



THE PUBLIC PRIVATE PARTNERSHIP COMMISSION

DIGITAL MALAWI ACCELERATION PROJECT (P505095)

STAKEHOLDER ENGAGEMENT PLAN

April 2024

Table of Contents

Acronyms & Abbreviations	iii
1.0 Introduction	1
1.1 Background	1
1.2 Project Description.....	2
2.0 Stakeholder Engagement Plan	6
2.1 Description of SEP	6
2.2 Objectives of the Stakeholder Engagement Plan.....	6
3.0 Stakeholder Identification and Analysis.....	7
3.1 Methodology.....	7
3.2 Affected Parties.....	7
3.3 Other Interested Parties	7
3.4 Disadvantaged and Vulnerable Individuals or Groups.....	8
4.0 Stakeholder Engagement Program	16
4.1 Summary of Stakeholder Engagement during Project Preparation.....	16
4.2 Summary of Project Stakeholders and the Methods and Techniques for Engagement.....	17
4.3. Proposed Strategy to Incorporate the Views of Vulnerable Groups.	21
4.4 Stakeholder Engagement Methods	21
4.4.1 Meetings	21
4.4.2 Mass/Social Media Communication	22
4.4.3 Communication Materials	22
4.4.4 Project Tours for Media and Local Representatives	22
4.4.5 Information Desks	22
4.5 Proposed Stakeholder Engagement Strategy	22
4.6 Future Phases of Project	23
4.7 Public Disclosure of Information.....	23
5.0 Resources and Responsibilities for Implementing Stakeholder Engagement	26
5.1 Implementation Arrangements	26
5.2. Resources.....	28
6.0 Grievance Mechanism (GM)	29
6.1 Description of Grievance Mechanism.....	29
6.3 Grievance Redressal Committees	30
6.3.1 Roles and Responsibilities of Community Grievance Redressal Committee	30
6.3.2 Roles and Responsibilities of Contractor Workers Grievance Redressal Committee	30
6.3.3 Roles and Responsibilities of District Grievance Redressal Committee.....	31

6.3.4 Roles and Responsibilities of Project Grievances Redressal Committee	31
6.4 Management of GVB and Labour Grievances.....	32
6.5 GRM Processes.....	33
7.0 Monitoring and Reporting	39
7.1. Summary of How SEP Will Be Monitored and Reported Upon.....	39
7.2. Reporting Back to Stakeholder Groups	39
Annex	40
Annex 1: Template to Capture Consultation Minutes	40
Annex 2: Stakeholder Engagement Budget	41
Annex 3: GRM Reporting Form	43
Annex 4. Grievance Receipt Acknowledgement	44
Annex 5. Grievance Eligibility Assessment Checklist	45
Annex 6: GRM Resolution Form.....	46
Annex 7. Sample Monitoring and Reporting on the SEP	47
Annex 8. List of Stakeholders Consulted during Project Preparation.....	49

Acronyms & Abbreviations

BIGRC	Beneficiary Institution Grievance Redressal Committee
ADCs	Area Development Committees
AECs	Area Executives Committees
AfDB	African Development Bank
COMESA	Common Market for Eastern and Southern Africa
DC	District Council
DEC	District Executive Committee
DGRMC	District Grievance Redress and Management Committee
DMAP	Digital Malawi Acceleration Project
DMEC	District Monitoring and Evaluation Committee
DODMA	Department Of Disaster Management Affairs
DPA	Data Protection Authority
DRC	Democratic Republic of Congo
EAC	Eastern Africa Community
EARDIP	Eastern Africa Regional Digital Integration Project
ECAM	Employers' Consultative Association of Malawi
EGENCO	Electricity Generation Company
ES	Environmental Standards
ESCOM	Electricity Supply Corporation of Malawi
ESCP	Environmental And Social Commitment Plan
ESF	Environmental And Social Framework
ESIRT	Environmental and Social Incident Reporting Toolkit
ESMP	Environmental and Social Management Plan
ESS	Environmental And Social Standards
ESSO	Environmental And Social Safeguards Officer
EU	European Union
E-WMP	E-Waste Management Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
HEIs	Higher Educational Institutions
ICGRMC	Institutional And Community Grievance Redress and Management Committee
ICT	Information, Communication and Technology
ICTAM	Information Communication Technology Association of Malawi
ISAMA	Independent Schools Association of Malawi
ITU	International Telecommunication Union
LMP	Labour Management Procedures
M&E	Monitoring And Evaluation
MACRA	Malawi Communications Regulatory Authority
MAREN	Malawi Research and Education Network
MDAs	Ministries, Departments and Agencies
MEC	MALAWI Electoral Commission
MEPA	Malawi Environment Protection Agency
MERA	Malawi Energy Regulatory Authority

MISO	Management Information Systems Officer
MITA	Malawi Information Technology Authority
MNOs	Mobile Network Operators
MoA	Ministry of Agriculture
MoE	Ministry of Education
MoF	Ministry of Finance
MoGCDSW	Ministry Of Gender, Community Development and Social Welfare
MoICT	Ministry Of Information, Communication and Technology
MoL	Ministry of Labour
MoNUCE	Ministry Of National Unity and Civic Education
MoT	Ministry of Tourism
MoYSC	Ministry of Youth Sports and Culture
MPA	Master of Public Administration
NCHE	National Council for Higher Education
NCIC	National Construction Industry Council
NGOs	Non-Governmental Organisations
NLGRMC	National Level Grievance Redress and Management Committee
NRB	National Registration Board
NRENs	National Research and Education Networks
OPC	Office of President and Cabinet
PAPs	Project Affected Persons
PDO	Project Development Objective
PDU	Presidential Delivery Unit
PIU	Project Implementation Unit
PKI	Public Key Infrastructure
PPDA	Public Procurement and Disposal of Assets
PPPC	Public Private Partnership Commission
PSIP	Public Sector Investment Programme
RAP	Resettlement Action Plan
SADC	Southern Africa Development Community
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
STEMs	Science, Technology, Engineering and Mathematics
TA	Tradition Authority
TEVET	Technical, Entrepreneurial and Vocational Education and Training
UNCEF	United Nations International Children's Emergency Fund
UNDP	United Nations Development Programme
UNIMA	University Of Malawi
VDCs	Village Development Committees
WB	World Bank
WGRC	Workers Grievance Redressal Committee

1.0 Introduction

1.1 Background

Digitalization can be a powerful tool for development in Malawi, transforming entire sectors and delivery of services as well as creating employment. Given the importance of the digital economy to increased productivity and efficiency, its potential benefits are amplified in the context of addressing and dealing with natural disasters and health pandemics as the world faced the COVID-19 pandemic. Malawi will need to rely increasingly on digital technologies to ensure that public services, businesses, and individuals are able to withstand current and future events and to develop a set of resilience measures, to ensure business continuity of government, and to avoid interruptions in service delivery. A combination of widespread access to broadband, digitally enabled services and payments can offer a powerful platform to remove barriers of distance, to lower cost in the delivery of services, and to improve human development while also contributing to economic growth and reduced poverty.

Digitalization can also play a critical role in tackling challenges such as climate vulnerability, health emergencies, fragility, conflict, and violence (FCV). Digital technologies have the potential to reduce greenhouse gas (GHG) emissions in high-emitting sectors by up to 20 percent by 2050¹. Digital technologies (mobile transfers, emergency communication facilities, stable internet connectivity at government offices, free public Wi-Fi zones) can also expand access to emergency response and aid delivery in fragile contexts, to climate-vulnerable communities in remote and rural areas, as well as enable the use of telehealth services during health pandemics like COVID-19. For example, under the *Digital Malawi Foundation Project* (P160533), an emergency program of over 100 public Wi-Fi hotspots was rolled out in schools, post offices, markets, community centers and airports, which was key during cyclone Freddy. It helped people to get access to critical services and to help with business continuity. The recent wave of natural disasters in Malawi only highlights the need to develop a resilient digital infrastructure designed to withstand impacts from climate events. Digital Malawi also supported internet connectivity to over 80 higher education institutions, which allowed continued learning during the pandemic when on-site access and tuition was limited.

The disruption caused by today's multiple and overlapping crises is creating a need for governments to do things differently and to prioritize investments in re-usable digital public infrastructure. By offering foundational services, such as digital ID, digital payments and data sharing, and getting them right, countries are putting in place the highways for inclusive and dynamic digital economies, societies, and governments. The benefits can be enormous: empowered people, improved access to services and economic opportunities, reduced transaction costs, more efficient delivery of social assistance and subsidies, and innovation unlocked.

The Government of Malawi through the Ministry of Information and Digitalization and involvement of the Public Private Partnership Commission intends to implement the Digital Malawi Acceleration Project (DMAP) with support from the World Bank. DMAP is expected to run for a period of eight years from 2025 to 2033. The Project Development Objective (PDO) is to Increase access to and inclusive use of the internet and improve the government's capacity to deliver digitally enabled services. The Digital Malawi Acceleration Project is being implemented under the World Bank's Environment and Social Framework (ESF). The project will be implemented throughout the country for some components, while other component locations will be identified at a later stage.

¹ World Economic Forum, 2022

In consideration of the potential risks and impacts of the project on the environment and the communities around the project areas, and to ensure inclusive development and smooth implementation of the Project, different stakeholders will be engaged, hence the need for a Stakeholders Engagement Plan (SEP). The SEP has been prepared as part of the Environmental and Social Framework (ESF) requirements for the DMAP project. The Environmental and Social Commitment Plan (ESCP) which is one of the ESF requirements, stipulates that the Government of Malawi, through the Public Private Partnership Commission (PPPC), is responsible for the implementation of this SEP. The SEP will continuously be implemented and updated as relevant during project implementation.

1.2 Project Description

The Digital Malawi Acceleration Project (DMAP) is structured around four components that are aligned with the Inclusive Digitalization in Eastern and Southern Africa (IDEA) program, as follows:

Component 1: Affordable broadband and secure data hosting.

1.1 Rural connectivity

- a) **Expanded broadband coverage in rural areas** with the aim of achieving universal coverage of mobile broadband. This will be achieved through private sector investment leveraged through matching investments from project funds and the national Universal Access Fund. This investment will be used to roll out mobile broadband coverage (4G/5G cellular and Low-Earth Orbit satellite) in uncommercial rural areas and to upgrade 2G cell sites to more energy efficient 4G/5G cellular technologies.
- b) **Closing last-mile connectivity gaps for government institutions.** Building upon connectivity which was provided to 530 government institutions under the Phase 1 of the Digital Malawi Project, additional Government Wide Area connectivity will be extended to offices, hospitals, and post offices in rural areas.

1.2 Education sector connectivity:

- a) **Universal school connectivity** – building upon Phase 1, which connected 80+ higher educational institutions (HEIs), the next phase will start upon the task of connecting Malawi's 11,000+ schools, beginning with some 2,000 schools under DMAP. It is proposed to work again with MAREN (the Malawi Research and Education Network), which proved an able partner under Phase 1, and to use the existing connected Higher Education Institutions (HEIs) under a hub-and-spoke model to reach surrounding schools.
- b) Sponsoring Malawi's participation in the **EU Africa Connect 4 program**, in partnership with the UbuntuNet Alliance. This will enable the program to leverage additional EU funding. The pre-purchase of internet capacity for Malawi's schools and HEIs will be coordinated at the regional level, drawing upon the resources of the planned regional financing facility to leverage cost savings through economies of scale.

1.3 Regional connectivity:

- a) **Addressing gaps in missing cross-border broadband links**, drawing upon a regional financing facility. To this end, a survey of missing broadband links has been commissioned. Investment will be coordinated with the EU, which has a similar program, and with IDEA programs in neighbouring countries (e.g., DRC and Zambia), to ensure that there is end-to-end connectivity and efficient route planning.
- b) Integrated infrastructure planning of **"Digital Corridors"** for Southern Africa. At the 2023 edition of the Transform Africa Summit, hosted at Victoria Falls, April 2023, Heads of State from four countries – Botswana, Malawi, Zambia, and Zimbabwe – came together to commit to building

“digital corridors” that would facilitate the growth of trade in the region. The project can support this initiative through further integrated regional planning of investments.

- c) **Demand aggregation** at the regional level for educational, health and government connectivity. The planned regional financing facility under IDEA can play a role in administering a framework contract for bandwidth suppliers to bid for competitively awarded connectivity contract to serve the regions’ educational, health and government users.
- d) **Climate resilience TA**, including development of regionally harmonized standards for climate resilient infrastructure.

1.4. Enhancing data hosting capacity and transition to cloud computing

- a) Providing support to the **national data center** and enabling cloud services at national and regional levels. Under the late stages of phase 1 of Digital Malawi, project funds were used to establish a national data center in Lilongwe. But additional TA will be required to oversee the development of a sustainability plan, including leasing co-location space to the private sector, and handling the transition to a cloud first national data strategy.
- b) Supporting **migration of data** from existing server rooms to the new data center, the disaster recover site in Blantyre, and cloud computing resources.

1.5 Enhancing policy and regulatory frameworks, and operationalization of the Data Protection Authority

- a) **Regional policy and regulatory harmonization** to support digital integration, cross-border digital services and data flows, with the goal of increasing digital trade. Under EARDIP, regulatory harmonization work is underway at the Eastern Africa Community (EAC). Extending this work also to COMESA will greatly increase the number of countries that will benefit.
- b) **Operationalization of the Data Protection Authority (DPA)**, which was approved by Parliament in November 2023, and support to MACRA, the regulatory authority, which hosts the DPA. TA for the DPA will include provision of expert consultant services, study tours, capacity building and development of data classification guidelines.

Component 2: Interoperable and safe data platforms.

2.1 Next Generation Digital ID

The roll-out of first-generation digital ID in Malawi was implemented by the National Registration Board (NRB) and supported by UNDP. However, the limitations of the system, which was based on physical ID cards, with a smart chip, are now apparent as those cards expire, and are too expensive to replace. Furthermore, the initial system was developed with a particular function in mind (supporting voter ID during national elections) rather than providing a foundational ID system. Project funds will support the government to transition to the next generation cost-effective Digital ID with streamlined identity verification services such as enabling secure digital authentication services, e-signature capability, scaling mobile ID and cross border mutual recognition of ID in Southern Africa Development Community (SADC).

2.2 Extending the *Bomalathu* data exchange platform for Government and Financial Institutions

- a) The Digital Malawi project supported the development of a government data exchange platforms, called ***Bomalathu*** (“my Government”) which has connected some 11 Government agencies by the end of the project. However, much more needs to be done to extend the data exchange platform and to automate e-services offerings in key sectors. This will require additional consultancy services and capacity building among Government institutions.
- b) To become truly transformational, it will be necessary to **extend the functionality of *Bomalathu* to private sector**, notably the financial institutions that have a requirement for eKYC and identity verification. It is expected that this extension will be largely self-financing from contributions

private sector firms which have an urgent need to provide this. But the eGovernment department, which runs *Bomalathu*, will require additional TA to develop a competitive price structure for these services.

- c) They may also be a need to develop a government **public key infrastructure (PKI) capability** and e-Signature capability for e-services that require higher level of assurance than can be provided by private, or cloud-based, PKI services.

Component 3: High impact digital services and productive digital use.

3.1 Support to Tech Hubs and Matching Grants for Digital Start-ups

- a) The Digital Malawi project provided seed funding to ten **tech hubs** across the country and provided training to over 19,000 youth in digital literacy, advanced digital skills (such as AI, drones) and digital entrepreneurship. Under DMAP, it is planned to expand support to the tech hubs through a further round of competitively awarded grants, disbursed in tranches, with agreed targets for service delivery.
- b) DMAP will initiate a **matching grants program for digital entrepreneurs** of up to US\$100,000 for around 20 awards to digitally enabled start-ups and high growth firms. Using matching grants will leverage private investment while the focus on the digital sector will ensure continuity with other aspects of the DMAP program. Those firms receiving grants will be tracked over time to identify what factors contribute to their success, so that these learning can be built into future phases, and the number of jobs created will be closely monitored.

3.2 Participation in regional program on device affordability

- a) Malawi, one of the world's poorest markets, is too small to attract major device manufacturers to invest yet the excise duty on some imported ICT devices is close to 35 percent. Thus, **device affordability** is a major barrier to further market development, particularly for higher end devices like smartphones and laptops. Malawi may wish to participate in the planned regional device affordability program that offers financial guarantees to organisations (such as mobile operators, banks, micro-lenders etc) providing pay as you go lending for devices.
- b) The device affordability program will be complemented by an **e-Waste initiative** for recycling and resale or safe disposal of laptops and phones. This will be carried out in conjunction with the tech hubs, with a focus on skills development and jobs creation for young people and persons with disabilities. This activity will also include development of a national e-waste strategy, capacity building and TA to support drafting of the necessary regulations.

3.3. Sectoral deep dives: social protection, disaster and emergency response, and financial inclusion.

In line with national priorities, and in coordination with other projects in the WB portfolio in Malawi, key sectors will be selected for deep dives in digitalization and automation, on an end-to-end basis. Seed funding provided under DMAP will provide cross support to other WB program, which will provide much of the funding needed.

Component 4: Project management and capacity building.

- a) Coordination and program management, including procurement, financial management and environmental and social safeguards. Other standard project management functions will include communications, monitoring and evaluation, security, and gender awareness.
- b) DMAP will provide funding for the operationalization of the newly created Malawi National IT Authority (MITA), including support to selected consultants embedded in MITA. It is expected that some of the staff of the existing eGovernment department will transition into MITA, on a competitive selection basis.

- c) A targeted program of capacity building for all DMAP beneficiaries will also be provided under this component.

Implementation for the DMAP project is anticipated to have positive and negative environmental and social impacts for various stakeholders. The main environmental and social risks are expected to arise from components 1 and 3 of the project. Component 1 will involve construction of cellular network towers in rural areas as well as building optic fiber network for connecting secondary schools and universities and colleges. This work may impact students in secondary schools, the rural communities including the vulnerable people through child safety, labour management issues, involuntary land acquisition, community health and safety and loss of agricultural land. Component 3 will involve recruitment of the youth for advanced digital skills training, provision of matching grants for startups, the device affordability programs and programs for social protection, disaster and response as well as financial inclusion. These programs pose social risks in which the vulnerable could potentially be marginalised from the benefits due to gender inequalities, technology gaps and lack of disability friendly programs. Thus, the project should ensure to effectively engage these groups to ensure they benefit from the various programs under these specific components.

2.0 Stakeholder Engagement Plan

2.1 Description of SEP

The Stakeholder Engagement Plan (SEP) seeks to define a structured, purposeful, and culturally appropriate approach to stakeholder engagement and disclosure of information throughout the entire project cycle, in accordance with ESS10. The SEP outlines the ways in which the PPPC will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits. It recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities in which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders, leading to improved decision-making. Having a robust SEP will ensure that right information including updates, changes, challenges, or risks related to the project is provided at the right time to stakeholders. The SEP will also require thorough engagement of stakeholders during preparation of the project's Environmental and Social Management Plan (ESMP). The SEP will be disclosed publicly and will be updated as and when necessary.

Specifically, this SEP serves the following purposes: stakeholder identification and analysis; outlining engagement methods for effective communication and consultation; defining roles and responsibilities for implementing the SEP; defining monitoring and reporting requirements to ensure the effectiveness of the SEP; elaborating on the role of grievance redress mechanism (GRM) and outlining strategies for disclosure or relevant instruments and reports. Thus, the SEP will provide a platform for influencing decisions at different stages of the project.

2.2 Objectives of the Stakeholder Engagement Plan

The objective of the SEP is to establish a systematic approach for stakeholder engagement and to maintain a constructive relationship with stakeholders. The SEP will ensure that appropriate project information is disclosed to stakeholders in a timely, accessible and appropriate manner.

The specific objectives of the SEP are:

- a) To identify all relevant stakeholders for the various components under the DMAP
- b) To establish a systematic approach to stakeholder engagements that will help DMAP build and maintain a constructive relationship with stakeholders, more specifically the project-affected parties (PAPs).
- c) To assess the level of stakeholder interest and support for the project and incorporate stakeholders' views in project design and implementation.
- d) To ensure that appropriate project information on environmental and social risks is disclosed in a format accessible to disadvantaged or vulnerable groups.
- e) To provide PAPs with accessible and inclusive means to raise issues and grievances and allow relevant authorities to respond to and manage such grievances.
- f) To devise a plan of action that clearly identifies the means and frequency of engagement with each stakeholder.
- g) To outline the means for public disclosure of project information including outcomes of consultations, project documentation and environmental and social safeguards instruments.
- h) To allocate budgetary and other resources in the project design, project implementation, and Monitoring for stakeholder engagement.

3.0 Stakeholder Identification and Analysis

3.1 Methodology

During the development of this SEP, DMAP stakeholders were identified and analysed to determine their interest and needs with reference to the project. Thus, the project has stakeholders who are affected parties and those who are interested parties. The matrix of stakeholder interest and influence is presented in Table 2 below. DMAP being a follow up project to the Digital Foundations Project, most Institutions who were key in the initial project remain stakeholders under the various components of the DMAP. However, the new DMAP has new components which affect new stakeholders. For instance, component 3 has programs for social protection, disaster response management and financial inclusion which will affect the local communities including the elderly, women, the youth, the disabled and financial institutions that would want to be part of these programs. Stakeholder analysis was done to tailor specific engagement methods to different types of stakeholders including conducting outreach meetings within the communities, having sign language interpreters and using translation of relevant documents. As part of this process, it was particularly important to identify individuals and groups under the interested and affected parties who may find it more difficult to participate in the project and those who may be differentially or disproportionately affected by the project because of their marginalized or vulnerable status.

The success of DMAP project is dependent upon the engagement of various key stakeholders including Ministry of Information and Digitalization (MOID), Malawi Research and Education Network (MAREN), Malawi Communication Regulatory Authority (MACRA), Ministry of Local Government, Ministry of Education, Mobile Network Operators and contractors. The design and delivery of each of the result areas (***number of people using broadband internet, number of public institutions provided with new or improved broadband internet, number of people enrolled in digital skills trainings and citizen engagement indicators including number of grievances received and resolved***) will involve several supporting partners led and coordinated by the government of Malawi through relevant ministries, departments, and agencies. Stakeholders for the DMAP Project will be continuously identified due to project design changes and availability of new legislation and policies, among other factors.

Within the DMAP Project, therefore, engagement is directly proportional to impact and influence. As the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement. Appropriate methods that are culturally acceptable will be used for each targeted stakeholder group.

3.2 Affected Parties.

The proposed DMAP project is likely to affect various groups or individuals differently due to potential or actual risks to their physical environment, cultural practices, health and safety, socio-economic livelihoods, loss of land, disturbances, and security lapses. These include beneficiary institutions, workers with the targeted institutions, the public, students in higher learning institutions and secondary schools, local communities and community members and other parties which are expected to be directly impacted by the project interventions, politicians, and community leaders.

3.3 Other Interested Parties

Interested parties include various individuals, institutions, and organisations with an interest in the project or direct involvement in the delivery of the project at national, district and community levels. The interest may be derived from the nature of the project, its location, level of ES risks and public interest. At national level the Public Private Partnership Commission and Ministries of Information and

Digitalization fall under this category as coordinating institutions. All beneficiary institutions under various Government Ministries, Departments and Agencies (MDAs) that will benefit and those that have a stake in the ICT sector will be part of this group. At district level, the District Commissioners of the targeted districts and relevant Non-Governmental Organisations working in such districts also fall under this category. In addition, the Development Partners at international and national levels, Politicians including members of parliament and ward councillors, representatives of NGOs at district and community level, religious groups and their leaders and the general community are some of the interested parties.

3.4 Disadvantaged and Vulnerable Individuals or Groups

Much as the project is largely expected to have positive impacts among beneficiary members of the target institutions, there is still a possibility of individuals, families and institutions that might be negatively affected by activities of the program. These may come from among the beneficiaries or non-beneficiary members of the target communities. The women and children, elderly, disabled and chronically ill are often the most vulnerable because of their limited access to information due to education, language, physical, social, cultural, and structural barriers.

These categories of people will be particularly targeted with adequate information to understand the nature of project activities and the anticipated positive and potential negative impacts of the project. They will also be provided with information on how to access the grievance redress mechanism of the project whenever the need arises. Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the sections 4.3 below.

For the Digital Malawi Acceleration Project, the following stakeholders have been identified and analysed per project component. These stakeholders include affected parties, other interested parties, and disadvantaged/vulnerable individuals or groups. Table 1 organises these stakeholders by project component at National, District and Community Level.

Table 1: List of DMAP Project Stakeholders at National, District and Institutional Level according to Project Components.

Project Components	Stakeholders at National, District and Institutional Level		
	National level	District level	Institutional level
Component 1: Affordable broadband and secure data hosting			
1.1. Rural Connectivity	<ul style="list-style-type: none"> - Ministry of Information & Digitalisation - MITA - DPA - Ministry of Local Government - Ministry of Health - Ministry of Energy - Ministry of labour - Ministry of Education - Department of Climate Change and Metrological services - DODMA - MEPA - EAD - MERA - MACRA - ESCOM - EGENCO - MDA's - E-government - NGO's 	<ul style="list-style-type: none"> - District Council - DEC - TA'S - Chiefs - VDC's - Police - Rural ISP's - Women - Elderly - Disabled 	<ul style="list-style-type: none"> -Targeted beneficiary institutions -Beneficiaries
1.2. Education Sector Connectivity	<ul style="list-style-type: none"> -Ministry of Education -Ministry of labour -MAREN -Ministry of Youths Sports and Culture 	<ul style="list-style-type: none"> -District Council -DEM -Women -Disabled -Children 	<ul style="list-style-type: none"> - Universities and Colleges - Secondary and Primary Schools -Students
1.3. Regional Connectivity	<ul style="list-style-type: none"> -Ministry of Homeland Security and Foreign Affairs -Ministry of Health - Ministry of Education 		

Project Components	Stakeholders at National, District and Institutional Level		
	National level	District level	Institutional level
	<ul style="list-style-type: none"> -NRB -MACRA -EU -Other African groups with similar infrastructure 		
1.4. Enhancing data hosting capacity and transition to cloud computing	<ul style="list-style-type: none"> -Ministry of Information & Digitalisation -Department of E-Government -Malawi Confederation of Chambers of Commerce Beneficiary Government MDAs 		
1.5. Enhancing policy and regulatory frameworks, and operationalization of the data protection Authority	<ul style="list-style-type: none"> Ministry of Information -Department of E-Government -Ministry of Justice -MACRA -COMESA 		
Component 2: Interoperable and safe data platforms			
2.1. Next Generation Digital ID	<ul style="list-style-type: none"> -NRB -MEC Ministry of Information & Digitalisation -Ministry of Local Government -Ministry of Homeland Security and Foreign Affairs -Department of E-government -Department of Immigration -Private Sector (Banks, TNM, Airtel, Insurance companies) 	<ul style="list-style-type: none"> -District Councils -Women -Elderly -Disabled -The Sick 	

Project Components	Stakeholders at National, District and Institutional Level		
	National level	District level	Institutional level
2.2. Extending the Bomalathu data exchange platform for Government and Financial Institutions	<ul style="list-style-type: none"> -Ministry of Information -Ministry of Finance -MACRA -Immigration -E-Commerce -Banks -Road traffic -Immigration -NEPA -MITA Police service -Reserve Bank of Malawi 		<ul style="list-style-type: none"> -Micro-finance companies -Insurance companies Private Sector
Component 3. High impact digital services and productive digital use			
3.1. Support to tech-hubs and matching grants for Digital start-ups.	<ul style="list-style-type: none"> -Ministry of trade -Ministry of information & Digitalisation -Ministry of Gender & Social Welfare -Ministry of Finance -Ministry of Local government -Ministry of Youth Sports and Culture -ICTAM -MACRA 	<ul style="list-style-type: none"> - District Councils -Chiefs -TA's -Youth coordinators, -Youth led organisation 	<ul style="list-style-type: none"> - Tech hubs -Innovation Start-up companies -Beneficiaries (Young entrepreneurs)
3.2. Participation in regional program on device affordability	<ul style="list-style-type: none"> -Ministry of Information & Digitalisation -Ministry of Finance -MRA -MACRA -Mobile Network Operators (TNM, Airtel, Access -Micro lenders (Finca, sycamore) 	<ul style="list-style-type: none"> -Women -The youth -The elderly -District Social Welfare Office 	
3.3. Sectoral deep dive: Various Sectors	<ul style="list-style-type: none"> -Ministry of local government 	<ul style="list-style-type: none"> -Local Councils 	

Project Components	Stakeholders at National, District and Institutional Level		
	National level	District level	Institutional level
including social protection, disaster and emergency response, and financial inclusion	<ul style="list-style-type: none"> -Department of E- government -Ministry of Natural Resources and Climate Change -Ministry of Agriculture -DODMA -Banks -MRA -MEPA -EAD -Department of Climate Change and Metrological Services -Environment and Climate Change Tec hub start-ups. -Innovators -World Bank projects on social cash transfer 	<ul style="list-style-type: none"> -The youth -Women -Elderly -The sick -CSOs -NGOs -District Social Welfare Office 	

Table 2: Description of Stakeholders and their roles, interests, and needs

	DESCRIPTION OF STAKEHOLDER	EXPECTED ROLE	INFORMATION NEEDS & INTERESTS
A.	NATIONAL LEVEL (MINISTRIES, DEPARTMENTS & AGENCIES)		
1	Ministry of Information (Dept. of E-govt)	Overall implementation of the project and provision of technical expertise Disseminate project information and raise awareness of the project	Progress updates regarding procurements, disbursements and work plans
2	Ministry of Finance	Updates on national economic policies, fiscal measures, and budget allocations to guide financial planning and decision-making	Disbursement reports from the project Project implementation work plans and progress reports
3	Ministry of Local Government	Help in facilitating community engagement	Project updates, Site beneficiary selection and allocation reports Reports on activities involving local government institutions
4	Ministry of Energy	Ensuring available and reliable power supply for the project's infrastructure and providing guidance on energy requirements	Project progress reports

5	Ministry of Labour	Provide guidance on labour and OHS related issues.	Project implementation work plans and progress reports, Monitoring reports on status of OHS and labour management compliance
6	Ministry of Education	Help in the implementation of education policies and coordinate schools for the connectivity component	Project progress reports, Beneficiary schools selection reports
7	Ministry of Gender & Social Welfare	Networking opportunities with NGOs and civil society organizations.	Project implementation work plans and progress reports in relation to gender management
8	Environmental Affairs Department	Providing guidance on environmental management aspects of the project Support planning, implementation and monitoring of environmental and social safeguards in the project	Safeguards compliance monitoring reports
9	-Department of Climate Change and Meteorological Services -Department of Disaster Management	Provide guidance on climate change mitigation requirements related to the project Provide guidance on disaster response and management programs under the project	Safeguards progress reports including climate change mitigation reporting. Project progress reports
10	Department of Immigration	Helping foreign expertise entry into the country	Details of international experts recruited
B.	<i>DISTRICT LEVEL</i>		
1	District Council	Facilitate infrastructure development, coordinate with stakeholders, support community engagement. Provide local insights for effective implementation. Ensure project alignment with national priorities	Project implementation work plans and progress reports
2	TAs, Chiefs, VDCs	Mobilize communities, collaborate with councils, provide local leadership, represent community interests, support project implementation Engage youth in initiatives, promote digital literacy and skills development	Information about project activities and employment availability
3	Police	Ensure security for infrastructure development, collaborate with local authorities.	Project security requirements
4	Rural ISP's	Extend internet coverage to rural areas, offer affordable and reliable services, offer digital literacy to communities	Project opportunities for them
5	Youth-led organisation	Support youth-led projects, advocate for digital inclusion.	Project opportunities for the youth
6	Innovators	Collaborating with local communities, government agencies, and private sector partners to identify connectivity challenges and co-create sustainable solutions that address specific needs and constraints	Project documents and requirements
C.	<i>INSTITUTIONAL LEVEL</i>		
1	Targeted beneficiary government institutions	Participate in the project activities Provide feedback on project progress	Information on how to benefit from the project
2	Universities and Colleges	Provide expertise and research support for connectivity projects, collaborate with government and industry partners on technology development and deployment, offer training and educational programs on digital literacy and ICT skills.	Contact details of project focal persons Cybersecurity details under the project
3	Secondary and Primary Schools and students	Integrate connectivity into curriculum and teaching methods, Provide feedback on connectivity needs and	

		challenges, Support teacher training and capacity building in ICT integration, Act as ambassadors for digital literacy and connectivity initiatives in schools, Provide feedback on usability and effectiveness of connectivity services	Procurement and safeguards requirements Information on universal subsidy provisions available for ISPs
4	Insurance companies	Collaborate with connectivity providers to offer bundled services or discounts for policyholders, invest in connectivity infrastructure in underserved areas, develop innovative insurance products tailored to the needs of connected communities.	Project requirements for digital skills training
5	Private Sector	Invest in connectivity infrastructure and technology solutions, provide support and funding for community-based connectivity projects, leverage connectivity for business growth and expansion into new markets.	
6	Tec hubs	Serve as incubators for connectivity startups and innovation projects, offer mentorship and support for entrepreneurs working on connectivity solutions, provide networking opportunities with industry experts and potential investors.	
7	MACRA	Overseeing internet provision and universal access to the project's internet Overseeing cyber security issues Regulate mobile network operators involvement in the project	Information on DMAP project Project progress reports
8	MAREN	Take part in the project under the schools connectivity and other programs in the project, improve ICT infrastructure in schools and innovations to enhance research and educational capabilities across universities and colleges	
9	NRB	Take part in the project under the digital ID programs	
10	ISP's	Taking part in the project activities such as the rural connectivity, providing technical support to new users to improve their understanding mobile network operations	Information on DMAP project
11	MRA	Implementing tax incentives and policies to encourage investment in telecommunications infrastructure for project partners.	
12	Commercial Banks	Take part in project activities including social cash transfers. Providing loans to project contractors Utilise the national data centre for EKYC	
13	Reserve Bank of Malawi	Updates on monetary policies, interest rates, inflation targets, and money supply to regulate economic stability and promote sustainable growth	Financial expenditure reports Project progress reports
14	ICTAM	Advocacy efforts to promote favourable ICT policies, regulations, and infrastructure development to support the growth of the tech industry in Malawi.	Information on DMAP project Project progress reports
15	MITA	Overseeing activities of the DMAP during construction works and operation Support research and development initiatives.	
16	MERA	Overseeing implementation of electricity standards on projects infrastructure and providing guidance on climate smart energy options and granting of permits for project's energy requirements	

D.	DEVELOPMENT PARTNERS		
1	World Bank	Provide technical and financial support for the DMAP project	Project implementation updates
2	COMESA	Provide regional support for the various programs under the project, including E-waste management, climate change mitigation and regional connectivity.	Climate change mitigation programs and E-waste strategies implementation reports
3	EU	Provide technical guidance under MAREN's university connectivity and broadband capacity programs.	Project progress reports
4	NGO's	Advocacy on environmental and social issues including providing guidance on inclusion of marginalised communities and ensuring equal project benefit sharing	Project reports on environmental and social management

4.0 Stakeholder Engagement Program

4.1 Summary of Stakeholder Engagement during Project Preparation

Several consultations were conducted for the development process of this SEP. Over the past one and half years, it has been anticipated that the opening months of Phase II of Digital Malawi (which has now become known as Digital Malawi Acceleration project) will overlap with the closing months of Phase I. Consequently, stakeholder engagements for different activities within Phase 1 were also used as platforms to get feedback from stakeholders on lessons learned and their aspirations for future projects and initiatives that started in Phase 1. Government members from various MDAs including the National Planning Commission, representatives from participating institutions including local communities, community members, and other parties who may be subject to direct impacts from the Project, and the ICT Association of Malawi, were consulted on the issues listed below. Particular attention was paid to vulnerable groups that may be at risk of being left out of the benefits of the project, such as people with disabilities, particularly for audio and visual disabilities, groups with lower digital literacy such as women, the elderly and the youth, rural and peri-urban communities characterised by low broadband coverage and access., The cultural sensitivities of diverse ethnic groups were taken into consideration. The consultations provided insights on what went on well in the first phase and areas that needs to be taken into consideration in the second phase project, including grey areas and pitfalls. They initiated and sustained a constructive external relationship that has provided a “social licence to operate” the project with public sector.

- a. Are the activities and outputs of the project consistent with the overall goal and the accomplishment of national Digitalization Strategy.
- b. To what extent are the chosen implementing partners appropriate/relevant to achieving the project’s objectives.
- c. To what extent is the project going to address challenges and gaps related to the overall National Digitalization Strategy
- d. To what extent the new project is designed to address societal needs and interests of the target group and communities (e.g., men, women, youth, disabled under all categories)?
- e. Are the activities and outputs of the project consistent with the Malawi developmental agenda 2063.
- f. Are the activities dropped in this phase of the project still relevant and shall be considered for inclusion in the next project?
- g. To what extent is the SEP likely to be achieved.

Intense stakeholder engagement and discussion on a potential follow-up operation to the Digital Malawi Foundations Program, including the proposed design, regional focus, and possible areas of support, were included in the Implementation Support Missions of February 4-9, 2024, August 28 – September 1, 2023, and February 6-10, 2023. Participating stakeholders included the Ministry of Information, eGovernment Departments - MoID, MACRA, PPC, PPDA, NRB, Rydberg Hub, Computer Clinic, NextGen Lab, TakenoLab, Green Impact, Kwathu Innovation and Creative Centre, Ministry of Finance - Debt & Aid and others.

Over the last year, various other stakeholder engagements took place to discuss follow up projects with government leadership team comprising the Presidential Delivery Unit (PDU), Office of the President and cabinet through the Department of Innovation, Ministry of Information, Department of eGovernment and the PPP Commission. To ensure proper coordination within government entities, in February and July 2023 further engagements were done with joint Supervision team comprising OPC,

PSIP Department of Economic Planning and Development and Debt and Aid Divisions of Ministry of Finance and Economic Affairs.

Development partners have been consulted throughout project preparation to ensure coordination. Consultations included technical discussions with development finance institutions, notably the Horn of Africa Initiative Secretariat, AfDB on its Horn of Africa Digital Integration Project, the EU on its Initiative for Digital Government and Cybersecurity and missing broadband links initiative, the International Telecommunication Union (ITU) on its support for affordable access to broadband, Smart Africa's proposed internet bulk internet capacity purchase program, the GIGA initiative (ITU and UNCEF) on infrastructure mapping for the education sector, the EU AfricaConnect program for NRENs and private sector consultations held, inter alia, during the Mobile World Congress event in Barcelona, February 2024. Additional consultations to seek partners for co-financing in future phases are planned over the preparation period and during the outset of the first phase of the MPA, to ensure that regional digital needs can be covered in a comprehensive manner and at scale. Consequently, proposed stakeholders that are relevant to the project were included in this SEP.

Given that DMAP project is likely to have environmental and social impacts, consultation will not be a single conversation but a series of opportunities to create understanding about the project among those it will likely affect or interest, and to learn how these external parties view the project and its attendant risks, impacts, opportunities, and mitigation measures. Thus, in the preparation of the new project, various stakeholder engagements took place as an integral part of Digital Malawi closing sensitisation and awareness workshops in 2023, and consultations were carried out with Districts authorities, local leaders, communities and mostly leaders of youth associations and movements, female entrepreneurship, community support and members of public institutes.

During final year of DigMap, the stakeholder engagements were extended to the ICT Association of Malawi (ICTAM), an umbrella body of ICT professionals, seeking views on areas that need future intervention. The engagement also identified concerns and overall feedback that formed the basis for future collaboration and partnerships. Full list of stakeholders consulted and dates of the meetings is presented in Annex 8.

In addition to the consultations undertaken as above and prior to appraisal of the proposed DMAP project, consultation meetings will be conducted with the stakeholders identified to present details of DMAP project and elicit their views, requests and concerns regarding the project. A consultant will be engaged to undertake consultations at national, district and community levels with a representation of project affected parties, interested parties and disadvantaged and vulnerable people. The outcomes of these consultations, including feedback from stakeholders and stakeholder groups, will be incorporated into this SEP. These consultations will identify more stakeholders, analyse their level of influence and interest and thus identify as well as determine their preferred method and appropriate level of engagement suitable for different stakeholders. The views of the various stakeholders will be captured in the minutes template presented in Annex 1. Responses from the project as well as follow up activities will also be entered in this template.

4.2 Summary of Project Stakeholders and the Methods and Techniques for Engagement.

The Stakeholder Engagement Plan in Table 3 below outlines the engagement process, methods including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Thus, stakeholders will be encouraged to express their views freely without fear of reprisal. In addition, the project will ensure confidentiality for stakeholders who request it.

Table 3: Stakeholder Engagement Plan

No.	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/ Timeline	Engagement Activity	
1	Project Preparation Phase	Development Partners Ministry of Information Ministry of Labour Ministry of Education Ministry of Home Affairs and Internal Security Ministry of Health Ministry of Energy Department of Climate Change MAREN Department of E-Government MEC, NRB, Commercial Banks, EAD Immigration Department Road Traffic, MEPA, ICTAM MACRA, Youth-led organizations Mobile Network Operators DODMA, MITA, NCIC.	Collect views on the design of the project. Present the project and receive feedback on project. ESMP development (ES risks & mitigation measures, GRMs, and SEP	Formal meetings Focus group discussions. One-on-one interviews Formal meetings Focus group discussions. One-on-one interviews	ICT Department Safeguards Department	April 2024 September 2024	National stakeholder consultations	
		Members of the District Executive Committees and its Sub-committees, Beneficiary Institutions Persons with disabilities.	Collect views on the design of the project, ESMP development (ES risks & mitigation	Formal meetings Focus Group Discussions Formal meetings Site visits	ICT Department Safeguards Department	September - October 2024		District level Stakeholder consultations

No.	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/ Timeline	Engagement Activity
			measures), GRM and SEP				
		Members of ADCs, VDCs, Traditional and Religious Leaders, Ordinary members of the community including women, youths, the elderly, and the disabled.	Collect views on the design of the project, ESMP development (ES risks & mitigation measures), GRM, and SEP	Community meetings, Electronic Media Fliers and Posters	ICT Department Safeguards department	October - November 2024 December 2024	Community level Stakeholders (Those around construction sites)
2	Project Implementation Phase	Members of the District Executive Committees and Subcommittees, Beneficiary Institutions.	Provide feedback on approved project design and orient district-level stakeholders on their roles Give information on GRM.	Formal Meetings Media (Print & Electronic), Emails, Project Website Community meetings Site visits	ICT department	March 2025 Bi-annually	Project meetings with District Councils
		Members of target communities, ADCs, VDCs,	Sensitize communities on upcoming project interventions and how	Community Meetings,	Safeguards Department	April 2025	Community Sensitization

No.	Project Phase	Targeted Stakeholders	Topic of consultation/ message	Method Used	Responsible Personnel	Frequency/ Timeline	Engagement Activity
		Traditional, Religious and Political leaders, Persons with disabilities. General Public.	to minimise Project negative impacts. Inform on project progress.	Media Electronic Fliers and Posters			
		National, District & Community level stakeholders	Provide and obtain ongoing information and support on project performance	Meetings Site visits Direct communication with affected parties	Safeguards Department	Ongoing at least on quarterly basis throughout the project.	Project implementation monitoring and supervision missions
		National, District & Community level stakeholders	Provide and get periodic feedback on project implementation progress and any emerging issues	Formal Meetings Emails Focus Group Discussions Community meetings	Safeguards Department	Twice a year from March 2025 to February 2030	Project review meetings with selected stakeholders from National, District, and Community level
3	Project Close Out Phase	Beneficiary institutions National & District stakeholders	Engage stakeholders on the project exit strategy	Formal Meetings FGDs Site visits	Safeguards Department	2033	Project close out meetings

4.3. Proposed Strategy to Incorporate the Views of Vulnerable Groups.

The project will seek the views of vulnerable or disadvantaged groups identified in this SEP through the following methods: meetings using sign language, messages printed in braille, using a speaker to enhance sound, having meetings close to those with movement challenges etc. The Malawi Council for the Handicapped (MACOHA) and the Ministry of Gender, Community Development and Social Welfare will be consulted to identify personnel with the sign language skills and printing of messages in braille. These service providers will be procured on a consultancy basis for provision of these services. The Digital Malawi Project has in past procured services of language translators for ESMP and GRM public disclosure purposes. The following measures will be taken in order to remove obstacles and ensure full and enabling participation / access to information:

- (i) **Women:** The project will promote gender-segregated consultations to allow free and enabling participation of women and girls. The project will ensure that community engagement teams include women to ensure that female facilitators are available for gender segregated consultations. The project will also use online and in-person surveys so that women can participate from their homes. The project will consider provisions for transport for any in-person community engagement activities to be conducted at neutral venues. The project will consult with women's organizations, to gain more insights on hindrances that women and girls may face under the project.
- (ii) **Elderly and people with existing medical conditions:** The project will develop information on specific needs for the elderly who face risk of exclusion from social protection and financial inclusion programs & what measures are needed to ensure they benefit from the project. The project will consider outreach meetings in order to reach the elderly with mobility issues. The project will work with NGOs who work with the elderly, to identify them and their vulnerabilities as well as measures that the project can take to ensure they are not marginalized under the project.
- (iii) **Persons with disabilities:** The project will provide information in accessible formats like braille and large print. It will also offer multiple forms of communication, including text captioning for hearing impaired and online materials for people who use assistive technology. The project will also use accessible venues for its meetings.
- (iv) **The youth:** The youth will be engaged through their schools and youth-based organizations. The District Youth Office will be engaged to guide the project further on best practices to follow in engaging the youth. For example, football matches will be organized for dissemination of information on programs under the project that the youth can take part in as well as identify the capacity challenges that would prevent them from taking part.

The Project will procure services of technical experts to assist with guidance and measures to be implemented for safe consultations with vulnerable groups, and/or on sensitive topics, as and when needed. These experts will be procured from relevant departments that deal with the various groups of vulnerable and disadvantaged people.

4.4 Stakeholder Engagement Methods

4.4.1 Meetings

At the start of the project, DMAP will organize the project launch. The project will hire an Environmental and Social Specialist (ESS) who will support the update and implementation of the SEP. This will help to ensure that meetings are organized and held throughout the project implementation phase. Further, consultation reports will be shared with the project leads and relevant stakeholders on

a quarterly basis. Contractors will be required to have ES safeguard personnel who will be required to ensure implementation of meetings with stakeholders at their level.

4.4.2 Mass/Social Media Communication

The DMAP will have a Communication Specialist that will be engaged in the project. Their role will be to provide project information, updates and post information on the dedicated project social media pages and the PPC websites, and to communicate with the local population via social media campaigns or tools like WhatsApp throughout the project's lifecycle. Social media channels including Facebook will be used as much as possible to disseminate information as rates of social media use appear to be high across users of different age and backgrounds.

4.4.3 Communication Materials

Written information will be disclosed to the public via brochures, flyers, posters, etc. A communication strategy to be financed under the project will prepare and design and distribute materials both in print and online form. PPC will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Chichewa. The website will also provide information about the grievance mechanism for the project.

4.4.4 Project Tours for Media and Local Representatives

At appropriate points during the construction phase, site visits will be organized for selected stakeholders from media organizations or local government. On average, it is planned under the Communication section tours will occur annually with the first one undertaken halfway into the project and thereafter once a year until the end of the project. The Communication Specialist will organize these tours in collaboration with the ICT Department of the project.

4.4.5 Information Desks

Information desks will provide local communities with information on stakeholder engagement activities, construction progress updates, job opportunities, contact details of the GRM focal point and Community Development Officers. The information desks will be set up every quarter in all the village locations where the sub-components are implemented. The villages in question include those that will be identified for the rural broadband connectivity under component 1 of the project. The beneficiary villages are not expected to be more than 20 villages. The Community GRM Committees in these villages will be the focal point for dissemination of project information including fliers and posters which will be duly provided by the project. These focal points will be points of contact for contractors who will be advertising for job openings.

4.5 Proposed Stakeholder Engagement Strategy

Stakeholder consultations are an integral component of the Bank environmental and social instruments. Requirements and guidelines for both Malawi Government and the World Bank will be followed in conducting stakeholder consultations. Various methods will be used to get inputs from stakeholders about the project at all levels as highlighted in this plan. These consultations will help in identifying key issues and determine how the concerns of all parties will be addressed.

The strategy proposed is a combination of methods and tools that allowed for a two-way and permanent dialogue, either through workshops or through different types of approaches, and events such as outreach meetings, visits to rural and peri-urban communities, consultation with experts of the target vulnerable groups, awareness-raising and information about the Programme, targeted meetings with MDAs and civil society institutions, both national and regional/international.

Where possible and necessary, separate consultations will be done with selected interest groups. The stakeholder meetings will be facilitated using pre-designed discussion guides which will carry specific questions targeting specific stakeholders including vulnerable groups. Experienced moderators will be used to conduct stakeholders' meetings to ensure equitable participation and the contribution of all stakeholders identified.

The facilitating teams will have skilled note takers who will record issues raised by specific stakeholders during deliberations. Further to this, the consultation output will clearly depict the key issues raised, who raised the issues, project responses and how the issues could be addressed in the project design or documentation. After completion of the consultations, the field notes and transcriptions will be consolidated, analysed and key issues identified will be incorporated into stakeholder engagement reports by the Monitoring and Evaluation Specialist as outlined under section 7 below. Relevant departments will be required to capture stakeholder views and concerns under their area of jurisdiction and provide responses or action plans for addressing them. Progress will be captured in the same Stakeholder engagement reports to show how views are being incorporated by the project. The stakeholder consultation outcomes will also be communicated to potentially affected persons and relevant stakeholders. Furthermore, the Project shall make it a point to brief decision makers on the outcomes of consultations with affected persons. This is important as these outcomes may lead to changes in Project design as well as policy adjustments.

4.6 Future Phases of Project

This stakeholder engagement plan describes a continuous stakeholder engagement program, presented in Table 1 above, for the project to ensure that stakeholders are kept informed throughout the project phases. The stakeholder engagement program includes project review meetings, community interface meetings, and regular project monitoring and supervision visits. These platforms will provide avenues for exchange of information between project implementers and other stakeholders regarding the progress of the project and issues related to management of environmental and social risks including the grievance redress mechanism.

4.7 Public Disclosure of Information

Appropriate information will be disclosed to stakeholders depending on the stage of the project and stakeholders' information needs. This information will be disclosed through the following documents: the Environmental and Social Management Framework, Sub-component specific ESMPs, Grievance Redress Mechanism Manuals, Resettlement Action Plans (RAPs), Labour Management Procedure (LMP), E-Waste Management Plan (E-WMP), the ESCP, SEP and project progress reports.

The project will use a combination of methods to disclose information pertaining to the project in manner that is commensurate with the nature of the stakeholders. For communities, information will mostly be disclosed through community meetings. Deliberate efforts such as translation of information materials, provision of information in braille will be made to ensure that information is accessible to vulnerable groups of people such as women and children, the elderly and disabled. At National and District level, disclosure of information will be done through formal meetings. In addition, printed and electronic copies of the above-mentioned project documents will be made available to stakeholders through platforms such as the PPC website and project social media pages, newspapers and radios as well as physically at the project and District Council offices. Table 4 summarizes the key methods that will be used to disclose project information at different stages of the project. The responsibility for disclosure of safeguards documents as well as project progress reports will be under the Environmental and Social Safeguards Specialist.

Table 4: Methods for disclosure of project information

Project stage	List of information to be disclosed	Target stakeholders	Methods proposed	Timelines/ Dates	Responsibilities
Project Preparation	Project Appraisal Document Environmental and Social Commitment Plan Stakeholder Engagement Plan Labour Management Procedures Environmental & Social Management Framework Resettlement Policy Framework Grievance Redress Mechanism Manual Environmental & Social Management Plans E-Waste Management Plan Resettlement Action Plan (RAP)	Ministry of Information & Digitalization Government MDAs, Development Partners and NGOs The general Public Contractors & Contractor workers Local Authorities Civil Society Organization Community – PAPs and vulnerable groups	Formal meetings Public meetings Print & Electronic media (Newspaper, Radio (Community and National Radio stations) & TV) Website publications Social Media	September 2024 PAD Upon approval and revision of E&S documents	PPPC
Project implementation	Project Progress Reports Environmental and Social Commitment Plan Stakeholder Engagement Plan	Ministry of Information & Digitalization Relevant MDAs who are project beneficiaries Local Authorities	Website publications In-person meetings Virtual meetings	Quarterly throughout the project for the progress reports	PPPC

Project stage	List of information to be disclosed	Target stakeholders	Methods proposed	Timelines/ Dates	Responsibilities
	Labour Management Procedures Grievance Redress Mechanism Manual Environmental & Social Management Plans E-Waste Management Plan	Community – PAPs and vulnerable groups Contractors Civil Society Organizations (CSO)s		Upon approval and revision of E&S documents throughout the project	
Project Closure	Project Completion Report	Ministry of Information Government MDAs Project beneficiaries Local Authorities Community – PAPs and vulnerable groups Contractors	Website publications In-person meetings Virtual meetings	At end of Project	PPPC

5.0 Resources and Responsibilities for Implementing Stakeholder Engagement

5.1 Implementation Arrangements

The overall responsibility for SEP implementation lies with the Project Manager at the PIU while the Environmental and Social Specialist will coordinate stakeholder engagement activities by PIU departments. The entities that will be key implementation of stakeholder engagement are the Ministry of Information and Digitalization, PPPC, District Councils and other relevant beneficiary ministries. The implementation arrangement for the project will partly use the existing decentralized government structures at District level as well as using structures at the community level.

At national level, the Implementation of the SEP will be coordinated by the Public Private Partnership Commission in collaboration with Ministry of Information and Digitalization and members of the project team. The project team will comprise qualified and experienced Specialists including the Digital Technology Specialist, Communication Specialist and Monitoring and Evaluation Specialist. This team will be responsible for:

- Implementing the Stakeholder Engagement Program (Table 3)
- Providing guidance for strategic engagement at all institutional levels.
- Ensuring inclusion of the vulnerable and disadvantaged groups in engagement activities.
- Monitoring implementation of the SEP.
- Ensuring disclosure of project and ESS documents
- Providing feedback to various affected and interested parties on their concerns and recommendations.

At District level, the implementation of this SEP will include District Council officers including Management Information System Officer (MISOs) and Community Development Officers. The District GRM Committee and Councillors will also be involved in the SEP activities. These entities will be required to:

- Identify SEP interventions.
- Organizing communities for public meetings, setting up of information desks for project communication and disclosure of information.
- Identifying the disadvantaged and vulnerable members of the community that required to be included in stakeholder engagements.
- Providing guidance on engagement methods for including the disadvantaged and vulnerable members of the public.
- Monitoring SEP implementation.
- Coordinating monitoring and evaluation activities e.g. joint monitoring with CSOs, and NGOs.
- Providing guidance for addressing views on the project from members of the public.

At community level, the Community GRM Committees will be part of the SEP implementation apart from their role in GRM and will be responsible for:

- Being focal points for provision of project information desks in communities surrounding project sites
- Safe keeping and distribution of project information in terms of fliers and posters for project communications.
- Custodians of GRM boxes for receiving project related grievances.
- Receiving and record all grievances as submitted to them by the PAPs.
- Investigating and facilitating grievance resolution process.
- Refers non-resolved grievances to DGRC for action.
- Provides feedback on grievance to PAPs.

The roles and responsibilities of officers and community members mentioned above in the SEP are provided in the Table 5 below.

Table 5: Roles and responsibilities of officers and community members within the DMAP SEP

Roles	Responsibility
<p>Project Implementation Unit: Project Manager</p> <p>Digital Technology Specialist</p> <p>Environmental and Social Safeguards Specialist</p> <p>Monitoring and Evaluation Specialist</p> <p>Communication Specialist</p>	<ul style="list-style-type: none"> -Overall coordination of the SEP -Manage and implement the SEP -To ensure adequate and timely resources for the implementation of the SEP. -To ensure stakeholder engagements are conducted during all project stages thus, preparation, implementation and closure. -To provide technical information about the project to all stakeholders -To coordinate the SEP implementation within the PIU -To facilitate disclosure of environmental and social safeguards documentation. -Develop and ensure effective implementation of Grievance Redress Mechanism (GRM) -Liaise with relevant institutions on environmental and social issues -Ensure provisions for disability and gender inclusion and GRM under the SEP are implemented effectively -Interface with stakeholders and respond to comments or questions about the project or consultation process. -Provide contact information if stakeholders have questions or comments about the project or consultation process. -Document any interactions with external stakeholders. -Maintain database, records for SEP and the grievances. -Coordinating public meetings, workshops, focus groups etc. -Makes sure the SEP is being adhered to and followed correctly. -awareness of the SEP among project implementation unit, employees contracted firms and other stakeholders -To monitor and evaluate the implementation of the SEP and determine areas of improvement. -Preparing SEP implementation progress and monitoring reports and disseminating to relevant stakeholder -To spearhead all communication requirements under the SEP including devising means of ensuring accessibility of the SEP to the vulnerable and marginalized
<p>Ministry of Information and Digitalization</p>	<ul style="list-style-type: none"> -Overall responsibility for the implementation of the project -To provide technical information on the government functions that are related to the project objectives
<p>District Councils</p> <p>Community Development Officers</p>	<ul style="list-style-type: none"> -Facilitating stakeholder engagement activities with local communities in collaboration with the project. -To take part in organising stakeholder engagements with local communities -Working with local leaders to identify the vulnerable and disadvantaged persons

Monitoring and Evaluation Officers	-Collaborating with PIU M&E Specialists in collecting data and providing input into SEP quarterly reports
Community GRM Committee members	-Act as focal points in the communities for disclosure of project and safeguards documents. -Perform their GRM roles as required by the Project GRM.

5.2. Resources

The project will allocate funds to facilitate implementation of activities stated in this SEP. The estimated budget amounting to **US\$979,200.00** will be required to adequately engage stakeholders identified in this Plan for the duration of the project. Annex 2 provides estimated budget for key stake holder engagement activities.

6.0 Grievance Mechanism (GM)

The DMAP project is a multifaceted project having multiple interventions which are expected to have positive impacts in the target communities and the country at large. While considerable effort and forethought has been made to include safeguards in the design and implementation of the project in order to minimize and prevent potential adverse impacts, there is always a possibility that the interests of some individuals, groups and institutions may still be negatively affected by the activities of the project. It is therefore expected that such instances may generate complaints from individuals, groups and institutions that may be affected by the project. As such, provision of a mechanism for receiving, recording, and resolving potential concerns and complaints that may arise from project affected persons is necessary. Such a mechanism would assist to provide remedies to grievances early enough to avoid unnecessary project implementation delays and obstructions.

The implementation of the DMAP is expected to receive grievances from different institutional levels i.e. from members of the community, targeted institutions, beneficiary District councils and bidders of various works among others. Some of the grievances that may be lodged include procurement related grievances, payments to service providers, contractors and contractor workers, compensation issues, gender-based violence, child labour issues, safety incidents and accidents, pollution, theft and corruption among others.

The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-components. Accessibility, Predictability, Fairness, Appeal, Transparency and Consensus and negotiations, Accountability, Gender equality, Equity and Justice are the key principles that will underpin the grievance redress mechanism for the Project.

6.1 Description of Grievance Mechanism

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner. The project will update the existing Grievance Redress Mechanism, which will be a platform for addressing concerns related to the DMAP project. The updates are described in Table 7 below. The project will ensure that Grievance Redress and Management Committees are established at Institutional level and District Level. These institutions will be adequately capacitated and will be required to have representation of the youth and women to ensure accessibility. Women should be included in the committee, with at least 30% representation.

The following Grievance Redressal Committees will be established and/or revived at four levels, namely, Community, Contractor workers, Local authorities (District, Municipal & City Councils) and at the PIU. The GRCs are already established under the Digital Malawi Project at all the levels. However, the existing GR committees at the district and community levels will have to be sensitised and oriented on the new DMAP project requirements. New community level and contractor workers GR committees will have to be established for new DMAP sites and contractors respectively. Grievances will be lodged by PAPs and interested parties at any of these institutions depending on proximity of the complainant to the GRC location, the type of grievance being lodged and the mandate of the institutions. The project has set up a three tier Grievance Redressal Mechanism in which unresolved grievances will be referred to successive GRM institutions until a satisfactory outcome is achieved. The other institutions involved in the management of Digital Malawi Acceleration Project related grievances will include the

Malawi Police Service and the Courts of Law. These institutions will handle criminal cases which cannot be heard by the GRCs. Cases of GBV and SEA and SH, theft, corruption, and child labour will require the attention of these institutions. The courts of Law will in addition be involved in cases that are not satisfactorily resolved at the high level GRC under the project. The roles of the four GRC are described below.

6.3 Grievance Redressal Committees

6.3.1 Roles and Responsibilities of Community Grievance Redressal Committee

The committee shall consist of bona fide members of the community including: a Government extension worker working within the area, Four (4) representatives of Village Development Committees (VDC), youth representative, women's representative, representative from Community Policing and a Community Land Tribunal representative.

The community GR committee shall have the following duties:

- Receives and record all grievances as submitted to them by the PAPs.
- Reviews and screens all received grievances.
- Investigating and facilitating grievance resolution process.
- Documenting status of the complaint and its resolution.
- Refers non-resolved grievances to DGRC for action.
- Refers Gender-based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and other serious cases to relevant institutions for action.
- Provides feedback on grievance to PAP.
- Submits monthly reports to PIU and updates the local chiefs.

6.3.2 Roles and Responsibilities of Contractor Workers Grievance Redressal Committee

The Workers Grievance Redressal Committee (WGRC) shall be established by the contractors who shall undertake any sub-component of the DMAP Project. This committee will be established for contractor workers to have a platform for raising their grievances during the time they will be working with the project. The WGRC is an entry point for worker-related grievances. This may include but not limited to labour related concerns, theft, SEA and SH incidents and safety concerns regarding the works. Employee representatives shall be selected by fellow workers to serve in the committee which will ensure female representation. The WGRC shall have the following duties:

- Conducts grievance redress sensitisation or awareness meetings for workers.
- Ensures that the grievance box is accessible to all workers in a secure manner.
- Opens grievance boxes every week.
- Records all grievances as submitted to them by the complainant.
- Vets, reviews and assesses the grievance to filter those not related to the project.
- Ensures that there is transparency and accountability in handling the cases.
- Investigates and facilitates grievance resolution process.
- Hears and determines all cases reported by workers or PAPs.
- Document's status of the complaint and its resolution.
- Refers GBV/SEA/SH and other criminal cases to relevant institutions for action.
- Refers non-resolved grievances and other grievances beyond their capacity to relevant DGRC or CGRC.
- Provides feedback on grievance to the PAPS.
- Prepares grievance progress reports and presents them to DGRC during monthly meetings.

6.3.3 Roles and Responsibilities of District Grievance Redressal Committee

The District Grievance Redressal Committee were established at the District Council level. The DGRC handles cases submitted to it by PAPs and cases referred to it by the CGRC and WGRC. Thus, the DGRC acts as entry or appeal point for grievances arising from Digital Malawi Project activities. If PAPs are not satisfied with the resolution made by the DGRC, the case is referred to the Project Grievances Redressal Committee (PGRC). The following is the membership of DGRC: Director of Planning and Development- Chairperson, Environmental District Officer-Secretary, Management Information Systems Officer (MISO), District Lands Officer, District Community Development Officer, District Gender Officer, District Labour Officer, District Information Officer, Police representative- victim support unit and NGO representative. The following shall be duties of DGRC:

- Facilitates establishment of CGRCs and WGRCs.
- Facilitates GRM training and awareness meetings at community level where applicable.
- Records all grievances as submitted to them by the complainant.
- Reviews all grievances referred by the CGRC and WGRC.
- Investigates and facilitates grievance resolution process.
- Determines cases and provides feedback to the CGRC, WGRC and the aggrieved persons.
- Ensures that there is transparency and accountability in the implementation of Digital Foundation Project interventions.
- Ensures that safety standards, labour requirements, human rights, economic empowerment, gender, disability, environment and community health standards are adhered to during and after Digital Foundation Project implementation.
- Periodically reviews (monthly) all grievances in the district.
- Refers unresolved grievances to Project GRC for action.
- Referring GBV/SEA/SH and other serious cases to relevant authorities for action.

6.3.4 Roles and Responsibilities of Project Grievances Redressal Committee

The Project Grievances Redressal Committee (PGRC) shall be at the Project Implementation Unit (PIU) level. It shall hear cases submitted to it by PAPs and cases referred to it by the lower committees. If the PAP is satisfied with the resolution of the PGRC, the case is closed. If the PAP is not satisfied and the case is not closed at PGRC, the PAP shall be directed to seek justice from any court of law and the court shall make the final decision. The committee will be valid as long as the Digital Foundation Project is being implemented. The following is the membership of the PGRC: Project Manager- Chairperson, Digital Technical Specialist, Senior Project Procurement Specialist, Assistant Finance Management Specialist, Assistant Environmental and Social Safeguard Specialist, Environmental and Social Safeguard Assistant, Director of Legal and Compliance and Contracting, Representative from Department of e-Government, Representative from Malawi Communication Regulatory Authority (MACRA), Representative from Malawi Environment Protection Authority (MEPA), Representative from Malawi Research and Education Network (MAREN). The following shall be roles and responsibilities of PGRC:

- Facilitates establishment of CGRCs, DGRCs and WGRCs.
- Ensures that there is transparency and accountability in the implementation of Digital Foundation Project.
- Records all grievances submitted to them by the PAPs.
- Reviews unresolved grievances referred by DGRCs.
- Investigates and facilitates grievance resolution process.
- Refers unresolved grievances to court.
- Refers GBV/SEA/SH and other criminal cases to relevant authorities for action.
- Provides feedback to DGRCs on referred cases.
- Carries out quarterly reviews of all grievances from the districts and provides appropriate policy guidance to the Councils and other stakeholders.

- Prepares periodic national level grievance handling progress reports and presents them to the relevant agencies and stakeholders.
- Supports the capacity building of DGRCs.
- Supervises, monitors and evaluates the effectiveness of GRCs.

The Digital Malawi Acceleration Project will be the custodian of the whole Grievance Redress Mechanism and the Grievance Redress Committees. The project will be responsible for coordinating the functions of the GRCs, provision of required resources and technical assistance to ensure effective grievance management. The focal point for the Digital Malawi Project GRM will be the Environmental and Social Safeguards Specialist. The Environmental and Social Safeguards Specialist will among other things work as the secretary in the Project GRC, undertake monitoring activities to verify functionality of the GRM.

The grievance redressal committees will conduct meetings as and when required by the GRM processes. The chairperson of the committee shall preside over and maintain due and proper conduct of meetings and ensure that the rules and regulations of the committee sets for its operation are properly administered at all times. The secretary of the committee will be responsible for calling meetings, taking minutes, circulating the duly signed copy of the minutes, and filing the minutes. The quorum at any meeting of the committee shall be 50% of the members of the committee eligible to attend the meeting. The committee shall always enforce transparency and accountability in the conduct of its affairs.

6.4 Management of GVB and Labour Grievances

With regards to GBV grievances, the GRM will primarily serve to: (i) refer complainants to the GBV Services Provider; and (ii) record resolution of the complaint. GBV survivors will be referred to the available GBV Service Providers immediately after a complaint is lodged directly by the survivor to the project GRM. The decision on the course of action to be taken lies in the hands of the survivor, thus consent has to be sought whether the case can be referred to a GBV Service Provider or not. The PIU will have to identify GBV Service Provider in all the project localities where cases of GBV can be referred to. Where these services are not available, the PIU will have to engage private GBV Service Providers.

The GBV Service Providers will provide support to GBV survivors in terms of health, psycho-social and legal support according to relevant standards. The information related to GBV complainants must be treated with confidentiality. This information includes the identity of the complainant. The GRM responses to GBV cases should follow a survivor-centered approach that prioritizes survivors' dignity, confidentiality, and safety. The survivor of GBV, particularly SEA and SH, who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. To facilitate reporting, the Project will immediately notify the World Bank of any GBV complaints with the consent of the survivor through the World Bank's Environmental and Social Incident Response Toolkit (ESIRT). The costs of addressing the GBV grievances by GBV Service Providers will be financed by the project as part of the general project management costs.

The existing Project GRM for Digital Malawi makes provisions for responding to work related grievances from direct and contracted workers. However, due to the nature and scale of E&S impacts of the DMAP Project, a separate Labour grievance mechanism will be required and will be included in the stand-alone Labour Management Procedure (LMP).

6.5 GRM Processes

There are five main steps that are supposed to be undertaken in grievance redressal processes. These stages include: (i) The grievance uptake (ii) complaint handling and assessment (iii) Case resolution and closure (iv) Registry update (v) GRM monitoring and evaluation. These processes are outlined in through the Table 6 below.

Table 6: Illustrative Table on the GM Steps

Step	Description of process	Timeframe	Responsibility
GM implementation structure	Project Implementation Unit (PGRC) District Council (DCGRC) Contractor Workers (CWGRC) Community (CGRC)		
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • Toll-free telephone hotline: 3108 operated by TNM & Access • Short Message Service (SMS) or WhatsApp to: +265(0)999988870 • E-mail to digitalmalawigram@pppc.mw • Letter to: Public Private Partnership commission, P.O. Box 937, Blantyre • In-person at a physical facility: Digital Malawi Acceleration Project Offices, Plantation House, 2nd Floor, District, Municipal and City Council Offices, • Grievance or suggestion boxes located at District, Municipal and City Council offices, All active project sites, All communities hosting project sites (TBD) • Social media: Facebook: @Digital Malawi X: @Digital Malawi • Tablet/smartphone application [<i>specify</i>] • Online form on the following website: www.pppc.mw 		Environmental and Social Safeguards Department Local council GRCs Community GRCs Contractor worker GRCs
Acknowledgement and follow-up	All received complaints or grievances will be recorded in a GRM Logbook which contains Grievance Reporting Forms. The GRM Reporting Form is attached in Annex 3. The GRM Logbooks will be available at all the GRC locations.	Within 2 days of receipt	Grievance focal points under all GRCs

	<p>The grievance recipient should ensure to collect all the relevant information including, name, contact details and description of the complaint. Preference of confidentiality should be established.</p> <p>Once a grievance is received and recorded, the secretary of the GRM committee shall provide an acknowledgement of receipt of the grievance to the complainant.</p> <p>The acknowledgement will be in form of an email, phone call or WhatsApp text. A template of acknowledgement is provided in annex 4.</p> <p>The acknowledgement indicates that the grievance will be assessed for eligibility before the complainant can be called for a dialogue with the respondent.</p> <p>A GRM tracking number for the grievance and the timeline for resolution and closure is included in the acknowledgement.</p> <p>The complainant will be advised on the contact numbers/ emails to be used in following up on the grievance as well as contact person.</p>		
Sorting, processing	<p>The reported grievances should be screened to ensure that they are relevant or related to the Digital Malawi Acceleration Project.</p> <p>The relevant GRC shall meet within 3 to 5 working days to assess whether the complaint or grievance is related to Digital Acceleration Project activities or not. In case complaints are not related to the projects, PAPs shall be advised to channel their complaints to the right institutions.</p> <p>The committee shall use a GRM screening checklist to ascertain how the complaint relates to the project. The Grievance Eligibility Assessment Checklist is provided in Annex 5.</p>	3-5 days of grievance receipt	Grievance focal points under all GRCs

Verification, investigation, action	<p>After the committee has verified the eligibility of the grievance, the appropriate respondent (individual, group, contractor, or institution) should be identified and notified of the grievance.</p> <p>The respondent should be appraised on the grievance and the GRM procedures that will be followed to resolve the complaint.</p> <p>An investigation of the grievance will be undertaken by the GRCs for them to fully understand the complaint and make an informed decision for an effective settlement of the grievance.</p> <p>The investigation will gather all the facts and collect evidence related to the grievance investigation and will involve both respondent and complainant to crosscheck the information provided.</p> <p>The GRCs should establish the respondents stand on the grievance as well as the outcome that the complainant is looking for through the GRM process.</p> <p>The GRC will then make a recommendation on the resolution to address the grievance, and this will be communicated to both grievance parties.</p> <p>The respondent should commit to a timeline for completion of the required action. The GRCs as well as the PIU must verify the that the proposed response or action by the respondent has been completed to warrant closure of the grievance.</p>	Within 10 working days	Complaint Committee composed of Chairman, Secretary, and committee members
Monitoring and evaluation	Data on complaints and status of resolution implementation are collected in the Grievance Register and reported to the Project Manager every month through Monthly progress reports.	Monthly	Environmental and Social Safeguards department
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected through the Grievance resolution form in Annex 6.	14 working days	PAPs
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants are:		PIU Contractors

	<ul style="list-style-type: none"> i. Recording of grievances. ii. Complaint investigation techniques. iii. GBV (SEA/ SH) case management. 		
If relevant, payment of reparations following complaint resolution	<p>Grievance respondents will be required to remit payments to complainants.</p> <p>Where this fails, respondents will be requested to write and approval the PIU to pay the aggrieved party from their contract sum.</p>		
Appeals process	<p>With the project having three levels or points of GRM resolution, unresolved grievances will be referred to higher level GRM committees for another attempt at resolution.</p> <p>When all GRC levels are exhausted, the complainant is advised of other referral paths including the courts of law and the police.</p>		GRCs at all levels

Table 7: GRM updates required for the DMAP Project

	GRM Aspect	Required updates.
1	GRM Manual	The GRM Manual will be revised to capture the changes that will be brought in by the upcoming DMAP project.
2	GRM Reporting and resolution forms	The GRM reporting and resolution forms will be revised according to the new project. New Logbooks will be printed and circulated to all the GRM committees.
3	GRM Committees	Existing committees at the District Council, local community and PIU will require re-orientation of the GRM based on the new project requirements. The make-up of the PIU GRM committee will be revised to ensure effective participation of committee members. The District GRC will be renamed to Local Authority GRC to cover committees at Municipality and City Council levels as some project sites fall under these Authorities jurisdiction. New GRM committees will be established in newly identified project sites.
5	Publicity	New GRM posters and fliers will be required to capture new project information and changes in the GRM structure.
6	Disclosure	New GRM Manual and reporting forms will be re-disclosed once they are duly updated.
7	Communication	The GRM Toll-free number contract will be renewed to ensure continued operations.

7.0 Monitoring and Reporting

7.1. Summary of How SEP Will Be Monitored and Reported Upon

Monitoring of the SEP will be done by the Monitoring and Evaluation Specialist in conjunction with the District Monitoring and Evaluation Officers. The SEP will be monitored based on both qualitative reporting (progress reports) and quantitative reporting linked to indicators on stakeholder engagement and grievance performance. An illustrative set of indicators for monitoring and reporting is included in Annex 7. SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators included in the SEP.

7.2. Reporting Back to Stakeholder Groups

Stakeholder Engagement activities are reported in ESCP implementation progress reports. Extracts will be shared with stakeholders. Through monitoring, stakeholder engagement activities and outcomes will be identified, reviewed and documented in quarterly monitoring reports that will be shared with stakeholders through the various project disclosure platforms. Further feedback on issues raised during stakeholder engagement will be provided through the bi-annual and annual progress review meetings.

SEP reporting will focus on key engagement elements including relevance of stakeholders, effectiveness of methodology, awareness of the project by beneficiaries and communities, and access to project information. The SEP will be revised and updated as necessary during project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions identified during stakeholder engagement will be collated and shared with project management.

Annex

Annex 1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

Annex 2: Stakeholder Engagement Budget

Budget categories	Quantity	Unit costs (US\$)	Times / Years	Total costs (US\$)	Remarks
1. Estimated Staff salaries* and related expenses					
1a. Communications consultant	1	70,000	7	490,000	Individual or Firm
1b. Travel costs for staff	1	10,000	7	70,000	Accommodation and allowances
1c. Estimated salaries for Community Development Officers	34	4,000	1	136,000	Allowances for community Development Officers
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. Project launch meetings	7	5,000	1	35,000	Launch of completed activities under various project components in all country's regions
2b. Organization of focus groups	5	2,000	3	30,000	To be held at regional level
3. Communication campaigns					
3a. Posters, flyers	1	5,000	2	10,000	10,000 posters and fliers
3b. Social media campaign	3	100	4	1,200	3 campaigns every other year
3c. Radio adverts	3	1,500	3	13,500	3 adverts at least every other year
3d. Television adverts	3	3,000	3	27,000	3 adverts at least every other year
3e. Newspapers	2	1,000	3	6,000	3 adverts at least every other year
4. Trainings					

4a. Training on social/environmental issues for PIU and contractor staff	1	3,000	3	9,000	One training once every 3 years
4b. Training on Gender-Based Violence (GBV) for PIU and contractor staff	1	3,000	2	6,000	One training once every 3 years
5. Beneficiary surveys					
5a. Mid-project perception survey	1	5,000	1	5,000	One survey conducted at mid-year
5b. End-of-project perception survey	1	7,000	1	7,000	
6. Grievance Mechanism					
6a. Training of GM committees	1	80,000	1	80,000	At community, district, and PIU level
6b. Suggestion boxes in villages	250	20	1	5,000	For all community GRCs
6c. GM communication materials	1	1,000	3	3,000	
6d. Grievance investigations/site visits	1	1,500	7	10,500	
6e. GM Information System (setting up or maintenance)	1	15,000	1	15,000	
6f. GM Logistical Costs	1	5,000	3	15,000	
7. Other expenses					
7a. Project inception meetings	1	5,000	1	5,000	
7b.					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				979,200.00	



DIGITAL MALAWI ACCELERATION PROJECT

SUB-COMPONENT NAME:
PROJECT SITE (Location of grievance):

Grievance Tracking Number: DMP/ _____ / BT / _____ / GR _____

1. RECEIVING DETAILS				2. COMPLAINANT'S DETAILS	
Received on (Date):				Full Name:	
Receiving time:				Gender: Male <input type="checkbox"/> Female <input type="checkbox"/>	
Means used to log a complaint (tick against options provided)				ID Number:	
Email	Verbally	Phone	Others (specify)	Contact Address:	
Type of grievance (tick against options provided)				Phone Number:	
				Email:	
Damage	Theft	GBV/ SEA/ SH		Request for Confidentiality? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Project progress	Work quality	Other (specify) _____		Category of complainant:	Beneficiary <input type="checkbox"/> Contractor <input type="checkbox"/> Implementer <input type="checkbox"/> Other _____
3. DESCRIPTION OF THE GRIEVANCE					
(Provide the nature of the complaint including; what happened, when it happened, where it happened, who was involved, and the problem that occurred etc.)					
Received by				Complainant	
Signature				Signature	
Date				Date	

Annex 4. Grievance Receipt Acknowledgement

[Insert the name and address of the Grievance Redressal Committee]

[Insert the Date]

Dear **[Insert complainant name]**

CONFIRMATION OF RECEIPT OF THE GRIEVANCE

I write to acknowledge receipt of the grievance that you logged with this committee on **[date of receipt]**. In your grievance, you raised the following issue(s) **[Insert brief description of the complaint]**.

Be advised that the committee met on **[Insert date]** and assessed the eligibility of your grievance in relation to the Digital Foundation Project activities. Your grievance has been recorded in the GRM register and is assigned a Grievance Tracking Number **[Insert the unique code]**.

The committee would like to invite you to the hearing session of your case scheduled as follows:

Date	
Venue	
Time	

The alleged offender will also be present during the hearing to accord him fair trial.

Yours Faithfully,

Grievance Redress Committee Chairperson.

Annex 5. Grievance Eligibility Assessment Checklist

This checklist is prepared to guide the Grievance Redressal Committee at any level when determining the eligibility of the grievances submitted by PAP

Question(s)	Answer(s)	
Describe the grievance logged as recorded in the grievance registration form		
(a) What harm did the Digital Foundation Project caused or is likely to cause?		
(b) Is the alleged problem resulting from the Digital Foundation Project activities?	No <input type="checkbox"/> Yes <input type="checkbox"/>	
	If yes, please explain	
(c) Are there any other supporting documents that have been shared as proof of the alleged problem?		
(d) Is the complaint raised with any other authorities?	No <input type="checkbox"/> Yes <input type="checkbox"/>	
If Yes (Please, provide the following details):		
(i) When?		
(ii) How and with whom the issues were raised?		
(iii) What response were received from and/or any actions taken?		
(iv) Why the response or actions taken were not satisfactory?		
If No		
(i) Why?		
(ii) How should the complaint be resolved?		
5. Name of the person who completed this form	Signature	Date



DIGITAL MALAWI ACCELERATION PROJECT

Grievance Tracking Number: DMP/____ / BT / ____ / GR____

Grievance Resolution updated by:

1. GENERAL INFORMATION		2. RESPONDENT'S DETAILS	
Name of Complainant:		Full name:	
Project Site:		Name of Organization:	
Type of Grievance:		Designation:	
Date of Grievance Registration:		Phone number:	
Date of Grievance Resolution:		Email:	
3. SUMMARY OF GRIEVANCE RESOLUTION PROCESS			
(a) Brief description of complaint			
(b) Brief description of the Resolution/Recommendations from GRC			
4. GRIEVANCE RESOLUTION AGREEMENT			
Level of redress: Institutional <input type="checkbox"/> Community <input type="checkbox"/> District Council <input type="checkbox"/> Project Level <input type="checkbox"/>			
Was the Grievance Resolution satisfactory: Yes <input type="checkbox"/> No <input type="checkbox"/>			
If No, Grievance to be escalated to:			
Agreement and Consent of the Complainant to the above Decision			
I _____ Agree /Disagree with the resolution.			
Signature _____ Date _____			
Grievance Redress Committee Members (At least three members to sign)			
Name	Position	Signature	

Annex 7. Sample Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are project affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	<p>Records from the implementing agency and other relevant agencies</p>
<p>Stakeholder engagement impact on project design and implementation.</p> <p>How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional</p>

	<ul style="list-style-type: none"> • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. • Number and location of formal and informal meetings with PAPs. • Number and nature of engagement activities with other stakeholders. • Number and nature of Project documents publicly disclosed. • Number and location of community awareness meetings. • Number of men, women and vulnerable groups that attended meetings. • Number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project design and/or instruments. • Number of grievances received. 	<p>media entries on the project results</p>
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

Annex 8. List of Stakeholders Consulted during Project Preparation

Stakeholder	Date of Meeting
National Planning Commission	2023
ICT Association of Malawi	2023
MAREN	28 August – 1 September 2024
NRB	28 August – 1 September 2024
MACRA	28 August – 1 September 2024
Ministry of Information and Digitalization	28 August – 1 September 2024
Public Procurement and Disposal of Assets (PPDA)	28 August – 1 September 2024
Department of E-government	28 August – 1 September 2024
Rydberg Hub	28 August – 1 September 2024
Computer Clinic	28 August – 1 September 2024
NextGen Lab	28 August – 1 September 2024
Green Impact	28 August – 1 September 2024
Kwathu Innovation & Creative Centre	28 August – 1 September 2024
Ministry of Finance – Debt and Aid	28 August – 1 September 2024
Presidential Delivery Unit (PDU)	2023
Office of the President and Cabinet (OPC)	2023
Ministry of Information and Digitalization	2023
Department of E-government	2023
OPC	February 2023
PSIP	February 2023
Department of Economic Planning and Development	February 2023
Department of Debt and Aid	February 2023
The Horn of Africa Initiative Secretariat	February 2024
Africa Development Bank	February 2024
International Telecommunication Union	February 2024
GIGA Initiative	February 2024
UNICEF	February 2024
European Union (Africa Connect Program)	February 2024
District Councils	March 2023
Local communities	March 2023