and oversee the construction process, including: the expression of interest, identification of primary schools for expansion with SPIU support, construction management, and overall supervision.

the SBMC will be responsible for organizing community-level meetings to discuss school progress against their improvement plans and targets.

1.4   Stakeholder Engagement Plan and Disclosure

The Stakeholders Engagement Plan (SEP) seeks to define a technically and culturally appropriate approach to consultation and disclosure, 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 to ensure that these groups are provided sufficient opportunity to voice their opinions and concerns, which may influence Project decisions.

The Parent Project SEP which was disclosed on World Bank and Government platforms on June 30, 2020. The SEP is now updated as a requirement prior to World Bank Board approval. The updated SEP will be disclosed in-country and on the World Bank website before the completion of the Project Appraisal process.

For the Adolescence Girls project and its sub-project activities in the participating eleven states, there is need for open and inclusive engagements/dialogues with stakeholders affected or likely to be affected by the project (project affected parties), and other interested parties throughout the project lifecycle as required by the World Bank's Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure of the Environmental and Social Framework (ESF). ESS 10 recognizes the importance of a systematic approach to open and transparent engagement between the project proponent and project stakeholders as an essential element of good international practice.

This SEP is designed to fulfil the project's requirements as stated in ESS 10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the AF. Where properly designed and implemented, stakeholder engagement supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

1.4.1   Objectives of the Stakeholder Engagement Plan

Specific objective of this SEP is to establish a systematic approach to stakeholder engagement at project level that will:

- Identify stakeholders and build/maintain a constructive relationship with them to enable stakeholders' views to be considered in project design and environmental and social performance;
- Assess the level of stakeholder interest and support for the project; and to enable stakeholders' views to be considered in project design and implementation

- Promote and provide means for effective and inclusive engagement with project affected parties throughout the project life cycle on issues that could potentially affect them;
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format; and
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond to and manage such grievances.

1.4.2 Applicability of the SEP to the Project

The AGILE Project (both Parent and AF) seeks to improve secondary education opportunities among girls in targeted areas in participating states. This additional finance project is upscaling the focus of parent project by targeting married girls specifically to include skills for girls that are in and out of school, especially adolescent married girls, and other vulnerable groups (girls with disabilities), promote policies that allow married girls to continue their education and eradicate prohibitions for married girls to attend school in addition to exisiting focus of the parent project in constructing new schools and refurbishing existing dilapitaed existing learning conditions. It further seeks to provide cash-based scholarships to improve girls transition to and attendance of secondary school, provide life-skills and digital training, as well as engage in behavioural campaigns that seek to address social norms that have enabled negative attitudes and behaviours towards girl's education and empowerment. Achieving these stated objectives will require a continuous and an inclusive SEP process.

Given the above, the process will be important in:

- ascertaining key project risks as the communities see them;
- developing preventive and mitigation measures to address risks;
- ensuring concerns of communities are acknowledged and addressed;
- ensuring the right mix of skills for out-of-school girls through non-formal learning centers;
- informing targeting mechanisms for the identification of schools as well as for recipients of financial packages (special care will be given to ensuring that vulnerable groups are included in the dialogue – marriedout of schoolgirls, notably students with disabilities and their parents/gurdians, displaced girls, among others);
- helping to identify the best monitoring mechanisms for activities;
- seeking inputs from stakeholders on how to develop an adaptive behavioral campaign that addresses differentiated concerns in communities, and the likely varied adoption rates of social norms that support girls education and their empowerment (notably, norms associated with child marriage, exclusionary education, School Related GBV and school-based violence (e.g., corporal punishment);
- strengthening the project's 'safe school' approach.

The SEP applies to the entire AGILE Project including any new States that may not be included in this current Additional Financing of the Project. This document is applicable to the entire

lifecycle of the Project with a specific focus on the implementation of the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF) and other management plans. The SEP is a part of the larger set of environmental and social documents and is to be considered a living document, to be updated regularly based on the emerging needs and patterns for engagement with the various stakeholders.

1.4.3   Principles of Stakeholder Engagement and Grievance Redressal

The stakeholder engagement and grievance redressal process for the Project will be based on the following principles:

- **Transparency and fairness**: The process for grievance resolution shall be transparent, in harmony with the local culture, and in the appropriate language. It should explicitly assure potential users that the mechanism will not impede their access to other judicial or administrative remedies.
- **Accessibility and cultural appropriateness**: Every member of the community or group should have access to the grievance procedure. Any individual or group that is directly or indirectly affected by the Projects and its contractors' activities, as well as those who may have an interest in the Projects or the ability to influence its outcome, either positively or negatively, can raise a grievance. To allow all stakeholders to have access to the mechanism, the grievance redressal procedure will be made available in the local languages which is mainly Hausa, in the participating Northern States. Other Nigerian languages being Igbo, Yoruba, and Pidgin and any other language preferred by the community would apply on a need basis in the states.
- **Meaningful Information**: As part of the engagement process, meaningful information should be disclosed to the stakeholders to allow for active and informed engagement.
- **Openness and regular communication**: There are multiple channels available for individuals and groups to choose their preferred method of lodging grievances.
- **Channels of communication** are kept open throughout the process of addressing each grievance, and up to 3 months after the situation has been resolved.
- **Written records**: All grievances are registered on a Grievance Form and need to be tracked through to resolution.
- **Dialogue and site visits**: All grievances are considered to warrant discussions with the complainant and a site visit, if required, to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to verify the validity and severity of the grievance.
- **Timely resolution**: The Project aims to resolve all grievances within 3 weeks.
- **Incorporation of feedback**: The feedback received to-date from the engagement and grievance redressal process shall be incorporated into the Project and program design, and the same shall be reported back to the stakeholder.

CHAPTER TWO: PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

2.1 Overview of Stakeholder Engagement So Far

This section gives a summary of the stakeholder engagement activities undertaken so far from the parent project and up to the preparation of the additional finance AGILE Project. Various stakeholder consultations, both formal and informal will take place during the design and implementation of the AF project.

Stakeholder engagement for the parent AGILE Project started early at project identification to allow stakeholders' views and concerns to be considered in the project design. Further stakeholder engagements have been undertaken as part of this updated SEP and will continue during project implementation as part of project activities under all project components especially, Component 2.1, 2.2, 2.3, and during the preparation of site-specific instruments such as the Environmental and Social Management Plan (ESMP), and Resettlement Action Plan (RAP), sensitization of the community members on the GRM, GBV Referral directory.

Table 2. 1: Summary of Previous Stakeholder Engagement Activities under the Parent Project

Activity type & Date	Audience and Location	Information disclosed/ Topic of consultation
Meetings prior to engagement with stakeholders at states	The AGILE Project team, Abuja	Focus on the Agile project concept and linkages, Need for preparation of site specific instruments and its relevance to the project
Site visits August 30 – Sept. 13, 2019	Relevant institutions in the 7 participating states in the Parent AGILE Project Ministry of Women Affairs, (MoWA) Federal Ministry of Education, UBEC, SUBEB, SMoE, Traditional rulers, non-governmental organizations (NGOs) and Civil Society Organizations (CSOs), and other key stakeholders.	- Women inclusion and opportunity for even participation in the AGILE project; - Gender based violence, sexual exploitation and harassment against women and girls and how AGILE project will guide against such in this project; - Labour influx and how to ensure that it is reduced or not pose a threat to women health and participation in AGILE, either as workers or students; - Child labour occurrences during construction stage and how AGILE project will avoid or manage this situation it its project; Waste generation types from the project and how AGILE will manage wastes. Mandate of MoWA and its capacity to implement its social responsibilities as will be assigned in AGILE project
Meetings prior to engagement with stakeholders at states	The AGILE Project team, Abuja	Focus on the AF Agile project concept and Need for preparation of site specific instruments and its relevance to the project
Site visits from the 25th – 28th October, 2022, 9th -12th November,	Relevant institutions in the 11 participating states with respect to the additional Finance.	The Preparatory Mission on Additional Financing (AF) of the AGILE Project Second chance girls' options in the AF

Activity type & Date	Audience and Location	Information disclosed/ Topic of consultation
2022, and December 5th – December 14th, 2022	Ministry of Women Affairs, (MoWA) Federal Ministry of Education, UBEC, SUBEB, SMoE, Traditional rulers, non-governmental organizations (NGOs) and Civil Society Organizations (CSOs), and other key stakeholders.	
Hybrid meeting 30th of November.	Same as above	Feedback on site assessment, and the status of the safeguard instruments prepared under the project AF including the SEP as it relates to the States

CONCLUSION

The preparatory mission visit to Nasarawa State was concluded on a positive note. The team highlighted the needs and next steps of the school with the Honourable Commissioner.

CHAPTER THREE: LEGISLATIVE AND POLICY CONTEXT

3.1   Introduction

This chapter is concerned with the review of national and international legal and regulatory frameworks and policies which underpin and regulate citizen's freedom of information, citizenship engagement, disclosure of public information and adequate response to concerns and grievances raised by the public on key governance and decision actions. These legal frameworks as reviewed under this section include the World Bank's Environmental and Social Standard 10 (ESS10), Constitution of the Federal Republic of Nigeria (1999), the Freedom of Information Act, 2011, the EIA Act 86 of 1992 and the Urban and Regional Planning Act, Cap N138, 2004.

3.2 National Legal Provisions for Citizen Engagement

3.2.1 Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended)

The CFRN in Chapter Two provides for fundamental objectives and directive principles of state policies which are the obligations accruing to the State with respect to its citizens. Section 16 provides that the State shall harness resources and control the national economy in such a manner as to secure the maximum welfare, freedom and happiness of every citizen on the basis of social justice and equality of status and opportunity. In Chapter Four, Section 39 (1) it is stated that every person shall be entitled to freedom of expression, including freedom to hold opinions and to receive and impart ideas and information without interference.

3.2.2 The Freedom of Information Act[4]

This Act derives its powers from Section 39 of the Constitution of the Federal Republic of Nigeria. It applies not only to public institutions but also to private organizations providing public services, performing public functions or utilizing public funds.[5] The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. Section 1 of the Act provides that every citizen whether adult or minor is entitled to have access to any records under the control of the government or any public institution. Section 1(3) of the Act allows an applicant who has been refused information by a public institution,

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4 Freedom of Information Act, 2011, Laws of the Federation of Nigeria. Electronically available at Freedom of Information Act (cbn.gov.ng)

5 Section 1 and Section 2 (1)

to institute proceedings in Court (Federal or State High Court) to compel the public institution to release the information sought. Obligations that the Act imposes on Institutions include:

- A description of the organization and responsibilities of the institution including details of the programmes and functions of each division, branch, and department of the institution.
- A list of all classes of records under the control of the institution in sufficient detail to facilitate the exercise of the right to information under this Act, and manuals used by employees of the institution in administering or carrying out any of the programmes or activities of the institution.
- Description of documents containing final opinions including concurring and dissenting opinions as well as orders made in the adjudication of cases.
- A list of files containing applications for any contract, permit, grants, licenses, or agreements, reports, documents, studies, or publications prepared by independent contractors for the institution, and materials containing information relating to any grant or contract made by or between the institution and another public institution or private organization.
- The title and address of the appropriate officer of the institution to whom an application for information under this Act shall be sent, provided that the failure of any public institution to publish any information under this subsection shall not prejudicially affect the public's right of access to information in the custody of such public institution.

All public institutions shall make available any of the records as listed above and as requested by the stakeholders within a period of 7 days of the request.[6]

3.2.3 Environmental Impact Assessment Act

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, Large Agricultural Projects, etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project. For the purpose of public access to information, Section 57 of the Act requires Agencies to maintain a public registry in respect of a project. The registry shall contain all records and information produces, collected, or submitted with respect to the environmental assessment of the project, including any report relating to the assessment and any comments filed by the public in relation to the assessment. The Act also makes it compulsory for project proponents

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6 Section 4.

to disclose EIA reports through the Federal Ministry of Environment to all stakeholders for their easy accessibility and inputs. This is usually carried out through advertisement in local dailies for 21 working days and through display of such Documents at various designated Centers close to the project area such as the Local Government Headquarters and Community Town Halls.

3.2.4 Urban and Regional Planning Act, Cap N138, 2004

This Act provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

3.2.5 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Standard10 (Stakeholder Engagement and Information Disclosure [7]) under the Environmental and Social Framework (ESF), recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice"

Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders.
- Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

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7 Electronically available at **https://www.worldbank.org/en/projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards**

- A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP.

The Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

CHAPTER FOUR: STAKEHOLDER IDENTIFICATION AND ANALYSIS

The stakeholder analysis for this SEP identifies the individuals or groups that are likely to be impacted by Project activities, and groups based on the significance of the impact/influence. This information is then used to formulate the SEP and assess the manner in which the interests of the stakeholders should be addressed during the Project lifecycle.

4.1   Stakeholder identification and analysis

The Proponent will identify the different stakeholders, both project-affected parties and other interested parties. As set out in paragraph 5 of ESS 10, individuals or groups that are affected or likely to be affected by the project will be identified as 'project affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties.'. As further discussed in paragraph 20 of this ESS, for both groups, special consideration should be given to stakeholders that may be disadvantaged or vulnerable.

The term project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders include adolescent girls and individuals or groups in their communities who are direct beneficiaries.

The term other interested parties refer to individuals, groups, or organizations with an interest in the project which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

The level of involvement by the different stakeholders also forms a basis for classification. This usually has to do with the level of interest of the stakeholders with regards to the expected outcomes of the project and how much the project team wants them to participate for practical reasons.

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

- Have a role in the project implementation (also known as 'implementing agencies');
- Are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as 'affected parties'); and
- 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.

4.2   Stakeholder's Sub-categorization

For the purposes of effective and tailored engagement, the stakeholders of the AGILE Project can be divided into three core categories:

- Affected Parties
- Interested Parties
- Implementing Agencies

4.2.1 Affected Parties

This comprises persons, groups and other entities studying at one of the implementing Secondary Schools who will be recipients/beneficiaries of the capacity building program. This group is the core target audience and will be directly affected by the project implementation or/and outcomes. A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program.

The vulnerable groups identified by the project include the adolescent girls (who are the primary vulnerable group) and women teachers. Other vulnerable groups may include girls/mothers with additional vulnerabilities, including but not limited to:

- Second chance girls
- Girls with disabilities (varied types of disability – beyond the physical)
- Students who are HIV positive
- Child-headed households
- Single mother headed households
- Widowed mothers
- Girls who are survivors of violence.
- Boys who are also indirect beneficiaries

The afore-mentioned groups are considered particularly vulnerable as the curriculum and training programs may exclude their participation. Furthermore, there could be heightened risks of SEA/SH at the project sites during minor civil works, or at schools after construction is complete.

Engagement with the vulnerable groups and individuals often requires the application of bespoke measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and participation in the process are commensurate to those of the other stakeholders.

4.2.2 Interested Parties

Interested Parties include stakeholders who may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or

who could influence the project and the process of its implementation in some way. Specifically, this category will include the following individuals and groups:

- The local population who can benefit indirectly from interventions;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from the capacity training program;
- Local contractors who can support in the delivery of the AGILE Project;
- Environmental and Social Consulting organizations in Nigeria that have staff that can be trained and will help build a cadre of trained professionals;
- Environmental protection authorities;
- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in PES safeguards;
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labour authorities;
- AGILE Project employees and contractors; and
- Mass media and associated interest groups, including local, regional, and national printed and broadcasting media, digital/web-based entities, and their associations.

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

4.2.3 Implementing Agencies
This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the AGILE Project.

At the Federal Government Level, they include the:

- Federal Ministry of Education (FMoE)
- Federal Ministry of Women Affairs (FMoWA)
- Technical Working Group (TWG) on Social Development (Ministry of Women Affairs)
- Ministry of Health
- Ministry of Labour and Productivity

- Ministry of Works and Housing)
- The EA Department of the Federal Ministry of Environment
- Bureau of Public Procurement (BPP)
- Universal Basic Education Commission (UBEC)

At the State Government level, they include:

- State Ministry of Education (SMoE)
- State Universal Basic Education Board (SUBEB)
- State Ministry of Women Affairs
- State Ministry of Health
- State Ministry of Environment
- State Ministry of Finance
- State Cash Transfer Office
- Bureau of Public Procurement (BPP)
- State Relevant MDAs

Table 4. 1:   Stakeholder Group Categorisation

Stakeholder Group	Project Affected	Other interest groups Tertiary Stakeholders	
Community	• Adolescent Girls (second chance girls, married girls out of school, and girls in regular schools.) • Project Affected Families and People • Vulnerable Groups • Local Community in area of influence (AoI)	• Local Community Leaders	• Trade Associations • Traditional Rulers • Religious Leaders
Institutional Stakeholders	• Implementation Partners • NGOs / CSO's	• Project Financing Agencies • Mothers Association • Boys Club	• Traditional Rulers • Religious Leaders
Government Bodies	• Regulatory Authorities	• LGA Administration •Government Bodies working on Community Development Activities	• MDAs • Policy Makers • Corporate Bodies • Civil Society • Government Entities
Other Groups	• Engineering, procurement, and construction contractors and sub-contractors	• Local Political Groups • Media • NGOs/CSOs active in the area	

4.3 Stakeholder Mapping

Stakeholder mapping is a process of examining the relative influence that different individuals and groups have over a Project as well as the influence of the Project over them. The purpose of a stakeholder mapping is to:

- Identify each stakeholder group
- Study their profile and the nature of the stakes
- Understand each group's specific issues, concerns as well as expectations from the Project
- Gauge their influence on the Project.

The significance of a stakeholder group is categorized considering the magnitude of impact of the Project on the stakeholder or degree of influence (power, proximity) of a stakeholder group on the Project functioning. The significance of the stakeholder group's importance for the Project and the requirement for engaging with them is identified as an interaction of the impact and influence. The matrix for significance is as depicted in table 4.2 below.

Table 4. 2:   Stakeholder Significance and Engagement Requirement

		Influence by Stakeholder on Project		
		Low	Medium	High
Magnitude of Impact on Project	Negligible	Negligible	Negligible	Negligible
	Small	Negligible	Minor	Moderate
	Medium	Minor	Moderate	High
	Large	Moderate	High	High

4.3.1   Magnitude of Impact of Project

Table 4.3 provides a brief profile of the various stakeholders identified, along with their key expectations, concerns in terms of the Project activities and their level of significance. As stated in the table 4.2, the matrix of significance, stakeholder "significance" is determined by an assessment of the potential influence stakeholders may have on a project (determined by their current power/vulnerability and proximity) as well as the impact of the project on the stakeholder. The "stakeholder significance" does not however indicate how important the stakeholders are to the project (i.e., how seriously the government or other stakeholders should consider their views), nor are the levels set in stone. They in fact may change throughout the life cycle of the project. The analysis below can also serve to enable further robust engagement to ensure more equitable influence over the project for the most vulnerable to achieve the aims of the project.

Table 4. 3:   Stakeholder Profile, Expectations and Project Impacts

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
Primary Stakeholders						
Project Affected Persons	•This stakeholder group comprises of the Adolescent girls in the various communities and their families, project affected families (PAFs) to be identified as the households who are directly or indirectly impacted by the **project where there is occasion of a land take process.** • These PAFs are comprised of households from the Schools who are currently living in Staff Quarters they had renovated with their personal money but may give up residential abode if they are transferred out of the school, or using part of the School land to farm as a means of subsidizing their income.	• This stakeholder group constitutes the most important stakeholder group as beneficiaries of the project • This stakeholder group constitutes the most important stakeholder group as they will lose their accommodation to the Project, which was the primary source of their shelter / or farmland. • The Project can impact the PAFs by training them on the right skills and connecting them to livelihood opportunities / income generating activities in keeping with the various management plans to be formulated as part of the AGILE Project.	• This stakeholder group shall play a critical role in the formation of public opinion towards the Project and allowing for the smooth functioning of the Project. • This stakeholder group may be used as local resources as construction labourers, masons, drivers, etc. during the construction phase of the Project. • Members of these stakeholder groups can provide services/ goods required for the construction of the Project like truck services, petty contractors, suppliers of construction materials, etc.	The members of the PAFs have high expectations from the Project in terms of opportunities for livelihood generation and community development. Some of the key expectations include: • Timely disclosure of information regarding the Project in terms of details and timelines of implementation of plans formulated; • Clarity on initiation of construction activities and on employment (permanent or contractual) opportunities with the Project; • Timely payment for any work which includes labour involvement; • Support in terms of market linkages for existing skill set and livelihood enhancement measures; • Support in establishing business enterprises and their linkage with the Project for sale of goods/ services;	Impact of Project on Stakeholder: Large Influence of Stakeholder on Project: Medium	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
			• Using local resources/ services will also help the Project to fulfil the requirements of labour influx.	• However, caution should be taken so as not to encourage encroachment of School premises in anticipation of funds; and • Access to the GRM established for the Project.		
Vulnerable Groups	This stakeholder group comprises of those adolescent girls who are vulnerable because they dropped out of school, a form of disability, PAFs who may be disproportionately impacted by the Project due to their socio-cultural and economic status. livelihoods. However, within this larger group, there are those who are disproportionately impacted. This group is comprised of the following: • Those without any potential source of income • Physically or mentally disabled	• The Project can positively impact this group by assigning priority to them for design of applicable digital skills for the adolescent girl's acquisition, employment opportunities with the Project and during AGILE implementation. • It is expected that any intervention by the Project which is focused on them will result in a significant improvement in the living standards of this stakeholder group due to their present status	• This stakeholder group cannot exert much influence on the Project, owing to its socioeconomic status	• Apart from the expectations and concerns identified for the impacted PAFs, this stakeholder group's primary expectation pertains to preferential treatment in the implementation of AGILE. • This preferential treatment may involve priority in suitable employment opportunities, skill-based trainings followed by employment with Project (if unskilled or not appropriately skilled), provision of cash-based support, wherever applicable, etc.	Impact of Project on Stakeholder: Large Influence of Stakeholder on Project: Low	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
	• Elderly couples / single member households without support • Single women headed households					
Local Community in AoI	• This stakeholder group is comprised of the local population in the communities touched by the Project boundaries, which is not expected to be directly impacted by the Project activities but may be impacted indirectly.	• This stakeholder group has been impacted by the Project in terms of the loss of common property resources and natural resources where there is land take by the Project and by the development of the Project in the area. • This stakeholder group may benefit during the construction phase of the Project, where they can get better business opportunities on account of influx of population (contractors and labourers); hence greater demand for their products / services. • The stakeholder group may be adversely impacted by the Project in terms of	• This stakeholder group shall play a critical role in the formation of public opinion towards the Project and allowing for the smooth functioning of the Project. • This stakeholder group may be used as local resources as construction labourers, masons, drivers, etc. during the construction phase of the Project. • Members of these stakeholder groups can provide services/ goods required for the construction of the Project like truck services, petty contractors, suppliers of construction materials, etc. • Using local resources/ services will also help the	The key expectations of the stakeholder group from the Project include: • Completion of Project activities keeping in mind community health and safety. • Adequate and timely communication of Project information, in terms of timelines of key activities and their potential impacts. • Access to the GRM established for the Project. • Benefit sharing in terms of skill and employment, infrastructural development. • Access to community development benefits, in keeping with the requirements of the applicable reference framework.	Impact of Project on Stakeholder: Large Influence of Stakeholder on Project: Medium	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
		community health and safety impacts of Project activities.	Project to fulfil the requirements stated in the Project Paper.			
Implementation Partners and NGOs	• This stakeholder group is comprised of the NGOs and third-party livelihood restoration experts who will be engaged in implementing the plans formulated as part of the RPF, ESMF for the Project. • This implementation partner will collaborate with other NGOs, which would be assisting with the various entitlements identified in the RPF.	• The project will provide sustained business opportunity to this group for a long period. • Timely provision of information and resources by the project is critical for the performance of this stakeholder group. • Adequate planning and budget allocation will be imperative for the smooth implementation of the plans formulated, which in turn may have an impact on the community's perception of the NGO.	• This stakeholder group is critical for the smooth functioning and timely implementation of the management plans formulated. • The manner of functioning of this group on ground will influence the opinions of the local stakeholders about the project.	The key expectations of the stakeholder group from the project pertain to: • Timely and complete provisioning of information pertaining to the AGILE, its objectives, components and implementation process. • Timely provision of financial resources and support from SPIU for the implementation of the management plans. • Timely provision of information and update on the commencement of the construction activities and the implications on the management plan implementation.	Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: High	High
Regulatory Authorities	This group is comprised of the regulatory authorities at the local, State and Federal levels that are responsible for various permits and licenses pertaining to the project.	The impact of the Project on this stakeholder group will be negligible as it is a critical part of projects being implemented in the State and the country.	• This stakeholder group is high in priority as this group provides the permits and licenses essential for the functioning of the project.	• The main expectation of the Regulatory Authorities from the Project Proponents is compliance with all applicable guidelines, policies and laws.	Impact of Project on Stakeholder: Small	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
			• This stakeholder group can result in Project shut down or stoppage for a few days and/ or penalties and fines being levied on the Project.		Influence of Stakeholder on Project: High	
Contractors and other sub-contractors	• This stakeholder group comprises of the contractors involved in the project. • The main contractor for the project is not known as at now • Their packages of contract being awarded are unknown as at now • The contractors may/ will in turn subcontract parts of the scope of work to local sub-contractors	• The project provides a sustained business opportunity to this group in the area • The project may thus provide an entry point into the locality and state to the contractors.	• This stakeholder group is critical for the smooth functioning and timely implementation of the project; • This group may also play an important role in the formation of public opinion towards the project. • This group will be a stakeholder in the implementation of the benefit sharing plans formulated for the project.	• Clear communication in terms of tasks, roles and responsibilities and timelines for the project; • Undertaking project activities in keeping with the contractual agreements and applicable regulations in place; • Timely payment of dues; and • Adequate provision for the health and safety of the personnel on the project and the affected community.	Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: High	High
Secondary Stakeholders						
Local Community Leaders (Traditional or Religious)	• This stakeholder group is comprised of those individuals in the community who hold traditional or rational power.	• The impacts of the project on this stakeholder group will be similar and comparable to that on the local community in the AoI.	• This stakeholder group shall play a critical role in the formation of public opinion towards the Project and allowing for the smooth functioning of the Project.	• This group can influence the perception of the community with regards to the project and its activities.	Impact of Project on Stakeholder: Large	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
			• This stakeholder group may be used as local resources as construction labourers, masons, drivers, etc., during the construction phase of the Project. • Members of these stakeholder groups can provide services/ goods required for the construction of the Project like truck services, petty contractors, suppliers of construction materials, etc. • Using local resources/ services will also help the Project to fulfil the requirements of labour influx.		Influence of Stakeholder on Project: Medium	
Project Financing Agencies	• This stakeholder group is comprised of the financing agencies who are exploring an investment opportunity in the project.	• The influence of the project on the stakeholder group will primarily pertain to the impact the project's performance will have on the agency's public opinion in the local area, country and international arena.	• This stakeholder group's influence on the project will primarily pertain to the determination of the project's financial feasibility. • In addition to the national rules and regulations, the	The main expectations and concerns of this stakeholder group from the project are as follows: • Timely completion of the project activities; and • Ensuring that the project is complying to the applicable	Impact of Project on Stakeholder: Large Influence of Stakeholder	High

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
			project is required to comply with the internal standards of these financial institutions.	reference framework, especially in terms of health and safety, environmental management, SEA-GBV, vulnerable groups; including women and Labour rules & working conditions and disclosure of information.	on Project: High	(red)
Local Government / Community Development Associations Community Leadership / Elders Forum / Mothers' Association	This stakeholder group is comprised of the government departments and community development association at Schools district level, including PTA, HILWA, Mothers Associations, Boys Club, etc. • This stakeholder group is comprised of institutions such as health and education at the Ward level, which is in the process of transition of to community development associated (CDA level, as per the new administrative structure Community Development.	• The project will bring developmental gains and employment opportunities in the area. • The project is also expected to play a critical role in the development of these institution capacities through its activities and the implementation of the management plans formulated.	• This stakeholder's influence on the project will pertain to their role in the implementation of the Social Responsibilities activities identified and the management plans formulated as well as in the form of assistance for skill trainings, income generating activities, etc.	The key expectations of the stakeholder group from the project include: • Timely disclosure of information pertaining to the project; • Involvement in the formulation and implementation of the community development activities for the project; and • Protection of the environment and the safety of the local community.	Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Low	Moderate

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
Resettlement Implementation Committee	• This is a committee especially formed for the project with representation of PAPs during the initiation of resettlement process either because of land take or displacement or loss of assets or access. • The role of the committee is limited after the finalisation of the resettlement process.	• The impact of the project on the stakeholder group primarily pertains to the stakeholder group being formed for the sole purpose of facilitating the negotiation process for the resettlement aspect of the project.	• The impact of project on this stakeholder group is limited as the primary purpose of its formation is in relation to resettlement aspects and its completion. • The stakeholder group will play a role in any future land take for the project in the area. • This committee can also play a greater role if it is involved in the implementation of the management plans formulated.	The key expectations of the stakeholder group from the project include: • Timely disclosure of information pertaining to the project; and • Involvement in the formulation and implementation of the resettlement aspects of the project and other community development activities for the project as the need may arise.	Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Medium	Moderate
MDAs working on Community Development Activities	• This stakeholder group includes those government bodies which are involved in undertaking community development activities such as the cottage industry department, Creative arts and Fashion, Food processing horticulture department, etc.	• The impact of the project on this stakeholder group is expected to primarily pertain to the role the project will play in implementing market skills acquisition and linkages in the community development activities in the area.	• This stakeholder group will have an impact on the local community in the project area, the PAFs and subsequently on the functioning of project and implementation of the AGILE aspects of marketable skills.	The key expectations of the stakeholder group from the project include: • Timely disclosure of information pertaining to the project; and • Involvement in the formulation and implementation of skill acquisition and linkage with community development.	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: Medium	Minor

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
Local Political Groups	• This stakeholder group is comprised of the political parties and local politicians active in the States and region.	• The impact of the project on the group is expected to be limited to that on the local community as a whole.	These groups are very active in the area and are looked up to by affected people and other people at large. • This stakeholder group may play an important role in the polarisation of public opinion towards a project.	• Undertaking project activities in keeping with the applicable regulations in place; • Adequate livelihood restoration and support for their respective groups/ settlements; • Assistance in Resettlement of the displaced community presently living in IDP camps; and • Timely implementation of the management plans.	Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Medium	Medium
Media	• This stakeholder group is comprised of the local or state, regional and national press (both print and audio-visual). This stakeholder group can play an extremely important role in the generation of awareness and public opinion towards the project.	• The influence of the project on the stakeholder is likely to be extremely limited due to the nature of the project activities	• The influence of the stakeholder group on the project is likely to pertain to the opinion formation amongst the local, national and potentially international stakeholders towards the project. • GBV issues are to be of major interest to the Stakeholder group	• Provisioning of adequate community development measures by the project; • Compliance to the regulatory requirements and international best practices applicable to the project; • Timely disclosure of information pertaining to the project; and • Ensuring safety of the local community, workers and the environment.	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	Medium
NGOs / CSOs operating in the area	• This stakeholder group is comprised of regional, national and international Non-Governmental	• The influence of the project on the stakeholder is likely to be extremely limited due	• The influence of the stakeholder group on the project is likely to pertain to the opinion formation	•Provisioning of adequate community development measures by the project;	Impact of Project on Stakeholder: Small	Medium

Stakeholder Group	Profile of the Stakeholder Group	Impact / Influence on the Project of this Stakeholder Group	Impact / Influence of the Stakeholder Group on the Project	Expectations & Concerns	Magnitude of Impact / Influence	Stakeholder Significance
	Organizations (NGOs) and Civil Society Organizations (CSOs) operating in the sphere of education of girls, human/ child rights, indigenous people's development and community development	to the nature of the project activities	amongst the local, national and potentially international stakeholders towards the project. • GBV issues are to be of major interest to the Stakeholder group	• Compliance to the regulatory requirements and international best practices applicable to the project; • Timely disclosure of information pertaining to the project; and • Ensuring safety of the local community, workers and the environment.	Influence of Stakeholder on Project: High	

CHAPTER FIVE: PROPOSED STAKEHOLDER ENGAGEMENT ACTIVITIES (THROUGHOUT PROJECT LIFE-CYCLE)

5.1   Proposed Engagement Activities

In keeping with the applicable reference framework and the expectations of the stakeholders, the project will undertake regular engagement with the key stakeholder groups identified throughout the life of the project. Key information disclosure will link to the planning and preparatory stages of the project to ensure sustainability of the project design through its operation and achievement of outcomes.

Based on the previous engagement activities and the profile of the stakeholders already developed, certain engagement activities have been identified for the project going forward, as shown in Table 5.1. The primary objective of these engagement activities is to allow for the stakeholders to interact with the project and contribute towards the project planning and in an effective and culturally appropriate manner. While the table below and following sub-section identifies the key proposed engagement activities, in keeping with the present understanding, it is acknowledged that the engagement plan is a live document. These engagement activities proposed, their frequency, location and modus operandi will be updated as required, based on the monitoring process and feedback of the stakeholders throughout the life of the project. Furthermore, the following table and engagement plan will not limit the project from interacting with the stakeholders when required.

A summary description of the engagement methods and techniques that will be applied by project developer is provided in Table 5.1 below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

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

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

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

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

- Taking written minutes of the meeting by a specially assigned person or a secretary;

- Audio recording (e.g., by means of voice recorders); and

- Photographing.

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

Table 5. 1:   Proposed Stakeholder Engagement Activities

Purpose of consultation	Stakeholder Groups	Procedure for Notification	Method of Engagement	Frequency of Engagement	Responsible Authority	Proposed Location of Engagement	Opportunity for comments & Feedback	Information dissemination strategy
Planning and Pre- Construction Phase								
Information disclosure on:								
Project Components and Scope, Resettlement Policy Framework, Environmental Social Management Framework, Stakeholder Engagement Plan, Grievance Redress Mechanism Environmental and Social Management Plans, Resettlement Action Plan	Adolescent Girls • Project Affected Families and People • Local Community in AoI • Vulnerable Groups Community Institutions • Local Community Leaders • NGOs/CSO • • Mothers Association / SBMC • Media District Administration • Project Financing Agencies • Regulatory Authorities	Project Website Use of selected schools board, women centers and skills acquisition center's boards Use of community town criers, Existing notice boards in the implementing agencies making direct calls (in case fixed-line or mobile phone communication is available) announcement in the public media – local, regional and national, as well as the distribution of	Use of questionnaires for adolescent girls, second chance girls and their families. Use of interviews and separate focus group discussion for women, second chance girls, vulnerable groups. Use of focus group discussion and meetings for local community leaders, NGO/CSO. Provisioning of reports and updates in local language in keeping with reporting requirements on	August to December 2023 At the time of formulation and finalisation of respective plans periodically	State AGILE-PIU (SSO) Communication officer	At Ward / Community Offices or in locations identified in consultation with the stakeholders. where necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.	Oral and written comments channeled to school's authority at district level or at state level. Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. Attention will be given to the vulnerable groups to ensure that they are not denied project benefits. **The Placement of any of the project materials in the public domain** is also accompanied by making available a register of comments and	Public disclosure for all safeguard documents is 21 days by law. The executive summary of the safeguard documents shall be in local language and not more than two pages that can be pasted or displayed in strategic locations accessible to all stakeholders, to understand the opportunities, risks and impacts associated with the implementation of any project e.g. the displays and visuals with a lesser emphasis on technical aspects). This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at

| | | invitations and full details of the forthcoming meeting well in advance, including the agenda. | the project to Project financing agencies and regulatory authorities. | | | | suggestions that can be used by any member of the affected parties, other stakeholders and public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary | least 30% of participant trainees are females as applicable on the project. |

Construction Phase of Classrooms and other supporting Infrastructures								
Purpose of consultation	**Stakeholder Groups**	**Procedure for Notification**	**Method of Engagement**	**Frequency of Engagement**	**Responsibility Authority**	**Proposed Location of Engagement**	**Opportunity to comments & Feedback**	**Information dissemination strategy**
Information disclosure on: Timeline of construction cycle, Occupational health and safety on site, Labour management plan Monitoring of the resettlements action plan	Contractors and Sub-contractors Resettlement Implementation Committee • Regulatory Authorities • Local Political Groups	Project Website dissemination of posters/ advertisements in public places Announcement in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in	Focus Group Discussions Interviews with key informants Questionnaires As part of the GRM process Regular Meetings Meetings with resettlement Committee Members	Regular Meetings/ Toolbox talks At least six monthly; through the construction phase At least monthly through the Resettlement implementation as and when required	Contractor, site engineer in liaison with SSO	At Project Site In keeping with GRM provisions Committee Office Administrative Offices Offices/community centres or in locations identified in consultation with the stakeholders	evaluation (feedback) forms may be distributed to participants to give them an #opportunity to express their opinion and suggestions on the project

a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders | **Drafting an agenda for the consultation meeting** is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the mutual exchange of ideas). |

| | | | | | | | experience a difficulty with providing comments in the written form. | A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for accountability and reporting purposes |

Operation and Closure Phase								
Purpose of consultation	**Stakeholder Groups**	**Procedure for Notification**	**Method of Engagement**	**Frequency of Engagement**	**Responsibility Authority**	**Proposed Location of Engagement**	**Opportunity to comments & Feedback**	**Information dissemination strategy**
Monitoring of the project activities and regular engagement	Adolescent Girls Mothers Association SBMC • Project Affected Families and People		Provisioning of reports and updates in local language in keeping with reporting requirements of on the project	As and when required through the operation and closure phase	AGILE safeguard team in liaison with the women's department	At SBMC/ Mothers Association Offices or in locations identified in consultation with the stakeholders	evaluation (feedback) forms may be distributed to participants to give them an opportunity to express their opinion and suggestions on the project	

	• Local Community in AoI • Vulnerable Groups • Local Community Leaders							
Project Status Update	• Media • NGOs/CSOs		Broadcast of information in newspapers, on radio and local television Reporting requirements in keeping with regulatory framework	At least annually or as and when required through the operation and closure phase	Project coordinator		Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project become an appropriate material for inclusion in the project's regular reporting to the stakeholders.	

5.1.1 Modes of engagement

Table 5.1 shows some tools for engagement for information disclosure and feedback. The methods of engagement incorporate individual profiles, concerns, and expectations of the groups. The need for different modes of engagement is primarily because the utilization of a common modus operandi for all the stakeholders and that too for the whole project duration may result in the failure of the engagement process to achieving its goals. The following methods have been identified for the purpose of this project:

- **Focus Group Discussions (FDGs)**: An FGD refers to a discussion carried out amongst a group of people (6 to 8) from a similar background/profile on a specific topic while being guided by a moderator. The primary purpose of such discussions is to gather insight into the thought process of the group with regards to a particular issue. Apart from FGDs, general discussions with either the community or individual representatives are also part of the engagement process. This method allows for the collective opinion of these groups to be captured and assessed. This method of consultation is imperative for the vulnerable groups because consultations with the entire community run the risk of the dominant group's views predominating. These discussions can be undertaken either at the villages of residence, the Secondary Schools, the Project site office, or any other location agreed upon with the stakeholders. If a location apart from the villages of residence is chosen, care should be taken to ensure the comfort of the stakeholders (e.g., provide food) and the discussions should be timed to allow the representatives to reach their residences before dark.

- **Semi-structured and Structured Interviews and Questionnaires**: In semi-structured interviews and questionnaires, a pre-determined set of open questions or check points are used to gather information pertaining to specific themes or issues. Similar to the FGDs, these interviews can be undertaken either at the villages of residence of the stakeholders, the common SBMCs, the project site office, or any other location agreed upon with the representatives.

- **Open Public Meetings**: These meetings and consultations not only form a part of certain regulatory requirements (such as public hearing) but also serve as useful tools for gathering information from larger groups. These meetings and consultations typically involve a notification (to publicise the matter to be consoled upon) and a consultation (a two-way flow of information).

- **Information Disclosure**: This process is not only part of certain regulatory requirements but also a requirement of the partners in the project. The process of information disclosure can be undertaken in two manners, either voluntary disclosure or disclosure as part of the regulatory requirements.

5.2   Disclosure and Participation Plan

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

It is required under ESS 10 that the Proponent will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

5.2.1   Disclosure Mechanism

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

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

One of the most critical components of the disclosure process is the disclosure of the RPF, ESMF, RAP, ESMP provisions for the project, and receiving feedback from the stakeholders on the same. As a precautionary principle, the project also has to establish Free Prior Informed Consent (FPIC) from the Local Stakeholders in the various communities.

The following sections provide an understanding of the information disclosure process to be followed for the project in general.

5.2.2   Key Aspects to be covered in Disclosure

As part of the information disclosure process, critical project information will be shared and feedback will be sought from the stakeholders on the same, including:

- The key project impacts identified;
- The details of the RPF/RAP Plans formulated and the entitlements within the same;
- The summary of the ESMF/ESMP update and the key impacts and mitigation measures identified in the same;
- The basis of the establishment of entitlements and the entitled groups identified;
- The implementation mechanism and schedule for the GRM initiatives;
- The details of the compensation already paid to the community; and
- The details of the additional compensation to be paid and the budget for the RPF implementation.

5.2.3 Process for Disclosure of Information

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

- Federal Ministry of Education;
- Federal Ministry of Women Affairs and Social Development;
- Environmental Assessment Department, Federal Ministry of Environment and its Zonal Offices in the participating Pilot States;
- The Ministries under the Technical Working Group;
- State Ministry of Education of the participating States;
- State Ministry of Environment of the participating States; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of the Bank and each implementing agency. This will allow stakeholders with access to the Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials. The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other interested parties.

5.3 Timetable for Disclosure

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within the following timeframe:

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

This method has been identified as the most suitable approach for information disclosure, keeping in mind the literacy levels in the area. In order to ensure that the opinions of the sections of the community who do not have access to the reports are also taken into account,

public consultations are recommended. These public consultations can be done on an annual basis or as and when the urgency of the situation warrants having such public consultations.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment. The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 5.2 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 5. 2: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication
Project Affected Parties- adolescent girls in regular school, second chance girls, married girls out of school, etc.	Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. (In alternative language preferred) Electronic publications and press releases on the Project website. Dissemination of hard copies at designated public locations. (Graphics, education on process) Press releases in the local media. Consultation meetings (taking cognisance of specific needs such as accessibility, large print, childcare, daytime meetings) Information leaflets and brochures. Separate participatory focus group meetings with vulnerable groups, as appropriate.
Non-governmental Organizations	Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. Electronic publications and press releases on the project website. Dissemination of hard copies at designated public locations. Press releases in the local media. Consultation meetings and workshops. Information leaflets and brochures.
Ministries, Departments and Agencies	Stakeholder Engagement Plan; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESMF/ RPF package, and SEP at municipal administrations. Project status reports. Meetings, multi-stakeholder workshops and round tables.
Project Employees	Employee Grievance Procedure; Updates on Project development.	Staff handbook. Email updates covering the Project staff and personnel. Regular meetings with the staff. Posts on information boards in the offices and on site. Reports, leaflets.

CHAPTER SIX: RESOURCES AND RESPONSIBILITIES

6.1 Introduction

The organizational structure and management functions of the AGILE Parent Project is still relevant for the AF Project. The Project Implementation Unit (PIU) will be responsible for the preparation and physical implementation of the project.

The Project Coordinator will be responsible for the overall implementation of the SEP. Other key staff, including the Social Safeguard Officer (SSO) and the Environmental Officer, will play important roles in implementing the SEP. The SEP activities will be included in project annual work plan & budget to ensure that they are properly budgeted for and implemented as planned.

6.2 Roles and responsibilities

Community Liaison Officers

The AGILE Project, through the assistance of the Traditional authorities, will hire Community Liaison Officers who will be the direct contact for PAP in the local communities. The Community Liaison officers will facilitate stakeholder engagements at community level under the supervision of the SSO. They will provide AGILE with assistance during consultations, identification of PAPs, and conducting of interviews, where required. The Community Liaison Officers are considered to be an extension of the PIU and therefore will be entitled to a stipend according to traditional practices for similar community office bearers and therefore will not be salaried like the PIU staff.

Social Safeguard Officer

Responsibilities of the SSO include the following:

- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project;
- Oversee all stakeholder engagement related activities for the Project;
- Manage the grievance mechanism;
- Interact with related and complementary support activities that require ad hoc or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
- Liaise with the Project Coordinators to ensure that stakeholder engagement requirements/protocols are understood; and
- Proactively identify stakeholders, project risks and opportunities and inform the PM.

Engineering Consulting Company

The engineering consulting company (to undertake detailed designs) shall be recruited to provide institutional capacity and support to the PIU with: (a) overall project management and supervision including procurement, design, contract management; and (b) oversee the

overall implementation, monitoring, and reporting of safeguards aspects such ESMPs, LMP, SEP and RAPs. After familiarizing themselves with the project area through reading and consultations with the AGILE Project Unit, the consultants will design appropriate questionnaires intended for data collection at project location levels. The consultant will design questionnaires for data collection from various households, individual farm units, depending on the nature of information source.

6.2.1 Integration and support

Since stakeholder engagement activities will influence other departments or require their inputs, the SSO needs to ensure that the various managers are included or kept informed on the stakeholder engagement process. Decisions taken by managers might have a direct or indirect impact on communities which would need to be communicated at the appropriate time.

In order to advance the Project, the PIU will work collaboratively with some of the Federal and State Ministry of Education departments and stakeholders such as (i) Purchasing, (ii) Finance, (iii) Customer Services, (iv) Technical Services Department, (v) Tender Committee, (vi) and Public Affairs Department (including the SO) on a need basis. The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarised in table 6.1.

Table 6. 1:   Roles and responsibilities

Departments	Role	Coordination	Frequency
Purchasing	Coordinate overall procurement under the project and prepare and revise Procurement Plans as needed	Hold meetings to update procurement plans and review delivery timelines that have high project risk impact	Regularly (quarterly)
Finance	Account for the deposits and withdrawals of project funds with Financial institution(s) and perform the audits and provide financial reports in accordance with the World Bank rules and guidelines	Hold meetings to evaluate project financial performance	Regularly (quarterly)
Public Affairs	Work with the Social Officer to conduct stakeholder engagement and project disclosure and outreach activities	Hold meetings to review and update stakeholder engagement plan	Regularly
Technical Services Department	Ensure timely and efficient construction and classrooms sanitation facilities, and skill acquisition infrastructure	Hold project progress meetings to highlight project challenges and risks	Regularly
Tender Committee	Ensure timely approval of procurement processes and	Provide updates on project progress through reports and meetings to discuss project risks that need their intervention	Regularly

6.3   External Resources

In case the internal human resources at the project appear to be insufficient, the project will also consider engaging a reputed third party in the form of the organization familiar with the region and are acceptable to the community. The NGO would then not only serve as a link between the company and the community but as a third party in the implementation of the SEP and GRM.

6.4   Training

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

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

6.4.1. Capacity Building Program

Fundamentally, training and capacity building increase direct and indirect communication among different stakeholder groups engaged with evidence syntheses. The two-way information flow that comes from effective communication can ensure that: an evidence synthesis concentrates on the issues of greatest importance; outputs can be understood by a wider audience; and benefits of evidence-based approaches are clear. These benefits include improved transparency, accountability, and accuracy, and reduced risk in decision-making. These points are all essential for helping to bridge the 'knowing-doing gap.

Table 6. 2: Capacity building training categories to strengthening stakeholder engagement process

Training summary and purpose	Stakeholders engaged in training	Stage of the evidence synthesis process	Suggested training media
1.World Bank Environmental and social standard framework -ESS Standards 1- 10. Relevant national policies applicable to the project	PIU Staff (Particularly the social and environmental teams) Participating school's guidance councilor	Scoping and question formulation, Communicating outcomes	In person or online (training courses)
2. community engagement approach framework – an overview Preparation of visualizations and communication media Production of readily digestible data visualizations Training in development of communication materials tailored for specific stakeholder	Project team at federal and state level	Report preparation Communication	Written (technical summaries), in person or online (workshops, training courses) Written (technical summaries), in person or online (workshops, training courses)

Training summary and purpose	Stakeholders engaged in training	Stage of the evidence synthesis process	Suggested training media
groups, and in communication skills			

6.5   Financial Resources

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

6.5.1   Budget

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

CHAPTER SEVEN: GRIEVANCE REDRESS MECHANISM

7.1   Overview

A Grievance Redress Mechanism is an accessible and inclusive system, process, or procedure that receives and acts on complaints and suggestions in a timely fashion and that facilitates

resolution of concerns arising from a project. An effective grievance mechanism (GM) provides project-affected parties with redress and tackles issues at an early stage. In compliance with applicable local and national laws and the World Bank's ESS 10, a project-specific mechanism is already functioning under the Parent Project to handle complaints and issues. The GRM mechanism of Parent AGILE will be adapted for this AF project.

The AGILE Project NPCU prepared a comprehensive Grievance Redress Manual which contains details on steps and measures in receiving, addressing, and resolving complaints. The manual also includes measures on GBV-GRM protocols including survivor-centered approach and confidentiality. The manual will be used by all project stakeholders under the AF, specifically, the SPIU, supervision consultant, school management and students, project communities, Grievance Redress Committees (GRCs), SBMC members amongst others.

The project-level GRM is fully operational in the AGILE Parent Project. The GRM also includes procedures for addressing issues of GBV. Under the Parent Project, over 135 grievances have been received, mainly related to inquiries about the Project and administrative processing for the CCT components. Each participating state shall operationalize a GBV-GRM with referral pathways established to established SEA/SH cases. Contractor firms implementing new school construction and Implementing partners under Component 2.2 shall establish GRMs responsive to the ESS 2 requirement on Labor and Working conditions.

Grievance Categories

Based on the understanding of the project area and the stakeholders, an indicative list of the types of grievances have been identified for the project, some areas of potential concerns include grievances that may arise from any of the following:

- Entitlements identified as part of the Conditional Cash Transfer and the implementation of the same
- Displacement and land use issues
- Damage of trees and property, losses to community forest
- Issues related to transportation and traffic, Lack of alternative route for movement of heavy-duty vehicles during construction and rehabilitation
- Increase in environment pollution, the proposed project activities may cause noise, dust emission, community health and safety issues, and waste management issues
- Waste from rehabilitations works could be dumped along the road or in farms; and
- Poor labor and working conditions for workers
- Disruption of academic activities and livelihood activities
- Delayed or non-payment of workers by the SBMC, and non-performance of other obligations of the SBMC to construction workers, suppliers, or supervisors
- Exclusion of marginalized and vulnerable groups including persons with disabilities
- Impact on community health
- Disturbances to locals due to influx of migrant workers in the area

- Issues arising out of sharing of employment and business opportunity
- Concerns over the impact on local cultures and customs
- Sexual exploitation and abuse/sexual harassment (SEA/SH) due to presence of foreign workers (non-locals).

The list of grievances will be regularly updated as and when a new one arises. Grievances from employees (including both direct and indirect employees, including local workers and migrant workers through contractors) are handled through the workers GM.

7.2 Channels to Receive Complaints

The Project utilizes various channels provided below to receive complaints/grievances from Project affected persons and stakeholders:

- ➢ Grievance Redress Committees (GRCs) at all levels, including those already formed and those which will be formed across the various schools/project sites.
- ➢ Complaint register /Suggestion Boxes located at strategic places in the communities such as within the school compound, community market, community leaders house etc.
- ➢ Dedicated Telephone Lines which will be manned by the GR focal persons
- ➢ Meetings/consultations/Focus Group Discussions (FGDs)/ Oral reports to school management, SBMC, community leaders, women leader, youth leader etc.

Channel 1: Grievance Redress Committees

- ➢ Complaints/suggestions can be received through GRCs.
- ➢ GRCs will be set up in all the project sites/schools.
- ➢ Students, school staff, and members of the communities would be sensitized on the GRM use, process and procedure.
- ➢ Stakeholders can channel their concerns through any member of the GRC, who will in-turn inform the committee for proper recording and subsequent action

Channel 2: Complaint/Suggestion Boxes

- ➢ Complaints/suggestions can be written by project affected persons, interested parties and other stakeholders and dropped in the complaint boxes in the project area.
- ➢ Complaints boxes to be located within the school and in the community – marketplace, near community leader's residence, other public places etc. The locations were selected based on their proximity to the project area and where grievances may likely occur. Consideration is given for accessibility to complaint boxes by the complainants.
- ➢ The name of the project and dedicated GRM number is on the box.
- ➢ It should have a lock and be on a stand and safe from rain.
- ➢ The boxes will be accessible to persons in the project area but also provide some form of privacy in case of anonymous complaints.
- ➢ The designated GRM focal person (usually the secretary of the community level GRC) should retrieve complaints from the box at least every 48hrs.
- ➢ Project related complaints should be documented in the grievance logbook for further action, while complaints not directly related to AGILE should be forwarded to the appropriate authority for action and the complainant duly informed of this action.

- Following the record of the complaints, the GRC will schedule a meeting to address the complaints timely
- GRCs to sensitise student, staff and community members on the locations and use of the complaint boxes

Channel 3: Dedicated Phone Lines

- Dedicated GRM phone numbers can also be used as a channel for receiving grievances.
- The lines are expected to be toll free, i.e. at no cost to the complainant
- This number will be provided on the project signpost and the complaint box for easy access of stakeholders
- All complaints received on the phone will be recorded in the grievance logbook
- Subsequently, this will be addressed by the GRC
- GRCs to sensitise student, staff and community members on the numbers
- The cost of maintaining the phone lines will be borne by the SPIU

Channel 4: Meetings/consultations/Focus Group Discussions (FGDs)/Oral reports

- Complaints and suggestions could be received during on-site project progress meetings, focal group discussions, community meetings, student meetings, through the SBMC or other forms of oral receipt etc.
- These complaints from such meetings will be channeled to the GRC and documented
- This will also follow the complaints resolution process

7.3 Processing of Complaints

This section explains the step-by-step process that a complaint goes through from receipt to resolution. This covers the following:

- Receiving and Recording Grievances
- Acknowledgement of Grievance
- Verification/Screening
- Allocation of Responsibility
- Grievance Investigation
- Resolution, Closure and Feedback
- Process chart
- Timeframe

7.3.1 Receiving and Recording Grievances

The grievances from the stakeholders or their representatives may be communicated verbally in person or over a telephone conversation to the dedicated GRM line or in written form placed in the complaint boxes or submitted to the project representatives. All grievances communicated in any of these mediums will be recognized and recorded by the GRCs as and when it is expressed.

Grievance Logbook – all project related grievances will be logged in the grievance logbook.

The registration will capture the following data:

- The grievance logbook will be maintained by the GRCs at the project site, SPIU and NPCU level

- This will be used to record grievances and how they are resolved
- The SPIU will provide the logbook for the GRC at the project sites
- The logbook will be kept by the GRC secretary/GRM officer at each level
- A separate GRM log would be available for recording GBV related issues. The log will contain minimum information and be manned by the Guidance Counsellor at the Community level and kept in a confidential manner.
- SPIU GRM officer to review the project sites logbooks on a monthly basis to see the type of grievances received and how they were addressed. The officer should maintain an electronic version of the grievance logbooks and upload details of grievances from all project sites in the GRM database.
- NPCU GRM Officer to review the SPIU grievance logbooks on a monthly basis either as scanned copies/emails or during monitoring & supervisory visits and maintain a GRM database for all the states.
- NPCU GRM Officer through the NPC will transmit the quarterly report to the World Bank.

7.3.2 Acknowledgement of Grievance for Non-GBV Cases

Once the grievance is received and registered by the GRC secretary, a grievance number will be allocated and communicated to the grievant. This communication will also serve as an acknowledgement of the grievance. In case the grievance is assessed to be out of the scope of the GRM, a communication towards the same will be made to the grievant, and an alternative mode of redress will be suggested. As part of this acknowledgement, a tentative timeline for the redress of the grievances will be identified, in keeping with the process below. This acknowledgement will be provided on the same day as the grievance is received.

7.3.3 Verification/Screening

Upon acknowledgement of the grievance, the recipient of the grievance in conjunction with the GRC secretary/ Chairman will quickly screen the compliant to ascertain its merit, relevance, categorization and whether further action is required by the project or not -

- Where complaints are not project related, the GRC should channel this to the appropriate authority for resolution, compliant should be closed and feedback should be given to the complainant on action taken
- In the case of SEA/SH/ GBV complaint, this will not be investigated by the GRC, but rather the case will be referred to the GBV focal person and handled in line with section 7.7, and with the survivor's consent, further action will be taken where the survivor will be referred to the relevant GBV service provider.
- Where the case is criminal in nature such as issues relating to armed robbery, serious bodily harm, manslaughter or murder, it should be immediately reported to the police/ other appropriate authorities.

7.3.4 Allocation of Responsibility

- Once the grievance is received and recorded, based on the subject and issue, the Grievance Redress Officer will identify the department, SBMC or personnel responsible for resolving the grievance, and also the GRC members that will be relevant to the matter and initiate a timeline for discussion/constitute a GRC meeting.
- Addressing a complaint will be timely, responsive and as less complicated as possible

- Where the complaint is an emergency, the matter will be treated urgently, pending when proper investigations and address can be made.
- Timeline to discuss matters will be commensurate to the complaint

7.4 Grievance Investigation (for non-GBV/SEA/SH cases)

The Grievance Redress Committee will discuss and undertake an enquiry into the facts relating to the grievance. This will be aimed at establishing and analyzing the cause of the grievance and subsequently identifying suitable mitigation measures for the same. The committee may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand.

The grievance redress committees will be responsible for the following:

- Communicate with the affected persons and evaluate what form of redress they are entitled to
- Investigate the complaint in a fair, honest and open-minded manner
- Interview/discuss with concerned parties with a view to resolving the issue
- Recommend a solution to the grievance
- Communicate the decisions to the complainant
- Refer the grievance to a higher level GRC, if unresolved

The GRC will investigate all project related complaints and resolve/provide responses. Where the issue cannot be resolved at a particular GRC level, the complainant will be supported in escalating the grievance to the next level GRC. However, efforts will be made to resolve all grievances at the project site/community level.

7.5 Resolution, Closure and Feedback

Based on the understanding developed from the investigation and consultations, the GRC will identify a suitable resolution to the issue. This resolution will be communicated accordingly to the grievant.

- If at any stage, the grievant is not satisfied with the resolution, she/he may choose to ask for an escalation of the grievance to the next level GRC, this should be facilitated by the GRM focal person. However, where grievance remains unresolved, complainant will be advised of his/her freedom to seek court redressal if they choose to.
- The status of the grievance will be updated in the grievance logbook frequently by the GRM secretary/officer.
- Once the grievance is resolved, and the same has been communicated to the grievant, the grievance shall be closed in the grievance logbook.
- The grievance register will also provide an understanding of the manner in which the grievance was resolved. These instances shall then serve as references for any future grievances of similar nature.
- Where there is evidence of recurring issues or grievance coming up on the project, it is necessary to flag this up to the NPCU in order to assess if the project design requires updating.

7.6 Timeframe for Processing Grievances

This section provides information on the expected timeframe for each stage of the GRM. It is expected that every responsible party will ensure they achieve the stipulated timelines or less.

GBV/SEA/SH cases will not follow this timeframe and support must be provided to the survivor immediately due to the serious natures of SEA/SH issues.

Table 7.1:Time Frame for Processing Complaints

PROCESS	DESCRIPTION	TIME FRAME	RESPONSIBILITY
Receipt of complaint	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day it was received	Secretary to GRC at project level
Acknowledgement of grievance to the complainant	By letter, email, phone	Same day as date of receipt of complaint	Secretary to GRC at project level
Screen and Establish the Merit of the Grievance	Review the complaint/ Listen to the complainant and assess the merit	2 days after receipt of complaint	Project level GRC Secretary & the aggrieved PAP or his/her representative
Refer unrelated project grievances	Where complaint is not related to AGILE refer to appropriate authority and inform complainant	2 days after receipt of complaint	Project level GRC Secretary & the aggrieved PAP or his/her representative
Investigate the grievance	Visit the site, conduct investigations and interviews	1 – 3 days after receipt of complaint	Project level GRC members
Implement a redressal action	Discuss and agree on the grievance resolution	1 – 7 days after receipt of complaint	Project level GRC members & the aggrieved PAP or his/her representative
Escalate to SPIU for a dissatisfied scenario	Refer the complainant to the SPIU GRC	3 – 10 days after investigation	Project level GRC Chairman
Receipt and record of complaint at SPIU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day of receipt	SPIU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the project level GRC/ conduct investigations and interviews. Recommend grievance resolution	2 – 7 days after receipt	SPIU GRC
Escalate to State Steering Committee for a dissatisfied scenario	Refer the complainant to the State Steering Committee	3 – 10 days after receipt	State Project Steering Committee Chairperson
Escalate to NPCU for a dissatisfied scenario	Refer the complainant to the NPCU GRC	3 – 10 days after receipt of complaint	State Project Coordinator
Receipt and record of complaint at NPCU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day after receipt	NPCU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the GRCs/ conduct investigations and interviews.	2 – 5 days after receipt	NPCU GRC

PROCESS	DESCRIPTION	TIME FRAME	RESPONSIBILITY
	Recommend grievance resolution		
Last resort - Advice complainant of option to seek judicial redress	Where resolution is not reached, complainant is free to seek judicial redress. NPCU to document the case including all attempts at resolution and send a report to the TTL	7days after receipt	National Coordinator
Close the case	Follow up to obtain feedback and document resolution in logbook	As required	GRM officers

7.7 GBV GM Protocol

The GBV GM will have special procedures for responding to allegations of sexual exploitation and abuse (SEA) and sexual harassment (SH) that are made against a project actor. However, for any complaint that is reported to the GRM (including complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers.

To fulfil the role of addressing GBV, all staff and volunteers at all levels of the AGILE Project will be trained (and/or have previous knowledge and experience) on the GBV Guiding Principles and the specialized procedures for receiving and referring GBV-related complaints. This set of skills will help GRM staff and volunteers to support the quality of the complaint mechanism, while at the same time ensuring the adherence to these Guiding Principles and a survivor-centered approach, including right to safety, respect, and confidentiality, of the complaint intake and management. Hotline operators, in particular, should receive training on the handling of GBV-related complaints in line with the principles of confidentiality and the specialized procedures.

When receiving a grievance/during the intake process, the person receiving the complaint shall respect the wishes, choices, rights and dignity of the complainant. In order for the survivor/complainant to make informed decisions about whether to seek services and whether to file a complaint with the project (where the complaint involves SEA or SH), she/he needs to be provided with clear and simple information on the functioning of the system, on the possible outcomes, likely timelines, and the types of support that can be provided. The survivor/complainant must also give their consent for the sharing of basic, anonymous, non-identifiable monitoring data about the incident with the SPCU/NPCU and with the World Bank. If a complainant chooses not to be referred to GBV service providers or have the project take further action, then the case will be closed. The officer or volunteer must seek the survivor/complainant's consent to share basic monitoring data, and if no consent is given, no data will be recorded. For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant/survivor and that they clearly understand the referral process.

The GBV/SEA/SH Grievance remit is to:

1. provide a survivor centered approach
2. provide confidential and accessible channels for reporting cases
3. enable linkages between survivors to the GBV service providers such as legal system, health, security, psycho-social, livelihood, mapped by the project

The principles for the GBV GRM and channels for receiving GBV related complaints are detailed in the GRM manual. Section 7.8.1 below shows the process for receiving GBV complaints and referral.

7.7.1 Process for Receiving GBV Complaint and Referral

i. GBV focal persons will Receive complaints from survivors. Survivors may choose any reporting channel they deem comfortable in which case, Complainant should be immediately referred to the GBV-GM focal person at the School or Community – without asking further questions or details. Complainant/survivor information must be kept confidential and anonymous.

ii. The GBV-GM Focal Person needs to provide the survivor information on services available and with their consent, move to recording. The GBV-GM FP will record the nature of the complaint only with no identifiable information on the survivor. Refer the survivor immediately to the project's registered GBV service providers

iii. The GBV-GM officer to immediately refer the case to the relevant GBV service provider identified in the referral directory.

iv. If the survivor wishes to take police or legal action, information as contained in the referral directory is provided by the GBV Officer

v. The SPIU GBV Officer to ensure the case is reported to the NPCU and World Bank without information of the survivors identity, only about the allegation, age and gender of the survivor, and what action has been taken.

vi. There may be need for the service provider to re-sensitize stakeholders at the project level on SEA/SH/GBV in collaboration with the SPIU and also develop strategies to prevent such re-occurrence.

vii. The GBV officer to obtain feedback on resolution of the case from the GBV service provider and record same including strategies to prevent re-occurrence

The SPIU must train all GM Focal persons and Guidance Counsellors on the SEA/SH escalation process so that they can refer cases effectively.

7.7.2 Documentation of GBV GM Cases

Given the highly stigmatized nature of the topic, caution would be taken when communicating about reported SEA/SH incidents. GBV-related complaints would provide information only on the nature of the complaint (what the complainant says in her/his own words), and operators would link the complaint to a GBV service provider for necessary attention and action

The GBV-GM focal persons will be trained by GBV experts hired by the NPCU/SPIU GBV Officers on how to collect GBV/SEA/SH cases confidentially and empathetically (with no judgement).

- In recording the incident, the identity of the survivor should be protected, keeping survivor information confidential and anonymous (no names in the record book). This information is limited to (a) the nature of the allegation or incident; (b) whether the incident is likely to be project related; (c) the age/sex of the survivor (if known); and (d) whether the survivor was referred for services.
- Ensure that no identifiable information on the survivor is stored in the GRM
- Document the exact complaint (no detailed information of the incident is expected), date, action taken and close the report
- As required, refer complaints to the GBV service provider

7.7.3 Monitoring

The GRM officer will be responsible for:

- ➢ Providing the grievance Committee with a weekly report detailing the number and status of complaints any outstanding issues to be addressed
- ➢ Monthly/quarterly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.
- ➢ Periodic monitoring of timely, mandatory and confidential reporting in case of incidents to the project level GBV-GRM.

The process to be followed for the redressal of the Internal and External stakeholder grievances is summarized in the figure below.
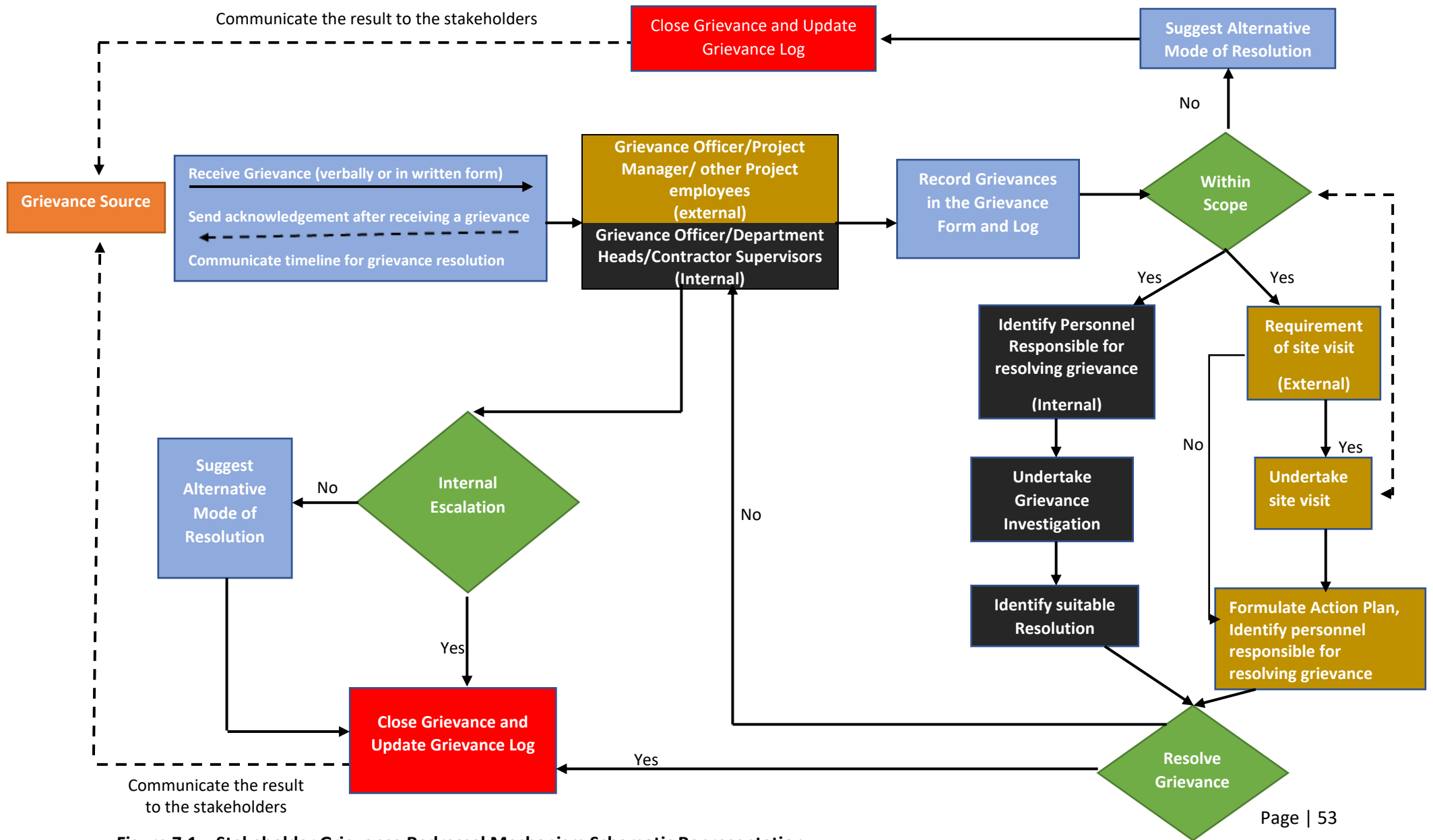
Figure 7.1: **Stakeholder Grievance Redressal Mechanism Schematic Representation**

Communicate the result to the stakeholders

Close Grievance and Update Grievance Log

Suggest Alternative Mode of Resolution

No

Grievance Source

Receive Grievance (verbally or in written form)

Send acknowledgement after receiving a grievance

Communicate timeline for grievance resolution

Grievance Officer/Project Manager/ other Project employees (external)

Grievance Officer/Department Heads/Contractor Supervisors (Internal)

Record Grievances in the Grievance Form and Log

Within Scope

Yes

Yes

Identify Personnel Responsible for resolving grievance (Internal)

Requirement of site visit (External)

No

Yes

Undertake Grievance Investigation

Undertake site visit

Identify suitable Resolution

Formulate Action Plan, Identify personnel responsible for resolving grievance

Suggest Alternative Mode of Resolution

No

Internal Escalation

Yes

No

Close Grievance and Update Grievance Log

Yes

Resolve Grievance

Communicate the result to the stakeholders

7.8   World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complain directly to the Bank through the Bank's

Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redressservice). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org

- By fax: +1.202.614.7313

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

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

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

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

CHAPTER EIGHT: MONITORING AND REPORTING

For the purpose of ensuring the proper and effective implementation of the SEP and GRM, the project will ensure that this engagement process is given as much importance as the other project activities and ensure the availability of the required resources. This section discusses monitoring/reporting for SEP implementation.

8.1   Monitoring and Evaluation

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

Methods and tools used for monitoring include review of documents and progress reports from the stakeholder engagement plan, stakeholder interviews and group discussion to ensure communication is happening and that the information they are receiving is sufficient – not too little, not overwhelming, just up to speed). It also includes feedback and status surveys to acknowledge stakeholder contributions and site visits to keep the project plan visible and flexible. These are the people aspects of project management that help ensure projects succeed with the help of engaged project stakeholders.

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:

1.   During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and

2.   Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 8.1 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 8. 1:   Key Performance Indicators by Project phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for construction	Preliminary Stakeholder engagement on project designs and anticipated impacts.	Number of stakeholder engagement reports & records of meetings.
	Notification of project phase on multi-media (posters, radio, TV, AGILE website, Official correspondence	i. Number of notifications & mode of communication ii. Number of letters/emails sent
Project Implementation	Project Notices issued	Evidence of newspaper publication indicating notices issued and updates on the AGILE website

Project Phase	Key activities	Indicator
	Recorded Grievances in the GRM	Number of grievances reported and resolved through out project implementation.
	SEP Implementation Public gatherings	Number of Stakeholder Engagements organized and reports from Project team on level of SEP Implementation. Number of public gatherings & records (topics discussed)
	Official correspondence	Number of letters/emails sent
Project Completion	Stakeholder Engagement Project Outputs	SEP Implementation final report

8.2   Review of Engagement Activities in the Field

During engagement with stakeholders the engagement team will assess meetings using a feedback evaluation form or asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly.

The engagement team will conduct debriefing sessions while in the field. This assesses whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary with the use of engagement tools developed through the ESMP/RAP engagement including:

- Stakeholder database;
- Issues Log or Issues and Response table; and
- Meeting records of all consultations held.

Moreover, the tool can be used to manage on-going Project issues, and for stakeholder identification and analysis processes as interests and influence changes.

8.3   Reporting Stakeholder Engagement Activities

Evaluation of performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance, the following will be considered:

- Materials disseminated: types, frequency, and location;
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. adolescent girls, women, youth, community leaders);
- Number of people attending public or formal meetings;
- Number of comments received on specific issues, type of stakeholder and details of feedback provided;
- Numbers and type of stakeholders who meet the Project team by mail, telephone and any other means of communication;
- Meeting minutes, attendance registers and photographic evidence;
- Comments received by government authorities, adolescent girls & family, community leaders and other parties and passed to the Project; and

- Numbers and types of feedback and/or grievances and the nature and timing of their resolution, and the extent to which feedback and comments have been addressed and have led to corrective actions being implemented.

Furthermore, given that a number of contractors and external parties will be involved in the project at various stages of its development, it will be ensured that the contractors/third parties abide by the principles established as part of the SEP and GRM. Wherever possible, relevant conditions will be inserted into the contracts, including right to investigate reported incidents and penalties for non-compliance. Also, it will be ensured that vetted and agreed Codes of Conduct are developed and shared with the relevant contractor employees.

The SSO plays a critical role as an internal change agent for social and stakeholder-related matters in AGILE. This becomes important if social and stakeholder risks identified need to be escalated for higher-level decision-making to identify a resolution. The SSO needs to remain actively involved with the project implementation as it affects any community development and land acquisition/resettlement planning and implementation to identify potential risks or opportunities and ensure that the needed administrative support is provided. Moreover, grievances submitted as part of the community development and land acquisition/resettlement processes need to be addressed under the GRM scheme.

8.4   Documentation, Monitoring and Reporting Process

As has been discussed in the previous sections, the review and appraisal process in any project is an extremely important component for the smooth functioning and the avoidance of major risks within a project. The importance of the review process lies in the fact that it allows for the corrections of any oversight which may have been made during the initial stages of a project through mid-course corrections. This also serves as an important quality assurance mechanism.

The review process becomes all the more important when it is kept in mind that the SEP is a 'live document' or in other words a document which needs to be updated in a timely manner to make it comprehensive for any given period. This is so, because of the life span of the project; it is difficult to properly identify and understand each stakeholder in the beginning of the project. The SEP thus requires regular reviews keeping in mind attributes such as the stakeholders, the engagement process for each stakeholder and the reporting period for each.

8.5   Documentation of the SEP-GRM Implementation

All stakeholder engagement activities as mentioned in the previous sections will be documented, in a standard engagement activities format, as can be seen below.

Table 8. 2:   Format for Recording Engagement Activities

Date	Location	Stakeholder Group	Form of Engagement	Purpose of Engagement	Key findings/	Reference to MoMs	Remarks

In addition to this format, the key points of each engagement activities will be documented in the form of Minutes of Meetings (MoMs), which will be signed by the attendees of the activities. These MoMs will be referred to in the documentation format, as can be seen above. To the extent possible, photographic evidence will be maintained of the engagement activities undertaken.

8.6 Monitoring of the SEP-GRM Implementation

- It is important to monitor stakeholder engagement to ensure that the consultation and disclosure efforts are effective, and especially that the key stakeholders such as local communities have been meaningfully consulted through the process. The monitoring of the SEP implementation, which will be undertaken on a quarterly basis by the Project Monitoring Manager will include:

- Auditing the implementation of the SEP;

- Monitoring the formal and informal consultation activities conducted with the stakeholder groups; and

- Monitoring the effectiveness of the engagement processes in managing impacts and expectations by:

  I. Tracking feedback received from engagement activities

  II. Recording and tracking commitments made to adolescent girls & families, communities; and

  III. Assessing the efficacy of the engagement activities in terms of the desired outcomes and the participation of the stakeholder groups

The Social Manager will also undertake quarterly reporting to the Project Coordinator which would allow for the Project Coordinator to adequately monitor the implementation of the SEP, as is discussed in the following section.

8.7 Reporting of the SEP-GRM

The initial years of Project construction and CCT implementation will witness lots of flux in the profile of stakeholders identified and subsequently the nature of their stakes may change. Additionally, the concerns and grievances of the project affected families (PAFs) and other stakeholder may also be more on account of uncertain location of the PAFs, CCT implementation, and other construction related issues. Thus, the performance of the SEP-GRM will be reviewed on a bi-annual basis during the initial years of SEP implementation. For the purpose of review, the quarterly reports will be considered for analysis and discussion. On the basis of these reports, a Stakeholder Engagement and Grievance Redressal Report will be prepared and disclosed biannually and annually, including a summary of issues raised by stakeholders, numbers and subjects of grievances, a summary of key actions taken to address the concerns, analysis of trends and plans for engagement in the next time period.

ANNEX 1: IMPORTANCE OF STAKEHOLDER ENGAGEMENT

The level of success and sustainability of the AGILE project is crucial and dependent upon proper Stakeholder Engagement and its associated activities taking place. Stakeholder Engagement is more than just a process. It is a way of achieving and maintaining influence and by doing so producing positive outcomes through effective management of relationships. It is also a key skill across Programmes and Projects. The so-called Stakeholder engagement cycle needs to be managed because if it isn't, the quality of engagement with stakeholders and the essential two-way communication will suffer.

The Stakeholder Engagement Cycle is as follows:

- **Identification of Stakeholders (Who?)**

It can be useful to organize the stakeholders by category and note what they care about, e.g., understand the socioeconomic status of the Girl Child, women, stakeholders, indigenous group, etc., their understanding and expectations of the Project, and its potential impacts and the changing socioeconomic profile of the communities hosting the Secondary Schools.

- **Creation and analysis of stakeholder profiles (Why? What?).** This will help:

a) Understand influences, emerging concerns, interests and attributes of the stakeholders towards the outcomes being produced
b) Prioritize stakeholder engagement
c) Focus resources to contribute to the most successful outcomes
d) Ensure communication channels are exploited and aligned
e) Understand the Importance and power of each stakeholder.
f) To record this analysis in a single document called a **Stakeholder Profile.** The key information from this creates the **Stakeholder Register.** This can be used to show the current status of the different groups and is much easier to review. The key document that feeds into the profile data is the **Stakeholder Map.** The stakeholder map and profiles need to be updated when new stakeholders are identified, or the interests of existing one's change.

- **(Re)definition of the Stakeholder Engagement Strategy (How?).** This needs to be actively adjusted and redefined and can be influenced by the following:

a) Scale of cultural, organizational or societal change
b) Managing expectations
c) Adequate resourcing
d) Document control (e.g., stakeholder profiles).

- **Planning of the Engagements (When?)**

Communications are core to this activity and messages need to be consistent, appropriate in number, focused and brief. The objectives of the communication process are to keep

awareness and commitment high, ensure that expectations do not drift out of line with what will be delivered, explain what changes will be made and when, and describe the future end state or vision.

Some tips around this:
a) Send the right message to the right audience in a timely and effective manner.
b) Identify specific measures to allow meaningful engagement with the different stakeholder groups in a manner that is transparent and accessible and using culturally appropriate communication methods with a specific focus on vulnerable groups.

c) The greater the change, the greater the need for clear communication about the reasons and rationale behind it.
d) Have a communication feedback system to assess the effectiveness of the communications sent.
e) Ensure relevance and recognition and engender trust.
f) Use established key phrases such as "touchstone statements" or "sound bites" as the foundation for communication.

- **Engagement with Stakeholders (The Doing)**

This could involve stakeholders in early workshops. It is critical at this point to ask the stakeholders and then listen. It is a two-way communication which can involve subtler and informal means. The project team will often need to influence and maintain momentum.

- **Measurement of the Effectiveness (The Results)**

It is advisable to sample the stakeholder communities straight from the start. Feedback will reveal under-communication or miscommunication. It will also answer the question if the stakeholders have changed? This question leads back to the first step of the cycle of **step 1.** It is important to gather this feedback in person and input it into the relevant fact check in order to improve the process cycle, such is its importance.

The Project Area of Influence is nationwide but will be focused on the participating pilot States at the initial stage. The project might later involve scaling-up to cover more states. The schools chosen in each of the participating States and the community within which the school is located, will also feel the direct impact of the Project. The interventions of the project will prove beneficial for the communities and residents and adolescent girls living within the project participating pilot states.

ANNEX 2: PROPOSED ONE YEAR BUDGET FOR STAKEHOLDER ENGAGEMENT FOR PARTICIPATING STATES

S/No.	Item	Expected Participants	Frequency	Estimated unit cost	Total (Naira)	USD
1.	Town-hall meetings to highlight behavioural campaigns that seek to address social norms that have enabled negative attitudes and behaviours towards girl's education and empowerment in Community where AGILE Project exist	200	12	1,000,000	12,000,000.00	26,086.96
2.	2-Day Primary Stakeholders retreat (SUBEB, Skill Development Centre, Second Chance and Gender team)	40	2	1,800,000	3,600,000.00	7,826.09
4.	Purchase of audio visual and Public Address systems			Bulk	2,500,000.00	5,434.78
5.	Maintenance of Vehicles & Fueling for continuous engagement in participating schools and community		12	300,000.00 / Vehicle	3,600,000.00	7,826.09
6.	Toll free number and Miscellaneous (Printing of engagement material etc.)		Lump Sum	3,600,000	3,600,000.00	7,826.09
7.	TOTAL				25,300,000.00	55,000.00

A SIMPLIFIED VERSION OF THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD.

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Article 1 Everyone under 18 years of age has all the rights in this Convention.

Article 2 The Convention applies to everyone whatever their race, religion, abilities, whatever they think or say, whatever type of family they come from.

Article 3 All organisations concerned with children should work towards what is best for each child.

Article 4 Governments should make these rights available to children.

Article 5 Governments should respect the rights and responsibilities of families to guide their children so that, as they grow up, they learn to use their rights properly.

Article 6 Children have the right to live a full life. Governments should ensure that children survive and develop healthily.

Article 7 Children have the right to a legally registered name and nationality. Children also have the right to know their parents and, as far as possible, to be cared for by them.

Article 8 Governments should respect a child's right to a name, a nationality and family ties.

Article 9 Children should not be separated from their parents unless it is for their own good. For example, if a parent is mistreating or neglecting a child. Children whose parents have separated have the right to stay in contact with both parents, unless this might harm the child.

Article 10 Families who live in different countries should be allowed to move between those countries so that parents and children can stay in contact, or get back together as a family.

Article 11 Governments should take steps to stop children being taken out of their own country illegally.

Article 12 Children have the right to say what they think should happen when adults are making decisions that affect them and to have their opinions taken into account.

Article 13 Children have the right to get and to share information, as long as the information is not damaging to them or to others.

Article 14 Children have the right to think and believe what they want and to practise their religion, as long as they are not stopping other people from enjoying their rights. Parents should guide children on these matters.

Article 15 Children have the right to meet with other children and young people and to join groups and organisations, as long as this does not stop other people from enjoying their rights.

Article 16 Children have the right to privacy. The law should protect them from attacks against their way of life, their good name, their family and their home.

Article 17 Children have the right to reliable information from the media. Mass media such as television, radio and newspapers should provide information that children can understand and should not promote materials that could harm children.

Article 18 Both parents share responsibility for bringing up their children and should always consider what is best for each child. Governments should help parents by providing services to support them, especially if both parents work.

Article 19 Governments should ensure that children are properly cared for and protect them from violence, abuse and neglect by their parents, or anyone else who looks after them.

Article 20 Children who cannot be looked after by their own family must be looked after properly by people who respect their religion, culture and language.

Article 21 When children are adopted the first concern must be what is best for them. The same rules should apply whether children are adopted in the country of their birth or if they are taken to live in another country.

Article 22 Children who come into a country as refugees should have the same rights as children who are born in that country.

Article 23 Children who have any kind of disability should receive special care and support so that they can live a full and independent life.

Article 24 Children have the right to good quality health care, clean water, nutritious food and a clean environment so that they will stay healthy. Richer countries should help poorer countries achieve this.

Article 25 Children who are looked after by their local authority rather than their parents should have their situation reviewed regularly.

Article 26 The Government should provide extra money for the children of families in need.

Article 27 Children have the right to a standard of living that is good enough to meet their physical and mental needs. The government should help families who cannot afford to provide this.

Article 28 Children have the right to an education. Discipline in schools should respect children's human dignity. Primary education should be free. Wealthier countries should help poorer countries achieve this.

Article 29 Education should develop each child's personality and talents to the full. It should encourage children to respect their parents, their cultures and other cultures.

Article 30 Children have the right to learn and use the language and customs of their families, whether or not these are shared by the majority of the people in the country where they live, as long as this does not harm others.

Article 31 Children have the right to relax, play and to join in a wide range of leisure activities.

Article 32 Governments should protect children from work that is dangerous or that might harm their health or education.

Article 33 Governments should provide ways of protecting children from dangerous drugs.

Article 34 Governments should protect children from sexual abuse.

Article 35 Governments should make sure that children are not abducted or sold.

Article 36 Children should be protected from any activities that could harm their development.

Article 37 Children who break the law should not be treated cruelly. They should not be put in a prison with adults and should be able to keep in contact with their family.

Article 38 Governments should not allow children under 15 to join the army. Children in war zones should receive special protection.

Article 39 Children who have been neglected or abused should receive special help to restore their self-respect.

Article 40 Children who are accused of breaking the law should receive legal help. Prison sentences for children should only be used for the most serious offences.

Article 41 If the laws of a particular country protects children better than the articles of the Convention, then those laws should override the Convention.

Article 42 Governments should make the Convention known to all parents and children.

The Convention on the Rights of the Child has 54 articles in all. Articles 43-54 are about how adults and governments should work together to make sure that all children get all their rights. **Go to www.unicef.org/crc to read all the articles.**

ANNEX 3: SUMMARY OF CONSULTATION MEETINGS WITH THE RELEVANT STAKEHOLDERS ON THE PROJECT, ENGAGEMENT APPROACH AND PERCEPTION AND FEEDBACK

Sokoto state (Date: 25th – 28th OCTOBER, 2022)

	State Government	Civil Societies Organizations	Schools
Stakeholders attendance present	Sokoto state Honourable Commissioner for Education, Permanent Secretaries, Directors, Representatives from SUBEB, Mass Literacy and other relevant Stakeholder in the State	- Save the Child Initiative - Nagarta Community Health and Gender Education Initiative - Helping Hands and Grassroots Foundation - Hikima Community Mobilisation and Development Initiative - Centre for peoples' Health, Peace, and Progress.	Names of schools visited: a. NANA Girls Day Secondary School- 3,000 students. b. Hafsatu Ahmadu Bello Model Arabic School- Boarding School with over 5,000 students.
Overview	Sokoto state eligibility: • Female gross enrolment in School is 10-19 years is below 70% • Adolescent fertility rate ages 15-19 is greater than 70 per 1,000 - The state has a huge number of dropouts. • Domestication of the Child Right Act- Done • The state established schools for continuing education and learning centres Implementation readiness: • The State has recruited over 2,000 teachers: Provided motorcycles to the desk officers; • On termly basis, 5,000 is given each to 10,012 girls in form of conditional cash transfer (CCT) with prospect of the amount being increased to 8,000 due to the current economic situation	• Targeted women & children's education on WASH program women empowerment. • Enrolment of learners and training the learners and facilitators of the centres; • Skill acquisition for out of school children and vocational skills to caregivers. • Covered education, health, environment, GBV and family planning in LGAs. • Covered good governance education, empowerment, WASH and behavioural change in LGAs. • Implementing spotlight GBV activity under UNICEF. • Sensitization on justice and psycho-socio support.	At Nana Girl's day School, the team explained what AGILE project is all about. SMBC chairman said, the education facilities of the School were over stretched. At Hafatu Ahmadu Bello Model Arabic School, the team explained what AGILE project is all about also. An organization came to the school and chose 30 students after an examination. They were trained in sciences and they came with the best WAEC/NECO results.
Highlighted Problems		• Girls need counselling and livelihood, but the service providers are not there. A lot of GBV and IDP camps have problems of WASH, Nutrition, clothing and access to education. • No learning centres.	**NANA Girls Day Secondary School** • The facilities are overstretched: • No water in the school, and no roofs. • The floors, labs and classes are in very bad shape. • No computers. • Parents do not attend monthly meetings.

	State Government	Civil Societies Organizations	Schools
		• Child marriage – Connect it with staying in school up to secondary school. GBV – sensitization is ongoing and the Women affairs ministry have set community structures in schools, trying to do checks and linkages.	• No period for skills acquisition in the school timetable. **Hafsatu Ahmadu Bello Model Arabic School** • The State government merged 6 schools into 1 and continued as Day school because of insecurity in some LGAs • Dilapidated buildings, no water, inadequate hostels because of the merger, dilapidated staff rooms etc. • Poverty issue is another major problem: The state has Islamic/Western education – the preachers need to preach to parents about the importance of female education, as poverty is not totally responsible for lack of education.

In conclusion, the World Bank and NPCU Team paid a Courtesy visit to His Eminence, Saád Abubakar III, Sultan of Sokoto on Thursday 27th October, 2022. The team was warmly received and gave the opening remarks introduced the AGILE Project to the Sultan, soliciting the support of the Sultan towards the sensitization of his subjects to embrace the AGILE project.

summary report of the World Bank/NPCU mission visit to Nasarawa state on Additional Financing (AF) of the AGILE Project

(Date: 9th -12th November,2022)

Team members: The World Bank and NPCU of AGILE Project

	State Government	Schools (10th and 11th November 2022)
Stakeholders present	Honourable Commissioner for Education represented by the Director Planning, Research and Statistic, and other relevant stakeholders in the State	Names of schools visited: A. Vocational and Technology Institute B. Model Girls Secondary School Gwandare C. G.S.S Tudun Gwandara D. G.S.S Burkan-Sidi
Overview	Nasarawa state eligibility: • Female gross enrolment 10-19 is below 70%.	The team explained what AGILE project is all about, components of the project and the eligibility criteria for selection. **a. Vocational and Technology Institute**

	State Government	Schools (10th and 11th November 2022)
	• Adolescent fertility rates ages 15-19 is greater than 70 per 1,000 women. • Demonstrated commitment base on Scoring approach, Demonetisation of the child right Act, Demonetisation of the National policy on Education. • Active programmes on the Girls Education. • Implementation Readiness based on: • Coasted action plan for teacher's recruitment • School security action, plan with National policy on safety and violence free. Nasarawa state is over eligible for the loan	The head of the Institution Dr. Daniel Ewuga, said the institute is one of the best in Nigeria with 18 functional Departments, with sophisticated machines e.g. welding, salon, tailoring, fabricating machines, ICT etc. The institution is partnering with Nigeria Employers' Consultative Association (NECA), Industrial Training Fund (ITF). The institution is focused on youth and retirees and the governor is passionate about the institute because of his background as an Engineer. • Criteria for Admission into the institute- Either with SSCE or no qualification. • School Fees- Free for students • Source of water- 3 functional borehole • Power source- 1 big functional generator and a solar panel • How to invite students- Use of Radio station, television station to sensitize the public, stakeholders, and the youths. Next steps for the Institution: In the process of designing research instrument and administration of questionnaires for students to select what they want. **b. Model Girls Secondary School Gwandare** It is a boarding school with 118 students, school fees and feeding is free. Parents only pay P.T.A levy of 3,500. **c. G.S.S Tudun Gwandara** The Principal said they have 1,111 students, 86 Teachers which 50 are female. The school have been liaising with the traditional ruler, community leaders to form SBMC. d. **G.S.S Burkan-Sidi** The school is a mixed day school, with a population of 876 students. It has a functional SBMC.
Highlighted Problems	The Honourable commissioner for Education appreciated the team for their visit to Nasarawa State and for briefing them on AGILE, and stressed the need for state to secure the project as Nasarawa is facing problem of Girl Child Education. • The state has a huge number of dropout girls • Some of the existing structures are dilapidated.	**a. Vocational and Technology Institute** • Lack of enough instructors (Teachers). • Need for a bigger generator that can carry the whole machines. **b. Model Girls Secondary School Gwandare** • Dilapidated building, no water, no electricity, no adequate hostels, staff quarters and staff rooms. • Lifting up of the perimeter school fence. • Poverty is a major issue. • Need an open standard kitchen **c. G.S.S Tudun Gwandara** • No perimeter fence and lack of security personnel.

	State Government	Schools (10th and 11th November 2022)
	• The state does not have adequate school infrastructure to cater for the students.	• No adequate class rooms and functional staff rooms • No qualified guidance and counselling personnel's • No adequate teachers. • No water and electricity • No functional SBMC **d. G.S.S Burkan-Sidi** • In adequate classroom. • No library, laboratories, perimeter fence, security personnel. • No adequate Toilets for both male and female students. • In adequate Furniture's for Students and Teachers. • No source of water and Electricity.

Stakeholder Engagement Process

The Preparatory Mission on Additional Financing (AF) of the AGILE Project was held from 25th – 28th October, 2022, 9th -12th November, 2022, and December 5th – December 14^{th,} 2022 with respect to the eleven states.

Objectives

The objective of the Mission was to have an on – the – spot assessment as well as hold consultation meetings with the relevant Stakeholders in the participating States.

The Engagement approach was to:

- Convey virtual meetings with the AGILE team in Abuja prior to engagement with stakeholders at states
- Consult and coordinate with development and state partners prior to social assessment of state partners
- Undertake state visits to eleven participating states starting with Adamawa, Sokoto and Kwara and the other eight States within the mission dates scheduled above;
- Discuss with key stakeholders and reach agreement on implementation, institutional, fiduciary and safeguards arrangements with potential implementation agencies at federal and state levels;
- Discuss on proposed actions in preparation for the project and technical assistance at federal and state levels;
- Engagement undertaken as part of the Stakeholder engagement plan preparation process

Highlights of Consultation with MoWA: The mandate of the MoWA is to advise government on social issues including women protection and safety, Gender based violence, sexual health and protection, women right to work and working conditions, child labour, etc.

During consultation with the MoWA, the following issues were identified and discussed:

- Levels of domestication of the Nigeria Child Right Acts in states and implementation status at Federal level
- Women inclusion and opportunity for even participation in the AGILE project;
- Gender based violence, sexual exploitation and harassment against women and girls and how AGILE project will guide against such in this project;
- Labour influx and how to ensure that it is reduced or not pose a threat to women health and participation in AGILE, either as workers or students;
- Child labour occurrences during construction stage and how AGILE project will avoid or manage this situation it its project;
- Waste generation types from the project and how AGILE will manage wastes

- Mandate of MoWA and its capacity to implement its social responsibilities as will be assigned in AGILE project.

The following issues were concluded:

- The consultation concluded the need to train staff of the MoWA and, the importance of ensuring that the PIU at all levels are fortified with skilled personnel that will carry out mandates on GBV/SEA, labour influx, child labour, grievance redress and other social safeguards concerns.

Highlights of Consultation with the Environmental Assessment Department of the Federal Ministry of Environment

The Environmental Assessment department has the mandate to regulate EIA, RAP and ensure compliance with guidelines and laws on environmental protection. It reviews EIA reports and gives approval to EIAs. It also penalizes violators of EIA laws and is responsible for approving the disclosure of draft EIAs, RAPs and ESMPs prepared for projects in Nigeria.

Consultation with the EA department focused on the following aspects:

- Quality of ESIAs/ESMPs submitted for disclosure in World Bank funded projects. The EA department wants the World Bank as the clearing institution to ensure that reports meet the international standards all the time;
- The EA department wants her involvement to be more meaningful in the preparation and monitoring of projects;
- The EA department assured its commitment to participate in projects funded by the Bank to ensure facilitation and standards.

The key engagement activities undertaken as part of the stakeholder engagement plan preparation process pertain to public meetings, consultations, and surveys as discussed below:

- Public Meetings, October 2022: In October, public meetings with three State project teams in their respective states, were held in Yola, and Sokoto and Kwara states respectively on 19th 25th and 27th October 2022. As part of the meetings, information regarding the Project was disclosed, including the capacity of the Project.

- Consultations were held with Officials of the State Ministry of Education, Stakeholders from relevant MDAs, Principals and Staff of some Secondary Schools (including Guidance Counsellors) on 18th to 28th October 2022 across the eleven participating states.

- A general stakeholder engagement workshop in Abuja for all eleven participating states and implementing agencies already identified for the project was held on the 30th of November.

Key Feedback received during Stakeholder Consultations

Based on consultations undertaken so far for the additional finance AGILE Project, the following areas of concern are key general feedback from all the eleven intending states while tables 2.2 and table 2.3 captures specific feedback summaries from two intending participating states that are cross cutting to all the states.

Community perception and feedback

- **Project engagement with the local community and external stakeholders has been characterised by regular communication and interaction with the relevant stakeholders.** Through this engagement, the Project has attempted to ensure timely dissemination of relevant information to the stakeholders in terms of Project activities, potential impacts from the same and the mitigation measures proposed.

- **Wherever relevant, feedback and input has also been sought from the community in terms of their expectations and concerns, especially in terms of the land take process and entitlements identified as part of the livelihood restoration process.** This engagement will be undertaken in keeping with the formal legal process through public hearings, as well as through consultations as part of the environmental and social assessment process since the Project inception. To the extent possible, this feedback and other input have been incorporated into the management plans and Project activities.

- **According to the information available, while the community and other stakeholders may have some concerns regarding the Project, the overall perception is positive.** The communities view the Project as a source of local development in the area, primarily through the construction of classrooms, employment opportunity generation and local economy development from improved marketable skills development outlined in the project design. The four key areas of concern are as follows (1) that the boy child should not be neglected, (2) their socio-cultural norms considered in the application of the project deliverables and learning materials and (3) the need to address and standardise the curriculum that will empower the second chance student across participating states, and (4) the AGILE project may need to support a special education school with community of regular schools as part of initiatives in its quest to mainstream inclusiveness of persons with disability at the junior level and build up resources for both teaching materials and teachers.

- **Community liaison officer.** This understanding of the engagement activities already undertaken by the Project, the key feedback and concerns of the local community towards the Project has informed the need for designation of a community liaison officer among the project team in participating state who will serve as the local point of contact between the Project and the PAPs and play an important role in the implementation of the stakeholder engagement process and the GRM.

ANNEX 4:   ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATIONS
ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATION PREPARATION OF SAFEGUARDS INSTRUMENTS FOR ADDITIONAL FINANCE ON THE ADOLESCENT GIRLS PROJECT

Detailed information on the stakeholders consulted in are available with the NPCU

ANNEX 5: CONSULTATION AND SITE VISITS PHOTOS
1. PHOTOS WITH THE STAKEHOLDERS AT GOMBE STATE

Name of School: Government Day School Pantami

Student Population: 2,300 (mixed)

Teachers: 84

Toilet Facilities: Grossly inadequate

NEEDS: Additional Classrooms and teachers, Toilets, Water supply, and site for waste disposal.

Plate A. 1: Dump site situated between classes and toilet at GDSS Pantami

Plate A.2: Front view of the student's toilet at GDSS Pantami

Plate A.3: View of the Students' Pit toilet at GDSS Pantami

Plate A.4. Nature of the classrooms at GDSS Pantami

Plate A.5: Inner view of the student's class with furniture at GDSS Pantami

Plate A.6: Cross sectional view of Block of classes and classrooms

Plate A.7: The floor of the class

2. PHOTOS WITHS THE STAKEHOLDERS AT JIGAWA STATE

Name of School: Day Science Secondary school Dutse

Student Population: 720 (mixed)

Teachers: 25

Toilet Facilities: Grossly inadequate

NEEDS: Renovation of Classes, Toilets, waste dumpsites and addition of Teachers

Plate A.8: Consultation with school principal and some teachers at DSSSD

Plate A.9: Erosion site and the dilapidated toilets at DSSSD

Plate A.10: Dilapidated school structure, 1 block of 3 classroom at DSSSD

Plate A.11: Open dumpsite waste at DSSSD

ANNEX 6: GRIEVANCE REDRESS MECHANISM FORMS

Box 1:   Grievance Recording Form

GRIEVANCE REGISTRATION	
Case No.:	Date:
Name:	
Department / Contractor's Name:	
Phone No.: email:	
Details of grievance:	
Name of person recording grievance (if applicable)	
Designation of recording person (if applicable):	
Proposed date of response to grievance:	
Signature of recording person (if applicable)	Signature of complainant
GRIEVANCE REDRESSAL RESPONSE	
Date of redresses:	
Decision (give full details):	

Box 2:   Grievance Register

S/No.:	Date	Grievance No.:	Name of Grievant	Department	Medium of Communication	Details of Grievance	Concerned Department	Name of Recorder	Status	Remarks
1.										
2.										
3.										
4.										
5.										
6.										

Box 3:   Grievance Recording Form

GRIEVANCE REGISTRATION	
Case No.:	Date:
Name:	
Office Location:	Unit:
Phone no:	
Details of grievance:	
Name of person recording grievances:	
Designation of recording person:	
Proposed date of response to grievance:	
Signature of recording person	Signature of complainant
GRIEVANCE REDRESSAL RESPONSE	
Decision of GO (give full details):	
Claimant accepts the outcome:	
Accepted	Not accepted
Signature of claimant:	
Signature of GO:	

Box 4: Acknowledgement Receipt for Claimant

This receipt is acknowledgement of grievance registration by_____, resident of village _____ on date _____. His case number is _____ and the date for response is _____.

Full name & signature of recording person

ADOLESCENT GIRLS INITIATIVE FOR LEARNING AND EMPOWERMENT (AGILE)

PREPARATION OF SAFEGUARDS INSTRUMENTS – STAKEHOLDER ENGAGEMENT PLAN (SEP) AND RESETTLEMENT POLICY FRAMEWORK(RPF)

ANALYSIS OF RESPONSES AND CONCERNS

- **SECOND CHANCE SCHOOL**

S/N	QUESTIONNAIRE	ADAMAWA STATE RESPONSE	JIGAWA STATE RESPONSES	BAUCHI STATE RESPONSE	NIGER STATE RESPONSE
1	Name of school and Location	Ladi Atiku Gov't Girls Sec. Sch. Lekki Tabba Street, Old GRA, Jimeta-Yola	Hajiya Sabuwa Shehu second Chance Center Abdulkadir Primary School, Hadeja	Married Women Secondary School Dutsen Tanshi, Bauch	
2	What year was it established and by whom?	2006 Junior and 2013 Senior section State Government	2003 State Government under UNICEF support	2008 By Isa Yuguda	
3	Is it run by Government? Is there any support NGO?	Yes Yes (Fixed Teens Initiative)	Yes Under SUBED	Yes No support from NGO	
4	How do the Girls get into the school? Do they pay fees? How much?	Through Entrance Exams Used to pay fees, but the current Government now makes it free.	Support of LGEA officials collaborating with SBMCs. No fees collected	i. By securing an admission from MOE. ii. They did not pay school fees	

S/N	QUESTIONNAIRE	ADAMAWA STATE RESPONSE	JIGAWA STATE RESPONSES	BAUCHI STATE RESPONSE	NIGER STATE RESPONSE
5	Do they get support from anywhere such as (tick as appropriate) Books? – who provides it? Uniform? – who provides it? Cash Stipends? – who provides it? How much? Feeding? – who provides it?	No No No No	The center receives support from LGEAs only as per learning materials, chalk, registers, financial support where necessary.	HOW MUCH? (cash stipends)	
6	a.What do they do in the school? b. Skills acquisition? And what type of skills. c. Curriculum courses to write exam? What type of courses? d. Do they do Junior and secondary school WAEC or NECO? And who pays for the exams?	a. Learning b. Nil c. Science, Arts and Commerce d. Yes, Adamawa State Government	a. Literacy, numeracy and Arabic lessons. b. Tailoring, Beads making, weaving, soap making, jewelry making, pomade making c. d. Yes, state government pays for WAEC	a. They read and write (Pedagogy). b. Even though there is provision for skills acquisition, yet, it is not taking place due to some certain reasons. c. They learn through normal conventional courses (Curriculum courses). And write terminal exams as others did in the public schools. They do write BECE, WAEC and NECO, State d. Government pays for either WAEC or NECO for those that passes a test (Mock exams) then parent, guardian or individual pays for one hand and for those that couldn't pass the test.	
7	Do their Husband/Parents support the program?	Yes	Yes	Yes	

S/N	QUESTIONNAIRE	ADAMAWA STATE RESPONSE	JIGAWA STATE RESPONSES	BAUCHI STATE RESPONSE	NIGER STATE RESPONSE
8	What are their challenges and what type of intervention support will they need?	Challenges: Trekking from long distance Interventions: Provision of crèche and stipends	Challenges: Inadequate financial support to sustain the learn skills attend lessons. Inadequate consumables of various skills in the center. Inadequate equipment/ facilities in the center to enable trainees learn skills easily. Interventions: Intervention needed are provision facilities, equipment, consumables and stipends	Challenges: The main challenge of this school in Bauchi is their permanent site is totally dilapidated and they share a structure with primary school pupils. They have limited time and place for their educational activities. Interventions: They need support in terms of learning/scholastic materials. They need skills acquisition program to support their educational and other activities. G&C needs to be emphasized in the school to stable their psychological well-being.	

- **DROP – OUT GIRLS**

S/N	QUESTIONNAIRE	ADAMAWA STATE RESPONSE	JIGAWA STATE RESPONSE	BACHI STATE RESPONSE	NIGER STATE RESPONSE
1	What are the major reasons Adolescent girls drop out of school?	Early / force marriage Poverty Unwanted pregnancy	Distance to school (Proximity) Fear of sexual harassment Domestic activities Poverty of Parent that cannot provide the basic needs for education Partake in family economic activities Early marriage Broken homes Orphanage	Traditional practice of early marriage Early pregnancy Proximity of the school and the community Insecurity Rate of poverty	No sponsor marriage
2	Will they be willing to go back to school to continue their education and also learn a skill?	Yes	Yes	Yes	Yes
3	What type of support will they need to go back to school? Books? Cash stipend? Feeding?	Yes Yes No	Yes Yes Yes	Yes Yes Probably	No Yes Yes
4	Do they have bank accounts or how do they receive money? Through husband of parents or what other means?	Some have and some don't	Majority do not have account but can use parent / Guardian account or to be coordinated to have if the need arises	Some have.	Yes
5	Will their husband support them to go back to school?	Yes	Yes, if the husband are enlighten or can be sensitized	Yes	
6	What challenges will they have in trying to go back to school?	Poverty	Age difference with regular students. No adequate time for them to stay in school for the complete period of school hours. Other domestic responsibilities.	Fear of marginalization and discrimination.	

- **SECOND CHANCE SCHOOL**

S/N	QUESTIONNAIRE	ADAMAWA STATE RESPONSE	NIGER STATE RESPONSE
1	Name of school and Location	School for Arabic and Islamic studies Former college for Legal studies, Yola town	
2	What year was it established and by whom?	1992 Adamawa State Government	
3	Is it run by Government? Is there any support NGO?	Yes No	
4	How do the Girls get into the school? Do they pay fees? How much?	Through Entrance Exams Used to pay fees, but the current Government now makes it free.	
5	Do they get support from anywhere such as (tick as appropriate) Books? – who provides it? Uniform? – who provides it? Cash Stipends? – Who provides it? How much? Feeding? Who provides it?	Yes (From Abti Sec. Sch.) No No No	
6	What do they do in the school? Skills acquisition? And what type of skills. Curriculum courses to write exam? What type of courses? Do they do Junior and secondary school WAEC or NECO? And who pays for the exams?	Learning No, but sometimes individuals come for training of students on soap making. Science, Arts and Commerce Yes	
7	Do their Husband/Parents support the program?	Yes	Yes
8	What are their challenges and what type of intervention support will they need?	Trekking from long distance Provision of crèche and stipends	Finance Lack of learning materials

- **DROP – OUT GIRLS**

S/N	QUESTIONNAIRE	ADAMAWA RESPONSE	NIGER STATE RESPONSE
1	What are the major reasons Adolescent girls drop out of school?	Early / force marriage Poverty Unwanted pregnancy	Lack of sponsor
2	Will they be willing to go back to school to continue their education and also learn a skill?	Yes	Yes
3	What type of support will they need to go back to school? Books? Cash stipend? Feeding?	Yes Yes No	No Yes Yes
4	Do they have bank accounts or how do they receive money? Through husband of parents or what other means?	Some have and some don't	Yes
5	Will their husband support them to go back to school?	Yes	Yes
6	What challenges will they have in trying to go back to school?	Poverty	Finances and learning material

- **SECOND CHANCE SCHOOL**

S/N	QUESTIONNAIRE	ADAMAWA RESPONSE
1	Name of school and Location	Gov't Day Sec. Sch. old GRA Upper NEPA road near FOMWAN
2	What year was it established and by whom?	2008 Adamawa State Government
3	Is it run by Government? Is there any support NGO?	Yes Yes (Balalau NGO and Justice Uwa)
4	How do the Girls get into the school? Do they pay fees? How much?	Through Entrance Exams Used to pay fees, but the current Government now makes it free.
5	Do they get support from anywhere such as (tick as appropriate) Books? – who provides it? Uniform? – who provides it? Cash Stipends? – who provides it? How much? Feeding? – who provides it?	Yes No No No
6	What do they do in the school? Skills acquisition? And what type of skills. Curriculum courses to write exam? What type of courses? Do they do Junior and secondary school WAEC or NECO? And who pays for the exams?	Learning Entrepreneur subjects without practical Science, Arts and Commercial subjects Yes

S/N	QUESTIONNAIRE	ADAMAWA RESPONSE
7	Do their Husband/Parents support the program?	Yes
8	What are their challenges and what type of intervention support will they need?	Trekking from long distance Provision of crèche and stipends

- **DROP – OUT GIRLS**

S/N	QUESTIONNAIRE	RESPONSE
1	What are the major reasons Adolescent girls drop out of school?	Early / force marriage Poverty Unwanted pregnancy
2	Will they be willing to go back to school to continue their education and also learn a skill?	Yes
3	What type of support will they need to go back to school? Books? Cash stipend? Feeding?	Yes Yes No
4	Do they have bank accounts or how do they receive money? Through husband of parents or what other means?	Some have and some don't
5	Will their husband support them to go back to school?	Yes
6	What challenges will they have in trying to go back to school?	Poverty